

**Appendix 2:**

**Further information requested under Clause 23 First Schedule of the Resource Management Act 1991**

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Planning, statutory and general matters – Chloe Trenouth, Hill Young Cooper Ltd				
P1	Section 32	Please provide an assessment against all relevant AUP RPS provisions and not just B2 Urban Growth.	The plan change is required to give effect to the AUP RPS under s75 of the RMA. While it is acknowledged that the Urban Growth Chapter is important when rezoning land, other RPS chapters are also relevant in terms of infrastructure, rural environment, and environmental risk. While the assessment required may not be as extensive, the relevant provisions should be identified and assessed.	<p>Additional assessment is included below.</p> <p><b>Chapter B3 Infrastructure, Transport and Energy</b></p> <p>Chapter B3 addresses the management and investment of infrastructure in Auckland and the need to realise the full economic potential of Auckland. There are a number of issues that are pertinent to this in terms of resilience of infrastructure, ability to service and upgrade infrastructure and deal with reverse sensitivity and, in respect of this plan change request, the integration of infrastructure with urban growth. It is considered that the proposal would give effect to Chapter B3 of the RPS given:</p> <ul style="list-style-type: none"> <li>The infrastructure assessment that has been undertaken has demonstrated that there is both wastewater and water availability for the additional dwellings enabled by the PPC request. The staging and necessary local upgrades that would be developer-led have been clearly identified in the PPC request. The LTP identifies funding for the Southwest Wastewater Scheme and an Environment Court Consent Order requires the delivery of the scheme by 2026. Furthermore, Watercare growth projections for Waiuku are well in excess of the extent of growth enabled under the existing zoning and would cater for the plan change request area (B3.2.1 (5) and B3.2.2(5)).</li> <li>The site is located within easy walking distance of Waiuku Town centre, open space, social and community facilities. This reinforces the compact urban form sought by the RPS. There is over 100ha of vacant employment land within Waiuku that needs to be supported by sufficient residential growth to ensure employees are able to easily access jobs with reduced demand for private vehicle trips (B3.3.2.(1) and B3.3.2.(5)).</li> </ul> <p><b>Chapter B6 Mana Whenua</b></p> <p>Chapter B6 outlines the negative impact that development of Auckland has had on the Mana Whenua taonga and the importance of Mana Whenua participation in the resource management process. It is considered that the proposal would give effect to the Chapter B6 of the RPS given:</p> <ul style="list-style-type: none"> <li>The applicant has been consulting closely with iwi and is committed to achieving the recommendations from the CVA prepared by Ngati Te Ata Waiohua and ensuring Maori values are incorporated into the precinct provisions (B6.2.1.(2)).</li> </ul> <p><b>Chapter B7 Natural Resources</b></p> <p>Chapter B7 identifies that urban growth and past practice have placed pressure on the land and water resources of the Auckland region. These pressures need to be managed for long term economic, social, cultural and environmental well-being. It is considered that the proposal would give effect to Chapter B7 of the RPS given:</p>

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				<ul style="list-style-type: none"> <li>• The plan change request identifies native riparian planting along the Rangiwhea Stream and in the wetland identified in the Stormwater Management Plan (SMP), which would include weed control. These initiatives will improve the biodiversity of the existing stream by providing habitat (B7.3.1.(1) and B7.3.2.(5)).</li> <li>• The Stormwater Management Plan proposed for the catchments on the site have carefully considered the existing and future freshwater system(s) across both the site and the wider environment (B7.3.2.(1)).</li> </ul> <p><b>Chapter B9 Rural Environment</b></p> <p>Chapter B9 focuses on the rural environment and the impacts of growth on these parts of the region in terms of amenity values, environment and the protecting of elite quality soils, fragmentation of sites and reverse sensitivity on rural production activities. It is considered that the proposal would generally accord with Chapter B9 of the RPS given:</p> <ul style="list-style-type: none"> <li>• It seeks to develop land that is predominantly comprised of soils that are not elite or prime, and is held in landholdings that are not significant in their ability to sustain food production (B9.2.1(2));</li> <li>• The use of the PPC land for more intensive vegetable or horticultural production uses would require significant capital investment and would be unlikely to occur given the small area suitable for such uses in terms of soil type and contour, and the fragmented land ownership. The location of the site along the existing urban edge hinders the ability of commercial horticulture to operate efficiently due to issues such as reverse sensitivity (particularly spray drift) and the site is well separated from any sensitive rural uses (B9.2.1.(1) and B9.2.2.(2)).</li> <li>• The need for growth in Waiuku has been well documented over the past 20 years and was identified during the AUP process. The extent of industrial employment growth does not correspond with the housing growth projections and the ability to retire in place is not currently provided for in Waiuku given the unavailability of live zoned land and the housing typologies being delivered. These market abnormalities demonstrate that whilst the importance of food production is accepted, there needs to be a balanced wider acknowledgment of the decreasing ability of Auckland to affordably house its residents and, in this case, support the self-sustaining nature of Waiuku. The technical reports provided with the PPC request demonstrate that the release of land in this particular set of circumstances is appropriate in this instance (B9.2.1.(5)).</li> </ul> <p><b>Chapter B10 Environmental Risk</b></p> <p>Chapter B10 addresses environmental risk. Of particular relevance to the PPC land are the risks from natural hazards, climate change and land contamination. It is</p>

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				<p>considered that the proposal would respond to the risks outlined within Chapter B10 of the RPS given:</p> <ul style="list-style-type: none"> <li>The SMP for the catchments across the PPC land have been designed to ensure there is no adverse effects on the pipe network downstream by maintaining pre-development flows at all three discharge points on site. Future development would be located outside of any flood plains or overland flow paths. Furthermore, the proposal seeks to improve existing flooding issues in the Breaker Grove/ O'Sullivan Place area by the design of the stormwater approach onsite (B10.2.1.(2) and B10.2.1.(5)).</li> <li>Appropriate preliminary site investigations have been undertaken which confirms that the site is suitable for rezoning, subject to this next layer of analysis being undertaken at development stage. On this basis, it is considered that potential soil contamination does not provide an obstacle to use of the PPC land for residential purposes, with the AUP and NESCS providing a suitable framework to manage any potential contamination effects (B10.4.1.(1) and B10.4.2.(1)).</li> </ul> <p>Once it is confirmed that this assessment is sufficient then section 8.7 of the formal Private Plan Change Request document would be amended to include this additional assessment.</p>
P2	Section 32	Please provide an assessment of additional option to consider the Residential - Mixed Housing Suburban zone with a precinct.	The section 32 considers three zoning options – Mixed Rural, Mixed Housing Suburban, and Large Lot. It would be helpful to understand the benefits and costs of imposing a precinct over the plan change area to deliver the mitigation measures recommended by technical experts.	<p>Two additional options have been considered in the amended s32 evaluation (<b>attached</b>). These are a MHS option with a precinct (Option 4), and a MHU option with a precinct (Option 5). Both of these options have some advantages over a simple rezoning because the precinct provides for additional benefits, and so a precinct is now proposed. Option 5 is proposed to align with the Government's recently enacted Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill, and the MDRS that would likely apply in Waiuku as a result.</p> <p>Option 5 is considered to be the most appropriate given its alignment with the MDRS.</p>
P3	Section 32	<p>Please provide an assessment of the following management plans and strategies:</p> <ul style="list-style-type: none"> <li>- Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan</li> <li>- Local Board Plan</li> <li>- Long Term Plan</li> <li>- Auckland Design Manual</li> <li>- Parks and Open Space Strategy</li> </ul>	<p>AUP Appendix 1, 1.3 identifies a range of external documents that are to be taken into consideration when structure planning. The plan change request does not fully address all the relevant documents. Relevant plans and strategies are also required to be considered when making a change to a district plan under s74(2)(b)(i).</p> <p>Auckland Council has committed to reduce emissions and adapt to the impact of climate change. The plan change should have regard to any potential climate change impacts and alignment with the Council's action plan.</p>	Each of these documents is considered in the subsequent rows below. The PPC request document has been amended with new sections to address these matters (in section 8).

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			It is important to understand any implications of the plan change on the Long Term Plan, the Local Board Plan and Parks Acquisition.	
P3A		Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan	As above.	<p>Tāruke-ā-Tāwhiri: Auckland's Climate Plan was published in December 2020 and it identifies eight areas for action to response to the climate emergency. The core goals of the plan are to seek to reduce greenhouse gas emissions by 50 per cent by 2030 and achieve net zero emissions by 2050 and to adapt to the impacts of climate change by planning for changes we will face under our current emissions pathway.<sup>1</sup></p> <p>An assessment of the PPC request against the relevant action areas is outlined below.</p> <p><b>Natural environment</b></p> <ul style="list-style-type: none"> <li>• The PPC request identifies native riparian planting along the Rangiwhea Stream and in the wetland identified in the SMP, which would include weed control. These initiatives will improve the biodiversity of the existing stream by providing habitat. The stream/wetland is shown on the proposed precinct plan and would contribute towards Action Area N1 and B5.</li> <li>• The PPC request seeks to encourage the ability for a walkway along the Rangiwhea Stream that could eventually provide a connection to the Manukau Harbour.</li> <li>• The applicant is working closely with Ngati Te Ata Waiohua to achieve the recommendations from the CVA.</li> <li>• The urbanisation of the site would increase the number of trees on the site (compared to the current pastoral state) within the areas identified as open space, riparian planting and within the new street network.</li> </ul> <p><b>Built Environment</b></p> <ul style="list-style-type: none"> <li>• Waiuku is a self-sustaining rural township meaning it provides the necessary day to day needs for residents. There is currently 100ha of vacant light industrial land in the town that will create additional employment demand of between 1,400-3,000 jobs but without the corresponding housing supply. If housing growth is not provided for to meet this employment demand, people would need to be commuting from elsewhere to service these employment needs.</li> <li>• The PPC land is not subject to extensive flood plains, although it does have OLFPs related to the three catchments on site. The proposed SMP for the site seeks to distribute stormwater flows via the use of a number of different catchments on site. In particular, the proposal includes future works to improve downstream flooding at Breaker Grove/ O'Sullivan by recontouring</li> </ul>

<sup>1</sup> Page 7, Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan

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				<p>the site to redirect runoff through a constructed wetland (treatment, retention and detention).</p> <ul style="list-style-type: none"> <li>• Portions of existing urban zoning within Waiuku have extensive flood plains which limits the ability for residential growth to occur and be achieved through these areas. The PPC land does not have the same limitations and will provide for growth to support the industrial employment area.</li> <li>• The site is well located to allow for cycle and pedestrian connections to local schools, open space, the town centre and other social infrastructure.</li> </ul> <p><b>Transport</b></p> <ul style="list-style-type: none"> <li>• The self-sufficient nature of the Waiuku township and surrounds results in a different travel profile to other parts of Auckland. This is demonstrated by the recent census journey to work data, which showed 77% of people travelled within the Franklin/Papakura area for employment. The extensive industrial employment planned for Waiuku will further reinforce this pattern, and housing growth needs to be provided for to cater for this employment growth as housing and employment go hand in hand. It is not considered that private vehicle use will be as high as other urban growth areas because of these local characteristics.</li> <li>• Walkways and green connections are sought and enabled in the precinct plan, and improved walking connections would be established along Constable Road at time of subdivision. The PPC land is within easy walking distance of the town centre, schools, open space and other supporting facilities. This supports reduced vehicle use and alternative modes of walking and cycling.</li> <li>• Improved bus connections to the Waiuku College School site are enabled by a potential connection which is shown on the proposed precinct plan. This will improve public transport to the College if the school or the Council wishes to pursue this option.</li> </ul> <p><b>Economy</b></p> <ul style="list-style-type: none"> <li>• The ability to support the future employment needs of Waiuku is important, and providing affordable housing supply for these employees will reduce emissions by reducing travel time to work whilst allowing for alternative travel modes given proximity to work (2.3km).</li> </ul> <p><b>Food</b></p> <ul style="list-style-type: none"> <li>• The soil characteristics of the site are predominantly neither elite nor prime and are not considered significant in their ability to sustain food production. The loss of the land from food production in order to provide for housing growth in Waiuku is considered to be appropriate.</li> </ul>

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				<ul style="list-style-type: none"> <li>The precinct provisions include the provision of a community garden within the site for use of the future community.</li> </ul>
P3B		Local Board Plan	As above.	<p>The Franklin Local Board encompasses the southern portion of the Auckland Council territorial area. The Board's area includes Waiuku and shares boundaries with both the Waikato District and Hauraki District Councils. Waiuku is identified as one of three townships in the local area, with the other two being Pukekohe and Beachlands.</p> <p>The Board issued the Franklin Local Board Plan in 2020 and it focuses on six outcomes to make Franklin a better community for all. Commentary against the relevant outcomes is included below.</p> <p><i>Outcome 1: Our strengths generate local opportunity and prosperity</i></p> <ul style="list-style-type: none"> <li>The rezoning of the land will support the future growth of Waiuku, allowing for improved housing affordability and supporting the industrial employment land. This will allow the self-sufficient nature of the town to continue.</li> </ul> <p><i>Outcome 2: Improved transport options and fit for purpose roads</i></p> <ul style="list-style-type: none"> <li>The development of the PPC land will facilitate improved pedestrian and cycling connections on Constable Road and enable the potential relocation of the bus drop off area for Waiuku College thereby improving safety for students.</li> </ul> <p><i>Outcome 3: Fit for purpose places and facilities</i></p> <ul style="list-style-type: none"> <li>The development will allow for greenway connections and improved interfaces within King Street open space, which has yet to be developed by the Local Board.</li> </ul> <p><i>Outcome 4: Kaitiakitanga and protection of our environment</i></p> <ul style="list-style-type: none"> <li>Native planting through the riparian areas and new stormwater wetlands would improve biodiversity on the site.</li> </ul> <p><i>Outcome 5: Cultural heritage and Maori identity is expressed in our communities</i></p> <ul style="list-style-type: none"> <li>The applicant is committed to achieving the recommendations from the CVA prepared by Ngati Te Ata Waiohua and ensuring Maori values are incorporated into the precinct. Specific objectives and policies are proposed in this regard, within the precinct.</li> </ul> <p><i>Outcome 6: A sense of belonging and strong community participation</i></p> <p>The precinct provisions include a number of measures for community betterment, with improved access and interface with the yet undeveloped Kings Reserve, the</p>

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				enablement of improved public transport access to Waiuku College, and enabling greenway connections along Rangiwheea Stream.
P3C		Long Term Plan	As above.	<p>The Auckland Council Long Term Plan (LTP) is the 10-year budget for Auckland and has recently been amended for the COVID-19 Recovery budget. That seeks to manage the financial impacts of the global Covid-19 pandemic on Auckland.</p> <p>The plan identifies that Council is having to operate under significant financial constraints and that the funding and financing of infrastructure is a particular constraint given falling revenue. This is a constraint experienced by a number of local councils, though Auckland is experiencing significant growth. It is noted that Central Government has outlined a programme for assistance in this regard with the Housing Acceleration Fund announced in March 2021, and through the tools enabled under the Infrastructure Funding and Financing Act 2020.</p> <p>Notwithstanding the above, the projects that are identified for the Waiuku area that are of relevance to the PPC continue to be funded under the LTP - principally the south west regional wastewater treatment plant project with \$218 million allocated. The PPC will generate significant contributions towards this project as outlined in section 9.9 below.</p> <p>All other infrastructure works in terms of upgrades to local pump stations, new pump stations, extended reticulation of services, and pedestrian improvements to Constable Road will all be developer funded and are enabled under the precinct provisions.</p> <p>On this basis it is considered that the PPC request aligns with the LTP, with the wider infrastructure upgrade that the zoning relies on being delivered by Watercare with funding directly allocated under the LTP.</p> <p>In respect of the Auckland Council Development Contributions Policy, this identifies a programme of works within Waiuku to increase capacity for community facilities, complete stormwater projects from the FDC CMP Stormwater A zone, and enable recreation reserve development.</p>
P3D		Auckland Design Manual	As above.	<p>The Auckland Design Manual (ADM) includes guidance on new neighbourhoods and greenfield subdivision. It identifies six elements to guide design of subdivision, being natural environment, movement networks, use and activity, urban structure, built form and community.</p> <p>The PPC addresses the guidance outlined in the ADM by the following:</p> <ul style="list-style-type: none"> <li>- There is no significant vegetation or habitat on the site. The proposed precinct does incorporate revegetation of riparian areas along Rangiwheea Stream, new wetland areas and street planting. These outcomes will all increase habitat relative to the existing pastoral state;</li> </ul>



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				<ul style="list-style-type: none"> <li>- The proposed Stormwater Management Plan carefully manages stormwater across the site by a new wetland and alleviates existing downstream flooding on Breaker Grove;</li> <li>- The movement network allows for a legible network around the site including internal connections between 45A, 92 and 130 Constable Road. Pedestrian connections are enabled by provisions for future connections to both Kings Reserve and along the Rangiwheea Stream;</li> <li>- The rezoning of the land will improve access to, and the interface with, Kings Reserve. Specific frontage requirements are included in the precinct to ensure surveillance and activation from the future dwellings is secured;</li> <li>- The site is within easy walking distance of the town centre, social and community facilities and open space and employment uses, thereby allowing for a transport mode shift;</li> <li>- The precinct includes a community garden, the potential for connections to the High School and a commitment to affordable housing for a community housing provider. These measures will build a sense of community and demonstrate a commitment to Waiuku;</li> </ul> <p>A Neighbourhood Design Statement has been prepared for the plan change request and testing of layout options to inform development of the land has been undertaken.</p> <p>The key moves in terms of connections, frontages, movement network, gateway and open space are identified on the proposed precinct plan and captured in the precinct provisions.</p>
P3E		Parks and Open Space Strategy	As above.	<p>This document suggests that residents of Mixed Housing Suburban and Mixed Housing Urban zones should be provided with neighbourhood parks of around 0.5ha within a 400m walk, and suburb parks of 5-10ha within a 1,000m walk. The PPC land has a suburb park of at least 7ha immediately on its north-eastern boundary. All of the PPC land is situated within 1,000m of the park boundary and most of it is within 400m of the park. In addition, the indicative open space in the western corner of the PPC land is around 0.8ha in area would be within 400m of all other parts of the land. On this basis, it is considered that the proposed open space shown on the precinct plan would more than meet the Council's Open Space Provision Policy.</p>
P4	Section 32	Please clarify whether on page 36 of the request the reference should be to Waikato District rather than Franklin District.	Reference to the Franklin District is made in regard to operational and jurisdiction issues if growth were to go south of the township. This appears to be an error and should refer to Waikato District.	This is a typographical error. The reference should be to Waikato District rather than Franklin District. This error has been corrected in the Private Plan Change Request.
P5	Section 32	Please identify whether the plan change will create any cross-boundary issues given the proximity of the Waikato District boundary.	The Waikato District jurisdictional boundary is within 500m of the plan change area. This issue is raised in the request (section 7.5) in terms of constraints for growth but is not assessed in terms of potential effects on Waikato District.	It is not considered that there are any cross-boundary issues given all infrastructure to service the additional housing growth is delivered on the Auckland side of the boundary. The growth of Waiuku has been envisaged for a considerable length of time and the Waikato District Council is aware of this potential. It is noted that its

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			As growth extends further towards the jurisdictional boundary there may be increased pressure within the Waikato District for urban growth. Has the applicant undertaken any consultation with the Waikato District Council regarding this plan change?	recent 'Growth and Economic Development Strategy – Waikato 2070' identified growth for all the Waikato rural towns and villages.
P6	Compact urban form	Please provide further information to demonstrate how the plan change will address the urban edge and the transition from urban to rural land use.	AUP Appendix 1, 1.4.1(3) Urban Growth requires a structure plan to identify, investigate and address the location, type and form of the urban edge. The plan set indicates low-density and landscaped edge at the boundaries to the Mixed Rural zone. However, the application identifies at Appendix K that there are no particular controls proposed along the urban boundary and refers to the density distribution plan in the Urban Design Report. In the absence of precinct provisions, it is unclear how the proposed densities will be given effect to.	Following further consideration, the applicant has decided to propose a precinct for the plan change area. The proposed precinct provisions (including a precinct plan) are <b>attached</b> . The precinct would introduce several measures to address the transition from urban to rural landscape character across the proposed urban edge. These include minimum size of 700m <sup>2</sup> for proposed lots immediately adjoining a rural zone, together with a building setback and planting requirement.
P7	Place based provisions	Please provide an assessment to address whether precinct provisions are required to implement the recommendations made by experts to mitigate adverse effects.	AUP Appendix 1, 1.4.4(2)(c) Use and activity provides for the inclusion of specific place-based provisions through the use of precincts.  The application at Appendix K identifies that such provisions are not required. However, a number of the expert reports make recommendations to mitigate potential adverse effects (e.g. urban design concept, stormwater management).  It is unclear what existing AUP provisions ensure that these recommendations are implemented. If the AUP does not have existing provisions to implement these recommendations at development stage then precinct provisions may be required.	While many of the desirable outcomes identified in the technical reports will be delivered through the normal subdivision consent processes, there are several more important outcomes that may not result from the subdivision process alone. For this reason, a precinct has now been proposed to ensure that key landscape and urban design objectives are able to be realised as development occurs.
P8	Reverse sensitivity	Please provide information that identifies and considers how potential reverse sensitivity effects on the adjoining rural land would be managed by the plan change.	AUP Appendix 1, 1.4.4(7) Use and Activity requires a structure plan to identify, investigate and address the location and protection of use and development and management of reverse sensitivity effects on use and development.  The application at Appendix K identifies that there would be no significant reverse sensitivity impacts because rural activities on the adjoining land are expected to be used for grazing as indicated by the Land Productivity Assessment. However, further explanation around how this can be ensured is needed to understand potential adverse effects.	The proposed precinct puts in place measures to appropriately address potential reverse sensitivity effects at the rural interface. These include larger minimum lot sizes, building setbacks, and a planted strip.  It is considered that land to the south-west of the PPC land is likely to be used more extensively (although still for grazing) than land to the north-west of the site, due to more gentle topography and better access.  The proximity of urban development adjacent to pastoral land along the boundaries of the site is unlikely to create any significant adverse reverse sensitivity effects. The adjacent rural land will not be subject to extensive use of sprays or fertilisers as would be the case for horticultural use. The presence of occasional livestock over the rear fence of a residential property does not constitute an adverse effect and is generally something that would be perceived as an amenity by future residents. In

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				any event, the proposed precinct provisions applying to the urban-rural boundary will appropriately manage any potential reverse sensitivity effects.
P9	Infrastructure	Please clarify whether any bulk infrastructure upgrades are required to support the plan change and provide a funding plan for any such works.	<p>The Engineering Report identifies several infrastructure upgrades to bulk infrastructure, including stormwater, water and wastewater. It is unclear whether these are required to be in place and if so, how they would be funded.</p> <p>The Engineering Report identifies that although the Southwest wastewater scheme is planned, that Watercare have indicated that there is no funding for this project.</p>	Refer <b>attached</b> Letter from Fraser Thomas dated 17 November 2021.
P10	Staging	Please clarify whether any staging of development will be required to align with the provision of infrastructure.	<p>The request indicates that no staging will be required for the plan change because of the small area. However, the Engineering Report suggests that development will be progressively developed in stages (piii) and indicates a timeframe of 2040-2050 of when development could be completed.</p> <p>Although water supply is identified to be available, the Engineering Report appears to indicate that the plan change would require 57% of peak daily water demand between 2020 and 2050. It is unclear whether the plan change is accommodated within the Watercare forecast as anticipated population growth or is additional to what is already anticipated.</p> <p>The Engineering Report identifies stormwater upgrades previously identified as being required under by the Waiuku ICMP. Although it is identified that these have not been constructed It is unclear whether these are required for the plan change or not.</p>	<p>Some staging of development within the PPC area is likely in order to align with local infrastructure upgrading. A summary of the required upgrading and the likely related staging is <b>attached</b> from Fraser Thomas dated 17 November 2021. The applicant accepts that local infrastructure upgrading would be undertaken at its own cost if the work was required solely to service the PPC land.</p> <p>Some staging of development across a land parcel of this size is inevitable at the time of subdivision, to align with provision of roads and infrastructure, but also simply to arrange the project in manageable phases and control release of houses and sites to the market. Final determination of staging will be undertaken when subdivision occurs.</p>
P11	Place based provisions	Please clarify how the outcomes proposed to address access issues for the Waiuku College will be achieved by the plan change.	<p>The request identifies the improvement of access to the Waiuku College as a significant positive effect and benefit of the plan change, suggesting a secondary vehicular access for the school through Council-owned land. However, there does not appear to be any way in which the plan change achieves this outcome.</p> <p>The Urban Design Concept does not address this matter and identifies residential development along this edge, which would back onto the school boundary, rather than a road which would facilitate the access indicated.</p>	<p>It is important to record that development of the plan change land cannot in itself provide road access to the rear of Waiuku College, because there is an intervening area of reserve land that is owned by the Council.</p> <p>However, the proposed precinct provisions seek a connection to the reserve land in this location, through the indicative road network illustrated on the precinct plan and through the objectives and policies. As a consequence, the subdivision of land adjacent to the reserve will not be able to proceed without a road connection being provided to the reserve boundary (or Council determining that this is not required). A connected road network is generally anticipated in any event under the normal subdivision provisions of the AUP.</p> <p>Third parties (such as Waiuku College or Council) would be responsible for providing the remaining part of the road connection to the school boundary, but the opportunity for that to occur in the future would be facilitated rather than foreclosed by the proposed plan change.</p>

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P12	Consultation	Please provide evidence of any consultation with Watercare Services Limited regarding adequacy of water and wastewater supply to service the plan change area.	<p>Evidence of discussions with Watercare ,and potentially Waikato Regional Council in terms of potentially to increase the water take in the future, should be provided to understand whether the plan change is utilising available capacity or is increasing demand on capacity that is anticipated for areas identified for growth.</p> <p>The Engineering Report (Page 52) indicates that it is not known whether the plan change would accelerate growth of water demand forecasted by Watercare. It is important to understand how the plan change will fit with Watercare’s modelling as the area is not currently identified for growth in the Future Urban Land Supply Strategy.</p> <p>While the Engineering Report identifies that the Watercare 2020 water use forecasts are relatively conservative compared to the June 2020 census data, the Economic Report appears to suggest that growth is increasing more rapidly. Rather than considering that water usage may be less, it would be prudent to consider what the effects are if water use is in fact higher.</p>	Refer <b>attached</b> evidence of consultation with Watercare, from Fraser Thomas and dated 17 November 2021.
P13	Consultation	Please provide evidence of consultation with the Ministry of Education regarding capacity within the local schools to accommodate student growth.	A letter from Waiuku College is provided regarding the benefits of the plan change for improved access to the school. However, no information is provided on consultation with the Ministry of Education in relation to the impact of 700 additional houses in the township for local schools.	<p>While the letter of support from Waiuku College is focused on potential improvements to access, discussions with the College have not raised any issues with regard to the capacity of the school. The current roll of the school is 907 students (July 2021, MoE ‘Education Counts’ website) and this has been static or subject to relatively small growth over the last five years. The roll is not large by secondary school standards, and is comfortably accommodated on the relatively large site of over 9ha.</p> <p>There are three state primary schools within proximity of the plan change land. Sandspit Road School (348 students), Waiuku Primary School (458 students), and View Road School (160 students). Records for the last five years show static or moderate growth.</p> <p>The applicant has not consulted with the Ministry of Education regarding the ability of local schools to accommodate student growth. The Ministry’s role with regard to school capacity is to “purchase and construct new property to meet increased demand” (MoE website). The Ministry of Education should not therefore play a part in determining whether growth is appropriate, but rather should take steps to accommodate that growth.</p> <p>It is however useful to consider whether the Ministry has sufficient time to accommodate growth in the context of the PPC. In that regard, the first homes on the site are unlikely to be occupied prior to 2-3 years from 2021, and full build out across the plan change land will occur incrementally over the following five years or</p>

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				more. Those time frames are sufficient to enable the Ministry of Education to anticipate the growth that is coming and increase capacity accordingly if required.
P14	Geotechnical	Please provide information to clarify whether precinct provisions are required to address the recommendation for detailed geotechnical investigation at the subdivision/development phase within the moderate and high risk zones identified within the plan change area.	<p>The Geotechnical Report (Appendix R) identifies areas of moderate and high risk for land instability/settlement and recommends that detailed geotechnical investigation, appraisal and reporting is required at development stage to address potential adverse effects.</p> <p>It is unclear whether the AUP adequately provides for this investigation at the subdivision/development stage. Therefore, further information is required to understand how this effect will be mitigated.</p>	<p>Geotechnical investigations are routinely required at subdivision consent stage, in order to address the requirements of s106 RMA and to address Policy E38.3(2), Rule E38.4.1(A11), Standard E38.8.1.1(2)(d), Matters of Discretion E38.12.1(4), and Assessment Criterion E38.12.2(4).</p> <p>Effects on land stability can therefore be identified and avoided through the subdivision consent application. The geotechnical report provided with the PPC application confirms that the land is generally stable and capable of being developed for urban purposes. The area of higher risk identified in the geotechnical investigation coincides with the area of indicative open space shown on the precinct plan and is a likely location for a stormwater pond, so is not an area that is expected to be subject to intensive residential development.</p>
P15	Development capacity	Please provide an assessment of the sub-regional growth projections to understand how the growth of Waiuku fits within this context or clarify how the assessment proposed achieves this.	<p>AUP Appendix 1, 1.4.1(1) requires a structure plan to identify, investigate and address the future supply and projected demand for residential and business land in the structure plan area to achieve an appropriate capacity to meet the subregional growth projections in the Auckland Plan.</p> <p>Population and household projections are provided but the assessment does not provide an assessment of development capacity enabled in Waiuku or the South Auckland Sub-region. There are extensive areas of future urban land identified in the sub-region. It would be helpful to understand how growth at Waiuku fits into this sub-regional picture.</p>	<p>It is considered that the presence of vacant Future Urban Zone land in the South Auckland Sub-region, and the capacity of that land to accommodate growth, is not relevant to the consideration of the PPC. That is because the provision of housing at Drury, Pukekohe or Takanini does not address or alleviate the capacity issues in Waiuku. Additional residential capacity is required in Waiuku to provide homes for the next generations of town residents. Failure to address the future growth of Waiuku will eventually lead to rapidly escalating housing prices and affordability issues, and splitting of extended families as people are forced to leave the town in search of appropriate housing. It will also mean that the significant employment area that has been provided in the town will need to increasingly rely on workers commuting from other areas.</p> <p>Waiuku is a self-sufficient rural town that does not compare with larger satellite towns or outer suburban locations around the Auckland metropolitan area. Growth in those areas is managed by the AUP through the RUB and through the Future Urban Zone. Neither the RUB nor the Future Urban Zone have been applied to Waiuku.</p>
P16	Development capacity	Please provide information to explain how the feasible capacity at Waiuku has been determined. There does not appear to be any explanation or calculations provided within the Economic Report to support the findings.	<p>Understanding feasible capacity is important to determine whether additional land is required to meet demand. However, there is not provision of information on enabled capacity or discussion on how the feasible capacity has been determined.</p> <p>Auckland Council has recently updated its Housing Assessment under the NPS-UD, addressing enabled and feasible capacity. While you may not agree with the approach, it would be helpful if the application acknowledged the Council data and responded to it accordingly including redevelopment opportunities.</p>	<p>The estimation of feasible development capacity in the economic assessment is based on the typical site size that has been taken to market rather than a theoretical calculation of available land area divided by minimum lot size. It includes assumptions to take into account those people that have no intention of subdividing or developing their land and for physical constraints such as flooding, topography or access difficulties.</p> <p>It is considered that the estimated feasible capacity of between 77-309 dwellings in Waiuku over the next decade is realistic.</p>

#	Category of information	Specific request	Reason for request	Response
Urban Design matters - Lisa Mein, Mein Urban Design and Planning Ltd				
UD1	Compact urban form	Please identify how the plan change will manage potential effects of opening up rural land to urban sprawl.	<p>The Urban Design Report (6.2.2) addresses the rural edge identifying that buffer development also needs to be provided to limit sprawl across the south-west boundary. However, other than the plan for proposed density there are no recommendations for ensuring that sprawl will be limited.</p> <p>A lack of consideration and response to the urban edge potentially creates opportunities for further expansion beyond the plan change area. This matter should be addressed further through landscape and urban design assessment and may require additional controls to manage sprawl.</p> <p>No precinct provisions are proposed to manage density across the site or to include assessment criteria that would enable consideration of the treatment of the rural / urban boundary.</p>	<p>This issue has now been addressed through the proposed precinct plan, which seeks to impose a reduced density of development along the urban edge together with a building setback and planted strip. It is considered that those provisions will appropriately address potential for urban sprawl spilling beyond the PPC land into the adjacent rural area.</p>
UD2	Urban design	Please clarify how the Urban Design Concept responds to the CVA recommendations in terms of identifying and protecting the cultural landscape and ensuring that access is retained and improved to water bodies and cultural and/or spiritual sites	<p>The Engineering Report (Appendix XX) identifies relevant recommendations of the CVA Report from Ngaati Te Ata (Table 3). A number of these recommendations are relevant to urban design and should be clearly reflected in the Urban Design Concept and articulated in the Urban Design Statement, with an indication of how these might be given effect to.</p>	<p>The proposed precinct provisions include specific objectives and policies to ensure that mana whenua are consulted over the development and management of the Indicative Open-space Reserve, the Indicative Greenway Connection, and the Gateway Area, and the naming of streets and places.</p> <p>Water-sensitive design and use of appropriate indigenous vegetation in planting schemes are given through the subdivision process, and conditions will be imposed to address these matters.</p> <p>The Indicative Greenway Connection provides a link through the PPC land from the existing reserve to the Indicative Open-space Reserve in the western corner and potentially beyond. That proposed reserve will afford access to the stream that passes through the site, and that access is not currently available due to the land being in private ownership. These are outcomes that are consistent with the CVA recommendations.</p> <p>The applicant intends to continue engagement with mana whenua as the land is developed, and that intention is cemented as an obligation through the proposed objectives and policies of the proposed precinct.</p>
UD3	Urban design	Please include assessment of the potential effect on the existing character of the Waiuku town centre.	<p>AUP RPS B2.6.2(1) requires maintenance and enhancement of the character of existing towns. The Urban Design Report does not provide an assessment of potential effects on character. Although it identifies the existing character and provides an analysis of lot sizes and housing typology it does not clearly articulate what the potential effects may be and whether the AUP Mixed Housing Suburban Zone can sufficiently address these.</p>	<p>The PPC will impose a zone for the land that is consistent with that found elsewhere in the town and appropriate given the proximity of the land to the Waiuku town centre.</p> <p>As the MDRS is likely to be applied to Waiuku, the PPC proposes a MHU zone. That will be consistent with the rest of Waiuku, which would also have development enabled at the level of intensification provided for by the MDRS.</p>

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			This is a key issue that the plan change must address to give effect to the AUP RPS.	Notwithstanding the development that is enabled by a MHU zone (if that were to apply) the applicant's economic advice ( <b>attached</b> memo prepared by Urban Economics and dated 4 November 2021) is that three-storey dwellings are unlikely to occur in Waiuku due to the additional cost of building and the relatively low land costs. That would ensure that the character of new housing proposed within the PPC land will not be appreciably different to that currently existing close to the site.
UD4	Place based provisions	Please clarify how the Outline Development Plan and Urban Design Concept is intended to be implemented if there is no precinct plan and the whole site is blanket zoned Mixed Housing Suburban Zone.	<p>The Urban Design Report establishes an Outline Development Plan and Urban Design Concept that identifies several key elements required as prerequisites to ensure future development provides a quality-built form and connections to the township. However, the plan change does not propose a precinct plan or any additional provisions to implement these.</p> <p>Key elements are:</p> <ul style="list-style-type: none"> <li>- Location and/or number of entries to the site (including the gateway)</li> <li>- Road network and typology</li> <li>- Open space network including an open space node and greenway connections</li> <li>- Buffer development to the rural edge</li> <li>- Connections to adjoining sites</li> </ul> <p>It is unclear how the Urban Design Concept would be achieved under the Mixed Housing Suburban Zone. It is important to understand clearly any actual positive effects on the environment that will be achieved by the plan change. It is unhelpful to identify opportunities where these cannot or may not be realised.</p>	<p>The PPC request has now been modified to include a precinct. The key elements that were identified in the Outline Development Plan and Urban Design Concept have been incorporated into the precinct plan and the associated precinct provisions. The precinct addresses each of the key elements identified in the request.</p> <p>Matters that are not directly addressed through the precinct are able to be managed appropriately through the subdivision process and through Council's powers under the RMA and Local Government Act. For example, road typologies will be subject to approval by Council and Auckland Transport and will not be accepted for vesting unless they meet specified standards for engineering and design.</p>
Ecological matters - Mark Lowe, Morpnum				
E1	Freshwater	Please include a map of the drainage features across the plan change area (45A, 92 and 130 Constable Road) that have been assessed and that determines the classifications (as per the AUP:OP and/or the NES:FW). Also provide further information and evidence to understand if the 'constructed drains' identified in the north-western corner of the site are artificial or modified natural features.	<p>The Ecology Report refers to 'constructed drains' in the north-western corner of the site.</p> <p>The classification of potential freshwater features on site is not clear in the application material. Therefore it is not possible to determine actual and potential adverse effects on freshwater.</p>	Refer attached memo dated 17 November 2021 prepared by Boffa Miskell.
E2	Freshwater	Please identify and classify (as per the AUP:OP and/or the NES:FW) the potential drainage feature evident in aerial images located on the northern portion of 130 Constable Road running in a roughly southeast to northwest direction (south of the main channel). Please also provide an assessment	This feature appears to have little attention in the application material. The classification of potential freshwater features on site is not clear in the application material. Therefore it is not possible to determine actual and potential adverse effects on freshwater.	Refer attached memo dated 17 November 2021 prepared by Boffa Miskell.

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		of effects for this feature and provide justification/evidence for the classification.		
E3	Freshwater	Please confirm that figure 5 in the Ecology Report depicts what appears as a drainage feature in aerial images.	<p>There is a potential drainage feature evident in aerial images located on the north-western portion of 92 Constable Road running roughly east to west. Appendix 2 of the ecological values assessment appears to indicate this location with a red arrow and refers to figure 5. Figure 5 does not appear to show any evidence of a drainage channel and does not appear consistent with the publicly available aerial imagery.</p> <p>The classification of potential freshwater features on site is not clear in the application material. Therefore it is not possible to determine actual and potential adverse effects on freshwater.</p>	Refer attached memo dated 17 November 2021 prepared by Boffa Miskell.
E4	Freshwater	Please comment on, and map, any actual or likely natural wetlands located within 100 m of the subject site. If any potential wetlands are present within 100 m, please assess any potential adverse effects on such features (if present) as a result of the proposed zone change; particularly as a result of diversion or discharge of water.	To enable an informed assessment as to any potential adverse effects on such features (if present).	Refer attached memo dated 17 November 2021 prepared by Boffa Miskell.
E5	Freshwater	Please comment on any ecological impacts of any reduction to the width of the riparian yard, and associated provisions, that applies to intermittent and permanent watercourses. The loss of potential enhancement and/or enabling a greater level of imperviousness within the stream margins.	The Ecology Report does not address impacts of the plan change on riparian margins. Further information is required to enable an informed assessment as to any potential adverse effects	Refer attached memo dated 17 November 2021 prepared by Boffa Miskell.
E6	Biodiversity	Please comment on the mechanisms proposed (if any) to ensure the following outcome identified in the Ecology Report is achieved: <i>Effort to increase awareness of the presence of iconic native species in the landscape and support for predator control as an integrated aspect of urban design can help facilitate positive biodiversity outcomes in this development.</i>	To understand the mechanisms to how the proposed benefit will be realised and therefore what weight should be placed in assessing this benefit.	Refer attached memo dated 17 November 2021 prepared by Boffa Miskell.
Landscape and visual effects matters – Rob Pryor, LA4				
LV1	Landscape character and visual amenity	<p>Please provide a Landscape and Visual Effects Assessment (LVEA) prepared by a qualified NZILA landscape architect.</p> <p>An LVEA should be prepared addressing the effects of the proposed plan change on the immediate and surrounding environment in terms of:</p> <ul style="list-style-type: none"> <li>• Landscape character values</li> </ul>	<p>For a Plan Change application of this size (32ha) and nature – transforming a rural landscape to an urban landscape it would be expected that a LVEA would be provided addressing the appropriateness of a fundamental change from a rural to an urban landscape.</p> <p>The Urban Design Report states that:</p>	Please refer to the <b>attached</b> Assessment of Landscape Effects prepared by Simon Cocker Landscape Architecture.



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		<ul style="list-style-type: none"> <li>Rural character and amenity</li> <li>Visual amenity</li> <li>Cumulative effects</li> </ul> <p>The LVEA should cover:</p> <ol style="list-style-type: none"> <li>Assessment methodology.</li> <li>Landscape context - detailed description and evaluation of the site and wider landscape setting with an emphasis on landscape and visual amenity considerations.</li> <li>Description of the plan change - description of the nature of the PPC and the ways in which landscape attributes and visual amenity are provided for.</li> <li>Planning context - description of the relevant statutory context of the site and surrounding area. Consideration of the proposal in relation to key relevant statutory planning considerations applicable to this assessment.</li> <li>Evaluation of the proposal - detailed assessment of the landscape character, rural character and amenity and visual amenity effects of the plan change and their significance on the site and wider context.</li> <li>Summary and conclusions in relation to the key landscape and visual amenity effects of the plan change.</li> </ol>	<p>“In a broader context, the PPC land provides for a transformation in landscape character from pastoral farming to the houses, fences, and roads that accompany residential development. While this is a change, the position of the PPC land means that it will have a contiguous connection to the existing residential area. Moreover, the PPC land occupies a rural ‘wedge’ in the side of the town that is close to the town centre and its development will tend to <i>complete</i> rather than <i>extend</i> the physical extent of the urban form.</p> <p>For the reasons outlined above, it is considered that the PPC will have no significant adverse effects in relation to landscape character and visual amenity.”</p> <p>It is uncertain as to how this conclusion is reached in the absence of a LVEA.</p>	
<b>Transport matters – Martin Peak, Progressive Transport</b>				
T1	Background information	Please provide a copy of or details of the Memorandum of Understanding between Franklin District Council and landowners regarding the issues connected with the Waiuku College entrance.	The ITA in the Summary and Section 2 refers to a Memorandum of Understanding (MoU) between the former Franklin District Council and landowners. The ITA states that the document is an important planning document relating to the integration of land development with resolving existing issues with access to the Waiuku College. The MoU is required to understand the anticipated involvement of landowners and any obligations in the development of the land in providing alternative access to the college.	This matter has been addressed by John Parlane of Parlane Associates Limited in the attached ITA.
T2	ITA	Please correct the ITA in Section 3.2 where it states that King Street is a Primary Collector Road in the	The amendment is required as the category of the road shows a higher level of importance than that indicated in the ITA.	This matter has been addressed by John Parlane of Parlane Associates Limited in the attached ITA.

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		NZTA One Network System. King Street is actually identified as an Arterial Road.		
T3	Walking and cycling	Please update the cycling and walking isochrones so that the origin of the isochrone is located within the centre of the site.	Section 3.5 of the ITA presented Figures 5 and Figure 6 of walking and cycling isochrones, respectively. Whilst not marked on the figures, it would appear the origin of the isochrones is located at the proposed intersection of the site with Constable Road. As the site is quite large, pedestrians would still have some distance to walk to this location before reaching the entrance to the site. Therefore, the isochrones are likely to overestimate the catchment that can be reached with a 10-minute walk or cycle. The updated isochrone is required to better understand the more realistic catchment area of the site for pedestrians and cyclists.	This matter has been addressed by John Parlane of Parlane Associates Limited in the attached ITA.
T4	Walking and cycling	Please confirm the extent of the proposed footpath works along Constable Road.  If the footpath is only to be provided along the site's frontage to Constable Road, please provide details as to how pedestrians will be able to safely connect to the wider footpath network on Constable Road.	Section 9 of the ITA presents mitigation works proposed, which includes a footpath on Constable Road on the side of the development only. The ITA places emphasis on the walkability of the area and ability for residents to walk to the town centre. There is currently no footpath along the frontage of the college and there are no pedestrian crossing facilities in the area. Therefore, if the footpath is only provided along the frontage of the subject site, then there would be a missing connection that would impede the safe movement of pedestrians from the plan change area to the centre of Waiuku.	This matter has been addressed by John Parlane of Parlane Associates Limited in the attached ITA.
T5	Walking and Cycling	Please provide details of cycling measures proposed to enable cyclists from the plan change area to cycle to the wider area, including Waiuku town centre.	Section 3.5 of the ITA states that the site is largely within a 10-minute cycle of the Plan Change area and "practically all of Waiuku" is within a 15-minute cycle. Whilst mitigation measures are provided for pedestrians along Constable Road no such mitigation measures are proposed for cyclists.	This matter has been addressed by John Parlane of Parlane Associates Limited in the attached ITA.
T6	Link Road	Please provide details of any discussions or plans of the proposed Council link road that would connect to King Street.	Section 4 of the ITA discusses a proposed road link to King Street that could connect to the subject site. To better understand how this link may affect the proposed plan change, any details or discussions with Council regarding the link should be provided.	This matter has been addressed by John Parlane of Parlane Associates Limited in the attached ITA.
T7	Site Access	Please confirm whether the site access has been designed for a 50km/h or 100km/h speed environment.  If it has been designed for 50km/h, please confirm that the intersection is still feasible for a speed environment with a posted speed limit of 100km/h given that there is no certainty that the speed limit will be reduced prior to the occupation of the first dwelling on the subject site.	The proposed intersection on Constable Road is currently located within the 100km/h posted speed limit area. The ITA states that it would be beneficial for the start of the 50km/h posted speed limit by Waiuku College to be relocated further to west. The relocation of the speed limit is subject to Auckland Transport processes and procedures and would require public consultation. Therefore, there is no guarantee that the speed limit would be modified. If the speed limit is not relocated prior to the construction of the intersection, the intersection would need to be constructed to a standard that is appropriate for the design speed operative at that time.	This matter has been addressed by John Parlane of Parlane Associates Limited in the attached ITA.

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T8	Site Access	Please provide details of how the proposed site access on Constable Road will be designed taking into account the access from Constable Road to the 45 Constable Road, which is currently being developed.	There is an existing site just east of the plan change area that is currently being developed. It is understood from the Urban Design Report (Section 6.2, Figure 6.1) that a secondary link to the plan change area will be provided through this development. There is no discussion on how the access from Constable Road to the 45 Constable Road and the proposed site access to the Plan Change area will operate together or any implications for the design of the proposed Plan Change site access. Further details are required to assess the potential effects of the plan change on the safe and efficient operation of Constable Road.	This matter has been addressed by John Parlane of Parlane Associates Limited in the attached ITA.
T9	Site Access	<p>Please provide details that visibility from the proposed site access onto Constable Road meets the requirements as set out in AustRoads.</p> <p>The assessment should take into account the vertical crest to the west of the proposed site access onto Constable Road.</p>	<p>Section 4.1 outlines the proposed access arrangements and presents a layout of the intersection with Constable Road in Figure 10. No details of the visibility from the intersection to comply with relevant standards are provided and therefore it is not possible to determine whether the intersection complies with the visibility standards and thus if there is a potential adverse effect on the safe operation of the transport network.</p> <p>The visibility assessment should be undertaken taking into account the 100km/h post speed limit given that there is no certainty that the posted speed limit would be reduced past the site prior to the construction and operation of the intersection.</p> <p>Section 4.1 of the ITA discusses a vertical crest west of the proposed intersection on Constable Road. Figure 9 of the ITA shows a photograph of the general area where the access would be located. There is a vertical crest on the road which may affect visibility from the proposed access. This vertical crest is discussed in the ITA and is shown in Figure 11. This vertical crest may impact on visibility to the west of the proposed site access, particularly if the posted speed limit is 100km/h.</p>	This matter has been addressed by John Parlane of Parlane Associates Limited in the attached ITA.
T10	Design Vehicles	Please confirm that the roading network will be designed for the appropriate design and check vehicles as required by AT's Transport Design Manual (TDM) and not the Auckland Transport Code of Practice (ATCOP). This should include for buses should the college be accessed via the roads within the plan change area.	Section 4.1.1 of the ITA states that all local roads and intersection will be designed to accommodate an 8m truck based on ATCOP. However, TDM is the current design standard used by AT. Further, it is expected that buses will use the road network to reach the college site. A larger vehicle than an 8m truck is also required as a refuse vehicle can be up to 10.3m in size.	This matter has been addressed by John Parlane of Parlane Associates Limited in the attached ITA.
T11	Traffic modelling	Please confirm that actual traffic survey count data has been used for the assessment, and the date that any survey data was collected.	Section 7.2 of the ITA presents traffic modelling of the effects of the plan change. It is unclear where the base traffic data has been obtained, and what date the data was recorded/surveyed. This is required to determine the suitability of the use of this data.	This matter has been addressed by John Parlane of Parlane Associates Limited in the attached ITA.

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		If survey data has not been used, please provide further details as to how the traffic volumes and turning movements have been derived.		
T12	Traffic modelling	Please provide commentary on the typical peak period operation of the key intersections that have been assessed (Constable Road / King Street, King Street / Queen Street, King Street / Sandspit Road) to provide confidence that the base traffic modelling represents actual traffic conditions.	The ITA does not describe the operation of the main intersections that would be impacted by the proposed Plan Change. Due to COVID 19 Level 4 restrictions a site visit has not been able to be conducted at this time to be able to observe the existing operation of the network. Therefore, to assist in confirming the calibration of the traffic models and assessing the effects of the Plan Change, a description of the operation of the key intersections would be useful. The description should include details of typical queue lengths and any congestion.	This matter has been addressed by John Parlane of Parlane Associates Limited in the attached ITA.
T13	Traffic modelling	Please undertake a future year assessment of the traffic effects of the proposed plan change for the 10-year construction horizon. The assessment should include all the intersections modelled within the ITA.	The site is anticipated to be developed over 10-years. The assessment undertaken does not appear to have taken into account any traffic growth over that time period. Therefore, the future traffic effects of the development have not been assessed or appropriate mitigation measures identified.	This matter has been addressed by John Parlane of Parlane Associates Limited in the attached ITA.
T14	Traffic modelling	Please include the traffic associated with the college in the assessment of the operation of the site access / Constable Road intersection.	The ITA places significant importance and weight on the benefits of the proposed plan change in providing an alternative access arrangement to Waiuku College for buses and for drop off and pick up. Therefore, it is anticipated motorists travelling to the college will do so via the proposed Site Access / Constable Road intersection as there is no other alternative route to reach the college. The assessment undertaken does not take into account this traffic and therefore, the operational performance of this intersection as outlined in Section 7.3 of the ITA would be under-reported.	This matter has been addressed by John Parlane of Parlane Associates Limited in the attached ITA.
T15	Traffic modelling	Please provide detailed SIDRA modelling outputs of all the intersections modelled, such as Movement Summaries as has been presented for the proposed site access on Constable Road in Section 7.3. SIDRA Site Layout drawings should also be provided.	Section 7.2 of the ITA presents limited SIDRA model output in the form of delays and level of service of the intersection. This is insufficient to fully understand the forecast operation of the intersections and effects of the development.	This matter has been addressed by John Parlane of Parlane Associates Limited in the attached ITA.
T16	Traffic modelling	Please provide details of the base and forecast traffic volumes for the assessment of the King Street / Sandspit Road intersection.  Please also provide details of the layout of the intersection that has been assessed.  Please provide detailed SIDRA model output in the form Movement Summary tables.	Section 8.2 of the ITA provides an assessment of the King Street / Sandspit Road intersection with a fourth arm added should a Council link road be constructed. However, no details of traffic volumes or layout of the intersection are provided to understand or review what has been tested.	This matter has been addressed by John Parlane of Parlane Associates Limited in the attached ITA.
T17	Assessment of Traffic Effects	Please provide commentary on the anticipated utilisation of the secondary access to the site via 45 Constable Road that is currently under	The Urban Design report refers to a secondary access to the Plan Change area via 45 Constable Road that is currently being developed. This secondary access is not	This matter has been addressed by John Parlane of Parlane Associates Limited in the attached ITA.

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		development. The commentary should consider the potential volume of traffic that may utilise this secondary access to reach the Plan Change area and the potential effects on the operation of the secondary access onto Constable Road.	discussed in the ITA nor the effects of development traffic from the Plan Change area should this secondary access be used by the Plan Change traffic. It is therefore not possible to determine whether there are effects on the safe and efficient operation of the secondary access on to Constable Road.  It is acknowledged that the assessment on the operation of the proposed Plan Change site access onto Constable Road has assumed the worst case of all Plan Change traffic using this intersection.	
T18	Alternative access to Waiuku College	Please provide details of how the alternative access to Waiuku College will be provided by the proposed plan change.	The application emphasises the importance and benefits of the proposals for the plan change with the opportunity to provide an alternative access to Waiuku College for school buses and pick up and drop off. However, there are no details provided as to how this access will be achieved. It is, therefore, not possible to understand the potential effects of this operation on the plan change or surrounding road network.	This matter has been addressed by John Parlane of Parlane Associates Limited in the attached ITA.
T19	Alternative access to Waiuku College	Please confirm that the proposed mitigation will include the necessary infrastructure for the new access to Waiuku College and who would be responsible for its provision.	The list of mitigation works in Section 9 of the ITA does not provide any details of whether the secondary access to the Waiuku College will be provided or who would provide it. The application emphasises that the plan change provides the opportunity to provide it but there appears to be no commitment for its provision or details of who would be responsible for providing the access and associated facilities.	This matter has been addressed by John Parlane of Parlane Associates Limited in the attached ITA.
T20	Road Typologies	Please confirm whether all the road typologies detailed in the Urban Design report are to be vested with Council.	The Urban Design Report in Section 6.4 presents four different road types that are proposed for the Plan Change area. Three of these road types (Greenway, living streets, and mews lane) are not consistent with Auckland Transport's TDM. Should these roads be proposed for vesting in Council AT would need to approve the designs because they would be responsible for maintenance and operation.	This matter has been addressed by John Parlane of Parlane Associates Limited in the attached ITA.
T21	Mitigation Works	Please provide details of the timing of when the mitigation works listed in Table 3 in Section 9 of the ITA will need to be delivered to mitigate the effects of the Plan Change.	Section 9, Table 3 of the ITA provides details of the mitigation works proposed. Whilst the table provides details of the works and who would be responsible for their implementation and funding, there are no details of when the measures would be required.	This matter has been addressed by John Parlane of Parlane Associates Limited in the attached ITA.
<b>Parks and open space matters – Lea van Heerden, Senior Parks Planner, Auckland Council</b>				
OS1	Precinct plans	Please include a precinct plan that implements the indicative locations of open spaces (recreation) and indicative greenway route; or  Please clarify why a precinct is not proposed and how open space will be provided.	The change from rural to mixed house suburban is a significant change in built character. The applicant has not provided designated open spaces zones, specifically for recreation as part of the zoning plan change and it is only through the application process subject to resource consents that parks and other recreation spaces are proposed as part of the future development.	A precinct plan is now proposed that proposes two indicative areas of public open space on the PPC land – one in the western corner and one at the 'gateway' area adjacent to Constable Road. These areas are likely to coincide with drainage reserves required for stormwater management, but would provide some general recreational benefits and amenity.

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			<p>The 'Structure plan' does not provide sufficient information to understand how the open space outcomes, shown in the Urban Design Report, will successfully be achieved without a precinct plan that provides surety of outcomes.</p>	<p>The substantial area of undeveloped recreation reserve immediately to the north, currently accessed from King Street, suggests that any potential reserve acquisition in the PPC land would be modest.</p> <p>The applicant understands that, if additional open space was provided within a future subdivision layout (such as the greenway connections), the Council is unlikely to seek to acquire that open space and private ownership options would be necessary.</p>
OS2	Section 32	<p>Please provide a full analysis against all the objectives and policies of the Auckland Regional Policy Statement, (B2.7 Open space and recreation facilities) and how they are being met by relying on the underlying zone Residential - Mixed House Suburban.</p>	<p>The application material does not include an assessment against the objectives and policies in AUP RPS Chapter B2.7 Open space and recreation facilities.</p>	<p>The provision of a precinct assists in meeting the relevant objectives and policies of the RPS, contained at B2.7. In terms of the objectives, the proposal would meet the recreational needs of the community by enhancing access to the existing area of reserve land and through the addition of further open space (B2.7.1(1)). The level of provision is consistent with Council's policy on open space provision (see response to OS3 below). Public access would be provided to the reach of the Rangiwhea stream that flows through the western corner of the site, through the provision of a reserve in this location (B2.7.1(2)). There would be no obvious reverse sensitivity issues between proposed open space and neighbouring land uses (B2.7.1(3)).</p> <p>The proposal would also align with the policies of B2.7. The Indicative Open-space Reserve areas shown on the precinct plan would be for informal recreation, which would provide for a range of accessible open spaces and experiences in this neighbourhood, given that the existing reserve is for sport and active recreation (B2.7.2(1) and (3)). The precinct also provides an Indicative Greenway Connection between the proposed and existing areas of open space (B2.7.2(2)). Policies (4)-(6) are not relevant as there is no deficiency of open space in the area of the PPC land and the proposal does not relate to a major recreation facility. The frontage control proposed for residential lots adjacent to the existing reserve area will ensure that residential development does not have any adverse effects on the reserve (B2.7.2(7)). Policy 8 relates to the operation of open space and is not relevant to the proposed PPC. The area of Indicative Open-space Reserve in the western corner will facilitate access to the Rangiwhea stream, which is an outcome sought in Policy B2.7.2(9). Policy 10 is not relevant.</p> <p>From the assessment set out above, it is considered that the PPC is consistent with the objectives and policies of AUP RPS Chapter B2.7.</p>
OS3	Open Space	<p>Please provide an assessment of the plan change against Auckland Council Open Space Acquisition Policy 2016 to determine the open space requirements.</p>	<p>While the applicant is relying on the establishment of greenways, the lack of a <u>recreational</u> park requires further assessment under the Open Space Provision Policy.</p>	<p>The Auckland Council Open Space Provision Policy 2016 suggests that residents of Mixed Housing Suburban and Mixed Housing Urban zones should be provided with neighbourhood parks of around 0.5ha within a 400m walk, and suburb parks of 5-10ha within a 1,000m walk. The PPC land has a suburb park of at least 7ha immediately on its north-eastern boundary. All of the PPC land is situated within 1,000m of the park boundary and most of it is within 400m of the park. In addition, the indicative open space in the western corner of the PPC land is around 0.8ha in area would be within 400m of all other parts of the land. On this basis, it is considered that the proposed open space shown on the precinct plan would more than meet the Council's Open Space Provision Policy.</p>

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OS4	Open Space	<p>Please include further details about the overall concept of the open space network and grid layout including:</p> <p>a. While the open space network is aspirational, it is not clear what is driving the greenways proposed and the unusual layout of the development blocks?</p> <p>b. Can we assume the greenways will be drainage reserves to help assist the overall draining network? Will this be something Healthy Waters will accept? Similar to the point above, how will this be implemented?</p> <p>c. the layout of blocks and greenways are unusual, apart from not knowing how the applicant will be implementing the greenways, will the greenways force the development layout to resemble the same built pattern for adjacent sites?</p>	<p>Further details are required to understand the overall concept of the open space network including how it is proposed to be vested in order to understand potential operations and maintenance implications.</p> <p>It is unclear whether the plan change proposes to vest the greenways that are identified in the Urban Design Concept. While the plan change does not require the open space node and greenways to be established, these are identified as an opportunity in sections 6.2.5 and 6.2.6 of the Urban Design Report and signalled within the Outline Development Plan and the Urban Design Concept in the plan set. To understand the implications for parks it is necessary to clarify the intention around how the open space node and greenways would be established, operated and maintained.</p>	<p>The PPC now proposes a precinct to provide more certainty regarding the outcomes envisaged for the land. In terms of the open space network, the precinct proposes two areas of Indicative Open-space Reserve, an Indicative Greenway Connection between the existing reserve (north of the PPC land) and one of the proposed areas of reserve, a new road connection to the existing reserve, and a mechanism for providing an appropriate frontage to the existing reserve where it adjoins residential lots.</p> <p>Much of the two areas of Indicative Open-space Reserve is expected to vest in the Council as drainage reserve, but there may be some opportunities for a small area of recreation reserve at the western end of the PPC land. The Indicative Greenway Connection could be vested as reserve or held in private ownership (through a body corporate or incorporated society or similar mechanism). The same would apply to any of the other greenways that are proposed at the time of subdivision. There would of course be no obligation for Parks or Healthy Waters to acquire the greenways if there was no interest in owning and maintaining these assets.</p>
Stormwater and flooding matters - Sameer Vinnakota, Environmental Planner, Jacobs Ltd				
SW1	Flood Risk and Hazard	Please provide a plan and assessment of the overland flow paths and 100yr floodplain within the development area and best practicable option to mitigate any adverse effects associated with this.	This assessment is needed in order to determine whether the stormwater flows can be conveyed safely to the receiving environment from the subject area and not give rise to downstream effects to neighbouring properties.	Refer <b>attached</b> from Fraser Thomas dated 17 November 2021.
SW2	Stream Hydrology	Please provide a plan indicating the hydrology features of the site; wetland areas, stream classification and other features relevant to site assessment	This site assessment is needed to determine what the existing condition of these features are and whether the stormwater management approach proposed will maintain or enhance water quality, flows, stream channels and their margins and other freshwater values	Please refer to drawing number 32897/20 on page 70 of the <b>attached</b> Fraser Thomas SMP. Measures to maintain stream hydrology are set out at section 7.11.3 (p46) of the SMP. Additional information regarding the streams on the site is contained within the Boffa Miskell response memo to ecological matters dated 17 November 2021, which is also <b>attached</b> .
SW3	Implementation of stormwater network	How will stormwater be managed under the potential development scenarios (i.e., whether the development will occur in parts or as a whole and anticipated timelines).	Further information regarding how the stormwater management approach is likely to be implemented is needed to ensure that stormwater effects can be managed appropriately and not likely to result in any downstream effects and that the stormwater management approach is implemented in an integrated manner.	Refer <b>attached</b> from Fraser Thomas dated 17 November 2021.
SW4	Geotechnical	Please provide information on soakage and infiltration testing undertaken within the development area. Soil infiltration testing should be provided at indicative locations across the plan change area.	<p>A soakage assessment is required to determine what the soil conditions are and their properties and whether the infiltration rates will support appropriate retention times.</p> <p>This information is needed as raingardens will provide for retention of stormwater volumes; therefore, soakage and infiltration results are needed to determine whether runoff can permeate the soil and the rate at which this will occur. Information is required to be satisfied that</p>	Refer <b>attached</b> from Fraser Thomas dated 17 November 2021.

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			water will be retained appropriately and will not result in ponding or unintended overland flows.	
SW5	Stormwater Management Plan	Please provide a Stormwater Management Plan (SMP) as a standalone document. The SMP should identify the anticipated stormwater effects of the plan change and subsequent development proposal and how effects will be managed to meet the Auckland Unitary Plan outcomes and, if intending to vest assets to council, the requirements under the regional network discharge consent (NDC).	The application document refers to an Engineering Report (which also contains water and wastewater information) for SMP information. Template and explanatory document provided in the Auckland Design Manual should be used for the preparation of the SMP. <a href="http://www.aucklanddesignmanual.co.nz/NDC">www.aucklanddesignmanual.co.nz/NDC</a>  An approved SMP is required for authorisation of stormwater diversion and discharge under the NDC. The SMP acts in the plan change process as both an assessment of effects of stormwater discharge and is also required as part of the process for authorising stormwater discharges under NDC	Refer <b>attached</b> from Fraser Thomas dated 17 November 2021 and the standalone SMP prepared by Fraser Thomas dated 17 November 2021.
<b>Land use capability– Dr Reece Hill, Landsystems Ltd</b>				
LUC1	45A Constable Road	Please provide evidence of the land use consent that has enabled earthworks across 45A Constable Road and enabling it to be excluded from the soil assessment.	The plan change includes the site at 45A Constable Road but the soils report excludes this site from the assessment because it has been earthworked as part of an approved land use consent.  The application materials include an approved subdivision for 45 Constable Road but not 45A Constable Road therefore it is unclear why this site should be excluded from the soils assessment.	The requested copy of the land use consent is <b>attached</b> .
LUC2	LUC explanation	Provide additional explanation (possibly as a summary table) detailing the soil and LUC specific limitations for each soil/LUC unit identified on the site with further detail provided on how these limitations were used to define areas as Elite, Prime or 'Other productive land' and how these limitations restrict the range of land uses; intensive horticulture and cropping.	Although the soils and LUC classes identified on the site have been classified according to the Auckland Unitary Plan (Updated 24 October 2019) elite and prime land definitions. An explanation (possibly a summary table) detailing the soil and LUC specific limitations that defined areas as Elite, Prime or Other and why would be useful. This would be especially useful for LUC 2w land with imperfectly assessed as 'Other productive land'.	Please refer to the <b>attached</b> response to this request from Dr Peter Singleton.
<b>Land productivity matters – Stuart Ford, Agribusiness Group</b>				
LP1	Limitations to Land use	Please provide seasonal rainfall data/information to support this statement to explain why the site has limitations greater than other successful intensive horticulture and cropping areas in the Waiuku and Pukekohe area.	The report states: <i>Low and erratic summer rainfall typical for the site make risk of crop failure high for this property for horticultural/vegetable production.</i> The report's reference to <i>Low and erratic summer rainfall typical for the site</i> is not supported by any rainfall data. Additionally, there are examples of intensive horticulture and cropping nearby, some of which look like they do not have irrigation.	Please refer to <b>attached</b> response from Paul Sharp, dated 5 November 2021.
LP2	Limitations to Land use	Please provide data/information on the size of viable parcel sizes currently used for intensive	The report states: <i>The relatively small scale by commercial primary industry standards makes the Constable Road block less</i>	Please refer to <b>attached</b> response from Paul Sharp, dated 5 November 2021.



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		horticulture and cropping areas in the Waiuku and Pukekohe area.	<i>viable – increased difficulty to justify undertaking capital development with only a small area to disburse the running costs across. In addition to this, being located in close proximity to Waiuku township, pricing, and availability of suitable parcels of land to amalgamate into an economic scale are remote.</i> The report's reference to <i>relatively small scale by commercial primary industry standards</i> is not supported by any data. This is relevant because there are examples of small scale intensive horticulture and cropping adjacent to the site and in the surrounding vicinity.	
Contaminated land matters – Andrew Kabarkzyk, Senior Specialist – Contaminated Land, Auckland Council				
C1	Contamination	Please <u>either</u> revise the content of the PSI report, so that it reflects the current, revised versions of <i>Contaminated Land Management Guidelines</i> , No.1 (revised June 2021), No.2 (revised 2011), and No.5 (revised June 2021), Ministry for the Environment; <u>or</u> change the references to the guidelines, if in the view of a suitably qualified and experienced contaminated land practitioner the PSI report adequately follows the current, revised versions of the guidelines.	The statement made within Section 8.0 the PSI report (titled <i>Preliminary Site Investigation – Contamination: O'Hara Waiuku Plan Change: 92 &amp; 130 Constable Road, Waiuku</i> , Version 1, dated 2 July 2021, prepared by Fraser Thomas Ltd) confirms the scope of the site assessment activities and relevant reporting was generally in accordance with <i>Contaminated Land Management Guidelines</i> , No.1 (2003), No.2 (2003), and No.5 (2004), Ministry for the Environment. All of those guidelines are considered being now obsolete. Guidelines No.1 and No.5 were first revised in 2011 and subsequently revised and replaced by amended versions in June 2021. Guideline No.2 was revised in 2011. Therefore, the PSI report, based on the obsolete versions of the guidelines is considered being inadequate for the purpose of supporting the request for the intended Private Plan Change.	Please refer to the attached revised PSI Contamination Assessment, prepared by Fraser Thomas dated 1 November 2021.
C2	Contamination	Please provide an Addendum PSI report, covering the property at 45A Constable Road, which is currently missing from the PSI report.	The PSI report covers only two out of the four properties being a subject of the plan change. It is acknowledged that 43 Constable Road will not have a change of land use and therefore can be excluded. However, missing from the PSI report is the properties at 45A Constable Road, Waiuku. Therefore, the current PSI report is considered incomplete for the purpose of supporting the request.	Please refer to the attached revised PSI Contamination Assessment, prepared by Fraser Thomas dated 1 November 2021.