

## Highbrook Precinct Private Plan Change Request: Response to further information request under clause 23 of Schedule 1 of the RMA

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**Date** 12 December 2022

**To** Celia Davison, Manager Planning – Central South  
Tania Richmond, Consultant Planner to Auckland Council

**By email** Celia.Davison@aucklandcouncil.govt.nz  
Tania@richmondplanning.co.nz

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**From** Sukhi Singh, Technical Director Planning

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Dear Celia and Tanya,

On behalf of Highbrook Living Limited, please find below our responses to the further information requested from Auckland Council (pursuant to Clause 23 of the RMA) for the processing of the private plan change request at 8 Sparky Road, Ōtara. For ease of reference, the responses provided correspond with the numbering of the questions set out in the further information request.

This response includes the following attachments:

- **Attachment 1:** Geotechnical Test Pit Data
- **Attachment 2:** Walking Isochrone
- **Attachment 3:** Cycling Isochrone
- **Attachment 4:** Cultural Values Assessment prepared by Te Ākitai Waiohua
- **Attachment 5:** Highbrook Noise Contour Areas
- **Attachment 6:** Updated Stormwater Management Plan (Technical Report 9)
- **Attachment 7:** Updated Highbrook Precinct Plan

| Category of information                        | Council Request   | Applicant's Response  |                   |                 |                |                  |                |  |  |                 |             |                  |                 |             |                  |      |     |       |           |     |       |         |      |     |       |           |     |       |         |      |     |       |           |     |       |         |              |            |                |                   |            |                |                |
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| <b>Economic matters</b>                        |   |   |                   |                 |                |                  |                |  |  |                 |             |                  |                 |             |                  |      |     |       |           |     |       |         |      |     |       |           |     |       |         |      |     |       |           |     |       |         |              |            |                |                   |            |                |                |
| <p>1. Industrial land occupation 2017-2022</p> | <p>Please provide an assessment of the amount of land that was identified as being vacant in 2017 but which is now no longer vacant.</p> <ul style="list-style-type: none"> <li>The Property Economics Limited document titled “Highbrook Proposed Plan Change Economic Overview”, November 2021 (“PEL”) uses Auckland Council’s “Housing and Business Development Capacity Assessment 2017” (“HBCA”) as a base for assessing industrial land demand and supply.</li> <li>The vacant land supply estimates in the HBCA are now at least five years old, and some of the land that was vacant in 2017 will now no longer be vacant, having been developed in the interim. An updated (2022) estimate of vacant land supply would be a better basis for the industrial land demand-supply assessment than the 2017 data. The PEL report refers to “Building Consent Statistics – Statistics New Zealand” data, which would be useful for this assessment, but has not been used.</li> </ul> | <p>The table below shows the industrial consents in the 3-year period post the Council 2017 HBA. There is no way of determining the proportion of these consents that are occupying vacant land or represent redevelopment / replacement of an old building on an already developed site as this information is not recorded.</p> <table border="1" data-bbox="1089 704 1711 889"> <thead> <tr> <th rowspan="2">Year</th> <th colspan="3">Auckland Region</th> <th colspan="3">Auckland South</th> </tr> <tr> <th>No. of consents</th> <th>Value (\$m)</th> <th>Floor Area (sqm)</th> <th>No. of consents</th> <th>Value (\$m)</th> <th>Floor Area (sqm)</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>207</td> <td>\$606</td> <td>4,157,700</td> <td>118</td> <td>\$424</td> <td>301,400</td> </tr> <tr> <td>2019</td> <td>228</td> <td>\$561</td> <td>4,888,600</td> <td>120</td> <td>\$324</td> <td>314,200</td> </tr> <tr> <td>2020</td> <td>210</td> <td>\$708</td> <td>3,637,700</td> <td>115</td> <td>\$397</td> <td>251,400</td> </tr> <tr> <td><b>TOTAL</b></td> <td><b>645</b></td> <td><b>\$1,875</b></td> <td><b>12,688,000</b></td> <td><b>354</b></td> <td><b>\$1,144</b></td> <td><b>867,000</b></td> </tr> </tbody> </table> <p>The reduction in vacant industrial land can only realistically be quantified by undertaking an audit of all the industrial areas across the region. This is a significant exercise for a single application. Therefore, in terms of assessing the level of vacant industrial zoned land that has been absorbed, the consent data is considered of limited value.</p> <p>However, Property Economics is aware of a number of large industrial plan changes that have added significant industrial supply (e.g., Whenuapai PC52) and Council Spatial Plans that are promoting significant levels of additional industrial land provision in areas such as Drury, Pukekohe and Silverdale, and the rezoning of industrial land from Heavy to Light in Drury</p> | Year              | Auckland Region |                |                  | Auckland South |  |  | No. of consents | Value (\$m) | Floor Area (sqm) | No. of consents | Value (\$m) | Floor Area (sqm) | 2018 | 207 | \$606 | 4,157,700 | 118 | \$424 | 301,400 | 2019 | 228 | \$561 | 4,888,600 | 120 | \$324 | 314,200 | 2020 | 210 | \$708 | 3,637,700 | 115 | \$397 | 251,400 | <b>TOTAL</b> | <b>645</b> | <b>\$1,875</b> | <b>12,688,000</b> | <b>354</b> | <b>\$1,144</b> | <b>867,000</b> |
| Year   | Auckland Region   |   |                   | Auckland South  |                |                  |                |  |  |                 |             |                  |                 |             |                  |      |     |       |           |     |       |         |      |     |       |           |     |       |         |      |     |       |           |     |       |         |              |            |                |                   |            |                |                |
|  | No. of consents   | Value (\$m)   | Floor Area (sqm)  | No. of consents | Value (\$m)    | Floor Area (sqm) |                |  |  |                 |             |                  |                 |             |                  |      |     |       |           |     |       |         |      |     |       |           |     |       |         |      |     |       |           |     |       |         |              |            |                |                   |            |                |                |
| 2018   | 207   | \$606   | 4,157,700         | 118             | \$424          | 301,400          |                |  |  |                 |             |                  |                 |             |                  |      |     |       |           |     |       |         |      |     |       |           |     |       |         |      |     |       |           |     |       |         |              |            |                |                   |            |                |                |
| 2019   | 228   | \$561   | 4,888,600         | 120             | \$324          | 314,200          |                |  |  |                 |             |                  |                 |             |                  |      |     |       |           |     |       |         |      |     |       |           |     |       |         |      |     |       |           |     |       |         |              |            |                |                   |            |                |                |
| 2020   | 210   | \$708   | 3,637,700         | 115             | \$397          | 251,400          |                |  |  |                 |             |                  |                 |             |                  |      |     |       |           |     |       |         |      |     |       |           |     |       |         |      |     |       |           |     |       |         |              |            |                |                   |            |                |                |
| <b>TOTAL</b>                                   | <b>645</b>  | <b>\$1,875</b>  | <b>12,688,000</b> | <b>354</b>      | <b>\$1,144</b> | <b>867,000</b>   |                |  |  |                 |             |                  |                 |             |                  |      |     |       |           |     |       |         |      |     |       |           |     |       |         |      |     |       |           |     |       |         |              |            |                |                   |            |                |                |



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|  |  | <p>South. As such, the current and proposed provision of industrial zone land in Auckland is likely to be higher than in 2017.</p>  |
| <p>2. Ability to accommodate industrial activity</p> | <p>Please provide an assessment of the range of parcel sizes and building sizes in nearby industrial zones such as Highbrook and East Tamaki, and assessment of the range of activities permitted on the site under the operative Business – Light Industry zoning.</p> <ul style="list-style-type: none"> <li>○ The PEL report states that the site is not efficient or practical for light industry activities, however there appear to be many industrial zoned parcels and industrial buildings that are of a size that could be accommodated on the site, including across a wide range of activities that are permitted in the operative Light Industry zone.</li> </ul> | <p>The subject site is unique in that it is highly compromised as a development opportunity for industrial activity, so while it may be zoned industrial the land from a practical perspective is unlikely to be developed for industrial development. It is in effect a 'clayton's zone', i.e., land zoned for an activity that practically cannot be developed on the site. The reasons for this are that the thin elongated shape of the site (i.e., residual land left over from the development of Highbrook Drive) and the Council requirement for esplanade reserves along the site's waters edge. These constraints in effect reduce the developable area of the site from around 4ha to only circa 2ha.</p> <p>However, this approx. 2ha is not a uniform development area, but a long thin piece of land bounded by Highbrook Drive on the south side of the site and the esplanade reserve running the length of its north boundary. For industrial development to occur there would need to be an industrial road capable of carrying a high number of truck movements accessed off Highbrook Drive and a turning circle at the end of the internal industrial grade road suitable for trucks. This reduces the developable area even further, to the point any at grade industrial development is highly unlikely to be feasible, i.e., the small amount of site left that could accommodate industrial GFA is so small it is unfeasible. To make any development feasible it would require the use of the vertical space above ground level (industrial</p> |

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|   |  | <p>development has very limited opportunities for multi-storey development), meaning other land uses are required to make land feasible to develop.</p> <p>It is clear there are a high number of practical limitations making industrial development of the site impractical and unfeasible. The counterfactual is likely the land remaining vacant and not utilized at all. The proposal is about trying to find a feasible use for the land so it can be developed. The proposal is not considered to not represent an alternative to industrial development. In that regard in my opinion the proposal does not represent a loss of vacant industrial zone land, but the use of a site that is likely to remain undeveloped if not rezoned for alternate uses.</p>   |
| <p>3. Economic efficiency of industrial land within this location</p> | <p>Please provide a discussion of the economic efficiency of this site being used for industrial activities, as compared to those activities being accommodated instead on alternative locations elsewhere in Auckland. This discussion should also refer to the likely growth in residential capacity in established parts of Auckland as a result of Plan Change 78 Intensification.</p> <ul style="list-style-type: none"> <li>○ The PEL report and the Planning Report both note the site's good vehicle accessibility, however the PEL report provides no discussion of the benefits of the site accommodating industrial activity relative to other potential locations. Many</li> </ul> | <p>This is partly addressed above with the efficiency relative to an alternative location not being relevant in this instance given the site is unfeasible to develop for industrial activity, and likely to remain so well into the foreseeable future. The primary way to achieve feasible development of the site is to enable vertical development due to the limited at grade developable area available once all the limitations are accounted for. As such the proposal represents one of the most economically efficient uses of the land when considering alternate land uses.</p> <p>It is also worth noting that there is 20ha of industrial land being readied for industrial development directly across Highbrook Drive from the subject site. This puts this site's developable area (i.e., less esplanade reserve and less roading requirements) into perspective.</p> |

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|  | <p>of the other places where industrial activities might locate if they were unable to establish on the site are located around the Auckland urban periphery, such as in the structure plan areas identified in the PEL report.</p> <ul style="list-style-type: none"> <li>o Plan Change 78 will significantly increase residential capacity, and therefore probably also population growth, in areas closer to central Auckland, requiring for that population employment opportunities that are easy to access.</li> </ul> | <p>The use of the site for vertical residential development and higher density dwellings represents increased efficiency (both land use efficiency and market efficiency) given the likely counterfactual is the site remains vacant as discussed above and its proximate to the Highbrook Business Park and adjacent to the 20ha industrial employment hub across Highbrook Drive in the future. The site is also proximate to the motorway making the site more accessible and efficient than many other sites in the Unitary Plan on the urban fringes of Auckland that are proposed to be rezoned for increased residential density through PC78.</p> <p>It is important to remember, despite the site's high-level access to the motorway and strong locational benefits the site has remained undeveloped and vacant despite other area of Highbrook Business Park being developed over the last 15 years. This provides some real-world facts that the site is not attractive for industrial development and / or is unfeasible to development for industrial activity as discussed above, indicating the site is likely to remain vacant while it maintains its industrial zone.</p> |
| <p>4. Employment yield of the site</p> | <p>Please provide an assessment of the potential employment yield of the plan change site under the operative Business - Light Industry zone and the proposed Residential – Terraced Housing and Apartment Building zone. This should discuss the relative merits of providing the assessed quantum of employment on the site compared</p>   | <p>Based on the commentary above, in my view the industrial employment opportunity on the site is nil as its unlikely to be developed for industrial activity, so its potential employment yield under its zone is considered zero.</p> <p>Under the proposal there is limited potential for employment on the site due to its residential focus. However, employment opportunity is not lost from this area with 20ha of industrial land being developed directly across Highbrook Drive. This means the proposed residential</p>   |

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|  | <p>to some alternative location, such as one of the structure plan areas identified in the PEL assessment.</p> <ul style="list-style-type: none"> <li>○ The number of workers able to be accommodated on the site is a relevant economic impact to consider when evaluating the merits of the proposal.</li> </ul>  | <p>activity would complement the industrial development and provides the opportunity for living very close to place of employment.</p>  |
| <p>5. Industrial sector definition</p> | <p>Please provide detail on the method used to define the industrial ratios adopted in Appendix 1 of the PEL report, and explain the rationale for the inclusion and exclusion of component activities.</p> <ul style="list-style-type: none"> <li>○ The ratios in Appendix 1 are a key input into the PEL report's demand assessment, but they are only described as being based on empirical data. It would assist interpretation of the assessment to understand to what extent the ratios are based on expert opinion.</li> <li>○ As explained in the economics report, "industrial activities" are those that drive demand for industrial land, but the ratios do not appear to include some activities that are permitted in the Business - Light Industry zone (such as food and beverages and trade suppliers). Nor does it include all of</li> </ul> | <p>In terms of employment to land requirement ratios, Property Economics has an extensive base of empirical data by territorial authority based on areas they have assessed reconciling land use ratios by employment type (zoned industrial land provisions against employment types in that provision). This data spans nearly 20 years illustrating factual trends in employment to land ratio changes by sector. The utilisation of this real-world data also includes the propensity and ratios for sectors with more significant components of 'work from home' and other zoned land exclusions. Property Economics routinely test the outcomes of this demand analysis to ensure the outputs are in line with 'on-the -ground' utilisation by industrial business activities.</p> <p>In terms of food &amp; beverages they form an ancillary component of industrial land provision in most district plans around the country and a proportion is applied to employment in this sector to generate ratios based on the assessed on the ground provision across a large number of assessed areas.</p> |

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|  | <p>other activities in which only part of their employment occupies industrial land (such as construction).</p>   | <p>Trade suppliers are treated as activities that typically utilise / consume industrial land and therefore form part of the industrial activity demand.</p>   |
| <p>6. Viability of retail and office space</p> | <p>Please assess the demand for, and viability and appropriateness of the proposed office, café and retail space on the Site.</p> <ul style="list-style-type: none"> <li>○ The PEL report has not assessed how much retail, café or office space would be sustained on the plan change site by the site's resident households, and to what extent those activities would require an inflow of customers or workers from other places in order to be viable. While the limited pedestrian accessibility from the site to the nearest neighbourhood centre indicates it may be efficient to provide for some convenience retail supply on the plan change site, the application provides no assessment of how much would be appropriate.</li> </ul> | <p>As part of the proposal there is a small commercial area to meet the basic requirements of the development's resident population and visitors. The economic reality is this provision will be very small scale and likely contain only a few tenancies. Market demand will dictate what commercial provision, if any, is sustainable ultimately, but it is not of a scale that would cause any significant adverse impacts on other commercial activity in the area. Providing small convenience store types within the development is efficient as it would likely reduce trip requirements to the nearest convenience centre for frequently required needs.</p> |
| <p>7. Demand for residential land</p>          | <p>Please provide some assessment of the demand for additional residential supply on the plan change site, in light of Auckland Council's Plan Change 78 Intensification.</p> <ul style="list-style-type: none"> <li>○ Plan Change 78 responds to the National Policy Statement on Urban Development 2020 and requirements of the</li> </ul>  | <p>As identified in the commentary above, this site is considered more efficient and better located than some of the more distant urban areas being promoted for residential intensification in Council's PC78. The development would in effect assist Council meet its NPS UD 2020 obligations around residential sufficiency more efficiently than the alternative.</p>  |

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|                          | <p>Resource Management Act by enabling more development in many parts of Auckland, including by incorporating Medium Density Residential Standards that enable three storey housing in large areas across urban Auckland.</p> <ul style="list-style-type: none"> <li>○ Plan Change 78 enables significantly greater residential development capacity than the operative Unitary Plan, and will reduce the need for new residential zones to be created in Auckland in order to meet demand. No assessment of that demand or the implications of Plan Change 78 for demand for dwellings on the plan change site is provided in the application.</li> </ul> | <p>The site is close to the motorway, close to public transport and close to places of employment.</p> <p>The RMA does not require a 'need' assessment. It is based on effects not need. However, there has been plenty of commentary over recent years in Auckland around the need to provide more homes at price points more affordable to the market. This development would do this in an efficient location.</p> |
| <p>8. Dwelling yield</p> | <p>Please provide an assessment of the potential dwelling yield of the site if zoned Residential – Terraced Housing and Apartment Building zone, and provide an opinion about the economic effects of the difference in that potential yield from the proposed maximum yield.</p> <ul style="list-style-type: none"> <li>○ The application proposes to limit the number of dwellings on the site to 200 to manage traffic effects, but that number of dwellings appears to be somewhat less than the capacity of the site under a Residential – Terraced Housing and Apartment Building zoning. Limiting the number of dwellings</li> </ul>                | <p>In terms of THAB residential activity, my understanding there is a 200-dwelling limit due to traffic constraints. Any more than 200 dwellings is a Discretionary activity.</p>   |



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|   | <p>on the site due to traffic concerns therefore represents a constraint, and an opportunity cost in relation to unconstrained development. That constraint may be relevant to assessing the most appropriate zoning of the site.</p>  |   |
| <p>9. Negative externalities of residential development</p> | <p>Please provide a discussion of the negative externalities associated with providing residential options on this site, as compared to alternatives in the rest of Auckland.</p> <ul style="list-style-type: none"> <li>○ The PEL report provides no discussion of the costs or benefits of this site in terms of being used for residential activity. The site is adjacent to State Highway 1, Highbrook Drive and land zoned Business - Light Industry zone, is not close to commercial or other services, and may offer constrained options for active modes of transportation. These factors may negatively impact residents that would live in this location, particularly relative to other locations where high-density residential activities are enabled.</li> </ul> | <p>Below provides some high-level economic costs and benefits of the proposed development on the site:</p> <p><b>Benefits:</b></p> <ul style="list-style-type: none"> <li>• In close proximity to the large employment hub of Highbrook.</li> <li>• Adjacent to the new 20ha employment hub being developed across Highbrook Drive in the near future.</li> <li>• Increases Auckland 's housing choice and typologies at a lower price point than many dwellings in the market. The residential density proposed creates more affordable / serviceable properties, with lower land costs per dwelling.</li> <li>• The proposal has the ability to supply the market with an additional 200 dwellings. This increases the overall competitiveness and efficiency due to the intensity of the proposed development.</li> <li>• The proposal would lower marginal infrastructure costs and has the potential to bring with it economies of scale.</li> </ul> |

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|   |  | <ul style="list-style-type: none"> <li>The proposal represents an efficient use of land that would otherwise likely remain vacant.</li> </ul> <p><b>Costs:</b></p> <p>Loss of industrial zone land, albeit this would be offset by the reality that its unlikely to be feasibly developed for industrial activity mitigating this loss almost in entirety</p>   |
| <p><b><u>Geotechnical matters</u></b></p> |  |   |
| <p>1. Liquefaction</p>                    | <p>Please comment on the liquefaction potential of these soils and the hazard that they present to future residential development here. Please outline any potential mitigation measures that would be considered (should conditions indicate they are required).</p> <ul style="list-style-type: none"> <li>The geotechnical report indicates that liquefaction is considered to be a low risk to the site. We have reviewed the borehole records provided and note that in several of them, loose sandy soils (e.g. potentially liquefiable) are present within the upper 5m of the soil profile, some from almost at the surface. This is potentially indicating a higher liquefaction risk than indicated in the report text.</li> </ul> | <p>We note that only relevant machine boreholes were appended to the geotechnical report, most of which are outside of the site boundaries. Test pit logs and CPT outputs are also available on the NZGD, although unfortunately the CPT outputs do not include the raw data. The available test pit data is set out in <b>Attachment 1</b>.</p> <p>It is correct that there are thin bands of loose to dense sands identified within the available data and anticipated within the profile, however they're likely to be reasonably localised/lenticular and overlain by a sufficiently thick non-liquefiable crust to prevent surface manifestation of liquefaction. The only log sheet indicating sand from near surface is BH_65553, located beyond the southern extents of the site boundary. The attached test pits logs from within the site did not encounter any sand, although we note the test pits only extended to depths of between 1.5m and 3.0m below ground level.</p> |



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|                         |   | <p>As discussed within the Geotechnical Report, the anticipated ground conditions comprise predominantly stiff to hard cohesive material for the majority of the soil profile with very low susceptibility to classic liquefaction. Thin sand lenses may be present which are more susceptible to liquefaction, however considering the relatively low peak ground accelerations associated with the design earthquake events and the lack of any significant vertical continuity, liquefaction risk is expected to be able to mitigated with conventional approaches.</p> <p>Site specific investigations and liquefaction analyses are recommended to be undertaken at land development stage to support future resource consent applications. If warranted based on the findings from the investigations and analyses, conventional mitigation options such as those proposed within the Canterbury Guidance documents (e.g. geogrid reinforced rafts) are anticipated to be sufficient to address the relatively modest liquefaction hazard expected. Should the investigation and analyses identify more significant liquefaction risk, other options such as ground improvement (stone columns, rammed aggregate piers, excavation and replacement, etc) could be considered. In that scenario, and assuming laterally continuous liquefiable layers are identified, more detailed assessments of lateral spreading would be required, and if necessary, additional mitigation measures such as palisade walls or barrier walls or stone columns or rammed aggregate piers could be considered. These are all matters that are able to be addressed at the detailed resource consent preparation stage.</p> |
| 2. Lateral spread       | Please provide comment on the lateral spread potential and hazard to future site development, plus potential mitigation measures that | Refer response to Item 1 above.   |



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|                                    | <p>would be considered for residential development (should conditions indicate they are required).</p> <ul style="list-style-type: none"> <li>○ This request is made in light of the above query and the near surface sands.</li> </ul>  |  |
| <p><b><u>Noise Matters</u></b></p> |  |  |
| <p>1. Acoustic assessment</p>      | <p>Please provide a site-specific assessment of the traffic noise levels at the application site and their effects on proposed residential activity. This should be prepared by a person experienced in acoustics.</p> <p>This should include analysis of what mitigation measures are available to achieve the external and internal noise levels recommended in the NZS 6806: 2010 and which best practicable option(s) that could be adopted.</p> <ul style="list-style-type: none"> <li>○ Whilst the internal noise levels proposed in the precinct rule are acceptable with regards to internal noise, the external noise levels recommended in the NZS6806 and in the Waka Kotahi report have not been considered and adopted in the application. The suitable mitigation options that are required to reduce the traffic noise to the guideline levels specific to</li> </ul> | <p>The applicant has consulted with Waka Kotahi and Auckland Transport in relation to the traffic noise levels received within the PC area. <b>Attachment 5</b> illustrates the road noise contour areas modelled and provided by Waka Kotahi in proximity to the PC area.</p> <p>The matter of noise attenuation to mitigate the effects of noise from State Highways (in particular State Highway 22) was extensively canvassed in PC51 (and by PC48-50 and 61) to the AUP(OP). The key matter for consideration by the Independent Hearings Panel was as to whether there needs to be precinct provisions to mitigate road noise in the THAB zone within land zoned Future Urban. The Hearings Panel decided it appropriate to include acoustic attenuation controls on habitable spaces within the THAB zone adjacent to State Highway 22 to address adverse health and amenity effects. However, the <u>Hearings Panel decided <b>not</b> to include acoustic attenuation in relation to outdoor areas.</u></p> |

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|                         | <p>this site/location also have not been discussed in the application.</p> | <p>Waka Kotahi subsequently appealed the Decision on PC51. The appeal was to refine the provisions relating to internal noise environment. Waka Kotahi <b>did not appeal the Hearings Panel's Decision not to include standards pertaining to external noise environment.</b></p> <p>Based on the discussions with Waka Kotahi, and in light of the above-mentioned Decision, the Highbrook Precinct proposes traffic noise attenuation within the THAB Zone in line with the Hearings Panel's Decision, with slight modification as requested by Waka Kotahi.</p> <p>In light of the above it is concluded that:</p> <ul style="list-style-type: none"> <li>• The road noise contour areas modelled and provided by Waka Kotahi in proximity to the PC area is sufficient and appropriate to understand the road traffic noise in the proximity of the PC area.</li> <li>• The road noise attenuation provisions proposed in the Highbrook Precinct align with the latest policy direction of Auckland Council's Independent Hearings Panel, as outlined in the PC51 Decision.</li> <li>• The road noise attenuation provisions proposed in the Highbrook Precinct are informed by discussions with Waka Kotahi.</li> <li>• The request for information pertaining to measures to mitigate external noise levels is not considered appropriate in light of the above discussion.</li> <li>• It is considered that the information requested does not align with noise management approach as set out in the AUP(OP) as it relates to the mitigation of external traffic</li> </ul> |

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|   |   | <p>noise environments in urban Auckland. Should the Auckland Council wish to amend its strategic approach in relation to this matter in the AUP(OP), then it is more appropriate that the Council lodge a submission on this matter at the PC notification stage.</p>   |
| <p><b><u>Landscape and Design Matters</u></b></p> |   |   |
| <p>1. Landscape visual assessment</p>             | <p>The applicant is asked to demonstrate how the high-level outcomes relied upon within the Landscape and Visual Effects Report (“LVA”), including providing for an esplanade reserve with comprehensive planting are achieved or could be adopted into the precinct plan.</p> <ul style="list-style-type: none"> <li>○ The LVA refers to the site being “comprehensively <i>planted with trees and riparian planting along the esplanade reserve to enhance its overall amenity and assist in its integration with the surrounding urban and industrial area over time.</i>”</li> </ul> <p>However, no esplanade reserve is shown/provided or standards included within the precinct plan to ensure to achieve the outcome referred to in the LVA.</p> | <p>Answers to questions 1 and 2 on landscape visual assessment matters are collectively are set out below.</p> <p>The Planning Report confirms that the PC Request does not seek to incorporate the Concept Plan into the Highbrook Precinct provisions, as the PC relies on the implementation of the THAB Zone and all other provisions within the AUP(OP) to implement the development vision for the PC area. The purpose of the Concept Plan is to identify the development potential of the PC area to inform the ITA; and water, wastewater and stormwater infrastructure servicing.</p> |

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| <p>2. Landscape visual assessment – THAB zone</p> | <p>Please review the LVA in the context of only those mechanisms available i.e. the proposed rezoning objective and policies of the Terrace Housing and Apartment Building (“THAB”) zone and the draft precinct plan. Alternatively recommend how the stated outcomes could be incorporated into the proposed precinct plan.</p> <ul style="list-style-type: none"> <li>○ The LVA refers to and appears to rely on the concept plan to support the change in zoning. For example, to ensure a “high level of visual amenity, comprehensively planted with trees and riparian planting along the Tamaki River corridor to enhance its overall amenity and assist in its integration with the surrounding industrial and coastal area over time”. In addition, the LVA refers to positive outcomes such as providing an open space network. These outcomes, particularly the latter, are only proposed within the concept plan which does not make up part of the plan change.</li> </ul> | <p>In both Question 1 and 2, it appears that Council’s principal concern is that while the LVA refers to the positive outcome of planting of the esplanade reserve area, the Precinct Plan does not include specific provisions pertaining to the: vesting of the esplanade reserve area; the planting of the esplanade reserve area; and the creation of an open space network within the esplanade reserve area. In regards to these concerns it is noted that:</p> <ul style="list-style-type: none"> <li>● Technical Report 6: Ecological Assessment Memo confirms that area of native plantings near the coast (within the future esplanade reserve area) are now well established, and are comprised of native species.</li> <li>● Chapter E38 Subdivision-Urban has a comprehensive suite of objectives and policies on esplanade reserves, including: <ul style="list-style-type: none"> <li>○ Objective E38.2(3) – seeks to ensure that land is vested to provide for esplanade reserves.</li> <li>○ Policy E38.3(24) – requires esplanade reserve or strips when subdividing land adjoining the coast or other qualifying water-bodies.</li> <li>○ Policy E38.3(25) – seeks to avoid reducing the width of esplanade reserve or strip, except in identified circumstances.</li> <li>○ Policy E38.3(26) – requires esplanade reserves rather than esplanade strips unless identified circumstances apply.</li> <li>○ Rule E38.4.1(A8) – subdivision establishing an esplanade reserve is a Restricted Discretionary Activity.</li> </ul> </li> </ul> |

| Category of information | Council Request | Applicant's Response   |
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|                         |                 | <ul style="list-style-type: none"> <li>○ Rule E38.4.1(A9) – subdivision establishing an esplanade strip is a Restricted Discretionary Activity.</li> <li>○ Rule E38.4.1(A10) – any reduction or waiver of esplanade reserves or strips is a Discretionary Activity.</li> <li>● Section 230 of the Resource Management Act requires that any subdivision involving creation of sites less than 4 ha and the proposed site adjoins the line of MHW or bank of a river or stream 3 m or more in width, must provide a minimum 20 m wide esplanade reserve.</li> <li>● One of the primary functions of esplanade reserve is to provide public access to and along water bodies.</li> <li>● Rule H6.6.9 of the THAB sets out a 10 m minimum coastal protection yard.</li> </ul> <p>It is considered that:</p> <ul style="list-style-type: none"> <li>● Alignment with the requirements of the RMA, the AUP(OP) has an extensive set of provisions which seek to ensure that esplanade reserve areas are provided at the land subdivision phase.</li> <li>● The THAB Zone provisions also seek to ensure that at land development stage, the coastal protection yard areas are retained.</li> <li>● The THAB Zone has an extensive list of matter of discretion for new dwellings to ensure good design outcomes, including the provision of landscaped areas.</li> <li>● Duplication of above provisions in the Highbrook Precinct is not warranted.</li> </ul> |



| Category of information                                      | Council Request  | Applicant's Response   |
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|  |  | <ul style="list-style-type: none"> <li>The LVA has appropriately relied on the above provisions to ensure the delivery of high-level outcomes envisaged by the above provisions.</li> </ul>  |
| <p>3. Urban Design Report – outcomes under the THAB zone</p> | <p>Please outline how the proposed adoption of THAB and the draft precinct provisions and standards meet the objectives, policies and design outcomes referenced within the Urban Design Report (“UD Report”).</p> <ul style="list-style-type: none"> <li>A large part of the support outlined in the UD Report is a result of certain design outcomes that are not part of the plan change. These are also referenced within the Planning Report provided (Paragraph 4.9). For example, the UD report notes “intensity of development at the widest part of the PC area, with a diminishing scale and intensity to the north.” The Precinct Plan provided does not address how these landscape and urban design outcomes will be achieved at later development stages.</li> <li>The adoption of the current THAB standards and objectives and policies also do not align with achieving the outcomes sought in the Urban Design and LVA Reports.</li> </ul> | <p>The Planning Report confirms that the PC Request does not seek to incorporate the Concept Plan into the Highbrook Precinct provisions, as the PC relies on the implementation of the THAB Zone and all other provisions within the AUP(OP) to implement the development vision for the PC area. This approach aligns with the application of the THAB zone in most of Auckland (i.e. generally without a need for an associated precinct plan).</p> <p>The first step in any development design is undertaking a site analysis to understand the key attributes of the site (including its key strengths and weaknesses). The Urban Design Statement has accurately captured this information, and explained how future development can occur on the site considering the key attributes of the site, aligned with the outcomes envisaged by the THAB zone.</p> <p>Noting that the THAB zone provisions are generally implemented across Auckland, without a corresponding precinct plan, it is concerning that the Council’s specialist view is that “the adaptation of the current THAB standards and objectives and policies also do not align with achieving the outcomes sought in the Urban Design and LVA Reports”. We disagree with this statement.</p> <p>The THAB Zone provisions in the AUP(OP) are generic for the reason that these provisions apply to a variety of sites, each with its own set of attributes, and bespoke solutions are</p> |

| Category of information | Council Request | Applicant's Response   |
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|                         |                 | <p>required to achieve positive built form outcomes that take advantage of the positive attributes, while giving careful thought to the less favorable attributes of the site.</p> <p>The standards set out in the THAB zone are “minimum” standards only. However, under Rule H6.8.1, the Council has limited its discretion to a wide range of matters to ensure that the future development is appropriately designed having regard to the site context, including:</p> <ul style="list-style-type: none"> <li>● Building intensity, scale, location, form and appearance.</li> <li>● Location and design of parking and access</li> <li>● Maximum imperious areas</li> <li>● Building coverage</li> <li>● Outlook space</li> <li>● Outdoor living spaces</li> <li>● Minimum dwelling size</li> <li>● Policies H6.3(1) to (6).</li> </ul> <p>Overall, it is considered that:</p> <ul style="list-style-type: none"> <li>● the design outcomes as set out in the Urban Design Statement are achievable using the THAB zone provisions.</li> <li>● Under Rule H6.8.1, for new dwellings, Council has listed a wide range of assessment criteria (including Policies H6.3(1) to (6)) to ensure that any future resource consent</li> </ul> |

| Category of information                                      | Council Request   | Applicant's Response  |
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|  |   | <p>applications can be thoroughly assessed to achieve the outcomes articulated in the Urban Design Statement.</p> <ul style="list-style-type: none"> <li>The Urban Design Statement explains how future development can occur on the site considering the key attributes of the site, aligned with the outcomes envisaged by the THAB zone. The Urban Design Statement confirms that aligned with Policy H6.3(2) of the AUP(OP), the proposed development of the PC area will be able to achieve high-density-built character, in terms of the height, bulk, form, landscaping and appearance of the future development in the PC area, having regard to the positive attributes of the PC area.</li> </ul>   |
| <p>4. Urban Design Report – outcomes under the THAB zone</p> | <p>Please outline how potential acoustic mitigation e.g. potential for large blank walls (on buildings and/or free-standing acoustic walls) to manage noise could be designed in a manner that achieves a quality design outcome in the THAB zone.</p> <ul style="list-style-type: none"> <li>This is not managed in the precinct plan, but relies on the objectives, policies and standards of the AUP THAB zoning.</li> </ul> | <p>The PC area is located adjoining State Highway 1 and Highbrook Drive. At the detailed site design stage, consideration would need to be given as to how the development interfaces with State Highway 1. Noting that the site has extensive views to the Tāmaki River environments (which provides the northern aspect to the site), access to and enjoyment of the Tāmaki River environments will be a key element of the design approach for the PC area. This would mean that future development would capitalize on views and focal points to the River. As such, it is likely that buildings would face the River, and have their “backs” to State Highway 1. With respect to achieving quality design outcomes:</p> <ul style="list-style-type: none"> <li>This would have the benefit of “looking away” from both the National Grid infrastructure and State Highway 1. This would focus the views to the high level of amenity provided by the Tāmaki River environments.</li> </ul> |

| Category of information                      | Council Request  | Applicant's Response  |
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|  |  | <ul style="list-style-type: none"> <li>The building facades facing the State Highway 1 can be designed to achieve an appropriate level of amenity, noting the functional nature of State Highway 1 and fleeting views from State Highway 1.</li> <li>Under Rule H6.8.1, for new dwellings in the THAB zone, the matters of discretion include “form and appearance”. This will provide Council the ability to assess the design elements of the building facades facing State Highway 1 at the resource consent stage.</li> </ul> |
| <p>5. Urban Design Report – connectivity</p> | <p>Please demonstrate how the site could achieve connectivity through enabling walking, cycling and public transport and how this can be achieved by the Highbrook Precinct Transportation Plan, or other mechanisms that could be incorporated in the precinct plan.</p> <p>Note: The Otara – Papatoetoe Draft Greenways Plan includes aspirational long-term pedestrian connectivity for the wider area.</p> <ul style="list-style-type: none"> <li>The UD Report refers to the site as being able to provide for a high degree of connectivity and will be able to accommodate the zone change, however the site is somewhat of an island and has restricted vehicle access.</li> </ul> | <p>Refer to the Integrated Transport Assessment Report (Technical Report 2) and the response provided on Transportation Related matters below.</p>  |
| <p><b>Stormwater Matters</b></p>             |  |   |

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| <p>1. Stormwater Assets</p> | <p>Auckland Council's GeoMaps indicates that there is an Auckland Transport sand filter present within the site boundaries. However, it has not been identified in the proposed Stormwater Management Plan ("SMP"). In addition, the existing stormwater pond referenced in the SMP does not appear on GeoMaps as being an Auckland Council asset and its purpose is not clear. Please identify and confirm the ownership of all existing stormwater assets within the site. Please show on plans the catchments that the sand filter and pond treat. Please also confirm how the function of the existing assets will be maintained in the post development scenario and/or how their decommissioning will impact the implementation of the SMP.</p> <ul style="list-style-type: none"> <li>○ The SMP in the plan change process acts as an assessment of stormwater effects and is also part of the Auckland Council Healthy Water's Regionwide Stormwater NDC authorisation process. An approved SMP is required for the authorisation of stormwater diversion/discharge under the NDC.</li> <li>○ This information is required to enable a full assessment of stormwater effects and to meet the requirements of the</li> </ul> | <p>We have completed a review of the historical aerial photos on GeoMaps and undertook a site inspection to locate this sand filter. There is no visual evidence of this sand filter ever being built in the aerial photographs. Our site inspection did not reveal any sand filters on site. We can only conclude that that is incorrect information in the Auckland Council's GeoMaps.</p> |

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|                              | <p>Auckland Council Healthy Water's Regionwide Stormwater NDC authorisation process.</p>  |  |
| <p>2. SMP Implementation</p> | <p>The SMP identifies a number of options to provide treatment of all impervious areas. However, it is unclear how the options will be incorporated into the proposed stormwater management. It is also noted that no area is shown on the Development Concept Plan (Appendix B) for any of the stormwater treatment devices proposed in the SMP. Please confirm how the options will be incorporated into the proposed stormwater management. Please also show on plan the catchment sizes and proposed treatment devices.</p> | <p>The objective of the SMP (as lodged) is to support the PC Request. It is not intended for adoption into the NDC.</p> <p>At this stage of the PC process, without a detailed site development plan, it is considered that the identification of catchment sizes and proposed treatment devices will be of little value, as these may change in the future, depending on the form of development on the site.</p> <p>This SMP will be revised with the detailed design of the stormwater management system at the land development stage, when a resource consent application is lodged with the Council. At that stage, the resource consent application package, including the SMP will outline how these options are incorporated in the design of the development.</p> <p>However, based on the SMP that has been provided, Council should have a high level of comfort that its current strategic stormwater management framework provides sufficient guidance in terms of the future stormwater management approach, and will need to accord with the following:</p> <ul style="list-style-type: none"> <li>• Applies the most up to date stormwater provisions in respect of best practice.</li> </ul> |

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|                         |   | <ul style="list-style-type: none"> <li>• Be informed by the specific constraints and opportunities of the local context.</li> <li>• Accord with the requirements of the relevant catchment management plan.</li> <li>• Meet the conditions of the NDC.</li> <li>• Demonstrate the implementation of the objectives, policies and rules framework set out in the AUP(OP) as it relates to stormwater management and freshwater systems.</li> </ul> |
| 3. SMP Implementation   | <ul style="list-style-type: none"> <li>• Please provide more details and assessment of the proposed storm filter devices in achieving the 75% TSS required under TP10, including type of system and potential size/area.</li> </ul>   | Refer to <b>Attachment 6</b> , which contains the updated Stormwater Management Plan (Technical Report 9).  |
| 4. SMP Implementation   | <ul style="list-style-type: none"> <li>• Please provide details on how the proposed requirements outlined in the SMP are intended to be implemented. In particular, please confirm and clarify at what stage of the development the proposed stormwater ponds and wetland are intended to be constructed. If staging of development is proposed, please provide details on how the SMP will be implemented corresponding to each stage of development.</li> </ul> | Refer to response to Question 2 above.  |
| 5. SMP Implementation   | <ul style="list-style-type: none"> <li>• Please confirm if any precinct provisions (including objectives, policies and rules) are proposed to ensure the implementation of the proposed SMP. It is unclear on how the proposed plan change as submitted will require and provide for the implementation of</li> </ul>   | <p>Refer to response to Question 2 above.</p> <p>The PC Request seeks a zoning change only. It does not seek to amend the objectives, policies or rules framework of the AUP(OP) as it relates to stormwater management.</p>  |

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|                         | <p>the proposed SMP, and hence it is unclear on how the objectives and outcomes outlined in Schedule 2 of the Regionwide Stormwater Network Discharge Consent (NDC) will be achieved.</p>   |   |
| 6. SMP Implementation   | <ul style="list-style-type: none"> <li>It is stated in the SMP that the existing stormwater pond onsite which treats runoff from a section of Highbrook Drive will be decommissioned. The treatment of runoff from this section of Highbrook Drive as well as the runoff from the proposed development area is proposed to be provided in the new device(s). Please provide details on how the catchment(s) to the decommissioned device(s) will be incorporated into the stormwater management. Please also provide details on how and when the transition will happen with a residential development, including if staged.</li> </ul> | <p>Refer to response to Question 2 above.</p> <p>In principle this can be achieved by extending the inlet pipes to the new treatment device(s) to be constructed. Further details will be provided at the Resource Consent stage when detailed design will be available.</p>                                |
| 7. Outlet               | <ul style="list-style-type: none"> <li>It is stated in the SMP that stormwater flows from the site will discharge directly into Tāmaki Estuary after treatment. Please provide information on the design approach of any outfall to minimise the risk of erosion and other potential adverse effects, particularly as the adjoining land will form part of an esplanade reserve on subdivision.</li> </ul>  | <p>Refer to response to Question 2 above.</p> <p>This is a subject of detailed design that will be developed at a later stage. Information about how the outfall will mitigate the risk of erosion and other potential adverse effects will be supplied at the time of applying for a Resource Consent.</p> |



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|                         |  | <p>The future resource consent application will need to demonstrate the implementation of the objectives, policies and rules framework set out in the AUP(OP) as it relates to stormwater management and freshwater systems.</p>   |
| <p>8. Water Quality</p> | <ul style="list-style-type: none"> <li>Please provide an assessment of how the proposed SMP addresses stormwater quality in accordance with the policies under Section E1.3 of the AUP.</li> </ul> | <p>The plan change request seeks a zoning change only, it does not seek to amend the objectives, policies or rules framework of the AUP (OP) as it relates to stormwater management.</p> <p>The objectives and policies framework set out in Chapter E1 (Water Quality and Integrated Management) of the AUP(OP) are Auckland-wide provisions that apply to all zones. This objectives and policies framework do not generally specify a varied approach to stormwater management based on the different type of zoning, instead, a universal approach is applied to all the zones.</p> <p>At this stage of the Plan Change process, without a detailed site development plan, a stormwater management strategy or the plan change area will contain little information of value. However, council should have a high level of comfort that is that its current strategic stormwater management framework provides sufficient guidance in terms of the future stormwater management strategy for the plan change area.</p> <p>Based on the Council's current strategic framework, the future stormwater management approach within the Plan Change Area will implement an integrated stormwater management approach, and will need to accord to the following:</p> |

| Category of information    | Council Request   | Applicant's Response  |
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|                            |   | <ul style="list-style-type: none"> <li>• Apply the most up to date stormwater provisions in respect of best practice;</li> <li>• Be informed by the specific constraints of the local context;</li> <li>• Meet the conditions of the Network Discharge Consent; and</li> <li>• Demonstrate the implementation of the objectives, policies and rules framework set out in the contaminants, effects on hydrology and fresh water systems.</li> </ul> |
| 9. Stormwater runoff       | <ul style="list-style-type: none"> <li>• Please provide details on how stormwater runoff is proposed to be managed and treated from any communal waste storage areas in apartments and multi-unit developments.</li> </ul>  | <p>Refer to response to Question 2 above.</p> <p>The information requested relates to detailed design matters, which is more appropriately addressed at a resource consent stage, and not at a plan change stage.</p>   |
| 10. Flood Risk and Hazards | <ul style="list-style-type: none"> <li>• Please confirm and clarify if the proposed stormwater ponds and wetland will be located above the 10-year floodplains.</li> </ul>  | <p>Refer to response to Question 2 above.</p> <p>At this PC stage, the preferred stormwater treatment device has not selected yet. The appropriate stormwater treatment device will be selected at the land development stage, informed by the holistic stormwater solution for the PC area. Notwithstanding that, the preference is to locate them above the 10-year floodplains</p>   |
| 11. Coastal inundation     | <ul style="list-style-type: none"> <li>• The proposed stormwater ponds and wetland will be located within the coastal inundation 1% AEP overlay. Please confirm the design approach of these devices to minimise the risk of contaminant resuspension and other potential adverse effects.</li> </ul> | <p>Refer to response to Question 2 above.</p> <p>The locations of the treatment devices shown in this SMP are indicative. The exact location of the treatment devices (ponds/wetlands) will be finalised once the development plans are available. The detailed design to be submitted in support of the future resource consent</p>  |

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|  |   | <p>application will contain design approach to minimise sediment resuspension and other potential adverse effects.</p>   |
| <p><b>Transportation Matters</b></p>   |   |  |
| <p>1. Accessibility of new THAB Zone by Non-motorised modes of transport</p> | <ul style="list-style-type: none"> <li>• Please provide further assessment of walkability and general accessibility by non-motorised users of the subject site from key services and activities, including employment, education and retail facilities, including expected travel times. An isochrone style plan would be a useful tool and basis for such an assessment.               <ul style="list-style-type: none"> <li>○ There is insufficient evidence to demonstrate that accessibility of key services and land use activities from the subject site adequately fulfils the policy objectives of the THAB zone.</li> <li>○ The Unitary Plan THAB Zone policy states that: The zone is predominantly located around metropolitan, town and local centres and the public transport network to support the highest levels of intensification...</li> <li>○ The geographical context and location of the subject site are considered to present a disadvantage in its ability to fulfil</li> </ul> </li> </ul> | <p>Isochrone (travel time contour) plans for walking and cycling accessibility are provided as <b>Attachments 2 and 3</b> to this response. These plans indicate the catchment of services and activities that could be accessed by residents of the subject site within a 5 to 30-minute timeframe.</p> <p>Key services and activities that typically would be of benefit or necessity to subject site residents include educational facilities, employment opportunities, retail outlets, healthcare services, and recreational/ entertainment facilities.</p> <p>While the walking isochrone (<b>Attachment 2</b>) indicates that there are few services / activities within a 15-minute walking timeframe, the cycling isochrone (<b>Attachment 3</b>) indicates that it is practical modal option for accessing education, employment and retail activities.</p> <p>Similarly, there are a variety of recreational opportunities within a 10-15-minute cycle journey of the site.</p> |

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|                         | <p>this objective, insofar as it does not immediately adjoin any of the closest town centres or local centres, with main roads and other features creating barriers to transport connectivity. A comparison with other nearby areas zoned as THAB indicates that such zoning is more common within residential areas immediately adjoining local centres such as Otara and Otahuhu.</p> <ul style="list-style-type: none"> <li>○ The THAB Zone policy further refers to the need to:           <ul style="list-style-type: none"> <li>- measure that residents have convenient access to services, employment, education facilities, retail and entertainment opportunities, public open space and public transport, and also that This will promote walkable neighbourhoods and increase the vitality of centres.</li> <li>- While the Integrated Management Plan (“ITA”) refers to nearby employment, education and retail opportunities to the subject site, it does not fully assess their walkability and access by non-motorised modes from the subject site.</li> </ul> </li> </ul> | <p>Accordingly, it is considered there is an adequate and appropriate level of connectivity between the site and a range of services and activities to support residential activities within the site.</p> |

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| <p>2. Scope and Viability of Proposed Shuttle Bus Service</p> | <ul style="list-style-type: none"> <li>• Please provide further assessment in relation to the expected travel functions and routes for a prospective shuttle bus service.</li> <li>• Based on the expected travel market size being generated by (approximately) 200 new residential dwellings, would this be expected to sustain services during weekday peak hours only, or would off-peak and weekend services also be expected to be viable?</li> <li>• Does the shuttle bus service require delivery of the full development to be commercially viable?               <ul style="list-style-type: none"> <li>○ There is insufficient assessment in relation to the scope and viability of the proposed shuttle bus service and what travel markets it would be likely to cater for (e.g., employment / retail / education related trips, and during what times of the week).</li> <li>○ This information is needed to better understand the potential contribution which public transport could make towards fulfilling travel demands generated by the new development. In turn, this underpins the ability of a future residential development on the site to fulfil strategic policy objectives associated with the THAB zone, such as ensuring that residents have convenient access to public transport,</li> </ul> </li> </ul> | <p>As discussed in the ITA report accompanying the Plan Change request and in previous discussion with Council / Auckland Transport the intention of the proposed shuttle service is to add to the range of potential travel mode connections between the development and nearby public transport hubs (specifically the Ōtahuhu Transport Interchange). The applicant intends to fully fund this shuttle service, thereby negating the potential for the service to be a burden on Auckland Transport. The detailed operation, timetable and routes for the shuttle will be confirmed via the Transport Management Plan (as conditioned as part of the Highbrook Precinct).</p> <p>The provision of the shuttle is proposed as part of the Plan Change proposal. Similar requirements have been proposed for other plan changes areas in the Auckland region (e.g. Plan Change 59 – Albany 10 Precinct).</p> |



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|   | <p>employment, education facilities, retail and entertainment opportunities, etc.</p>  |  |
| <p>3. Traffic Effects of SH1 Southbound / Highbrook Road / Hellaby's Road Roundabout upon Subject Site Intersection</p> | <ul style="list-style-type: none"> <li>• Please provide additional assessment of potential mitigation measures to ensure that vehicular access to and from the subject site is not adversely affected by queueing from the roundabout at the motorway interchange.</li> <li>• The ITA forecasts peak hour queue lengths on Highbrook Drive which would extend northwards beyond the proposed site access intersection. However, it does not propose mitigation to ensure that the subject site access intersection will be able to function safely and efficiently without being adversely affected by traffic effects from the downstream motorway interchange roundabout.</li> <li>• This information is required to confirm that safe and efficient vehicular access to and from the subject site can be achieved, which in turn underpins strategic objectives of the THAB zone, to ensure integration with adjoining land uses and efficient access to activities such as employment, education and retail opportunities and other services.</li> </ul> | <p>As discussed with the Council representatives in earlier communication and building on the earlier communication with AT/ WK during the pre-lodgment period, the transportation assessment reported within ITA concludes that there are a number of existing constraints imposed on the private vehicle traffic generation associated with the Plan Change site. The ITA assessment and proposed conditions of the Plan Change sought to provide a balanced transport outcome involving promotion of travel options as well as the recognition of those current constraints to minimise peak period trip generation within an existing trafficked road network.</p> |
| <p><b><u>Planning, Statutory and General Matters</u></b></p>  |  |  |

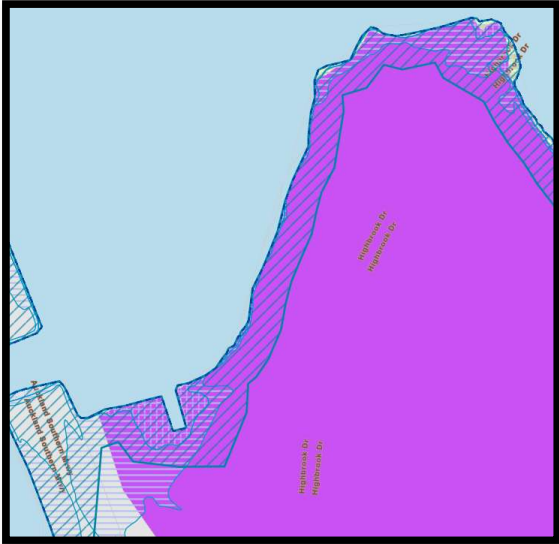
| Category of information                   | Council Request   | Applicant's Response  |
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| 1. Consultation with Mana Whenua          | <ul style="list-style-type: none"> <li>Please provide an update on the Cultural Values Assessments that are being prepared by Ngati Te Ata and Ngāi Tai Ki Tāmaki. Pages 91 – 92 refer to Ngati Te Ata and Ngāi Tai Ki Tāmaki providing Cultural Values Assessment and these documents currently in preparation.</li> </ul>   | <p>Refer to <b>Attachment 4</b>, which contains the Cultural Values Assessment prepared by Te Ākitai Waiohua.</p> <p>Cultural values assessment from Ngāti Te Ata and Ngāi Tai Ki Tāmaki have been commissioned, however, these have not been received yet.</p>   |
| 2. Road to vest and designation uplifting | <ul style="list-style-type: none"> <li>Please provide the following information:               <ol style="list-style-type: none"> <li>If there is a timetable for the vesting of Highbrook Drive.</li> <li>What process is proposed for vesting the land for Highbrook Drive with Auckland Transport e.g. by subdivision.</li> <li>The timetable for the uplifting of the designation that applies along the western part of the site.</li> <li>The extent of the designation that may remain over the land.                   <ul style="list-style-type: none"> <li>The plan change refers to the benefit of residential zoning being the vesting of land for esplanade reserve. This may also be required if a subdivision occurs as part of the vesting of Highbrook Drive.</li> <li>The extent of land required for the State Highway may impact on future use of the land for residential purposes and</li> </ul> </li> </ol> </li> </ul> | <p><u>Vesting of Highbrook Drive</u></p> <p>As explained in section 3 of the Planning Report, in November 2000, a Deed of Agreement was signed between Contact Energy Limited (Contact Energy) and the former Manukau City Council in which Contact Energy Limited agreed to support the then proposed Notice of Requirement for Highbrook Drive. Subsequently in 2004, an Agreement for Sale of Land for Road and Compensation was agreed between the former Manukau City Council and Contact Energy. This is a confidential agreement. One of the matters agreed was to survey the Ōtāhuhu Power Station site to identify the interests to be recorded on the Record of Title, and survey the area of the Highbrook Drive route. In accordance with this agreement, a Survey Plan SO 403357 (as agreed between Contact Energy and Auckland Transport) was approved by Land Information New Zealand in 2014. A copy of the Survey Plan SO 403357 is included in Appendix 1 of the Plan Change Request.</p> <p>The Survey Plan SO 403357 details the exact areas of</p> <ul style="list-style-type: none"> <li>Land to be acquired for public road (e.g Highbrook Drive)</li> </ul> |

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|                         | <p>any potential mitigation/standards set out in the precinct plan (s176 of the RMA).</p> | <ul style="list-style-type: none"> <li>● Severance lots</li> <li>● Land to be acquired for motorway purposes</li> <li>● Easements for various services (water, wastewater, stormwater)</li> </ul> <p>While Survey Plan SO 403357 was approved by Land Information New Zealand, the final step to legalise the land for Highbrook Drive has not yet been completed (i.e the land has not been legally vested into AT).</p> <p>The owners of the subject land are currently in the process of dismantling the infrastructure on the Ōtāhuhu Power Station site (PC site). The owners of the site and AT are working through a number of matters pertaining to the existing infrastructure underneath Highbrook Drive, prior to the land being vested into AT, as per the agreement.</p> <p>The timing for the vesting of Highbrook Drive does not have any implications for the PC Request. The subdivision of the area for Highbrook Drive has already been approved by Land Information New Zealand. AT has already agreed to the surveyed boundaries of Highbrook Drive.</p> <p>The land for future esplanade reserves has not been identified in Survey Plan So 403357. There could be two reasons for this:</p> <ul style="list-style-type: none"> <li>● The allotment subject to the PC Request is greater than 4 ha, and therefore is not subject to section 230 of the RMA. Under section 230 of the RMA, requirement for esplanade reserves or esplanade strips applies to any allotment of less than 4 ha.</li> <li>● The requirement for esplanade reserves or esplanade strips under section 230 of the RMA only apply where section 11(1)(a) of the RMA applies, and does not apply to</li> </ul> |



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|   |  | <p>section 11(1)(b) which relates to subdivisions affected by the acquisition, transfer, or disposal of part of an allotment under the Public Works Act 1981.</p> <p><u>Uplifting of parts of Designation 6714, State Highway 1</u></p> <p>The Survey Plan SO 403357 clearly identifies areas to be vested for motorway purposes. Waka Kotahi has agreed to the surveyed boundaries shown in this Survey Plan.</p> <p>Waka Kotahi has confirmed that in principle it will agree to the uplifting of the designation from the PC area, subject to an agreement on the access to the Waka Kotahi's stormwater infrastructure (which is shown in the Survey Plan SO 403357) and the legalisation of Highbrook Drive.</p> <p>It is considered that the PC Request can proceed based on the in-principle agreement from Waka Kotahi to uplift Designation 6714 over the PC area. The applicant acknowledges that section 176 of the RMA will continue to apply until part of Designation 6714 is uplifted from the PC area. It is considered that there is no need to duplicate section 176 of the RMA requirements into the Highbrook Precinct Plan).</p> |
| <p>3. National Policy Statement on Electricity Transmission</p> | <ul style="list-style-type: none"> <li>Please provide an assessment of the National Policy Statement on Electricity Transmission.</li> </ul> | <p>The mapped extent of the National Grid Subdivision Corridor extends minutely into the PC area.</p> <p>The AUP(OP) gives effect to the National Policy Statement on Electricity Transmission through the implementation of the National Grid Corridor Overlay provisions. The PC Request does not seek to amend the National Grid Corridor Overlay provisions.</p>  |

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|  | <p>Note: While the AUP recognises and provides for electricity transmission through the National Grid Corridor, for completeness this NPS should be addressed in section 8 of the planning report.</p>   |  |
| <p>4. Recent plan changes/section 32</p> | <ul style="list-style-type: none"> <li>Please provide an assessment of Plan Changes 78, 79 and 80 as part of the assessment of statutory documents (section 8 of the planning report).</li> </ul> <p>Note: Parts of PC78 have immediate legal effect.</p> <p>Objectives and policies of these plan changes require consideration as part of the assessment. This includes effects of climate change, particularly given the sites coastal location. Coastal erosion and coastal inundation are spatially identified qualifying matters applying to the plan change area.</p> | <p>The plan change request seeks a zoning change only, it does not seek to amend the objectives, policies or rules framework of the AUP (OP) that relate to the Terrace House and Apartment Zone.</p> <p><u>PC78</u></p> <ul style="list-style-type: none"> <li>PC78 responds to the National Policy Statement on Urban Development and seeks to achieve intensification in Auckland. The PC Request seeks intensification of residential development within the PC area, supported by a range a technical reports.</li> <li>PC78 identifies wetland management areas overlay as a qualifying matter. There is no wetland within the PC area. This is not relevant for the PC Request</li> <li>PC78 identifies Outstanding Natural Features Overlay and Outstanding Natural Landscapes Overlay as a qualifying matter. This is not relevant for the PC Request.</li> <li>PC78 identifies Emergency Management Areas (Chapter E29) as a qualifying matter. This is not relevant for the PC Request.</li> <li>PC78 identifies Natural Hazards and flooding (Chapter E36) as a qualifying matter. The PC Request does not seek to amend the provisions of Chapter E36. All future development within the PC Request area will need to comply with the requirements of Chapter E36. The map below illustrates the extent of the indicative mapping of the</li> </ul> |

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|                         |                 | <p>Coastal Erosion (dark blue lines) and Coastal Inundation (light blue lines) areas as shown in the Council's GIS viewer for PC78. It clearly illustrates that the indicative extent of the Coastal Erosion and Coastal Inundation is located generally within the 20m riparian margin areas. The coastal inundation areas shown in the map below are limited to discrete areas, generally within the future esplanade reserve areas.</p>  <ul style="list-style-type: none"> <li>With respect to coastal erosion mapping, the Highbrook Geotechnical Appraisal (Technical Report 3) confirms that wave action is not expected in the Tāmaki River, and therefore the risk of erosion affecting the proposed development is considered highly unlikely. Furthermore, the future esplanade reserve areas and coastal yard setbacks will ensure that building platforms are not detrimentally affected by coastal</li> </ul> |

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|                         |                 | <p>erosion processes. It is further noted that the matters pertaining to climate change and effects on the PC area are explained in the Highbrook Stormwater Management Plan. It is considered that the site-specific assessment should be given priority over the generic modelling results shown in Council's GIS viewer for PC78.</p> <p><u>Plan Change 79:</u></p> <p>PC79 seeks to manage impacts of Auckland's transport network, with a focus on pedestrian safety, accessible car parking, loading and heavy vehicle management, and catering for EV-charging and cycle parking.</p> <p>The PC Request seeks a zoning change only, and does not seek to amend the objectives, policies or rules framework of Chapter E27 Transport of the AUP (OP).</p> <p>The PC Request aligns with PC78 as:</p> <ul style="list-style-type: none"> <li>• All provision of Chapter E27 Transport and other matters sets out in PC78 will be implemented at land development stage. The PC Request does not seek to amend any of the proposed amendments set out in PC78.</li> <li>• PC Request proposes upgrades to the shared pedestrian and cycling pathway and the installation of pedestrian barriers in identified locations. The recommendation of an additional bus stop on Highbrook drive and private shuttles to Middlemore and Otahuhu train station provides a resilient solution in encouraging the public transport uptake rather than emphasis on the roading network.</li> </ul> <p><u>Plan Change 80:</u></p> |

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|                         |                 | <p>PC80 proposes amendments to Chapter B Regional Policy Statement of the AUP(OP). PC80 seeks to integrate the concept of well-functioning environment, urban resilience to climate change and qualifying matters introduced through the NPS-UD into the RPS. The evaluation of the PC Request against the NPS-UD is set out in the Planning Report. With respect to climate change matters, please refer to the response on PC78, and the Highbrook Stormwater Management Plan, which applies climate change to pre-development and post-development scenarios.</p> |

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| <p>4. Regional Policy<br/>Statement/section 32</p> | <ul style="list-style-type: none"> <li>Please provide an assessment against RPS Chapters B8 Coastal Environment and B10 Environmental Risk (including PC 80 – also see above).</li> </ul> <p>Note: The plan change is required to give effect to the AUP RPS under s75 of the RMA. Chapters B8 and B10 are relevant. While the assessment required may not be as extensive as Chapters B2 and B3, the relevant provisions should be identified and assessed.</p> | <p>An assessment of the PC Request against the RPS is set out in paragraphs 8.32 to 8.34 of the Planning Report.</p> <p>An assessment of the PC Request against the Chapter B8 and coastal environment outcomes is also set out in paragraphs 6.8 to 6.13 of Technical Report 4 Assessment of Landscape and Visual Effects.</p> <p>In brief:</p> <ul style="list-style-type: none"> <li>Chapter B8.2 seeks to ensure that areas of coastal environment with outstanding and high natural character are preserved and protected from inappropriate subdivision, use and development. In this respect, the PC area does not contain a coastal environment deemed to be of outstanding or high natural character.</li> </ul> <p>Chapter B8.3 seeks to ensure that subdivision, use and development in the coastal environment are designed, located and managed to preserve the characteristics and qualities that contribute to the natural character of the coastal environment. In this regard, it is noted that the THAB zone is an existing zone in the AUP(OP). It has already undergone a section 32 assessment as part of the Unitary Plan development process and it has been concluded that it gives effect to the RPS. The development of new dwelling is a restricted discretionary activity in the THAB zone, and matters of discretion include building intensity, scale, location, form, and appearance. The resource consent application approval process will ensure that the future subdivision, use and development within the PC area is designed, located and managed to contribute to the natural character of the coastal environment.</p> <ul style="list-style-type: none"> <li>Chapter 8.4 seeks to ensure that public access to and along the coastal marine area is maintained and enhanced. In this regard, it is noted that via the implementation of the</li> </ul> |
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relevant sections the AUP(OP), in particular the subdivision chapter, and the coastal yard setback (as set out in the THAB Zone), areas subject to future esplanade reserves will be vested into Council and/or future building platforms will be located outside the esplanade reserve areas to ensure that public access to and along the coastal marine area is not adversely affected, but rather enhanced.

- Chapter B10 seeks to ensure that communities are more resilient to natural hazards and effects of climate change. In this regard refer to commentary on PC78 and PC80 above.

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| 5. Section 32/options        | <ul style="list-style-type: none"> <li>Please provide an assessment of why the proposal cannot be achieved by only a residential zoning (i.e. without a precinct plan).</li> </ul> <p>Note: The section 32 considers two zoning options but does not specifically address the benefits and costs of imposing a precinct over the plan change area to deliver the mitigation measures recommended.</p>  | <p>The Planning Report and the supporting Technical Reports provided to Council should be read as a holistic document. The Technical Reports identify the key resource management issues of relevance to the PC area, and its proximity. The Planning Report assesses the viable options available informed by the findings of the Technical Reports. As such, paragraph 6.2 of the Planning Report, clearly identifies that the “proposal” means to rezone the PC area from Light Industry Zone to THAB Zone and apply the proposed Highbrook Precinct.</p> <p>It is considered that the requirements of section 32 of the RMA have been met.</p>  |
| 6. Section 32/options        | <ul style="list-style-type: none"> <li>Please comment on whether the preferred outcome of a THAB zone with a permitted activity limit of 200 units is consistent with achieving the greatest density, height and scale of development of all the residential zones.</li> </ul> <p>Note: The THAB zone has the highest intensity of all the residential zones. There is no limit on the number of units in this zone (or the Mixed Housing Urban zone).</p> | <p>We agree that the THAB Zone is highest density residential zone.</p> <p>The Highbrook Precinct does not impose an upper limit on the number of dwellings within the precinct. New dwellings in the THAB Zone is a Restricted Discretionary Activity. The proposed standard I4.6.1 specifies that the Restricted Discretionary Activity status applies to a maximum of 200 dwellings.</p> <p>The Highbrook Precinct Plan changes the activity status of dwellings (where it exceeds 200) to a Discretionary Activity. The rationale for this is set out in the precinct description and Policy I4.3(3). An ITA is required to be support the Discretionary Activity resource consent.</p> |
| 7. 14.1 Precinct Description | <ul style="list-style-type: none"> <li>Please consider adding:</li> <li>The extent of area e.g. 4.4 hectares included in the precinct.</li> </ul>  | <p>One of the AUP(OP) drafting principles is that the precinct descriptions should be brief and reliance should be on the objectives and policies to inform the key outcomes. As such, it is considered that no change to the precinct description is required.</p>   |




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|   | <ul style="list-style-type: none"> <li>Reference to protecting activities sensitive to noise as this is one of the precinct plan objectives.</li> </ul> <p>Clarity of provisions / extent of precinct area.</p>  |  |
| <p>8. 14.2 Objectives – relationship with other parts of the AUP</p> <ul style="list-style-type: none"> <li>14.3 Policies - relationship with other parts of the AUP</li> </ul> | <ul style="list-style-type: none"> <li>Please consider moving the following text above the section to which they relate</li> <li>'All relevant overlay, Auckland-wide and zone objectives apply in this precinct in addition to those specified above below.'</li> <li>'All relevant overlay, Auckland-wide and zone policies apply in this precinct in addition to those specified above below.'</li> </ul> <p>Consistency with other precinct plans.</p> | <p>There is a mixture of approaches in the precinct plans in the AUP(OP) in relation to where cross-referencing text is placed within the precinct provisions. As such, it is considered that no change in this regard is required.</p>  |
| <p>9. 14.3 Policies</p>   | <ul style="list-style-type: none"> <li>Please consider re-drafting policy 14.3(3).</li> </ul> <p>The intent is understood, but it currently reads as a method rather than an outcome.</p>  | <p>Policy 14.3(3) would apply to a Discretionary Activity resource consent. The AUP(OP) does not identify the assessment criteria for Discretionary Activities. The reliance is placed on objectives and policies is clearly articulate the outcomes, or key matters for assessment to guide the decision makers. Policy 14.3(3) uses policy drafting terminology, through the use of the term “require”, and then articulates the outcome.</p> <p>It is considered that Policy 14.3(3) is appropriate from a policy drafting perspective.</p> |

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| <p>10. Table 14.1.1 Activity table</p> | <ul style="list-style-type: none"> <li>Please explain the reason for difference in the activity status of (A1) and (A2).</li> </ul> <p>See PL 13</p> | <p>Precincts enable local differences to be recognized by providing place-based provisions to vary the outcomes sought in the respective zone or Auckland-wide provisions and can be more restrictive or more enabling.</p> <p>The precinct drafting principles are that an activity status rule must be included in the precinct activity table if that activity:</p> <ul style="list-style-type: none"> <li>Requires a different activity status from that given to the same activity by an overlay, Auckland-wide or zone;</li> <li>Is subject to additional precinct-specific standards relating to that activity.</li> </ul> <p>Having regard to the above, the Technical Reports supporting the PC Request have identified a number of place-based provisions which are recommended for the PC area that would not be addressed by the proposed THAB zone provisions, and therefore, require bespoke set of provision.</p> <p>The Highbrook Precinct proposes five new standards which are set out in Rule 14.6. These standards apply to all permitted, controlled and restricted discretionary activities, and in addition to all the standards that apply in the THAB zone. These five new proposed standards relate to:</p> <ul style="list-style-type: none"> <li>Maximum number of dwellings</li> <li>Highbrook Precinct Transportation Plan</li> <li>Upgrading of shared cycle / pedestrian path and pedestrian barrier</li> </ul> |

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|  |  | <ul style="list-style-type: none"> <li>Construction of bus stop</li> <li>Road noise attenuation.</li> </ul> <p>In light of the introduction of new standards, we then need to specify the activity status for the infringement of these standards (consistent with the approach of the AUP(OP) drafting principles). In this regard, in Rule I4.4.1:</p> <ul style="list-style-type: none"> <li>(A1) specifies that non-compliance with Standard I4.6.5 (road noise attenuation) is a Restricted Discretionary activity.</li> <li>(A2) specifies that the breach of all other four standards is a Discretionary activity.</li> </ul>                                  |
| 11. Standard 14.6.2<br>Highbrook Precinct<br>Transportation Plan | <ul style="list-style-type: none"> <li>Please consider redrafting as this does not read as a standard.</li> </ul> <p>Rules/standards should have a measurable outcome. This standard is worded as an assessment process.</p> | <p>It is common for standards to require the preparation of specific plans to address resource management issues of concern (e.g. an archaeological management plan, a landscape plan etc). Aligned with this approach, the “outcome” or deliverable of Standard I4.6.2 is the Highbrook Precinct Transportation Plan. The standard sets out the matters to be included in the Transportation Plan. Any future resource consent application will need to illustrate compliance with this standard, by producing the Transportation Plan which includes the matters set out in the standard.</p> <p>It is considered that no changes are required Standard I4.6.2.</p> |
| 12. Standard 14.6.5 Road<br>noise attenuation                    | <ul style="list-style-type: none"> <li>Pending responses for the request for a site-specific acoustic assessment.</li> </ul>   | <p>Refer to the response on Noise Matters.</p>  |

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| <ul style="list-style-type: none"> <li>14.8.1 Matters of discretion</li> <li>(1) Non-compliance with Standard I4.6.5 – Road noise attenuation</li> <li>14.8.2 Assessment criteria (2)</li> </ul> |  | <p>The road noise attenuation provisions proposed in the Highbrook Precinct align with the latest policy direction of Auckland Council's Independent Hearings Panel, as outlined in the PC51 Decision.</p>   |
| <p>13. 14.8.2 Assessment criteria (2) Transport matters</p>  | <ul style="list-style-type: none"> <li>Please refer the relevance of this criterion to activity (A1), or the activity status of (A2).</li> </ul> <p>It appears this criterion is related to activity (A2), which is a discretionary activity. These are relevant matters but are unable to be addressed if the activity status is discretionary.</p> | <p>The text below Rule I4.8.2 explains that the assessment criteria in this section applies to restricted discretionary activities. As such, it would apply to all restricted discretionary activities set out in the Precinct activity table (being Rule I4.4.1(A1)) and those in the activity table in the THAB zone.</p> <p>It would not apply to (A2) as Rule I4.4.1 clearly specifies that (A2) is a Discretionary Activity.</p> <p>Rule I4.8.2(1) sets out the assessment criteria for any activity that does not comply with Standard I4.6.5 – Road noise attenuation.</p> <p>Rule I4.8.2(2) sets out the assessment criteria that applies to all relevant activities which are a Restricted Discretionary Activity in the THAB zone activity table (including “dwellings”), enables council to consider transportation matters, in particular, the prior to the occupation</p> |

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|  |   | <p>of the first dwelling, the extent to which provision has been made for a private shuttle bus service.</p> <p>There is nothing precluding the consideration of Rule 14.8.2(2) for discretionary activity resource consent, but as currently drafted, it is specific to Restricted Discretionary activities to capture the activity dwellings.</p>  |
| <p>14. 14.9 Special information requirements</p> | <ul style="list-style-type: none"> <li>• Please consider listed the following:               <ul style="list-style-type: none"> <li>a. Precinct Transportation Plan; and</li> <li>b. Acoustic assessment.</li> </ul> </li> </ul> <p>These documents are referred to in the standards/assessment criteria.</p> | <p>Generally, matters are included in the section 14.9 where further clarity needs to be provided in terms of how that information is to be provided, for example, what details are to be included in the Planting and Landscaping Plan.</p> <p>In this case, Standard 14.6.2 adequately sets out the matters to be included in the Highbrook Precinct Transportation Plan, and as such, there is no need to duplicate the same information in the special information requirements.</p> <p>The applicant does not support the requirement for an acoustic assessment as explained in the response on Noise Matters.</p> |
| <p>15. 14.10.1 Highbrook Precinct plan map</p>   | <p>Please confirm:</p> <ul style="list-style-type: none"> <li>a. The extent of the precinct area relates only to land zoned Business – Light Industry, or if there is a discrepancy between the survey from 2014 and the coastal boundary of the site as shown on planning maps.</li> </ul>                   | <p>The extent of the precinct area has been determined by the Survey Plan SO 403357 and approved by Land Information New Zealand in 2014. We suspect that the boundaries as shown on the Council's GIS maps has not yet been updated to reflect the surveyed property boundaries as it applies to the mean high-water spring boundary. We note that there are minute differences in this regard. Our mapping correctly maps the surveyed boundary of the</p>   |

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|                         | <p>b. Why a portion of land along the eastern boundary with SH1 is excluded from Highbrook Precinct (indicated in blue).</p> <p>It is understood from the Planning report the precinct plan only relates to land zoned Business – Light Industry however, parts of the map appear to include land within Mean High Water Spring Tide.</p>  | <p>property when adjoining the mean high-water spring boundary. We infer that the Council's GIS map boundaries will be updated then Survey Plan SO 403357 has been legalized.</p> <p>The subject land that is excluded (adjoining State Highway 1) from the proposed rezoning is the stormwater management area for State Highway 1. When this land is vested into Waka Kotahi, it will become part of the Strategic Transport Corridor Zone (Chapter H22 of the AUP(OP)). The Strategic Transport Corridor Zone applies to NZTA and KiwiRail designated land.</p> |

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| <p>16. 14.10.1 Highbrook<br/>Precinct plan map</p> | <p>Please consider the following amendments to the map:</p> <ul style="list-style-type: none"> <li>a. Indicative location of the bus stop.</li> <li>b. The pedestrian barrier to be installed identified in a different colour to the extent of the precinct.</li> <li>c. The shared pedestrian pathway/cycleway to be upgraded identified in different colour to the other features on the map.</li> <li>d. The indicative (or defined) coastal boundary be shown relative to the precinct plan area. This may be assisted by showing the Tāmaki River and Ōtara Creek in blue.</li> <li>e. The motorway be marked.</li> </ul> <p>To improve the linkage between the text and the diagram, and clarify parts of the map, aspects could be refined.</p> | <p><u>Bus stop</u> – The requirement for the construction of the bus stop is set out in Standard I4.6.4. Based on our discussions with AT, it is more appropriate that the location of the bus stop be confirmed in consultation with AT at the land development stage. Therefore, the inclusion of an indicative bus stop location without AT confirmation is not supported.</p> <p><u>Pedestrian barrier, pedestrian/cycle pathway, coastal boundary, motorway</u> – updated as requested, refer to the updated Highbrook Precinct Plan in Attachment 7.</p> |