



124 Halsey Street,  
PO Box 6345, AUCKLAND,  
1142, New Zealand  
T: +64 9 300 9000 // F: +64 9 300 9300  
E: [info@beca.com](mailto:info@beca.com) // [www.beca.com](http://www.beca.com)

Auckland Council  
Private Bag 92300  
Auckland 1142

10 June 2025

**Attention: Penny Anson, Senior Planner**

Dear Penny

**RE: Carrington Road Improvements and Point Chevalier Watermain No. 2 Project – Responses to requests for further information (BUN60444262 / LUC60444264 / WAT60444263)**

This letter responds to requests for further information made by Auckland Council on 20 May 2025 regarding the above noted resource consent application pursuant to section 92 of the Resource Management Act 1991. Responses are set out in the table below, and are limited to the matters identified by the Council as outstanding following Auckland Transport’s initial response on 17 April. The remaining matters are closed.

The following attachments are provided in support of the responses:

- **Attachment A** – Further assessment of design options adjacent to the Airing Court Wall; and
- **Attachment B** – Deletion of Mt Albert Pedestrian Bridge.

I trust these responses will enable a fuller understanding of the effects of the proposal.

Kind regards

A handwritten signature in blue ink, appearing to read 'Liam Winter', with a stylized flourish at the end.

**Liam Winter**

Senior Associate - Planning

on behalf of

**Beca Limited**

Phone Number: +6493009158  
Email: [Liam.Winter@beca.com](mailto:Liam.Winter@beca.com)

**Copy**

Kelly Durham, Auckland Transport

**make  
everyday  
better.**

RESPONSES TO FURTHER SECTION 92 REQUESTS

No.	Initial s92 request (31/3/25)	AT initial response (17/4/25)	Further s92 request (20/5/25)	Further response (10/6/25)
Plans and Information				
5	<p>Please advise if s176 approval is/has being sought for the works in relation to Designation 6300 – North Auckland Railway Line for the permanent occupation of the active mode bridge in the designation. Please advise if approval has been sought from any of the Requiring Authorities for the works within their respective designations.</p>	<p>As noted at 4.3 of the AEE, engagement with the relevant Requiring Authorities is underway to confirm s176 approval requirements. This process remains ongoing. Accordingly, AT is seeking s176 approval for works within Designation 6300.</p>	<p>Please provide an update on the status of s176 approvals from the relevant requiring authorities</p>	<p>In respect of designations 6718 and 6723, NZ Transport Agency Waka Kotahi (NZTA) have advised that no risks needing to be addressed have been identified based on design and information provided to date; but that review of the final detailed design plans will be needed to confirm whether s176 approval is required or not. As detailed design is underway now, the need for s176 approval or otherwise has still not been confirmed.</p> <p>With regard to Designation 6300, KiwiRail have still not advised if a s176 approval is required. As detailed in <b>Attachment B</b> to this letter, the scope of works within this Designation is reducing substantially, with works now limited to minor upgrades within the existing road corridor / bridge. In our opinion these works will not prevent or hinder the operation of the railway. Notwithstanding this, AT is continuing to engage with KiwiRail on the project.</p>
Timing and Construction				
7	<p>Section 3.3.4 of the AEE states that the Watermain will need to be procured early to ensure it is available to meet the construction programme. Please confirm if the Proposed Construction Staging in Section 3.3 of the AEE is tied to or will be implicated by the procurement of the Watermain and any delays in obtaining this infrastructure. For example if there is a delay in procurement will there be an associated delay in the CRIP programme. This information is required to understand the duration of construction effects.</p>	<p>Watercare is currently undertaking to procure the necessary materials for the Watermain early to mitigate risk of delay to either project. This will ensure the CRIP and the Watermain are able to be constructed concurrently as described in Section 3.3 of the AEE. This is the strong preference of both Auckland Transport and Watercare to maximise programme efficiencies and reduce costs and disruption.</p> <p>The funding for the CRIP under the Infrastructure Acceleration Fund (IAF) is contingent upon construction commencing in Q1 2026 with practical completion by May 2028 to align with the Carrington Residential Development. In the highly unlikely event that delays in the procurement of the Watermain put this programme at risk, the CRIP will need to proceed independently of the Watermain.</p>	<p>Please advise if the Applicant would accept a condition of consent requiring that both the CRIP and Watermain works are constructed concurrently. Or, please offer alternative wording to provide some certainty that the CRIP and Watermain works will occur in tandem to manage the overall timing of construction effects.</p>	<p>The applicant does not consider such a condition to be necessary given that concurrent construction is sought in the consent application (as described in Section 3.3 of the AEE). The effects of the proposal were accordingly assessed on the basis that the projects would be concurrently constructed. Any change to this assumption would more appropriately be addressed as a future change to the consent under s127.</p> <p>By way of update, the detailed design programme for both projects continues in parallel at pace. Completion of detailed design for both projects is programmed to be completed by the end of August 2025. Procurement of materials for the Watermain is well advanced.</p> <p>Accordingly, we consider that the construction sequence described at Section 3.3 of the AEE remains realistic.</p>
Mana Whenua Values				
12	<p>Please confirm and provide if relevant any Cultural Values Assessments (CVA) from iwi consulted as part of the proposal</p>	<p>As set out in section 5.10 of the AEE, Mana Whenua have been invited to provide CVAs for the project. One CVA was provided by Ngaati Whanaunga during the preparation of the DBC in August</p>	<p>Please provide an update on the status of the CVA prepared by Ngaati Whanaunga.</p>	<p>While Auckland Transport has followed up with Ngaati Whanaunga regarding this request on several occasions, there has been no change in the status of</p>

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	including any updates to Ngaati Whanaunga's CVA.	<p>2023. Auckland Transport has invited Ngaati Whanaunga to provide an update of the CVA several times since November 2024, no response has been received.</p> <p>Auckland Transport also contacted Ngaati Whanaunga to confirm that the original CVA could be shared with AC (in response to this s92) query. Ngaati Whanaunga have not yet advised that this can be shared.</p> <p>No further CVAs have been provided.</p>		this CVA since Auckland Transport's initial response on 17 April.
13	<p>The proposal involves resource consent for groundwater diversion. It is understood that the diversion is associated with the new active mode bridge and/or excavations for the Watermain isolation valve. Please confirm if iwi have been consulted on this scope of works associated with the Watermain works. This information is required to inform the effects assessment under E7.8.1(1)(a)).</p>	<p>As noted above, Watercare included the wider Khyber and Konini Watermain Project (of which the Point Chevalier Watermain No. 2 within Carrington Road forms a part) in the list of projects presented to the Kaitiaki Managers Forum in late 2024. Three iwi have indicated an interest in the project and have been provided an overview of the project options being considered. They have not yet expressed any further interest in the project.</p> <p>Given the high level nature of this initial engagement, and the recency of the investigation data which confirmed the need for localised groundwater diversion consent, groundwater diversion matters have not yet been discussed specifically with Mana Whenua by Watercare.</p> <p>Note that groundwater diversion consent is not required for the Mt Albert active mode bridge as the piles are proposed to be &lt;1.5m in external diameter (see Table 1 of the lodged Groundwater Assessment).</p>	<p>Please provide an update on status on iwi engagement either through the Kaitiaki Managers Forum (or other forums) with regards to the three iwi which have expressed an interest.</p>	<p>No significant action has been taken since the previous update. As noted in the previous s92 response, the three iwi which indicated an interest were briefed on the options in late 2024; but have still not expressed further interest in the Project.</p> <p>The Point Chevalier Watermain No. 2 forms part of the wider Khyber and Konini Watermain Project. Work on the wider scheme has advanced since late 2024, and is near confirming a preferred option. Accordingly, Watercare intend to provide a further update to the Kaitiaki Managers Forum shortly to advise the preferred option and route being taken for the wider scheme.</p> <p>It is noted in relation to the groundwater diversion matters that s92 items 50-57 are closed.</p>
Historic Heritage				
23	<p>Please provide information to demonstrate why Airing Court Wall or part of the wall cannot be preserved in-situ. Please comment on any scope for changes to AT policy with regards to reduced lane widths for example.</p>	<p>This is addressed at Section 3.1.5 of the AEE. To reiterate and elaborate, we note the following:</p> <ul style="list-style-type: none"><li>While the Wairaka Precinct boundary setback provision provides for road widening on the western side of Carrington Road, the design has been subject to localised realignment to the east between Ch. 1300-1500. The extent of realignment enables avoidance of the former Oakley Hospital Main Building (the Primary Feature within the Extent of Place); whilst also avoiding the need for third-party land take and removal of mature Pohutukawa on the eastern side of the road.</li><li>Realignment further east than proposed would require third-party land take and removal of mature Pohutukawa on the eastern side. This would be difficult to substantiate in an alternatives assessment given that the Wairaka Precinct boundary setback provision clearly envisages and provides for road widening on the western side. It would also present integration issues with the design to the south (which provides for all widening on the western</li></ul>	<p>Please provide further assessment regarding the inferred hierarchy in the "alternatives assessment". Please clarify what is meant by the statement:</p> <p><i>"Realignment further east than proposed would require third-party land take and removal of mature Pohutukawa on the eastern side. This would be difficult to substantiate in an alternatives assessment given that the Wairaka Precinct boundary setback provision clearly envisages and provides for road widening on the western side"</i></p> <ul style="list-style-type: none"><li>It is noted that the Wairaka Precinct envisages a road widening setback on the western side but the Precinct Plan does not trump the provisions in Chapter D17. Refer Rule C1.6(3) and I334.4 Activity Table which confirms that the relevant Auckland wide rules apply unless specified in the Activity Table. The Precinct Plan also seeks the retention and enhancement of features as the Precinct is developed including the</li></ul>	<p>Please refer to <b>Attachment A</b> which provides a full response to these points.</p>


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		<p>side of the road), and to the north (where integration with the existing SH16 bridge is required).</p> <ul style="list-style-type: none"><li>• The design has already been subject to localised narrowing in this location. As shown in drawing 3230635-CA-0403 (see Appendix B of the lodged application), the design is narrowed to approximately 24.9m at Ch. 1368 – a 3.9m reduction from the 28.8m provided for along the remainder of the Wairaka Precinct frontage. Virtually all cross-section elements have already been compromised to achieve this reduction – bus lanes are reduced to 3.2m (3.5m preferred), general traffic lanes are down to the minimum compliant width of 3.0m, the western footpath is down to the minimum compliant width of 1.8m, while the western cycle lane is 1.3m which is below minimum standard. Further reductions to individual elements of the cross-section are not supported.</li><li>• Accordingly, the only way to further narrow the corridor would be to delete features which are integral to the purpose of the Project, including bus lane(s), the bus stop, and the southbound right-turn lane for the Gate 1 intersection. Such deletions are not supported, as they would result in the corridor’s existing deficiencies in this location remaining. For clarity, it is noted that deletion of the bus stop alone would not sufficiently accommodate the Airing Court Wall.</li><li>• The Airing Court Wall cannot remain in situ, as it would result in a 2m high brick wall cutting across sections of cycle path, kerbline, and bus lane. As set out above, there is no scope to amend the design such that these conflicts can be practically avoided. Accordingly, the wall needs to be removed.</li></ul>	<p>Historic Heritage overlay of the former Oakley Hospital and identified trees on site. Therefore, please provide further clarification on the implications for the proposal for widening of road corridor to the east noting that:</p> <ul style="list-style-type: none"><li>– The mature Pohutukawa trees are not protected.</li><li>– Why a third party land take has /was not explored. Please note that the assessment under the RMA cannot consider cost implications from any land take option.</li><li>– Whether features integral to the purpose of the project (bus lane(s), the bus stop, and the southbound right-turn lane for the Gate 1 intersection) could be retained if the road was widened to the east and the Airing Court Wall retained.</li><li>• Please provide further clarity around localized narrowing and why this is not supported. Please refer to relevant Auckland Transport standards which specify “compliant” footpath widths, “compliant” bus lane widths and “complaint” cycle lane widths.</li><li>• Please also note the following comments from Council’s Historic Heritage Specialist which you are encouraged to provide further comment on:</li></ul> <p><i>“The applicant appears to claim that the removal is essential to facilitate the proposed development yet has not provided evidence of alternative design options being explored or sufficient justification as to why this approach is the only feasible outcome. Without this clarity, it is not possible to conclude that demolition is necessary or that the resulting adverse effects cannot be avoided. Furthermore, it has not been shown if the public benefit claimed to be associated with the development can be achievable without the total loss of the wall. I cannot therefore test the applicant’s claims.</i></p> <p><i>Overall, the proposal would result in significant adverse effects from a Historic Heritage perspective due to the near-total loss of a significant heritage feature—the historic brick wall. This feature plays a key role in the heritage values of the place, contributing to the physical attributes, aesthetic, historical, and social significance of the former asylum complex. Its removal would fundamentally alter the character of the site and diminish its overall heritage value. The justification for the demolition of the wall has not been adequately demonstrated, and no evidence has been provided to show that alternative design options have been explored, as outlined under the provisions of the overlay. Although the applicant</i></p>	

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			<i>has offered some mitigation measures, they do not sufficiently offset the impact of losing the wall itself. Moreover, certain mitigation has been excluded from the consent at the applicant's request, which means I cannot factor these into my assessment. As discussed above, and based on the analysis provided, I consider that the application in its current form is not appropriate from a built heritage perspective and therefore cannot be supported"</i>	
Archaeology				
28	<p>The Archaeological Assessment should include details of the optioneering/alternatives analysis in particular regarding the 1887 Airing Court Wall, and an explanation as to why the assessment was apparently commissioned after the developed design was completed, and several years after planning and assessment began. Likewise the archaeologist should address the potential for a redesign to avoid or minimise archaeological effects, and the proposed re-use of some of the bricks if it's not too difficult or expensive to remove the mortar.</p>	<p>This is partly addressed at Section 3.1.5 of the AEE, and in the response to item 23 above. To reiterate and elaborate, we note the following:</p> <ul style="list-style-type: none"><li>As noted in the AEE, the options assessment took place as part of the preceding DBC between 2022 and 2024. The DBC was supported by a heritage assessment prepared by Plan Heritage Limited, dated July 2023. This assessment documented the optioneering process and effects assessment as it related to heritage and archaeology, and reached similar conclusions to the assessment subsequently commissioned to inform the resource consent application. It is therefore erroneous to infer that heritage and archaeology effects were not considered prior to the preparation of the resource consent. Moreover, we note that it is not uncommon that an assessment to inform a business case is commissioned separately from a subsequent assessment to inform a resource consent application for a project identified through a business case process.</li><li>As summarised at Section 3.1.5 of the AEE, the DBC Options Assessment considered a shortlist of three options with different configurations for active mode (bidirectional or unidirectional) and bus lane (one-way or two-way) facilities. All options assessed required removal of the Airing Court Wall to achieve the desired form and function, even factoring in the localised narrowing of the design and eastward realignment (as described in the response to item 23 above).</li><li>In terms of the possibility of redesign – please refer to the response to item 23 above.</li></ul> <p>Note this point is also addressed at section 7.4 of the revised Archaeological Assessment – see <b>Attachment E</b>.</p>	<p>Please refer to the comments below from Council's consulting archaeologist which you are encouraged to provide further comment on.</p> <p><i>"The archaeological assessment still does not address the construction laydown area/yard despite a preferred yard concept being available to assess per the response to the Landscape and Visual amenity questions. I appreciate the new images and maps in the assessment however the update still does not address the gaps in the significance assessment of the Airing Court Wall.</i></p> <p><i>Regarding the lack of options to preserve the Wall in-situ, there is no reference to the Plan Heritage Ltd heritage assessment from 2023 where optioneering was apparently addressed, in either the archaeological assessment or the heritage assessment, either the original or updated per this response. The response letter table from BECA references the Plan Heritage report and it seems to be the critical point where the Airing Court Wall is put in the "too hard basket" so why isn't it referred to in any of the subsequent documentation?</i></p>	<p>Regarding the construction yard/laydown area, the Archaeological Assessment addresses the preferred site (being either to the immediate north or south of the Gate 3 intersection) as follows:</p> <ul style="list-style-type: none"><li>The report notes (from page 8) that previous assessment undertaken by CFG Heritage for the Unitec Open Spaces project examined several areas including a large block at Gate 3 (see Figure 5 of the Archaeological Assessment). The area was found to have potential for previously unidentified archaeological deposits for both 19<sup>th</sup> Century hospital and farm activities; and pre-European Māori activities.</li><li>During field assessment (see page 14), recent topsoil stripping in some areas was observed as a result of other development projects (including construction yard/laydown for the Carrington Backbone Works). Where subsoils were visible they were largely clay fills, with evidence of older demolition materials mixed throughout. It is unclear where natural subsoils had been exposed, if at all. Very little ground surface was visible due to berms, footpaths, and ongoing construction. On this basis, this part of the corridor was noted as being of moderate to low risk of impacting archaeological sites (see Figure 25).</li><li>There are no identified archaeological sites within the preferred construction yard/laydown areas (see Figure 24).</li><li>Any unidentified archaeological sites within the proposed works area are likely to be destroyed, and an archaeological authority is proposed accordingly.</li></ul> <p>Regarding the points in relation to the Airing Court Wall, please refer to <b>Attachment A</b> which provides a full response on this subject.</p>

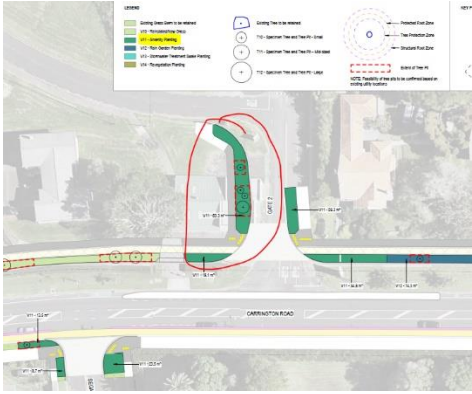


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<b>Visual Amenity and Landscape</b>				
34	<p>The AEE at section 3.1.3 Proposed Vegetation and Landscaping notes that there will be the planting of 190 new specimen trees equating to 1,624m<sup>2</sup> of canopy coverage. It then goes on to note the feasibility, locations, sizes, numbers and species of trees shown on the Preliminary Design Drawings will be confirmed at Detailed Design Stage. The commentary within the AEE suggests that the proposed number, locations and grades of tree may be changed at a later date. However, it is understood that the conclusions / levels of effects outlined within the Landscape Effects Assessment rely on the proposed planting and tree implementation as mitigation – including the number and grade / rate of establishment of these. Accordingly please clarify / confirm the following:</p> <ol style="list-style-type: none"> <li>How the proposed 190 trees / 1,642m<sup>2</sup> canopy coverage is ensured as an outcome within the conditions offered.</li> <li>Confirm that the locations of trees indicated do not conflict with existing or proposed cables, pipes, and lights, in ground or above.</li> <li>What the minimum grade size for all trees will be, noting 45L-80L for small, 80L-160L for medium and 80L- 400L for large are mentioned, as well as minimum 45L under the Urban Ngahere Strategy.</li> </ol> <p>Confirm the minimum number of trees and canopy coverage to be implemented. If this is less than the 190 proposed whether this would still meet the outcomes of the Urban Ngahere Strategy.</p>	<p>Regarding point (a):</p> <ul style="list-style-type: none"> <li>The Project Team is seeking to realise all feasible opportunities for tree planting across the project site and its immediate environs to ensure Auckland Transport's sustainability outcomes are realised, whilst working within the numerous technical constraints of the road corridor design and existing site conditions.</li> <li>Broadly, the proposed conditions provide for the tree planting outcomes through: (i) Condition 1, which requires the activity to be carried out in general accordance with the plans and information listed in Schedule 1 (which includes soft landscape plans showing proposed new trees); (ii) Condition 8, which requires a detailed planting plan as part of the ULDP; and (iii) Condition 16, which sets requirements for works within root zones.</li> </ul> <p>Regarding point (b):</p> <ul style="list-style-type: none"> <li>A rigorous 3D clash detection process is underway in the Detailed Design phase of the project to ensure the proposed trees do not clash with the underground and above ground utilities, structures, lighting and carriageway clearances.</li> <li>In addition, the structural root zones, canopies and Tree Protection Zones of the existing trees have been clearly identified to the engineering team to ensure that no new utilities or structures negatively affect their health, and that arborist input can be sought where required.</li> </ul> <p>Regarding point (c):</p> <ul style="list-style-type: none"> <li>The minimum tree grade size will be 45L grade across the project, which aligns with the Auckland Council Urban Ngahere Strategy's recent recommendations and the Urban Ngahere team's support for the planting of smaller grade trees to aid in their establishment on site.</li> <li>Opportunities for larger 80L &amp; 160L grade trees will also be explored along the corridor where berm conditions and clearances allow, primarily on the west side of Carrington Road to achieve a greater degree of day one amenity for the public. 400L grade trees will be used in a very limited manner, and only at locations of high significance / amenity and where large berm areas exist for planting them such as near to the heritage buildings, or the corners of the Woodward Road intersection.</li> </ul> <p>Regarding point (d):</p> <ul style="list-style-type: none"> <li>The exact number of trees to be planted and the resultant canopy cover cannot yet be confirmed until the design of the road corridor geometry is finalised. To define the minimum numbers requested we have used the Urban Ngahere team's requirement for AT projects of one</li> </ul>	<p>Applicants Responses Noted for a - d.</p> <p>It is understood that final locations of trees will be confirmed at detail design stage, however the replacement of trees is critical in ensuring the long term landscape outcomes mitigate the loss. Reduction of street trees / grades as part of detailed design would not be supported.</p>	<p>Noted – reduction in the number and grade of street trees is not proposed.</p>

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		<p>replacement tree for every 10m<sup>2</sup> of canopy cover loss to mitigate the loss within a reasonable timeframe.</p> <ul style="list-style-type: none"><li>A figure of 839.5m<sup>2</sup> of canopy loss has been calculated based on the updated tree removal figures (see responses to items 41 and 44 below, and to <b>Attachments F-H</b>). This would set an absolute minimum number of 84 replacement trees at a minimum 45L grade. At 10 years, this would ensure the replacement of the tree canopy loss, and achieve a minimum canopy cover of 9.54% within berm areas and 3.89% across the whole project area.</li></ul> <p>While this minimum replacement figure would not meet the 15% target set by the Urban Ngahere Strategy, the proposed numbers are well in excess of this – as noted in the responses to items 41 and 44 below and in Attachment F, the proposed number of new trees exceeds the minimum replacement by 96 trees (i.e. 180 minus 84). Confirmed tree numbers and canopy cover calculations will be available at the end of detailed design, and are required to be provided as part of the ULDP under the proposed conditions.</p>		
35	<p>Please confirm the location and size of laydown areas. Please advise if works proposed on the eastern-side of the road and western-side road works will use the same laydown areas. Please confirm if separate laydown areas are required for the CRIP works and the Watermain works. This information is requested to understand the potential visual amenity effects on specific neighbours.</p>	<p>As per the response to item 6 above, a single laydown area will be shared between the CRIP works (west and east side) and the Watermain works – there are no requirements for separate laydown areas for each project.</p> <p>In terms of the location and size of laydown areas, three options have been identified on the western side of Carrington Road as follows. Each would be 0.7 to 1ha in area:</p> <ul style="list-style-type: none"><li>Option 1 – North of the Gate 3 intersection, within land to be developed by the Marutūāhu Rōpū;</li><li>Option 2 – South of the Gate 2 intersection, within land to be developed by the Marutūāhu Rōpū; and</li><li>Option 3 – South of Gate 3 intersection, within land to be developed by the Waiohū-Tāmaki Rōpū.</li></ul> <p>Each of these options would require temporary occupation of Rōpū land by the contractor to utilise during the construction programme of approximately 24-32 months. Negotiations with the Rōpū are ongoing and an agreement is yet to be reached on a site. Auckland Transport will enter into a temporary occupation agreement once a site is agreed.</p> <p>Auckland Transport's preference is for either Options 1 or 3, both being flat sites with direct main road access. A potential site layout for Option 1 is shown below. Note that the Option 3 site is the same site as previously utilised as a laydown area by Dempsey Wood for works within the Carrington Residential Development. Option 2 is not favoured as it would require significant retaining, and would result in a narrower laydown area.</p>	<p>Please note the comments below from Council's Principal Landscape Architect with regards to amenity effects on residents during construction which you are encouraged to provide further comment on.</p> <p><i>"I consider that during works - including vegetation removal and construction, with mitigation measures in place .....that the residents...will be impacted to at least a low-moderate degree (<b>minor</b>). Without mitigation measures effects would be moderate and greater. Subject to the proposed 180x 45L trees being implemented I would agree that permanent effects over time mid-long term will be managed and reduced. However, this will take time."</i></p>	<p>We reiterate the following key conclusions from the Landscape and Visual Assessment regarding visual amenity effects for residential viewing audiences (pages 21-22):</p> <p><i>"... Despite the scope of construction, these activities will principally remain within the road corridor or within the Wairaka Precinct (where road widening is anticipated) and will be visually associated with road infrastructure upgrades. As such, even with increased visibility, construction work is expected to align with typical large-scale upgrades in an established major arterial corridor. It is anticipated that without construction hoarding in areas of intensified activity, interpretive panels in areas where larger groups of viewing audiences may be grouped... along with directional lighting and light shields, effects would be up to moderate during construction. With mitigation measures applied, adverse effects on residential viewing audiences... are anticipated to be low-moderate during construction."</i></p> <p>Moreover, we note the following:</p> <ul style="list-style-type: none"><li>We agree that the proposed level of new tree planting will assist in the management and reduction of permanent effects over time.</li><li>The preferred construction yard/laydown area (either to the immediate south or north</li></ul>

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				<p>of Gate 3) will only be visible to a relatively localised area of dwellings opposite. The area has recently been used as a construction yard/laydown area for the Carrington Backbone Works.</p> <ul style="list-style-type: none"><li>The assessment alludes to the visual effects associated with Mt Albert pedestrian bridge. These works are no longer proposed (see <b>Attachment B</b>).</li></ul>
36	Please provide a CPTED report for the proposed pedestrian bridge and associated space including the slip lane in front of 222 and 224 Carrington Road.	In our view, there is not sufficient design detail at this stage to complete a full CPTED assessment for this area. For this reason, the proposed conditions require a CPTED audit to be prepared for the walking and cycling facilities and bridge structures proposed as part of the Project. The proposed requirement under condition 8 is that this is prepared as part of the ULDP prior to the start of construction, when further design detail is available.	<p>The applicant’s response is noted. However, it is considered that the proposed pedestrian bridge will likely create further CPTED issues along the slip lane for the childcare and residential unit residents. Without a design to address the potential effects against, please advise if any specific wording within conditions is proposed to ensure the design responds to CPTED issues for these users - above providing a CPTED report. e.g., requirements of the design - lighting, appearance, space for pedestrians access etc.</p> <p>To understand the potential adverse effects on the surrounding environment and adjacent persons you are strongly encouraged to provide a preliminary design (site plan and elevations) which show the bridge in relation to the slip lane and existing retained road.</p>	The Mt Albert pedestrian bridge is no longer proposed as part of the Project – see <b>Attachment B</b> . Accordingly, the requested information has not been provided.
37	While it is recognised the fabrication of the new active mode bridge is to take place offsite and is to be steel frame or precast concrete material, there is limited details on the final appearance and design. The proposed condition wording “consideration given around the form, function and exterior appearance” does not provide enough detail to ensure a quality outcome given the proximity of the bridge and piles to the properties at 222 and 224 Carrington Road. For example it is not clear how the offered condition will ensure the final design will require elements to minimise blank / solid concrete or steel appearance of the bridge, piles and retaining wall. It is not clear how the design will respond to any identified CPTED issues and the character of the area.	Detailed design for the bridge has not yet been completed, so it is not possible to provide the detail sought on its final appearance and design at present.	<p>Please refer to the comments above and note the below from the Council’s Principal Landscape Architect:</p> <p><i>“Without having a design of the bridge and the potential additional effects on access, safety and amenity for residents at 224 Carrington Road., and users of the Childcare centre at 222 Carrington Road is considered to be adversely impacted.”</i></p>	The Mt Albert pedestrian bridge is no longer proposed as part of the Project – see <b>Attachment B</b> . Accordingly, the requested information has not been provided.
<b>Parks Planning</b>				
45	The landscaping plans, specify both “V11 – Amenity Planting” and “V14 – Revegetation Planting” on “Soft Landscape Plan Sheets 10 & 11”.	<p>Regarding point (a):</p> <ul style="list-style-type: none"><li>The proposed stormwater treatment and conveyance swales on the North Side of Segar Avenue create some challenges for the long term maintenance of the berm on</li></ul>	<ul style="list-style-type: none"><li>Given HW’s support of the proposal, detailed comments around the swale planting / revegetation planting for Segar Avenue, will be provided at EPA stage when a detailed</li></ul>	Regarding the first point – noted.



No.	Initial s92 request (31/3/25)	AT initial response (17/4/25)	Further s92 request (20/5/25)	Further response (10/6/25)
	<p>a. Please provide rationale why revegetation planting (V14) is proposed in addition to the swale planting on Segar Avenue (shown on Soft Landscape Plan Sheets 10 &amp; 11)?</p> <p>Please confirm what is planned in the grey-coloured area of the road reserve on Segar Avenue (as outlined in green in the snip below)?</p>	<p>the north side of this road. This is due mainly to the site constraints within which they, and the associated planting have been designed.</p> <ul style="list-style-type: none"><li>Due to the gradual but significant level change between the boundary and the road below in the northern berm the swale must be located adjacent to the existing northern road kerbline if excessive earthworks, retaining walls and overhead powerline relocation are to be avoided. The earthworks required to form the swales will also extend north into the berms, requiring the removal of existing trees, grass and shrubs, however the swale and overhead power lines limit the opportunity for tree planting within this berm area.</li><li>To mitigate the effect of these tree removals revegetation planting has been proposed between the swale and northern boundary for the following reasons:<ul style="list-style-type: none"><li>To mitigate the loss of canopy cover via the use of small trees and shrubs that connect the swale to the existing screen planting along the northern boundary, while working within the limitations of the overhead power line clearance envelopes.</li><li>That the use of small trees and shrubs is appropriate at this location due to the lack of sightline requirements across the northern berm and the context of a blank northern boundary with existing screen planting and a current lack of any footpaths or access points along the extent of the proposed swales and planting.</li><li>To ensure that all remaining grass berm areas are maintainable, practical and not steeper than 1:5 to permit mowing. Should revegetation planting not be provided unmaintainable narrow grass strips blocked by utility poles could result, preventing efficient mowing and maintenance.</li></ul></li></ul> <p>Regarding point (b):</p> <ul style="list-style-type: none"><li>The grey coloured area of the road reserve referenced in this query is a conveyance swale, which both moves treated water from the upper treatment swale and also the wider catchment, increasing the capacity of the network. This purpose means it cannot be planted without impeding water flow, explaining the grey colour. The final material / surface of the swale will be confirmed at detailed design.</li></ul> <p>Further to the above and as noted in the response to item 34, a detailed planting plan is proposed to be prepared as part of the Urban and Landscape Design Plan; as required by the proposed resource consent conditions (see draft condition 8(b)(v)).</p>	<p>landscaping plan is provided by the applicant. This will form one of the conditions required for this resource consent.</p> <ul style="list-style-type: none"><li>As outlined in the other matters section of the s92 requests, Parks will not accept planted berms outside of stormwater devices (i.e. Segar Ave) – and wish to reiterate that Parks will need to see the removal of the “V11 – Amenity Planting” areas as shown on plans for Carrington Road itself and have it revert back to standard grassed berms with street trees in these instances (see example of this in the snip below). Therefore, please seek this change to the proposal.</li><li>Additionally, Parks do share some high level concerns on how the new berms on Carrington Road will adequately provide for new trees to reach the required canopy cover to mitigate the loss of mature, street trees sufficiently (in reference to the Urban Ngahere strategy) – though these detailed comments is to come from the Urban Forest team.</li></ul> 	<p>Regarding the second point – we confirm that planted berms are no longer proposed outside of stormwater devices.</p> <p>Regarding the third point – noted.</p>

No.	Initial s92 request (31/3/25)	AT initial response (17/4/25)	Further s92 request (20/5/25)	Further response (10/6/25)														
49	<p>Please provide the proposed earthwork plans and comments from the project geotechnical engineer regarding the potential adverse effects on the stability and safety of surrounding land, buildings, and existing services associated with the proposed new active mode bridge over the railway corridor. Specific geotechnical input on the potential temporary and long-term effect for the proposed earthworks is required at land use consent stage.</p>	<p>Currently we do not have a complete model necessary to generate an isopach plan. However, Detailed Cross-Sections prepared for the Preliminary Design showing indicative cut and fill depths have been prepared, and are included as <b>Attachment I</b>. Earthworks associated with the active mode bridge are yet to be confirmed and modelled.</p>	<p>The provided roading cross-sections indicate the proposed cut and fill depth. It appears that the maximum cut required will be around the widening segment, at the chainage annotated as 1220. It is noted that no geotechnical comments regarding the potential adverse effects on the stability and safety of surrounding land, buildings, and existing services due to the earthworks have been provided relative to the proposed maximum cuts.</p> <div><table><tr><td colspan="2">NO RETAINING NEEDED AS CARRINGTON RESIDENTIAL DEVELOPMENT IS PROVIDING THE WALL TIE INTO ADJACENT DEVELOPMENT LEVELS (RC2) RECEIVED NOV 24</td></tr><tr><td colspan="2">Datum: 22.00</td></tr><tr><td>FEATURE CODES</td><td>BF, KEB, CL, BE, KEB, LA, CL, PW</td></tr><tr><td>CUT/FILL</td><td>-1.333, -1.244, -1.141, -0.900, -0.894, -0.872, -0.302, -0.034, 0.000</td></tr><tr><td>DESIGN LEVELS</td><td>24.345, 24.311, 24.345, 24.211, 24.030, 23.918, 23.983, 24.047, 24.070</td></tr><tr><td>EXISTING LEVELS</td><td>25.620, 25.420, 25.420, 25.111, 24.930, 24.881, 24.940, 24.881, 24.870</td></tr><tr><td>OFFSETS</td><td>-12.446, -10.744, -10.744, -8.744, -6.825, -4.400, -3.200, 0.000, 1.486</td></tr></table><p>CH: 1220.00</p></div>	NO RETAINING NEEDED AS CARRINGTON RESIDENTIAL DEVELOPMENT IS PROVIDING THE WALL TIE INTO ADJACENT DEVELOPMENT LEVELS (RC2) RECEIVED NOV 24		Datum: 22.00		FEATURE CODES	BF, KEB, CL, BE, KEB, LA, CL, PW	CUT/FILL	-1.333, -1.244, -1.141, -0.900, -0.894, -0.872, -0.302, -0.034, 0.000	DESIGN LEVELS	24.345, 24.311, 24.345, 24.211, 24.030, 23.918, 23.983, 24.047, 24.070	EXISTING LEVELS	25.620, 25.420, 25.420, 25.111, 24.930, 24.881, 24.940, 24.881, 24.870	OFFSETS	-12.446, -10.744, -10.744, -8.744, -6.825, -4.400, -3.200, 0.000, 1.486	<p>The following comments are provided by the Project geotechnical engineer:</p> <ul style="list-style-type: none"><li>• The cross-section at CH. 1220 shows up to approximately 1.3m cut, with a retaining wall indicated to be built at the new boundary (by others).</li><li>• Potential adverse effects of excavation may include stability of the slope face at the property boundary. Temporary slope stability would be assessed and managed by the Contractor.</li><li>• Potential adverse effects of excavation may also include service strike. The Contractor will need to locate and protect all services prior to excavation.</li><li>• The proposed retaining wall (by others) would need to consider buildings located on the property. Design details of the retaining wall would be developed and provided by the developers' engineer.</li></ul>
NO RETAINING NEEDED AS CARRINGTON RESIDENTIAL DEVELOPMENT IS PROVIDING THE WALL TIE INTO ADJACENT DEVELOPMENT LEVELS (RC2) RECEIVED NOV 24																		
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## Memorandum

**To:** Auckland Council  
**From:** Carrington Road Improvements Project Team  
**Copy:** Kelly Durham, Auckland Transport  
**Subject:** Attachment A – Technical Memorandum – Airing Court Wall further assessment

**Date:** 10 June 2025  
**Our Ref:** 3230635-776096487-11802

### 1 Introduction

This technical memorandum addresses Auckland Council's most recent (dated 20 May 2025) section 92 request for further information as it relates to the proposed removal of a 65m length of a 2m-high brick boundary wall referred to as the Airing Court Wall (the wall). The removal of the wall is a non-complying activity under rule D17.4.1(A1) of the Auckland Unitary Plan: Operative in Part (AUP:OP), being a pre-1905 feature within the Oakley Hospital Main Building Extent of Place.

The memorandum addresses items 23 and 28 of the s92 request which in short seek clarification on the assessment substantiating the need to remove the wall. Specifically:

- Whether an option to realign Carrington Road eastwards to avoid the wall has been assessed;
- Whether an option to further narrow the proposed Carrington Road cross-section to avoid the wall has been assessed;
- Whether assessment of the above options has given adequate weight to the heritage value of the wall; and
- By extension, whether the proposed removal of the wall is justified.

### 2 Context and current situation

#### 2.1 Engagement with Auckland Council and HNZPT

The following points are noted for context:

- Auckland Transport (AT) held a pre-application meeting with Heritage New Zealand Pouhere Tāonga (HNZPT) on 4 November 2024, during which some questions were raised regarding the rationale for removing the wall. A written response was provided via a technical memorandum to HNZPT on 12 November 2024 detailing the rationale to date.
- AT held a pre-application meeting with Auckland Council Heritage specialists on 6 November 2024, during which the need for a strong rationale for removal of the wall to satisfy the relevant policy tests was emphasised. Otherwise, mitigation was the key focus of the meeting.
- AT shared draft heritage and archaeological assessment reports with Auckland Council Heritage specialists and HNZPT staff in December 2024. The rationale outlined in the 12 November memorandum to HNZPT substantiating the removal of the wall was included in the draft heritage assessment. Feedback was received from both parties in January. Both appeared to accept rationale for removing the wall and neither raised further points on the subject at this point. Both sets of comments focused on mitigation. In the case of HNZPT, feedback specifically noted that “we accept that the parameters and concept design proposed to achieve the roading, bicycle path and footpath for the west side of Carrington Road are such that realistically the existing 1887 portion of the Airing Court Wall cannot be retained in situ.”

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- On the basis of the above, AT sought non-complying activity resource consent for the removal of the wall under D17.4.1(A1) of the AUP:OP as part of its application lodged on 21 February 2025, on the basis that sufficient justification for removal of the wall had been demonstrated to meet the relevant policy tests; and that suitable mitigation was feasible and could be agreed.
- Over the course of s92 process, AT has further developed mitigation proposals. Mitigation concepts were produced for the initial s92 response (on 17 April 2025), and further concepts were developed and subsequently distributed on 30 May 2025.

### 2.2 Design rationale to date

Rationale substantiating the need to remove the wall has been provided in the 12 November 2024 memorandum alluded to above, the Assessment of Effects on the Environment (AEE) lodged on 21 February 2025, and in the initial s92 response on 17 April 2025. To summarise:

- To reduce effects on the Oakley Hospital Main Building Extent of Place, the design to date through the Detailed Business Case (DBC), Concept Design, and Preliminary Design has incorporated both:
  - Localised realignment between Ch. 1300-1500, incorporating a lateral shift of 2.3m eastwards from the centreline of the remainder of the design (addressed further at 3.1 below); and
  - Localised narrowing of the corridor between Ch. 1300-1500 from 28.2m down to 23.9m at the narrowest point adjoining the Oakley Hospital Main Building, a 4.3m reduction (addressed further at 3.2 below)<sup>1</sup>.
- The localised realignment and narrowing of the corridor has been sufficient to avoid the Oakley Hospital Main Building, the Primary Feature within the Extent of Place; but not the wall. Options for further realignment and narrowing of the corridor to the extent needed to avoid the wall were considered and ruled out. These options are outlined more fulsomely in this memorandum.

## 3 Alternatives considered

### 3.1 Option 1 – Further localised realignment of the corridor

#### 3.1.1 Requirements to avoid the wall

As noted earlier, the design to date has already provided for a lateral shift of 2.3m eastwards from the centreline of the remainder of the design between Ch. 1300-1500 which enables avoidance of the Oakley Hospital Main Building, but not the wall.

To avoid the wall through further localised realignment of the corridor to the east (i.e. without further reduction of the corridor width), the following design parameters would need to be adopted:

- A lateral shift of 8m to the east of the centreline for adjoining sections to the north and south (i.e. a further 5.7m over and above the 2.3m already adopted). This lateral shift would need to clear the 65m length of the wall, before transitioning back to the remainder of the alignment via tapers to north and south.

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<sup>1</sup> Note that the earlier cited figure of a 3.9m reduction is based on a slightly wider point of the corridor (cross-section at Ch. 1368), and an erroneous reference to a 28.8m width for the remainder of the corridor.



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- As per the geometric design standards set out in Austroads Part 3, a compliant transition taper distance would be approximately 185m to tie back into the remainder of the alignment to achieve an 8m lateral shift in the context of a straight in a 50km/h speed environment.

These parameters are illustrated below at Figure 1.

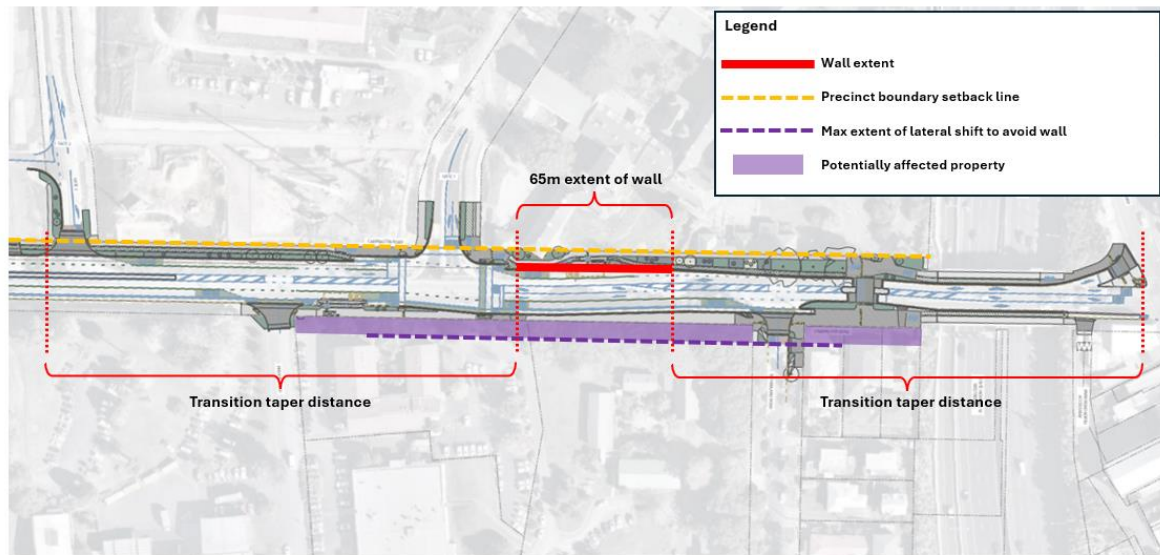


Figure 1 – Eastward lateral shift required to avoid the wall

For completeness and clarity, we acknowledge and agree with Council's comment that the Wairaka Precinct boundary setback (which provides for road widening to the west of the existing road) does not trump the provisions of Chapter D17. The comment in the initial s92 response was intended to convey that achieving eastward realignment sufficient to avoid the wall is made more challenging by the remainder of the corridor being predicated on widening westwards.

### 3.1.2 Consideration of Option 1

The option of further localised realignment of the corridor as described above is acknowledged to have heritage benefits insofar as it achieves avoidance of the wall. However, the option introduces significant design constraints and additional adverse effects, which are described in further detail below.

#### Geometric design

As noted above, achieving the lateral shift of 8m to the east needed to clear the wall requires a transition taper distance of approximately 185m to tie back into the remainder of the alignment to the north and south to achieve compliance with the relevant geometric design standards.

To the north, the alignment must tie into the existing SH16 bridge as a fixed constraint – a new bridge or substantial modifications to the existing bridge are not within the Project scope. The location of the bridge is such that it only allows for a 100m transition taper, meaning that a compliant tie-in would not be possible.

To the south, a compliant 185m transition taper can be achieved. However, it would require reconstruction/realignment of the Gate 1 intersection to the immediate south. This intersection has only recently been constructed as part of the Carrington Backbone Works, and has accordingly informed the Project design for further improvements in this location. The Gate 1 intersection

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remaining on its current alignment would result in a non-compliant transition taper being located just 20m south of the wall.

Non-compliant transition tapers introduce safety concerns as vehicles may experience loss of control or encroach into opposing lanes. While this is typically a low risk during daytime/peak periods with higher traffic volumes and lower operating speeds, the risk is elevated during off-peak/night periods with lower traffic volumes and higher operating speeds.

### Property requirements

The option would require additional third-party land on the eastern side of Carrington Road to accommodate the required lateral shift and transition tapers. Permanent encroachments of up to 5.7m into the following properties would be required (from north to south):

- 26 Carrington Road, a dwelling;
- 28 Carrington Road, an Early Childhood Education (ECE) centre;
- 5-27 Sutherland Road / 54 Carrington Road, Te Whatu Ora properties containing the Whatua Kaimarie Marae, the Buchanan Clinic, and a rehabilitation centre;
- 50 Carrington Road, a Community Alcohol and Drugs Services (CADS) facility; and
- 56 Carrington Road, the head office and logistics centre for OneLink, a medical consumables supplier.

While none of the above properties would need to be fully acquired, the encroachments will affect vehicular access arrangements for each property, trees/boundary planting (addressed further below), and site parking in some cases.

The Project is constrained by the fixed funding envelope and timeframe imposed by Kāinga Ora's Infrastructure Acceleration Fund (IAF), which is the funding source for the Project. As noted in the AEE, IAF funding is contingent upon construction commencing in the first quarter of 2026 with practical completion by May 2028 to align with the Carrington Residential Development programme. AT has therefore sought to avoid the need for land take given that it will result in exceedance of the available funding envelope, and likely failure to meet the programme requirements on which funding for the Project was conditioned. The exception has been Crown land within the Wairaka Precinct boundary setback which has been earmarked for road widening purposes in the AUP:OP since 2016, and accordingly is well advanced as a willing-buyer/willing-seller acquisition.

For completeness, it is acknowledged that realignment to the east as described above would negate the need for the corresponding section road widening (and therefore property) on the western side of the road as currently proposed for the relevant extent.

### Arboricultural Effects

The option would result in the removal of a row of eight Pōhutukawa trees, which are set back approximately 4-5m from the existing property boundary (see Figure 2). The measurements of the trees as given in the lodged Arboricultural Assessment are set out in Table 1.

The Project arborist has noted that this is a row of pōhutukawa with a continuous canopy for 100m, ranging from 10.5-13.6m in height and a canopy spread of up to 26m wide. Most of the canopies overhang the Carrington Road footpath. The group was assessed by the Project arborist as being in good to fair condition, with the exception of Tree 5.

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Figure 2 – The row of pōhutukawa (taken from Arbor Connect Carrington Road Upgrade Project Arboricultural Assessment, dated 17/4/25)

Table 1 – Summary of arboricultural characteristics for the row of pōhutukawa (taken from Arbor Connect Carrington Road Upgrade Project Arboricultural Assessment, dated 17/4/25)

Tree / Group Number	Species	Height (m)	Canopy Spread (m)	Trunk Girth @ 1.4 (m)	Trunk Diameter @ 1.4 (m)	Trunk Diameter @ Base (m)	Condition
2	Pōhutukawa	13.6	26.0	8.9 (5 Stems estimate)	1.34	1.30 (Estimate)	Good
3	Pōhutukawa	11.2	19.0	12.4 (15 stems Estimate)	1.07	1.80 (Estimate)	Good
4	Pōhutukawa	13.0	20.0	6.6 (7 stems Estimate)	0.81	1.50 (Estimate)	Fair
5	Pōhutukawa	13.0	15.0	3.1 (4 stems Estimate)	0.53	1.00 (Estimate)	Poor
6	Pōhutukawa	13.0	20.0	13.0 (12 stems Estimate)	1.22	1.80 (Estimate)	Fair
7	Pōhutukawa	12.0	20.0	5.3 (5 stems Estimate)	0.76	0.80 (Estimate)	Fair
8	Pōhutukawa	10.5	1.0	4.4 (4 stems Estimate)	0.72	0.80 (Estimate)	Fair
9	Pōhutukawa	10.6	20.0	8.2 (9 stems Estimate)	0.90	1.80 (Estimate)	Fair

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Using the Auckland Council Guidelines for Nominating a Notable Tree for Evaluation, the Project arborist has assessed the trees as being significant for the following reasons:

- **Age and health** – The trees are estimated based on historical aerial photographs to be 95-100 years old, and have good vigour and vitality.
- **Character and form** – The row of pōhutukawa exhibits a character considered to be exceptional in a local context. The trees exhibit a typical pōhutukawa tree form and have a continuous canopy for 100m.
- **Size** – A row of this size of pōhutukawa trees with a continuous canopy of this length is not common in Auckland. The group would be greater than the average size of groups of pōhutukawa in Auckland.
- **Visual contribution** – The row of pōhutukawa trees is highly visible, being situated prominently along a busy arterial road.

Based on the above assessment, the Project arborist concluded that the row of pōhutukawa trees to be significant trees; and that their retention should be regarded as important. Conversely, removal of the trees would be considered a significant adverse effect of the Project.

### Landscape and Visual Effects

Removal of the pōhutukawa trees has also been considered in terms of landscape and visual effects by the Project landscape architect. This assessment also concluded that the trees could be considered to be a notable group of trees, noting particularly:

- **Cultural factors:**
  - The pōhutukawa tree holds spiritual and symbolic importance from a Māori cultural point of view, being revered as a link between the physical and spiritual worlds and standing as a powerful symbol of remembrance and loss. The trees' location on a site which also supports a Marae (the Whatua Kaimarie Marae) further contributes to this cultural connection.
  - From a landscape point of view, these trees are seen as a local marker and landmark to the community due to their recognizable species, size, and prominent location fronting a busy road corridor. Viewing audiences both permanent and transient would enjoy the presence of the trees which significantly contribute to the local urban ngahere.
- **Intrinsic factor and visual contribution** – Overall the trees are large in size, and mature specimens of good to fair condition (see Table 1). The combination of these factors together with their prominent location contribute to their memorable nature. In addition to their visual contribution within the Marae land, their physical presence along the urban road corridor, nearby a pedestrian crossing and overhanging canopies provide an element of natural shade over the footpath which further heightens their visual identity on the road environment and its users.

### 3.1.3 Conclusion

For the reasons discussed at 3.1.2 above, Option 1 was discarded despite enabling avoidance of the wall.

## 3.2 Option 2 – Further narrowing of the corridor

### 3.2.1 Requirements to avoid the wall

As noted earlier, the design to date has already provided for localised narrowing of the corridor between Ch. 1300-1500 from 28.2m down to 23.9m at the narrowest point adjoining the Oakley



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Hospital Main Building, a 4.3m reduction. To achieve this, minimum dimensions as per AT's Transport Design Manual (TDM) have been adopted for most transport elements within the cross-section (see Table 2). Adoption of minimum dimensions requires a departure from standard to be approved.

It is noted that the narrowest part of the proposed design described in Table 2 omits features included in immediately adjoining sections including berms, raingardens, and bus stops.

Table 2 – Dimensions adopted adjacent to Oakley Hospital Main Building vs AT Transport Design Manual standards

Cross-section element	Proposed dimension at narrowest point (approx Ch. 1350)	Preferred dimension as per AT TDM	Minimum dimension as per AT TDM
Western footpath	<b>1.8m</b>	1.8m	-
Western cycle lane	<b>1.3m</b>	2.0m	1.8m
Northbound bus/special vehicle lane (SVL)	<b>3.2m</b>	3.5m	3.2m
Northbound general traffic lane	<b>3.0m</b>	3.5m	3.0m
Southbound right-turn lane for the Gate 1 intersection	<b>3.0m</b>	3.5m	3.0m
Southbound general traffic lane	<b>3.0m</b>	3.5m	3.0m
Southbound SVL	<b>3.2m</b>	3.5m	3.2m
Eastern cycle lane	<b>1.5m</b>	2.0m	1.8m
Eastern footpath	<b>2.2m</b>	1.8m	-
Other (sum of kerbs and channels, cycle lane buffers / separators)	<b>1.7m</b>	-	-

To avoid the wall through further localised narrowing of the corridor (i.e. without further realignment to the east), the corridor for the 65m length of the wall would need to be reduced back to its existing width of 20.5m – i.e. the current design would need to be reduced in width by between 3.4m (at the currently proposed narrowest point adjoining the Oakley Hospital Main Building) and 7.7m.

As shown in Table 1, there is little scope to achieve this through further reductions in dimensions for individual corridor transport elements. Accordingly, avoidance of the wall would require deletion of multiple cross-section elements which are integral to the purpose of the Project:

- The southbound right-turn lane for the Gate 1 intersection;
- At least one of the SVLs;
- Any upgrades to the existing active mode facilities and bus stop; and
- Potentially deletion or narrowing of raingardens and berms.

For clarity, it is noted that deletion of the bus stop from the proposed design does not in and of itself result in avoidance of the wall.

### 3.2.2 Consideration of Option 2

The option of further localised narrowing of the corridor as described above is acknowledged to have heritage benefits insofar as it achieves avoidance of the wall.

However, the option results in a constrained design which compromises the Project's ability to realise its benefits / achieve its stated objectives – namely, increased capacity to meet the travel

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demands of 4,000+ additional dwellings planned as part of the Carrington Residential Development; and an improved level of service for public transport, walking, and cycling to induce mode shift. The option will result in the existing form and function (i.e. one traffic lane per direction, footpaths, and painted cycle lanes) remaining in place for an already constrained section of the corridor.

The implications are set out in further detail below.

### Transport

The specific transport implications of the option are set out as follows:

- Traffic modelling suggests that removing the right-turn lane for southbound traffic wishing to access the Carrington Residential Development via the Gate 1 intersection will by 2031 result in diversion of approximately 200 vehicles per peak hour to Gate 3, the next location where right-in movements are enabled (some 400m to the south). Fewer points of access for southbound traffic will add to the right-turning queue at Gate 3, and may result in overflow affecting the ability for northbound right-turning traffic to access Fontenoy Street at peak periods.
- Removing either of the SVLs will impact on the performance of public transport and general traffic:
  - The northbound SVL enables buses using the bus stop to do so without blocking northbound general traffic. Removal of the northbound SVL will therefore result in stopped buses blocking the remaining general traffic lane. This will result in congestion at the Gate 1 intersection, and to the south. Conversely, users of northbound buses will experience a reduced level of service as a result of sharing a lane with general traffic; and
  - The southbound SVL enables buses and transit vehicles to get a 'head start' at the Gate 1 intersection over queued vehicles, which will improve the level of service for public transport. Traffic modelling assessment was undertaken to test whether the southbound SVL could be deleted. This concluded that bus passengers could experience a 50% increase in travel time on this section as a result of sharing with general traffic without the SVL. Accordingly, it was recommended that the southbound SVL is maintained.
- Removing upgrades to the active mode facilities results in the existing substandard facilities remaining in place – i.e. reduced level of service and safety.
- Removal of the bus stop will mean no bus stop for the northernmost 600m of the corridor, and consequently that AT's recommended bus stop spacing is not achieved. This will affect the accessibility of multiple Frequent Transit Network (FTN) bus routes that use the corridor.

### Stormwater

While a localised reduction in corridor width will reduce the quantity of stormwater runoff to be treated, the removal or reduction in raingarden space will affect treatment capacity for the northern subcatchments (and by extension the whole corridor).

### 3.2.3 Conclusion

For the reasons discussed at 3.2.2 above, Option 2 was discarded despite enabling avoidance of the wall.

### 4 Conclusion and Recommendations

The Project team has concluded that neither Option 1 nor Option 2 represent either a practicable outcome, or an outcome which can be supported from an effects perspective. Accordingly, the recommendation remains to:

- Incorporate the extent of localised corridor realignment and narrowing shown to be practicable as described at 2.2 above, which enables avoidance of the Oakley Hospital Main Building (the Primary Feature within the Extent of Place); but not the wall; and
- Implement suitable mitigation for the removal of the wall. As noted at 2.2 above, AT has developed several mitigation proposals through the s92 process for consideration by Council and HNZPT. AT is prepared to accept in principle a condition of consent specifying:
  - A process between AT, Council, and HNZPT to finalise agreement on suitable mitigation; and
  - That AT will implement the agreed upon mitigation as part of the Project.

This outcome has been assessed as appropriate in two separate heritage impact assessments (by Plan Heritage Limited in 2023 for the DBC; and by Dave Pearson Architects in 2025 for the consent application).

Moreover, we consider that this outcome is appropriate from a policy perspective having regard to the relevant provisions of B5 and D17 of the AUP:OP; noting that:

- Avoidance of the primary feature of the historic heritage place (i.e. the Oakley Hospital Main Building) is achieved (B5.2.2(6), D17.3(12), D17.3(14));
- Alternatives which avoid the wall are limited by the functional and operational constraints outlined above, meaning that there are no reasonably practicable alternatives. Accordingly, there are functional needs and operational constraints necessitating removal of the wall (B5.2.2(7), D17.3(25), D17.3(26));
- The Project provides a significant public benefit that would not otherwise be achieved if either Option 1 or Option 2 were to be taken forward; and the significant public benefit outweighs the retention of the wall (D17.3(14), D17.3(25)); and
- Suitable measures to mitigate the effects of removing the wall will be implemented such that its removal no longer constitutes a significant adverse effect (B5.2.2(7), D17.3(25)).

**Liam Winter**

Senior Associate - Planning

Phone Number: +6493009158

Email: [Liam.Winter@beca.com](mailto:Liam.Winter@beca.com)

# Memorandum

**To:** Auckland Council  
**From:** Carrington Road Improvements Project Team  
**Copy:** Kelly Durham, Auckland Transport  
**Subject:** Attachment B: Technical Memorandum – Deletion of Mt Albert pedestrian bridge

**Date:** 10 June 2025  
**Our Ref:** 3230635-776096487-11799

## 1 Introduction

This technical memorandum summarises a proposed change to the design of the Carrington Road Improvements Project – namely the deletion of the previously proposed pedestrian bridge adjacent to the Mt Albert Rail Bridge. The design change will result in a generally **reduced** level of adverse effects.

In addressing this matter, the memorandum is relevant to items 35-37 from the Council's most recent section 92 request for further information on 20 May 2025.

## 2 Proposed design change

### 2.1 Initial proposal

The Assessment of Effects on the Environment (AEE) lodged with the application on 21 February described the following works on and around the Mt Albert Rail Bridge:

*“... A new pedestrian bridge is proposed to the east of the existing Mt Albert Rail Bridge to provide additional space for pedestrians. The new bridge spans and approach structures to the south and north are proposed to match the span arrangements, horizontal, and vertical alignment of the existing Mt Albert Rail Bridge and approaches between New North Road and Prospero Terrace. The bridge foundation of has been indicatively sized as Ø1050mm concrete piles, while the bridge structure has a typical structural width of 2290mm over the primary structural beams...*

*... The proposed new bridge to the east frees up space on the existing 16.2m-wide Mt Albert Rail Bridge, enabling the following reconfiguration:*

- Widened general traffic lanes in the same general lane configuration as existing;*
- Widened cycle lanes on both sides of the road, and raising of the northbound cycle lane to match the existing raised cycle lane on the eastern side; and*
- New kerb-and-channel on both sides of the road to enable the reconfigured cross-section.”*

This description was based on the Preliminary Design, which was appended to the application.

### 2.2 Revised proposal

Since the Preliminary Design, Auckland Transport has taken the decision to delete the previously proposed pedestrian bridge from the Project. Instead, it is now proposed that works in this location



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are limited to improvements to the existing Mt Albert Rail Bridge within the existing 16.2m width as follows:

- Maintaining the existing active mode facilities on the eastern side of the bridge, which were recently upgraded as part of works associated with the Lloyd Avenue level crossing closure. The facilities comprise a 1.5m footpath and 1.3m cycle lane with 0.1m marked horizontal separation between them, 0.2m horizontal separation from the carriageway, and with cycle lane raised to be flush with the footpath;
- Western cycle lane to be widened to 1.5m, and raised to be flush with the footpath to match the recently upgraded eastern side of the road (and removal of existing separators);
- New kerb and channel on the western side to match the recently upgraded eastern side of the road;
- New eastern railing/barrier, and improvements to the existing western railing; and
- A reduction of 0.2m in the carriageway width to accommodate the above improvements.

These changes are illustrated in the attached cross-sections (see **Attachment 1**).

The design change has been endorsed by Auckland Transport's Project Control Group, and was the subject of a workshop with the Albert-Eden Local Board on 5 June 2025. The rationale for the change is as follows:

- Significantly reduced construction risks and disruption;
- Lower carbon footprint;
- Requires no utility relocation in this location;
- No property impact or acquisition required;
- Increases the benefit-cost ratio of the Project to over 5 while providing similar benefits;
- Provides a marginal safety improvement compared with existing;
- Is a value-engineered solution with costs well within the available funding envelope; and
- Is supported by Auckland Transport Subject Matter Experts.

## 3 Consenting implications

### 3.1 Implications for consent triggers and effects

The removal of the new pedestrian bridge means that the remaining proposed works at the Mt Albert Rail Bridge are all permitted activities.

The only specific change to the resource consents triggered by the Project are that night works infringing standard E26.6.29(2) will no longer be required for bridge placement works. While the standard is still likely to be infringed by road resurfacing works (which will still require resource consent as a restricted discretionary activity under E25.4.1(A2)), the localised noise effects associated with night works for bridge placement works will no longer occur. Parties previously identified as directly affected by these works will therefore be advised that this aspect of the Project will no longer proceed.

While not directly changing the resource consents required for the Project, the following changes to the effects of the Project are noted for completeness:

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- Foundation piling will no longer be required, meaning that no groundwater or construction vibration effects will occur. In any case, the initially proposed foundation piles were <1.5m in diameter (i.e. exempt from permitted activity standards E7.6.1.10(2)-(6), and therefore permitted activities under E7.4.1(A17) and (A27)). The piling was also assessed as being compliant with the relevant vibration criteria under E25.6.30(1)(b).
- Pruning the Pōhutukawa tree identified in the Arboricultural Assessment as tree 67 will no longer be required to accommodate the pedestrian bridge works. In any case, the tree is on private land and did not require resource consent to prune.
- Removal of the pedestrian bridge will remove associated landscape and visual effects during construction and operation, and will also remove any effects on property access on either side of the bridge.

### 3.2 Implications for information sought under 20 May s92 request

The decision to delete the pedestrian bridge has the following implications in terms of the information sought by Auckland Council under its 20 May s92 request:

- Under item 35, the Council's specialist provided further commentary regarding the magnitude of amenity effects during construction. For completeness, it is noted that the effects that would have eventuated from construction of the pedestrian bridge (as noted in the lodged Landscape and Visual Assessment report) will no longer occur and can therefore be disregarded.
- Under item 36, the Council's specialist sought a CPTED assessment and a preliminary design (site plan and elevations) to better understand how the proposed bridge would respond to CPTED issues. Given that the bridge is no longer proposed, this information has not been provided.
- Under item 37, the Council's specialist noted the potential for adverse effects on access, safety, and amenity for residents at 224 Carrington Road; and users of the childcare centre at 222 Carrington Road is considered to be adversely impacted. Given that the bridge is no longer proposed, these effects will no longer eventuate.

**Liam Winter**

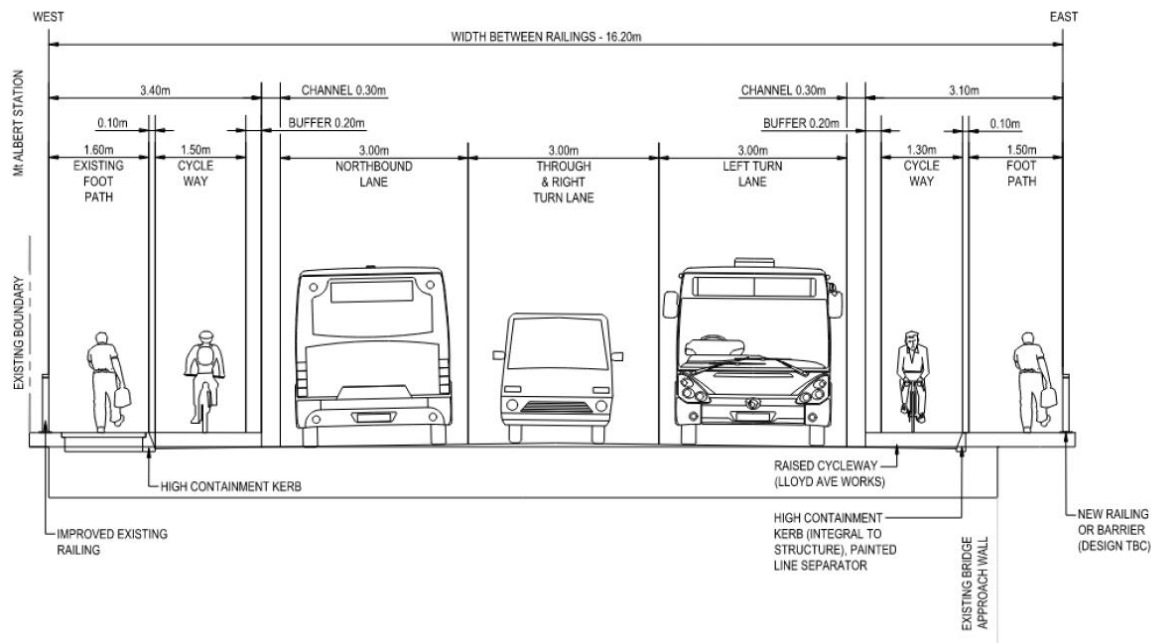
Senior Associate - Planning

Phone Number: +6493009158

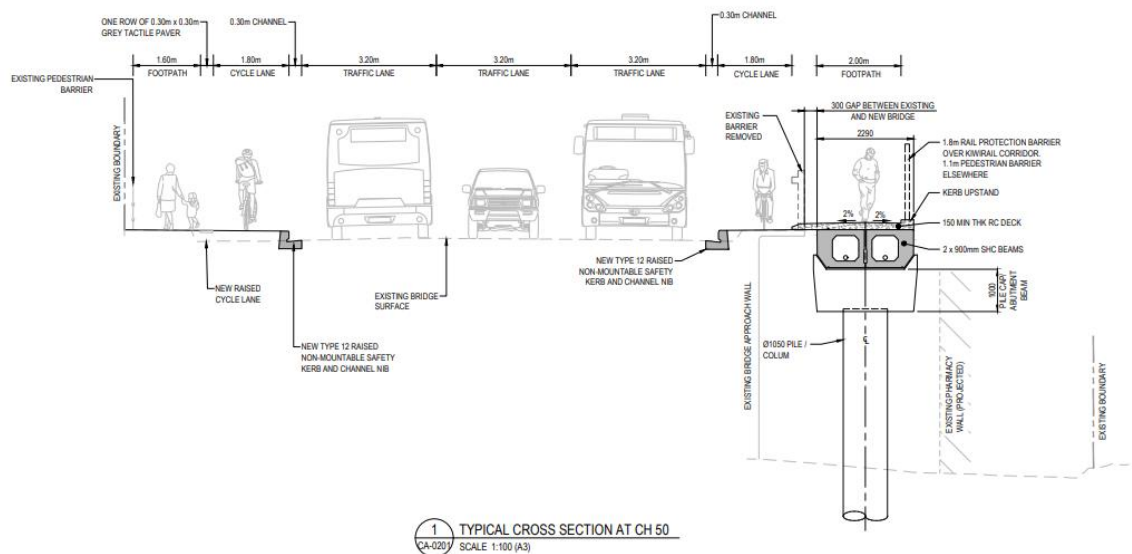
Email: [Liam.Winter@beca.com](mailto:Liam.Winter@beca.com)

Attachment 1

Currently proposed cross-section at Mt Albert Rail Bridge



Previously proposed cross-section at Mt Albert Rail Bridge





20 Viaduct Harbour Avenue, Auckland 1010  
Private Bag 92250, Auckland 1142, New Zealand  
+64 9 355 3553 | at.govt.nz

6 August 2025

Penny Anson / Doug Fletcher  
Auckland Council

Via email: [Penny@formeplanning.co.nz](mailto:Penny@formeplanning.co.nz)  
[Doug.fletcher@aucklandcouncil.govt.nz](mailto:Doug.fletcher@aucklandcouncil.govt.nz)

Dear Penny / Doug

**BUN60444232 - Carrington Road Improvements – Mt Albert Pedestrian Bridge**

Further to the letter from Beca dated 10 June 2025 in which it was advised that the Mt Albert Pedestrian Bridge had been deleted from the design and subsequently removed from the resource consent application, Auckland Transport now proposes to reinstate this element.

The bridge is shown in the preliminary design plans submitted with the application. As the plans were not updated to remove the bridge, no changes to the plans are required to address reinstatement of the bridge in the application.

Responses to the s92 requests related to the bridge will be prepared and provided to Auckland Council in due course.

Ngā mihi | Kind regards,

Kelly Durham  
**Team Leader – Consent Planning**