

Clause 23(2) Request Tracking Table



Site / Project	Fisher & Paykel Healthcare Karaka Road Plan Change	Last Updated	21/05/2025
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In addition to the responses provided in the ‘Applicants Further Response to Further Information Requested on 22 April 2025’ column of the below table, the following attachments support the response to Auckland Council’s Further Information Request under Clause 23(2) of the First Schedule to the Resource Management Act 1991 (RMA), dated 22 April 2025 on behalf of Fisher & Paykel Healthcare (FPH):

- Attachment 1 – Section 32 Report – Karaka Road – Updated May 2025;
- Attachment 2 – Updated Karaka Road Structure Plan – May 2025;
- Attachment 3 – Revised Appendix 1 – Revised Precinct Provisions (Marked-Up version with track-changes);
- Attachment 3A – Revised Appendix 1 – Revised Precinct Provisions (Clean version without track-changes); and
- Attachment 4 – Updated SMP (Final Version 5) including Stream Erosion Assessment (prepared by Woods).

Original Clause 23 Request		Reason	Applicant Response Provided 28 March 2025	Further Information Required (as per further Request dated 22 April 2025)	Applicants Further Response to Further Information Requested on 22 April 2025
Planning					
Planning					
P1	A number of activities within the Precinct Activity table duplicate the underlying zone and have the same activity status. Please clarify why this is necessary and whether the plan change could be simplified by avoiding duplication of provisions.	To clarify the proposed plan change	Activities already provided for as permitted activities in the underlying B-LIZ zone (e.g Light Manufacturing and Servicing (updated to Manufacturing, research, and development of medical products and systems and ancillary activities) (A5), Warehousing (A6), Storage and lock-up facilities (A7) and Industrial parks enabling over 100,000m ² GFA of mixed light industrial activities (A8)), which are nested under Industrial activities, and New Buildings (A1) have been included to provide the Applicant with certainty that the anticipated activities associated with their development are permitted within the Precinct, and to provide greater certainty about the development envisaged within this Precinct, consistent with FPH operations and the Precinct description.	No further information requested.	N/A - No further information requested.

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		In our view this provides greater clarity about the activities that are anticipated within the Precinct, and will enable a similar type of development to the existing FPH Campus at East Tāmaki while maintaining certainty for FPH over the longer term, given the AUP will be reviewed at some point during FPHs development of the site.		
P2	Please explain why Activity (A3) is a discretionary activity rather than a NC activity given the importance of the standards referenced.	To clarify the proposed plan change Discretionary activity status for (A3) is considered appropriate as there are no limitations on the effects or matters which can be considered when considering applications for discretionary activities. Discretionary activities provide the Council with full discretion when assessing any future resource consent applications. In particular, under a resource consent application, a Council will undertake a: Full assessment to determine whether development or subdivision that does not comply Standard IX.6.2 should be approved, subject to any conditions; and Full assessment of the effects of the activity on the environment and the suitability of the proposed development. As it is not generally anticipated that development prior to the transport infrastructure upgrades in Standard IX.6.2	No further information requested.	N/A - No further information requested.

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			will occur, it is most appropriate for development that infringes this standard to be Discretionary Activity as opposed to a non-complying activity which is not considered necessary in this case.		
P3	Please explain how the floor space limit in Activity (A4) is able to be monitored and enforced given the permitted activity status of most industrial activity. Please also explain whether industrial activity outside of buildings (i.e. yard space) is included in this activity.	To clarify the proposed plan change	A new Special Information Requirement has now been included in the Updated Precinct provisions to address this feedback (Attachment 1), refer IX.9(5). Yard space is not included in the GFA, as per the definition of GFA in the AUP(OP).	No further information requested.	N/A - No further information requested.
P4	In respect of Activities (A8) and (A9) please explain how this can be monitored or enforced. Please also explain whether this relates to the entire Precinct or to subdivided sites.	To clarify the proposed plan change	Activities (A8) and (A9) (now (A11) and A12) in the updated Precinct provisions at Attachment 1) will be monitored and enforced the same way that compliance with the Business Light Industry zone Activities (A17) and (A18) are monitored and enforced, however with a 40 per cent GFA threshold as opposed to the 30 per cent threshold in the underlying zone. This will be on a per site basis at the time of consenting, as per the underlying Business – Light Industry zone provisions. At the time of consenting, applications will need to demonstrate compliance with Activity (A11) and if not, apply for Restricted Discretionary consent, as part of a future resource consent application.	No further information requested.	N/A - No further information requested.
P5	Activity (A10) refers to arterial roads identified on the planning maps. Should	To clarify the proposed plan change	More specificity is not required – the wording ‘arterial roads identified on	No further information requested.	N/A - No further information requested.

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	this be more specific and refer to the Precinct Plan which shows the preferred access points.		the planning maps’ is used in Chapter E27 – Transport. Activity (A10) (now (A13)) is providing vehicle access along the existing arterial road as a controlled activity. (A11) (now (A14)) requires the new vehicle accesses to be located in the general location as shown in Precinct Plan 1.		
P6	Standard IX.6.1 requires Iwi to be advised of any resource consents. Please clarify how this is to occur. The standard seems very general and has a lack of clarity about who should be informed.	To clarify the proposed plan change	Standard IX.6.1 is clear, in that it states when iwi are to be informed (all development requiring resource consent within the Precinct), how iwi are to be informed (must be communicated with written advice) and which iwi are to be informed (Ngāti Tamaoho, Ngaati Te Ata Waiohua and Te Ākitai Waiohua). Standard IX.6.1 also clearly states that for any land disturbance within the archaeological alert area in Precinct Plan 3, an archaeological and cultural assessment must be development with iwi in accordance with IX.9(4) Archaeological and Cultural Assessment Special Information Requirement. Standard IX.6.1 and Special Information Requirement IX.9(4) were developed collaboratively with the interested iwi authorities involved in this Plan Change.	No further information requested.	N/A - No further information requested.
P7	Please explain why occupation rather than the commencement of construction is used in Table IX.6.2. Please also explain how the floor space will be	To clarify the proposed plan change	Occupation is used in Table IX.6.2 rather than the commencement of construction as there are existing vehicle accesses into the site off Karaka Road which are appropriate for construction vehicles. A	No further information requested.	N/A - No further information requested.

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	monitored to ensure compliance.		Construction Traffic Management Plan will be prepared at consenting stage. A new Special Information Requirement has now been included in the Updated Precinct provisions to address this feedback (Attachment 1), refer IX.9(5).	
P8	Please explain how IX.6.3 relates to activity (A10) and whether similar wording should be used in each.	To ensure consistency of AUP wording.	The description of Activities (A10) and (A11) (now (A13) and (A14)) have been updated in the revised Precinct provisions at Attachment 1 to refer to Vehicle Access as opposed to Vehicle Crossings, to ensure consistency with wording in Standard IX.6.3.	No further information requested.
P9	Figure IX.6.4.1 explains how landscaping is to be applied. Please reconsider the use of the word 'road' within the diagram as this appears to relate to a driveway and not a road. Given that road is a defined term, this is likely to lead to confusion. Please explain how the 40m planting requirement in IX.6.4(2) works when this is in excess of the actual yard requirement. The proposed wording is open to various interpretations and would benefit from review.	To clarify the proposed plan change	The reference to "New Access Roads" in Figure IX.6.4.1 has been amended to refer to "New Vehicle Access" to avoid confusion. The 40m planting requirement relates to the distance from any new development which must be planted (for a depth of at least 3m) and is separate to the minimum yard depth required under IX.6.4(1). Note that IX.6.4(2) needs to be read in conjunction with the supporting diagram.	No further information requested.
P10	Standard IX.6.5 requires a 10m landscaping strip. Please explain whether the 10m depth is to be measured from the road or from internally within the Precinct.	To clarify the proposed plan change	The 10m deep landscaped area referred to in Standard IX.6.5 will be measured from the Property boundary / precinct boundary, as shown in Precinct Plan 2.	No further information requested.
P11	Please explain how standard IX.6.6 is to be monitored and enforced. Does this standard have the potential to prevent	To clarify the proposed plan change	A new Special Information Requirement has been included in the Updated Precinct provisions (refer to	No further information requested.

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	development at later stages if all impervious surface is used up in early stages?		Attachment 1) requiring the monitoring of impervious areas, and a requirement to provide a schedule of impervious surface at time of building and/or resource consent. The standard does limit development at later stages if the maximum impervious area has been reached. This is similar to other rules within Precincts across the region.		
P12	Please explain why occupation rather than the commencement of construction is used in Standard IX.6.9?	To clarify the proposed plan change	Water supply and wastewater will not be required on site until the buildings are occupied.	No further information requested.	N/A - No further information requested.
P13	Please explain the term “addendum Transport assessment is used in IX.9 i.e. addendum to what?	To clarify the proposed plan change	This term refers to an Addendum to the Integrated Transport Assessment which was prepared as part of the development of the Karaka Road Structure Plan and the proposed Plan Change (Appendix 9 to the lodged plan change application). Greater clarity has been added to the heading of this Special Information Requirement in the Revised Precinct Provisions at Attachment 1 .	No further information requested.	N/A - No further information requested.
P14	It would be helpful to the plan interpretation if the key to Precinct Plan 2 contained the widths of the various yards and the special landscape area.	To clarify the proposed plan change	Precinct Plan 2 has been updated to include dimensions. Refer to Revised Precinct Provisions at Attachment 1 . This has also been updated at Figure 7 (page16) in the Updated section 32 Report at Attachment 3 .	No further information requested.	N/A - No further information requested.

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P15	The archaeological features alert layer on Precinct Plan 3 appears to vary from a strict 100m from the stream. To clarify this it is considered that the words “100m from Oiroa Awa (Creek)” be removed and that the layer should stand alone on the plan.	To clarify the proposed plan change	Precinct Plan 3 has been updated and the notation “100m from the Oiroa Awa (Creek)” has been removed. Refer to Revised Precinct Provisions at Attachment 1 . This has also been updated at Figure 24 (page 57) in the Updated section 32 Report at Attachment 3 .	No further information requested.	N/A - No further information requested.
P16	Given that the land will be urbanised please advise as to whether the Macroinvertebrate Community Index requires change for some or all of the plan change area.	To understand whether other parts of the AUP require change.	Consistent with other recently approved Plan Changes seeking to rezone land from Future Urban zone to an operative live zone under the AUP across the region, the Macroinvertebrate Community Index does not require any amendments. The Macroinvertebrate Community Index is applied to an extensive area comprising both urban and rural zones.	No further information requested.	N/A - No further information requested.
P17	In section 7.1 of the Assessment of effects it stated that; <i>The built form of the Plan Change area will be very similar to that of the existing FPH East Tāmaki Campus, where large, low height building footprints are separated by green infrastructure including integrated stormwater management devices as well as useable open spaces.</i> While the PPC may enable a campus type development there is little in the plan change that requires this outcome, and apart from some impervious surface and	To understand the effects of a standard development rather than a campus development.	We are not entirely clear what Council considers a “standard industrial area”, or its effects with regards to built form to be. However recent examples of industrial development which have occurred post adoption of the AUP (and where buildings are permitted) include Highgate (Silverdale), parts of Hobsonville Corridor (away from Hobsonville Road), Drury South in addition to FPH’s own developments at East Tāmaki. None of these give rise to problematic built form effects. Industrial buildings are typically large and more utilitarian in	It is considered that the initial response should be reconsidered, The master plan provided is a single outcome that while meeting the proposed provisions is not required by the proposed provisions. The effects of range of other outcomes is possible and these should be assessed.	The Plan Change will <i>enable</i> a comprehensive and integrated development, rather than <i>requiring</i> the delivery of a comprehensive and integrated development. This has been clarified in the supporting documentation attached, including the updated s32 report (refer Attachment 1) and the updated Karaka Road Structure Plan (refer Attachment 2). The proposed controls as drafted in the precinct provisions (refer Attachment 3) will appropriately manage all forms of future development provided for under the B-LIZ, along with the Auckland-wide AUP provisions which will also apply to any future development within the Plan Change area. In the unlikely event that the Plan Change area is not developed by Fisher & Paykel

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	landscaping requirements, there is little that will prevent a standard industrial area developing. Please provide additional assessment of the effects of a standard industrial area developing in this land.		design that is more reflective of their internal uses and function. Ancillary office spaces within these buildings, which themselves typically incorporate higher levels of glazing and more fine-grained design features, are generally orientated towards the street edge. Further we note that future development of the Site will continue to be informed by the Auckland-wide provisions of the AUP in addition to the Precinct provisions. In particular, rules around earthworks, natural hazards, and wetlands will influence the spatial arrangement of development on the Site that responds to its unique topography, natural features and orientation. This has been demonstrated in the indicative Masterplan which has been included at Attachment 2.		Healthcare as an industrial campus, all ‘standard’ industrial development would be appropriately managed using the proposed Yards Standard (IX.6.4), Special Landscape Area Standard (IX.6.5), Maximum Imperious Area Standard (IX.6.6) and Riparian Margin and Wetland Planting Standard (IX.6.7). In the unlikely event that the form of development provided by a Fisher & Paykel Healthcare industrial campus, does not occur, traffic effects from a typical industrial development will be significantly less than the FPH campus development, and all Auckland-Wide Transport provisions, along with the proposed Staging of Development with Transport Upgrades Standard (IX.6.2) and Vehicle Access Standard (IX.6.3) will also apply.
P18	The S32 analysis under theme 6 (and potentially elsewhere) states that the Precinct provisions will deliver a comprehensive development. Please explain how this will be delivered rather than enabled. It is considered that there is a significant difference between enabling a form of development and delivering a form of development. The s32 assessment indicates that a particular form will be delivered, but the Precinct provisions appear to only enable a campus form of development.	To understand how the stated aim of the applicants will be achieved.	The s 32 Report has been updated to reflect that the provisions will enable a comprehensive development, as the provisions enable the delivery of the intended form of development rather than deliver the intended form of development, hence the use of the word ‘enable’ is more appropriate than ‘deliver’. Refer to updated s 32 Report at Attachment 3.	As above it is considered that the initial response should be reconsidered.	As mentioned above, the Plan Change and the proposed Precinct provisions enable rather than require a comprehensive and integrated development. This has been clarified in the supporting documentation attached, including the updated s32 report (refer Attachment 1) and the updated Karaka Road Structure Plan (refer Attachment 2). Alternative non-comprehensive industrial development of the Plan Change area as opposed to the comprehensive development that the Masterplan illustrates has still been considered acceptable, as set out in the Updated s32 Assessment Report (refer Attachment 1).

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	If the provisions only enable a form of development please update the s32 analysis to reflect this.				
Structure Plan					
P19	Please outline the effect of the proposed structure plan on the removal of the suburb park within the plan change area.		We do not consider there will be any effect from removal of the suburb park within the Plan Change area. This change is to ensure alignment with Auckland Council's Open Space Provision Policy 2016 and the Draft Manaaki Tamaki Makaurau – Auckland Open Space, Sport and Recreation Strategy (“the Draft Strategy”). Under both documents, suburban (and neighbourhood) parks are not anticipated to be located within industrial zones. The indicative location / sizing of the suburb park was based on a different land-use pattern (comprised entirely of residential uses). We anticipate that open space provision across the wider Drury area from what is shown on the operative structure plan may need to be reassessed in light of the revised provision metrics contained within the Draft Strategy.	No further information requested.	N/A - No further information requested.
P20	In section 7.1 of the structure plan document it is stated that; <i>The following built form elements underpin the Structure Plan:</i> <i>A built character that enables the</i>	To understand how the structure plan is proposed to be implemented.	A number of potential design responses as they relate to the Site are captured through either the proposed Precinct provisions including Precinct Plans 1 and 2 as well as bespoke yard (IX.6.4), special landscape area (IX.6.5), maximum impervious area (IX6.6) and	No further information requested.	N/A - No further information requested.

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<i>establishment of large, low height building footprints to accommodate manufacturing and distribution operations in keeping with a campus style facility;</i> <i>Directing activities that can be accommodated within smaller building footprints towards areas with steeper topography;</i> <i>Inclusion of “gateway” built form and landscape treatments at main site access points on State Highway 22 and near the Ngākōroa Railway Station; and Karaka Road</i> <i>A built form that is balanced with natural open spaces, including a landscaped area along Oiroa Creek which forms the southwestern boundary of the Structure Plan area.</i> Please explain in detail with reference to specific provisions how the requested plan change achieves these bullet points (and in particular bullet points 2 and 3.		riparian planting (IX.6.7) standards as well as special information requirements (IX.9(3)). These standards variously contribute to supporting principles around gateway design treatments, native planting, connectivity and the provision of open space. In terms of gateway built-form the Precinct provisions provide for a bespoke front yard standard (5m deep with at least 3m of planting, as opposed to the operative 2m deep and planted) and a special landscaped area (10m deep) along SH22 extending approximately 100m eastwards from the Rural Urban Boundary. Further, given the width of SH22 (including proposed road widening (Designation 6707)) provides a physical separation of approximately 50m with existing or potential residential zones to the north. In addition, Precinct Plan 2 identifies an intermittent stream along part of the eastern boundary of the Site close to the rail station which triggers requirements relating to riparian planting margins. This will help support a potential gateway treatment when accessing the Site from the south-east. The Masterplan included at Attachment 2 assists with illustrating what will likely be provided on the site, and what is likely to be achieved		

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			based on the Precinct provisions.		
P21	Section 7.3 of the structure plan document states that the structure plan area will be comprehensively master planned . Please explain how the Council can have confidence that this will be the case taking into account the lack of proposed plan provisions that would require or encourage master planning.	To understand how the structure plan is proposed to be implemented.	Following the lodgement of the Private Plan Change request, FPH commissioned the development of a comprehensive masterplan to help guide future development of the Site. This Masterplan drew on a range of specialists from disciplines including architecture, urban design, landscape architecture, infrastructure, civil engineering, ecology etc. Development of the Masterplan was informed by a number of briefing and workshops with internal FPH staff as well as a series of hui with Mana Whenua. The indicative Masterplan is included at Attachment 2.	Please explain the role of the new Masterplan in the precinct provisions.	The Masterplan provided as Attachment 2 to the first Clause 23 response issued on 28 March 2025 demonstrates <i>one way</i> that the Plan Change area could be developed by Fisher & Paykel Healthcare. A detailed Masterplan is not a requirement of a Private Plan Change request to rezone Future Urban zoned land, however provides greater clarity about how the site could be developed in the future, in line with the proposed Precinct provisions. The role of the Masterplan is to inform Fisher & Paykel Healthcare as they plan the future development of the site alongside undertaking the plan change process, and in the context of the Plan Change request, is helpful in assisting with demonstrating how the site could be developed. As described in the response to P17 above, in the unlikely event that Fisher & Paykel Healthcare does not end up developing the site, an alternative development that complies with the precinct and Auckland-wide Unitary Plan provisions would be an acceptable and appropriate outcome on the site.
Urban Design					
P22	Please update the Urban Design report to show how the features recommended in the report have been included within the plan change. (for example requirement for 100% native planting on permitted activities, integration of security features, maintain north / south connectivity, gateway to the railway Station etc.)	To understand how the features within the urban design report are proposed to be implemented.	The urban design report identifies potential responses that should be “considered as part of a subsequent plan change” (pg. 23) with the inference that these matters need to be considered in the round with all other technical reporting prepared to support any private plan change request.	No further information requested.	N/A - No further information requested.

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			That said, a number of potential design responses for the Site are captured through the proposed Precinct provisions including Precinct Plans 1 and 2 as well as bespoke yard (IX.6.4), special landscape area (IX.6.5), maximum impervious area (IX.6.6) and riparian planting (IX.6.7) standards and special information requirements (IX.9(3)). These provisions variously support principles around gateway design treatments, native planting, connectivity and the provision of open space. Other elements are also captured by the amended Structure Plan and would be delivered through future plan change and resource consent processes.		
Infrastructure					
Infrastructure					
I1	Meeting minutes have been provided showing discussions have been held with Veolia Water. These indicate that Veolia will provide confirmation that the service can be provided. This has not been provided. Please provide conformation from Veolia that water service can be provided	To understand whether the plan change can be provided with a water supply service.	Please refer to the detailed response provided in the Infrastructure Report prepared by GHD at Attachment 4.	No further information requested.	N/A - No further information requested.
I2	Meeting minutes have been provided showing discussions have been held with Watercare and with Veolia Water. These indicate that they will provide confirmation that the service can be provided. These have not been provided. Please provide conformation from	To understand whether the plan change can be provided with a waste-water disposal service.	Please refer to the detailed response provided in the Infrastructure Report prepared by GHD at Attachment 4.	No further information requested.	N/A - No further information requested.

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	Watercare and Veolia that waste water service can be provided.				
Wastewater and Water Infrastructure					
13	Please provide information from Watercare that an alternative onsite water and/or wastewater solution is acceptable to enable the plan change area.	The s32 report of the application material indicates that if the development is not able to connect into the bulk wastewater and/or water network due to capacity constraints then an alternative on-site solution will be implemented. Infrastructure required to mitigate effects must be fit for purpose and not present a risk that the council will need to remedy at a later date	Please refer to the detailed response provided in the Infrastructure Report prepared by GHD at Attachment 4 .	No further information requested.	N/A - No further information requested.
Infrastructure					
14	No information has been provided that land line and fibre telecommunication connections will be available. Plea confirm that land line and fibre telecommunication services will be available.	To understand whether telecommunications services will be available.	Please refer to the detailed response provided in the Infrastructure Report prepared by GHD at Attachment 4 .	No further information requested.	N/A - No further information requested.
Funding Plan to support the Structure Plan					
15	Please detail - a) What infrastructure is required to support the proposed development and mitigate the effects associated with the private plan change request, including: i. identifying all infrastructure projects (bulk infrastructure projects and developer mitigation projects) being relied upon to enable the development.	In accordance with Schedule 1 Cl23(1)(a) and (b) of the RMA, further information is required to better understand the nature of the request in respect of the effect it will have on the environment and any ways in which adverse effects may be mitigated. In addition, the RPS (Chapter B) of the AUP(OP) requires the rezoning of land to follow the Appendix 1 Structure Plan Guidelines ('Appendix 1'). For example, Policy B2.2.2(3) is as follows: <i>Enable rezoning of future urban zoned land for urbanisation following structure planning and plan change processes in accordance with Appendix 1 Structure plan guidelines.</i> Section 1.5 Specialist documents to support the structure plan and plan changes process of Appendix 1 of the AUP	Please refer to the Funding Plan prepared to support the Structure Plan, included at Attachment 5. A meeting was held with Auckland Council staff on 18 March 2025 to work through the details of the funding plan which confirmed that the funding plan attached captures what is required by Auckland Council, and an additional sheet has been included to clearly outline the development timing assumptions, as requested at this meeting. In terms of transport infrastructure: i. No external transport	No further information requested.	N/A - No further information requested.

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	This information is needed to understand what the effects of the development will be, how the infrastructure will mitigate those and is information required for the plan change hearing to assess quality compact urban form as required under the RPS B2.2.1(1). ii. how these projects are proposed to be delivered e.g. who is delivering it iii. when these projects are assumed to be required to mitigate any adverse effects and when they are planned to be delivered. iv. The assumptions used to inform project timing e.g. what growth models have been considered to determine when projects are required v. a brief risk analysis on the likelihood of the infrastructure being delivered	under section 1.5(5) implementation sets out what documents may be required to support the structure planning and plan change process. Specifically, a 'Funding Plan' is such document listed.	infrastructure is required to support the proposed Plan Change. Upgrades to site access locations are required in accordance with Standard IX.6.2, which provides triggers (in terms of GFA) for when connections need to be built. Initially access onto SH22 at Oira Road via a (likely) double-roundabout, likely during the early 2030s, when the first activities appear on the site, and prior to the occupation of the first building. Then, a secondary access onto SH22 between Oira Road and Jesmond Road intersections, to the west of the site boundary, will be required, likely during the 2040s, and likely as a signalised intersection. ii. A third access is anticipated onto SH22 to the west of Oira Road in the future, but this will not be required until into the 2050s, hence it is not included within the proposed trigger table. Instead, any development that		

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at the timeframe proposed to mitigate effects. To assist you, we have attached a Funding Plan template which addresses the points above, and we are available to discuss it if needed.		exceeds 128,900m² GFA requires discretionary activity consent under Table IX.4.1(A4) and an Addendum Transport Assessment to be prepared in accordance with Special Information Requirement IX.9(1). iii. The Plan Change site will also connect to whatever active mode improvements are provided by others adjacent to the site. A direct active mode connection between the site and the Ngākōroa Train Station to the east of the Plan Change site is proposed to be constructed by FPH and AT. If this does not eventuate, employees would need to find alternative access to site. iv. The site accesses will be funded and delivered by FPH, potentially in collaboration with other local developers that require the accesses to enable development of their sites. v. The direct connection to the		

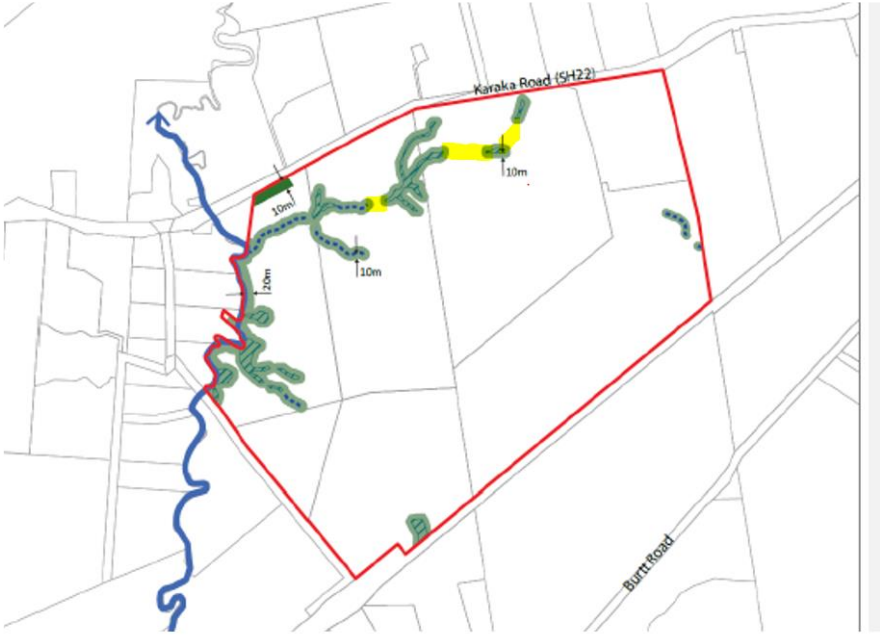
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		Ngākōroa Train Station will be funded by FPH and AT, with some potential cost sharing with adjacent landowners, depending upon where the connection occurs. Please refer to the Infrastructure Funding Plan prepared in support of the Clause 23 Response to Auckland Council for a more detailed breakdown of infrastructure required and who will be responsible for delivering / funding it. vi. AFC’s MSM model was used to determine the travel patterns, background land use growth projections and infrastructure upgrade timings within the south Auckland region. Further traffic modelling was undertaken to provide more conservative infrastructure scenarios by removing key infrastructure (whilst retaining the land use growth that said infrastructure enables), then		

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			establishing levels of activity on the PC Site that can be supported by the site access strategy. vii. To enable a fully risk-free infrastructure scenario, the network was modelled with no upgrades and the outcome of that modelling demonstrated that no external upgrades were required, other than the site’s connections to SH22 Karaka Road as described, thus demonstrating the plan change can be enabled without relying on the timing of any other external infrastructure upgrades.		
Assumptions used to inform thresholds for development related to transport upgrades.					
16	Please also provide further detail on the assumptions used to inform the thresholds developed for the specific transport upgrades. This information can be included in the Funding Plan template provided.	This information is required to better understand the nature of the private plan change request in respect of the effect it will have on the environment and any ways in which adverse effects may be mitigated.	The development scenarios (Table 7-1 within Section 7.2.1 of the ITA), external infrastructure scenarios (Table 7-9 within Section 7.3), and site access timing (within Section 7.4 including the additional sensitivity testing within Section 7.4.6) with respect to development GFA are all included within the ITA. All specific transport upgrades that are required to enable development of the Plan Change area have been included in the	No further information requested.	N/A - No further information requested.

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			Funding Plan provided alongside the Clause 23 Response.		
Noise and Vibration					
Noise					
N1	In regard to noise effects on land zoned Special Purpose – School (occupied by St Ignasus of Loyola Catholic College), please confirm; a. Recommended maximum noise levels to ensure adverse effects on the school are avoided because the assessment appears inconsistent as it states on page 10: <i>The “catch-all” noise interface standard, E25.6.22 All other interfaces would typically require noise generated from the Site to meet the noise standards that apply in the SPPZ. However, E25.6.22 does not apply in this case as Chapter E25 does not prescribe a standard for noise generated and/ or received within the SPSZ and, the footnote on page 11 states:- Standard E25.6.22 requires any activity in the LIZ to comply with 55 dB LAeq during the daytime and 45 dB LAeq and 75 dB LAF(max) when measured at the boundary of the School Zone.</i>	To fully understand the noise effects of the plan change.	Please refer to detailed response provided in Acoustic memo prepared by Styles Group at Attachment 6 and consequential amendments to the Precinct to include a new Standard and associated provisions, included in Attachment 1 – Revised Appendix 1 – Plan Change.	No further information requested.	N/A - No further information requested.

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	b. <i>If a specific precinct provision is required to ensure adverse effects on St Ignatius of Loyola Catholic College are avoided, remedied or mitigated to a reasonable level (i.e. compliance with maximum levels assessed within the school zone).</i>				
Stormwater					
Stormwater					
SW1	Executive Summary, Flood Management, pg. 6. Please clarify what <i>“There are less than minor flood increases on areas upstream and downstream of the site...”</i> What does ‘less than minor’ mean? “less than minor” is also used on pg. 39 and pg. 48 of the SMP.	To better understand the flood effects of the proposed plan change.	Agree, wording to be amended. The water level difference plots indicate no change in flood hazards upstream or downstream of the PPC area as a result of the plan change. Therefore, flood effects are considered less than minor. The SMP (now V4), included at Attachment 7, has been amended to provide further clarity.	No further information requested.	N/A - No further information requested.
SW2	Executive Summary, Stormwater Management, pg. 7. Stated that, <i>“As per the FUZ SMP, the ecologists engaged by the applicant (Bioresearches) were consulted and have confirmed that the proposed stormwater management strategy in this SMP will mitigate any stream erosion which may occur post development.”</i> Please clarify where in the report by Bioresearches (May 2024) this is stated. What assessment was used to determine this?	To better understand the effects on the streams and whether the proposed management is appropriate.	A stream erosion assessment has been undertaken using Auckland Council’s Erosion Screening Tool, to understand if there is an impact as a result of the Plan Change. The results (included at Appendix E of the Updated SMP (V4) included at Attachment 7) indicate there is active erosion within the Oiroa Creek in the existing (without Plan Change) scenario, which is similar to the information that has been provided by Healthy Waters in the watercourse assessment. The effects of land use as a result of the	Healthy Waters met with Woods on 7 April 2025 to discuss the EST tool and results. Questions and concerns have been communicated. Please clarify, - whether the results provided are based on the EST results for pre and post development changes, - whether the proposed mitigation will sufficiently manage the existing state of the stream. - include the missing excess shear tables and graphs - provide assessment of the existing state of the stream based on the EST. Viridis stated that any increase erosion risk is expected to be mitigated through the SMAF provision detailed in the SMP. The SMP does not sufficiently detail why SMAF will mitigate the erosion effects, please clarify. A detailed Stream Stabilisation Assessment is recommended at consenting stage to ensure any works required to manage effects on stream erosion are implemented, and any structures in the stream are properly designed to address erosion risk. Please outline how this will be captured in the SMP and precinct provisions?	The stream erosion assessment memo (refer to Appendix E of the Updated SMP (Final Version 5) at Attachment 4) has been updated to include the discussion that occurred in the meeting held on 07/04/2025 and the queries raised in the further Clause 23 request. Please refer to the memorandum included at Attachment 4 for detailed analysis. A brief response regarding the query is provided here. The results have been provided for pre- and post-plan change (imperviousness upliftment). The EST makes use of hydrographs taken from the flood models as discussed in the SMP.

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		proposed Plan Change are minimal. A detailed assessment may be required once there is further detail available around the pipe network and discharge locations (i.e., outlets) to determine further impacts. This would be most appropriately addressed at consenting stage through a future condition of consent. Please also refer to the response provided in the Ecology Response memo prepared by Viridis at Attachment 14.		2. The proposed SMAF mitigation should mitigate any increase in erosion potential that may occur due to the proposed plan change. However, as the details regarding the location of the outlets, stormwater devices, and staging are not available currently, detailed analysis will be required during consenting stage and future detailed design to identify if there is any increase in erosion potential within the stream as a result of the proposed development. 3. The shear tables have been moved forward from the appendix to the main body of the report. Further, discussion on each cross section has also been provided. 4. Assessment of the existing state of the stream has been provided in the memorandum. The SMP has also been updated to include that a Stream Stabilisation Assessment is recommended to be undertaken at detailed design and relevant consenting stages once the staging, pipe network and locations of outfalls are better understood. A new Special Information Requirement is also proposed (refer to Attachment 3 – Revised Precinct Provisions), which requires a Site-Specific Watercourse Assessment to be prepared by a suitably qualified person for any application for land modification, subdivision or development within 100m of the Oiroa awa.

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SW3 Section 4 Propose Development, pg. 25. <i>“In addition to this, the ecological assessment recommends that a minimum 10m (but potentially up to 100m) buffer zone be provided around Oiroa Creek to avoid further degradation of the stream health.”</i> <i>The range for the buffer zone is 10m to 100m, how was the most appropriate minimum buffer zone for Oiroa Creek determined?</i> How was the minimum planting and minimum depth for riparian yard of 20m for Oiroa Creek and 10m for other permanent and intermittent streams in the precinct provision determined?		Please refer to the detailed response provided in the Ecology Response memo prepared by Viridis at Attachment 14.	TP148 is used as a reason for recommending a minimum 10m, however TP148 notes that wider is better, site specific information is important, that the 10-20m does not meet all the functions provided by riparian margins, and that evidence should be provided alongside the suggested buffer width. Please discuss how 10m riparian margin is appropriate for the streams in the plan change area given its existing state and characteristics. It is noted that the Oiroa Creek is a meandering stream and that it will continue to adjust its sinuosity. Erosion hotspots have also been identified. Given this, what consideration has been given to the width of riparian margin. Can more riparian planting be proposed? Can the planting plan also include the requirement for the plants to be flood resistance? Especially where the riparian planting is located in the flood plain. Was any consideration given to using the floodplains to determine riparian margin, please discuss. Was consideration given to the location of some proposed stormwater treatment wetlands within the floodplain, considering the risk of overtopping during a flood event and effects on the effectiveness of the water quality treatment function of the wetlands? The proposed Karaka Road – Indicative Riparian Margin and Special Landscape Area plan identifies waterbodies and Indicative Riparian Margin, however there are areas that are fragmented, why is this? Is it worth considering including it, as this will ensure there is a continuous riparian margin for the stream? How does this current proposed fragmentation effect the health of the stream?  It is recommended that for Table IX.6.4.1 Yards, the riparian yard setback minimum is increase to 100m for Oiroa Creek and 20m for the other streams.	While TP148 provides a general recommendation of a minimum 10 m riparian margin which will achieve most of the identified aquatic benefits, such as shade, food supply and habitat for all sized streams, it also acknowledges that narrower or wider options should be considered based on site-specific information. In this instance, site-specific information has been provided in the form of the EclA and the ecology Clause 23 response provided to Auckland Council on 28 March 2025, which describes the different streams within the site and provides justification for the varying minimum riparian margins proposed, either 10 m for the smaller streams or 20 m for the larger streams (i.e., the Oiroa Creek). To elaborate further, in the case of the smaller streams within the plan change area, a minimum 10 m riparian margin is considered appropriate based on the following site-specific factors: Stream Characteristics: The streams in the plan change area are generally small, modified watercourses with limited ecological and hydrological function due to historic land use, channel modification, and the surrounding developed landscape. These streams lack well-established riparian vegetation and still have minimal bank instability, reducing the need for wider margins in this context. Improvement Opportunity: Although the current riparian condition is degraded, a 10 m margin allows sufficient space for restoration planting and stormwater treatment improvements. The

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			<table><tr><td>Area</td><td>Setback</td></tr><tr><td>Riparian yard</td><td>10220m from the edge of the Oiroa awa (Creek) 210m from the edge of other permanent and intermittent streams</td></tr></table> Looking at the proposed masterplan the 100m yard setback from Oiroa Creek does not affect the proposed development on the site and is consistent with what is planned.	Area	Setback	Riparian yard	102 20m from the edge of the Oiroa awa (Creek) 210 m from the edge of other permanent and intermittent streams	proposed margin width is sufficient to re-establish ecological functions such as shading, filtration of runoff, and habitat value, which would represent a marked improvement over the current state. 3. Land Use and Constraints: A 10 m minimum margin represents a balance between protecting and enhancing stream values and enabling efficient land use. Therefore, while TP148 highlights the benefits of wider riparian margins, the proposed minimum 10 m riparian width for all permanent and intermittent streams other than the Oiroa awa is appropriate in this specific context when considering the current state of the smaller streams, the surrounding land use, and the potential for meaningful ecological and water quality improvements within those constraints. For the Oiroa awa, a minimum riparian margin of 20 m has been recommended instead of the 10 m for the smaller streams. While the Woods Stream Erosion Assessment identified no areas of significant erosion, the 20 m margin accounts for the limited areas of active erosion present and the stream’s potential to change its course over the long term. As noted in the previous Clause 23 response, this buffer will exceed 90 m in certain locations due to the proximity of wetlands. The proposed width of riparian planting is considered to strike an appropriate balance between protecting and enhancing stream values while also allowing for efficient land use and development of Future Urban zoned land which has been identified and zoned for future
Area	Setback							
Riparian yard	102 20m from the edge of the Oiroa awa (Creek) 210 m from the edge of other permanent and intermittent streams							

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				growth and development. The costs to development potential of finite Future Urban zoned land associated with requiring riparian margins that are significantly greater in width than currently proposed will outweigh any additional ecological benefits associated with requiring greater riparian margin widths, and therefore the proposed minimum riparian margin requirements are considered most appropriate. The suggested riparian yard setback of 100m for Oiroa awa and 20m for the other streams is not considered appropriate for the reasons explained above. A stream erosion assessment has been undertaken to identify the existing erosional condition of the Oiroa awa. However, detailed identification of erosion hotspots will occur during the resource consent stages. This has been further discussed in the stream erosion assessment memo and the SMP (refer Attachment 4). Furthermore, a toolbox has been prepared (Appendix 5 to the Stream Erosion Assessment) which includes a list of erosion measures that can be used for mitigation of erosion in the Oiroa awa. One of the recommended options includes provision for an esplanade reserve with targeted species selection to improve channel stability and reduce sediment transport. Further investigation regarding the most suitable riparian margin or esplanade reserve can be addressed during consenting stage. The stream erosion assessment undertaken has concluded that the increase in flows, and susceptibility to erosion, as a result of change in land use associated with the Plan Change, is

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				minimal. Therefore the mitigation currently proposed in terms of SMAF is considered appropriate. Detailed planting design and plant species selection is more suitably addressed at the resource consent stage, following comprehensive topographic surveys and site-specific assessments. While the varying widths of floodplains were not a primary factor in determining the riparian margins, this approach reflects the use of <i>minimum</i> widths that can be expanded where appropriate. Additionally, the existing floodplain area may be modified through site development. Nonetheless, much of the existing floodplain area is expected to be encompassed within the riparian margins due to the protection and enhancement of adjacent wetlands. The gaps shown between the indicative riparian margins on the proposed Precinct Plan 2 – Indicative Riparian Margins and Special Landscape Area Plan (refer to the Precinct provisions at Attachment 3) correspond to known culverts, piped sections, or constructed ponds, which are not necessarily subject to riparian planting requirements. It is important to note that this plan reflects indicative riparian margins and indicative wetlands, and these may be refined following detailed site-specific assessments at the resource consent stage. The proposed planting will significantly enhance the ecological health of the streams, and the existing gaps are not expected to have a substantive impact on overall outcomes.	
SW4	What are the current conditions of the stream. Has	To better understand the condition of the streams in the plan change area, the	Refer to response provided to SW2 above.	No further information requested.	N/A - No further information requested.

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	a geomorphic assessment of its current state been carried out? What are the effects of the change in land use on stream erosion? Please provide further information on what management options can be used to manage any adverse effects.	effects of the proposed plan change and whether effects will be appropriately managed.		
SW5	SMAF is proposed for the plan change area, is SMAF sufficient to manage the erosion effects on the streams from the change in land use? There is diversion of some of the catchment from Ngakoroa Stream to Oiroa Creek, how does this affect SMAF requirements?	To better understand whether SMAF will appropriately manage the effects of the proposed plan change on the streams.	Total catchment = 102ha Diverted catchment = 32.74ha However, flow less than 2yr ARI is sought to be maintained in a regime similar to existing conditions. Therefore, the diversion is unlikely to affect SMAF requirements The proposed diversion is discussed in Section 9 of the SMP, refer to Attachment 7 .	No further information requested.
SW6	Please provide further information about the flood modelling information in the SMP, such as what is being looked at and why it has been included, and the difference between Post development without mitigation (Scenario 2) and Post development with pass forward (Scenario 3). Assessment of the diversion should be further quantified.	To better understand the flood modelling used and the information included in the SMP Please note there may be further questions following the review of the flood model.	The flood modelling section in the SMP has now been updated to provide further information as to why each scenario has been included. Refer to updated SMP (V4), at Attachment 7 . An afflux plot of Scenario 2 and 3 is also included in the SMP and included in this Cl 23 response for reference.	No further information requested.
SW7	Figure E1: Summary of stormwater management - Please clarify the function of the reuse tanks. - For Zone B – Ngakoroa Stream Catchment after ‘Communal Wetlands’	To ensure the SMP is clear on what is recommended to manage stormwater and flooding for the plan change area.	SMP V4 has now been updated providing further clarity on the query raised. Re-use tanks are for non-potable use only. The Stormwater management flow chart has been updated for Zone B	Non-potable reuse can include landscape watering which does not provide an adequate use as it has limited applications over the year. In order to achieve the benefit of reuse against required Hydrology Mitigation requirements, please clarify the non-potable reuse and outlined how it will be implemented, please also up the precinct plan where appropriate.
				The SMP (refer Attachment 4) has suggested that reuse can be provided for purposes such as non-potable water supply, garden/crop irrigation or toilet flushing, internally. Additionally, it is noted that if either reuse or infiltration cannot be achieved, that the communal devices are sized adequately to take up the full volume.

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	there are two options ‘Retain Base flows ...’ and ‘Pass flows forward + Diversion...’ it is unclear if both are options, is it worth having two boxes one for flows less than 2yr and one for flows more than 2yr.		with words also provided – refer to SMP V4, at Attachment 7 .	At a Plan Change level, sufficient detail has been provided and adequate sizing has been allowed for, No further changes to the Precinct Plan are considered necessary. The details requested will be provided at the relevant consenting stages once detailed design has been undertaken.	
SW8	Who will monitor and how will it be ensured that the total impervious area within the precinct is limited to 80%, as stated in the precinct provision? For example, what happens if the site is further subdivided and there is different land ownership?	To ensure the impervious area requirements are meet and stormwater effects are managed appropriately.	A new Special Information Requirement has been included in the Updated Precinct provisions (refer to Attachment 1) requiring the monitoring of impervious areas, and a requirement to provide a schedule of impervious surface at time of building and/or resource consent. Yes, it does have the potential to limit development at later stages if the maximum impervious area has been reached. This is similar to other rules within Precincts across the region.	No further information requested. It is recommended that ‘total’ be included in the standard below. (1) The total maximum impervious area <u>within the [Precinct Name TBC] Precinct</u> must not exceed 80 per cent, of the area within the [Precinct Name TBC] Precinct. (6) Monitoring of Standard IX.6.6 Maximum Impervious Area (a)(b) Any proposal for development must demonstrate compliance with Standard IX.6.6 Maximum Impervious Area. Any application must contain details of the amount of impervious area proposed to be enabled, <u>and must not exceeded the total impervious area of 80 per cent for the precinct</u>. As the stormwater management is planned to be private and not adopted under the NDC, it is recommended that it is not referred to in the precinct as there is no way to keep a record of it and if details changed who would assess it. Therefore, it is important the precinct provision is clear and reflects the key details in the SMP. Please see the recommended amendments to the precinct. <i>Stormwater management</i> (6) Require development to be consistent with the water sensitive approach outlined in the supporting stormwater management plan, including: (b) Requiring the use of <u>low contaminant generating inert</u> building materials to eliminate or minimise the generation and discharge of contaminants;	Noted. Please refer to the amendments proposed to Policy IX.3(6), Standard IX.6.6, Standard IX.6.8 and Special Information Requirement IX.9(6) at Attachment 3 – Revised Precinct Provisions, in response to this request. Please note the requested amendment to remove reference to the Stormwater Management Plan in Policy IX.3(6) for Stormwater Management is not supported as the SMP will still be adopted under the NDC regardless of the devices being retained in private ownership and privately maintained by Fisher & Paykel Healthcare.

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				IX.6.8. Stormwater quality Purpose: Contribute to improvement to water quality, stream health and freshwater ecological values. (1) Stormwater runoff from new, or redevelopment of existing, <u>high contaminant-generating carparks</u>, all carparks exposed to rainfall, and all roads, <u>and trafficked impervious surfaces</u> must be treated with a stormwater management device(s) meeting the following standards: (a) The device or system must be sized and designed in accordance with 'Guidance Document 2017/001 Stormwater Management Devices in the Auckland Region (GD01)'; or (b) Where alternative devices are proposed, the device must demonstrate it is designed to achieve an equivalent level of contaminant or sediment removal performance to that of 'Guidance Document 2017/001 Stormwater Management Devices in the Auckland Region (GD01)'. (c) For all other trafficked impervious surfaces, water quality treatment in accordance with the approved stormwater management plan must be installed. (2) New buildings, and additions to buildings must be constructed using <u>low contaminant generating inert</u> cladding, roofing, spouting and building materials that avoid the use of high contaminant yielding building products which have:	
SW9	8.10. Implementation of stormwater network. Please include further details about staging of stormwater management devices and what is required to occur to support development on the site.	The implementation details need to be included in the SMP to ensure stormwater and flooding effects are managed for the plan change area.	Details around staging will occur during detailed design. This would be most appropriately addressed at consenting stage through a future condition of consent.	Figure E1 / Figure 27 of the SMP sets out the stormwater framework that any staging will need to meet. This is considered an appropriate approach for this plan change. Please provide general/high level information in the SMP of when the water quality treatment devices (communal wetlands/outfalls), the reuse tanks, the mechanism to divert flows from Ngakoroa Stream would need to be in place to ensure stormwater and flood effects are managed for the plan change area. This will ensure stormwater infrastructure and services are co-ordinated appropriately.	Additional wording has been added to the SMP (refer Attachment 4) to explain that a staging assessment is recommended to be undertaken at consenting stages that will identify the triggers for the various stormwater measures. As noted above, the devices will remain privately owned and maintained by Fisher & Paykel Healthcare.
SW10	Section 4 provided a summary of meetings with mana whenua, however there was no information on what mana whenua values were identified and how they are incorporated into the SMP, please clarify and update the SMP.	To understand the mana whenua values for the plan change area and how they are incorporated into the SMP.	Mana Whenua values regarding stormwater management have been incorporated i.e., a multi staged treatment approach - re-use of roofed areas, a GPT providing pre-treatment, wetlands and a green outfall have been allowed for.	No further information requested.	N/A - No further information requested.
SW11	It was noted in Appendix 22 – Consultation, in the minutes for the meeting with Ngāti Tamaoho on 23 August 2024 a second opinion/independent assessment with a specialist was put forward, what was outcome of this?	To understand the mana whenua values for the plan change area and how they are incorporated into the SMP.	It is our understanding that Ngāti Tamaoho have not obtained a second opinion/independent assessment. A further hui was held on 23 Oct 2024 between Ngāti Tamaoho and FPH. A summary of the hui is set out below:	No further information requested.	N/A - No further information requested.

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It was noted that another meeting was scheduled for 3 September 2024, what was the outcome of this? Please update the SMP accordingly.		• An overview the draft masterplan was presented. • Discussion of various of elements of the masterplan and reasons behind the designs. • Ngāti Tamaoho confirmed that an independent review of the proposed stormwater strategy was not required at this stage. • If FPH wanted to implement a pass flows forward approach, there needs to be an agreement between Ngāti Tamaoho and FPH that if this approach is causing problems downstream in the future, FPH will retrofit some sort of attenuation or retention on its site. Ngāti Tamaoho confirmed they would not oppose FPH’s pass flows forward approach if an agreement is reached. Following several hui between FPH and Ngāti Tamaoho, a draft partnership agreement has been shared (independent of this PC process), which captures the common intent and relationship fundamentals between the two parties. Water management is specifically referenced, with FPH		

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			committing to adopting a ‘best for awa’ approach, creating a baseline monitoring plan and creating no greater impact downstream as a result of its development.		
SW12	Why was the Auckland Water Strategy 2022-2050 not reference in the SMP or in the section 32 report?	To ensure the proposed plan change is consistent with the matters in the Auckland Water Strategy.	Additional reference added – refer to SMP V4, included at Attachment 7 .	No further information requested.	N/A - No further information requested.
Economic Analysis					
Economics					
E1	Please update the population and household projections presented in the economic assessment.	The Property Economics assessment presents Auckland Region population projections which are referenced as “Stats NZ and Property Economics”. Those projections are between 8% and 10% higher than the current Statistics NZ population projections for Auckland Region, and the Property Economics projections appear to be more similar to the previous Statistics NZ population projections which have since been updated. That update involved significant downwards revision of future growth expectations in the Auckland Region. Auckland Council bases its strategic planning (including NPS-UD HBA and Future Development Strategy) on a custom projection series referred to as “Auckland Growth Scenario” (AGS), with the current version being v1.1. That data is published to a Macro Strategic Zone resolution. For consistency with Auckland Council’s strategic planning, the economics assessment should be based on the AGSv1.1 projections, available from https://data-aucklandcouncil.opendata.arcgis.com/datasets/ed61b2290e914993a2f63eca2f73bb49_0/explore/ .	Please refer to the detailed response provided in the Economics Response memo prepared by Property Economics at Attachment 8 and the updated Economics Assessment at Attachment 9 .	No further information requested.	N/A - No further information requested.
E2	Please update the economics assessment to include the business area in Whenuapai that is anticipated to be available for development	The PEL report provides assessment of industrial zoned land supply and capacity, but has not in that assessment referred to all future urban areas, and has excluded Whenuapai, which is included as a business area anticipated to be available for development from 2025+ in the Future	Please refer to the detailed response provided in the Economics Response memo prepared by Property Economics at Attachment 8 and the updated Economics	No further information requested.	N/A - No further information requested.

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	from 2025+ in the Future Development Strategy.	Development Strategy. Including that area would provide a more complete picture of industrial land supply and capacity in Auckland.	Assessment at Attachment 9 .		
E3	Please provide specific references in the economics assessment for data sourced from the HBA 2023 and used in the PEL report.	It would be helpful to have specific references provided for the data relied on in the economics assessment, and to have explanations of any calculations or analysis relied on by Property Economics to arrive at the presented numbers. This point particularly relates to numbers presented in table 5 (and related discussion) which are only generally referenced to “Auckland Council” and “HBA 2023”	Please refer to the detailed response provided in the Economics Response memo prepared by Property Economics at Attachment 8 and the updated Economics Assessment at Attachment 9 .	No further information requested.	N/A - No further information requested.
E4	Please include in the assessment in section 9 of the PE report (Alternative Sites Overview) whether any of the three larger industrial sites identified (25- 40ha) are contiguous, or whether there is any other prospect of grouping other vacant industrial sites to meet the applicant’s land requirements.	While the point about the (un)availability of large industrial sites is well made, it is necessary to understand, for completeness, whether there is any prospect of combining several smaller industrial sites to meet the applicant’s land requirements.	Please refer to the detailed response provided in the Economics Response memo prepared by Property Economics at Attachment 8 .	No further information requested.	N/A - No further information requested.
E5	Please provide some assessment of the potential implication for the proposed BLIZ rezoning to stimulate additional industrial activity to establish in the immediate vicinity of the PPC area in the future.	The economics assessment has assessed the implication of the PPC area being used for industrial activities instead of the residential activities envisaged in the Drury Structure Plan. There has been no assessment of the likelihood or potential implications of additional industrial activity that might seek to co-locate with the proposed Fisher and Paykel campus. While the campus will be self-contained and not reliant on other industrial activities nearby, its presence may be attractive to other industrial activities and could stimulate the establishment of a broader industrial hub, if further plan change applications are made for surrounding FUZ areas. That outcome would further reduce residential capacity in the area.	Please refer to the detailed response provided in the Economics Response memo prepared by Property Economics at Attachment 8 .	No further information requested.	N/A - No further information requested.
Urban Design and landscape effects					
Urban Design (Karaka Road Structure Plan)					
L1	Principle 3 of the identified Design Principles, is	To provide further clarity of what the PPC seeks to achieve and the implication this	FPH’s core operations relate to the research,	No further information requested.	N/A - No further information requested.

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	‘establishing a secure environment’. Please provide further description of what is meant by a ‘secure environment’.	may have on the urban structure and amenity of the wider area	development and manufacturing of innovate healthcare products. A number of these operations relate to commercially sensitive intellectual property and products and there is therefore a need to protect this through building and site design. This includes through both active (e.g. restricted access to buildings through gates, fencing, CCTV, on-site security personnel) and passive security features (physical buffers through landscaping). In this regard, a secure environment refers to FPH’s ability to influence and control access to and through the Site.	
L2	Please clarify whether the objectives for open space and recreation identified in Section 1.5.3 proposes that open space connections are public or publicly accessible or if they are intended as private.	To provide clarity on the outcomes sought/recommended in the Structure Plan to better understand the implications for connectivity and amenity in the wider environment.	Open spaces and recreational areas are intended to primarily benefit future FPH employees and visitors as per existing operations at their East Tāmaki Campus. However, this situation does not entirely preclude public access, especially where these may be integrated with site accesses. Open spaces at the Site are not intended to be vested to Council.	No further information requested.
L3	Please advise what consideration has been given to the timing of development and the ability to achieve good active mode connections to the Ngākōroa Railway Station with the land between the PPC area and the station remaining as Future Urban Zone (“FUZ”) at this stage.	Section 7.3 “Connectivity and Layout” notes that the Structure Plan identifies an indicative active mode connection which will provide a direct connection between the Site and the Railway Station. However, there is no consideration given to the timing of achieving /the connection indicated and how active mode connectivity will support the live zoning of the PPC area prior to adjacent land being zoned.	Refer to response to L5 below.	No further information requested.
				N/A - No further information requested.
				N/A - No further information requested.

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L4	Please advise how the identification of Natural Character, Landscape and Visual Values set out in Section 7.4 have been informed by the cultural values identified and summarised in Section 7.6 of the Section 32 report.	To understand and confirm whether an integrated approach to understanding and responding to landscape values has been taken.	The natural character, landscape, and visual values of the project have been informed by the cultural values conveyed through Mana Whenua engagement and articulated in the Cultural Values Assessments (CVAs) provided by Ngāti Tamaoho, Ngaati Te Ata Waiohua, and Te Ākitai Waiohua. The CVAs identify key values, including the rehabilitation and enhancement of the Oiroa Awa and its margins, the restoration and protection of the Manukau Harbour through stream rehabilitation within the broader catchment (including the Oiroa Awa), and the incorporation of plant species representative of the local indigenous vegetation. These values have been fully integrated into the project and are reflected in the landscape principles.	No further information requested.	N/A - No further information requested.
Neighbourhood design statement					
L5	The Neighbourhood Design Statement (“NDS”) has been prepared to inform and support the Structure Plan and PPC request. Therefore, there is some overlap of queries relating to the NDS and the Structure Plan addressed above. As noted above, please provide further analysis of the active mode connections to the train station in the interim before the intervening FUZ land is live-zoned.	The section on ‘Existing and Planned Transport (p. 7) notes the proximity of the Site to the Ngākōroa Railway Station and the opportunity this presents to achieving good active mode connectivity. However, there is no discussion of the timing of development. Further analysis would be helpful to understand how connectivity will be achieved with the PCC land. Has there been any discussion with the neighbouring land-owner or KiwiRail to achieve an interim path to the railway station?	No discussions with neighbouring landowners around future live zoning or development adjacent to the Ngākōroa Railway Station have been undertaken by FPH. Some high-level discussions have been held with KiwiRail with regard to the Papakura to Pukekohe project which involves 4-tracking of the rail line and delivery of a walking and cycling path (active modes connection) along the corridor. It is understood that this project is currently on hold.	No further information requested.	N/A - No further information requested.

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		It is understood that FPH would not be looking to commence development on the Site until development of their East Tāmaki Campus is complete. As such, it is not expected that the Site would be occupied prior to 2030 under the most optimistic assumptions. Ngākōroa Railway Station is planned to open in 2026 providing some time for live zoning and / or some development of adjacent land to occur that could result in the development of connections providing a direct link to the Site. If physical access to the Site cannot be achieved through a direct link, FPH would look to implement options to support employee travel via the railway station (e.g. a shuttle connecting with the Site) until a permanent solution is developed. We note that as a publicly listed company FPH is also subject to additional reporting under the Financial Sector (Climate-related Disclosures and Other Matters) Amendment Act 2021 and have committed to reducing their Scope 3 emissions (which includes employee travel) as part of their sustainability policies and Toitū Carbon reduce certification. As such, there are other methods and commercial requirements that sit outside the RMA / AUP that will encourage and direct FPH to ensure employee utilise more		

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		sustainable modes of transport.		
L6	Please advise how the amended indicative location for the neighbourhood centre (annotated as (5) on the plan on p.22 was determined as suitable?	The location depicted appears to be considerably constrained by proximity to the north- south arterial route and watercourses. Further detailed analysis to demonstrate this as a suitable location for a neighbourhood centre would be helpful. Neighbourhood centres in greenfield areas vary in size from around 2,000m² to 1ha in size. Given the potential size of a neighbourhood centre and the nature of the constraints Council has raised concerns about whether there is sufficient space to accommodate a neighbourhood centre generally where indicated. We also note that the location shown is “indicative” and implies there will be more detailed investigation and application during a future plan change process which would likely need to take on the design and location of any north-south arterial road alignment. This ensures the Structure Plan retains sufficient flexibility to support development of a neighbourhood centre in an area signalled for more intensive forms of residential development. We note that the Operative Structure Plan identified a neighbourhood centre along SH22 and a north-south collector road within the FPH Site as well as a further neighbourhood centre along the north-south arterial route. As such, the amended Structure Plan has maintained a consistent approach with that already adopted by Auckland Council and further reinforced its potential through co-location with the	No further information requested.	N/A - No further information requested.

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		confirmed location of the Ngākōroa Rail Station. It is also noted that the location of centres on, or near nodes of, key transport routes is a common feature of urban areas across Auckland, New Zealand and internationally and allows for centres to service both their immediate neighbourhood and passing trade.		
L7	Please advise how the indicative location for a neighbourhood reserve to the east of the PPC land (No. 6 as depicted on P. 22 map) was determined as suitable.	A new suburban park in this location is described as being between 3 – 5 hectares. The scale of this open space in close proximity is queried in relation to the effect this may have in reducing the intensity of land-use immediately around the Station.	This was an error in the Proposed Structure Plan key and should refer to the existing Neighbourhood Park as shown in the Operative Structure Plan. The amended plan corrects the notation to a new neighbourhood park as per the Operative Structure Plan with the only change being its slight shift to the east to sit at the centre of the residential catchment consistent with Auckland Council's Open Space Policy.	No further information requested.
L8	Has consideration been given to amending the extent of THAB zone to the south west of the Railway Station as indicated in the Structure Plan Changes?	Now that the Ngākōroa Railway Station location has been confirmed (further west than the indicative location shown on the 2019 Structure Plan, it is suggested that consideration is given to indicating a greater extent of THAB zone to the south of the Station.	The extent of THAB zoning shown on both the Operative and Amended Structure Plan is indicative and can be refined through a more detailed Plan Change process by its proponent(s).	No further information requested.
L9	Should active mode connections along the railway corridor be indicated on the Structure Plan?	The Supporting Growth's 'Indicative Strategic Transport Network – South' diagram contained in the Integrated Transport Assessment (Fig. 4.1 on p. 18) identifies a strategy walking and cycling corridor along the railway corridor and it would be helpful for the Structure Plan to reflect this.	The Structure Plan has been amended (refer Figure 1 at page 8 of Attachment 10 – Updated Structure Plan) to include the walking and cycling corridor alongside the railway corridor consistent with the Operative Structure Plan, SH22 Drury Upgrade Plans	No further information requested.

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		and the Papakura to Pukekohe project.			
L10	Is there a tension between achieving Design Principles 3 (establishing a secure environment), 4 (connecting with the wider network) and 5 (Integration of amenities) as identified in the Structure Plan? If so, how are these design tensions reconciled in the PC provisions?	The Table on p. 23 and 24 describes how the Structure Plan and PC respond to each of the Design Principles. It appears there are some tensions between achieving a secure environment and providing connectivity and integration with the wider environment. In relation to ‘ensuring quality industrial development is integrated with surrounding residential uses and the natural environment’, the table notes ‘the inclusion of potential “gateway’ built form and landscape treatments at main site access points on SH22 and near the Railway Station”. However, I note that in the Precinct provisions, buildings are listed as a Permitted activity. It is unclear how the precinct provisions would secure these outcomes. Has consideration been given to requiring buildings at key entry points to the industrial environment to be a Restricted Discretionary activity with consideration given to how they front and engage with the surrounding urban environment?	Yes, there are some tensions with these design principles. The need to establish a secure environment (in support of FPH operations in innovative research and development of health products) has helped to inform proposed amendments to the structure plan including the removal of the collector road and proposed suburban park from the Site to reduce the need or ability of the general public to pass through or access the Site. In addition, the site features a number of permanent and intermittent stream corridors as well as overland flow paths and potential wetlands, generally moving from east-to-west. These natural barriers will be reinforced with riparian planting as proposed through the precinct provisions and more generally through Auckland-wide provisions relating to earthworks and natural hazards and will ultimately assist concentrating access through the Site to specific areas and supporting the development of a secure area for FPH operations. With regard to the above, connectivity and integration of amenities with the wider area are focussed around how the edges of future development respond to the surrounding context	No further information requested.	N/A - No further information requested.

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		(e.g. the location of site accesses, connections with important destinations such as the rail station). The B-LIZ itself affords some opportunity for some complimentary amenities and employment opportunities (e.g. small food and beverage premises) to locate in the area. In terms of potential gateway built-form, we note that the Precinct provisions provide for a bespoke front yard standard (5m deep with at least 3m of planting, as opposed to the operative 2m deep and planted) and a special landscaped area (10m deep) along SH22 extending approximately 100m eastwards from the Rural Urban Boundary. Further, given the width of SH22 (including proposed road widening (Designation 6707)) provides a physical separation of approximately 50m with existing or potential residential zones to the north. Given this context, the nature of FPH's development to date at their East Tāmaki Campus which features highly specialised building designs linked to product development and manufacturing, as well as recent examples of industrial development where buildings are a permitted activity additional controls on building at key entry points were not considered necessary.		

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			In addition, we also note Precinct Plan 2 also identifies an intermittent stream along part of the eastern boundary of the Site close to the rail station which triggers requirements relating to riparian planting margins which would help support a potential gateway treatment when accessing the Site from the south-east.		
Landscape					
L11	Has consideration been given to whether Rule H17.6.5 Storage and Screening should also apply to the FUZ for the proposed Precinct.	This rule requires screening of outdoor storage areas and/or rubbish storage areas as viewed from neighbouring residential, rural, open space zones, the Special Purpose – Māori Purpose zone or Special Purpose – School zone , but not the FUZ. Given the importance of the quality of interface created with the surrounding environment, as identified in the assessment, should this rule be applied to the FUZ?	The Plan Change has adopted a consistent approach with the AUP through the B-LIZ and other recently approved industrial precincts (e.g. Spedding Block, Drury South). We note that whilst the Structure Plan indicates a potential residential zoning adjacent to the Site, this does not preclude an alternative zoning such as Business – Mixed Use, or Special Purpose – Healthcare Facility and Hospital Zone from being advanced through a future plan change process. Retaining Rule H17.6.5 as currently provided for within the AUP ensures flexibility for the future design and development of the Site to respond to its surrounding context.	No further information requested.	N/A - No further information requested.
Geotechnical					
Geotechnical					
G1	Please provide a copy of the Geotechnical Investigation Report prepared by Geotek Solutions Ltd (ref: 948 and dated 29 June 1999) that is	To review all existing available geotechnical information that is applicable to the site.	Please refer to Geotechnical Investigation Report prepared by Geotek Solutions at Attachment 11 .	No further information requested.	N/A - No further information requested.

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	referenced in Section 3 of the Preliminary Geotechnical Assessment report.			
G2	We note that the review of aerial photographs presented in the CMW geotechnical report has been limited to images between 1942 and 2006. Considering current availability of the aerial photographs up to 2023 on the Auckland Council Geomaps, please update the CMW Preliminary Geotechnical Assessment report to provide further review of relevant aerial photographs.	We note that the review of aerial photographs presented in the CMW geotechnical report has been limited to images between 1942 and 2006. Considering current availability of the aerial photographs up to 2023 on the Auckland Council Geomaps, please update the CMW Preliminary Geotechnical Assessment report to provide further review of relevant aerial photographs.	Photographs from 2017 are the only additional photos available for this area. These, and relevant observations, have now been included in the updated Geotechnical Report, included at Attachment 12 . The 2017 images show ponded water in the middle of the site. These images do not identify any geotechnical issues nor do they change the conclusions of the Geotechnical Assessment.	No further information requested.
G3	Please update the natural hazard risk assessment to include risk categorisation for the site.	This is to better understand the potential impacts and risk level of the future development on the site due to nature hazard.	The Geohazard Assessment Summary table has now been updated, in the updated Geotechnical report at Attachment 12 , to include risk ratings for relevant Geotechnical Hazards in accordance with ACCOPS. The unmitigated Auckland Council Code of Practice for Land Development and Subdivision (ACCOP) risk ratings range from low to extreme but residual risks following development will be very low to low and are considered acceptable.	No further information requested.
G4	Section 7 of the CMW Preliminary Geotechnical Assessment report states that liquefaction assessment utilising the Cliq software package was undertaken as part of a previous report. Please provide a copy of the Cliq analysis output for reference.	To review all existing available geotechnical information that is applicable to the site.	Now included with the CPT data in the previous report, at Appendix C, refer to the updated Geotechnical Assessment at Attachment 12 .	No further information requested.

Ecology

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Ecology					
E1	Please update the plan change to give effect to the recommendations within the Ecological Impact Assessment (EclA).	The Ecological Impact Assessment (EclA) includes a number of recommendations, including: • Potentially up to 100 m of riparian planting alongside intermittent and permanent streams (this is discussed further below). • A site-specific Planting and Pest Management Plan. • Measures to address impacts on wildlife from artificial noise and light. • Requirement for infrastructure and buildings to use dark-coloured, non-reflective surface alongside the Oiroa Stream Corridor. • Planting in the Open Space area (however there is no Open Space shown in the precinct plan). The implementation of these recommendations has been used to inform the applicants ecologist’s effects assessment. However there does not appear to be a mechanism within the plan change that ensure that these recommendations are enacted.	Please refer to the detailed response provided in the Ecology Response memo prepared by Viridis at Attachment 13. Please also refer to the amendments to the Precinct provisions to include natural inland wetlands in the riparian margin standard, included at Attachment 1.	A further change to IX.6.7(2) as follows IX.6.7(2) 2. Prior to any subdivision of a site, <u>or the occupation of any building</u>, adjoining any permanent or intermittent stream (other than the Oiroa awa (Creek)) or natural inland wetlands, or the occupation of any building within a site which adjoins any permanent or intermittent stream other than the Oiroa awa (Creek) or natural inland wetlands, the riparian margins must be planted either side to a minimum width of 10m measured from the top of bank of the stream or the edge of the wetland area, provided that: a. This rule shall not apply to road crossings over streams; and b. Walkways and cycleways must not locate within the riparian planting area. The underlined is my recommended insertion and strike through is my suggested deletion. The reference to wetlands have not been in the yard standards – which makes it uncertain how this standard would be applied. It is recommended that proposed Table IX.6.4.1 Yards be updated with a 10m riparian yard for wetlands.	Noted and agree. The proposed changes to Standard IX.6.7(2) simplify the Standard and it was an oversight to not include reference to wetlands in Table IX.6.4.1. Please refer to the additional amendments proposed to Standard IX.6.7(2) and Table IX.6.4.1 at Attachment 3 – Revised Precinct Provisions, in response to this request.
E2	Please update the plan change to give effect to the NPS:FM.	The EclA identifies a number of wetlands within the plan change area and the proposed precinct. However, the precinct only mentions intermittent and permanent streams. Please either provide a mechanism within the plan change to ensure that the wetlands are protected and enhanced, as well as streams; or an assessment as to why such provisions would not be necessary or appropriate.	Please refer to the detailed response provided in the Ecology Response memo prepared by Viridis at Attachment 13. Please also refer to the amendments to the Precinct provisions to include natural inland wetlands in the riparian margin standard, included at Attachment 1.	No further information requested.	N/A - No further information requested.
E3	Please clarify how the findings of the further investigations (that are	The EclA has found that bats utilise the site, and further investigations are on-going.	Please refer to the detailed response provided in the Ecology Response memo	No further information requested.	N/A - No further information requested.

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	ongoing) of how bats utilise the site could be recognised and accommodated within the precinct plan.	In the Summary and Recommendations section the EclA states: A greenspace network of up to 100 m along-side Oiroa Creek is available within the site, and this would be consistent with current expectations for provision of bat corridors. What are the mechanisms for securing the provision of the bat corridor?	prepared by Viridis at Attachment 13.		
E4	Please explain how the plan change to gives effect to the recommendations within the Drury- Opāheke Structure Plan concerning stream bank erosion.	The precinct plan proposes a riparian yard of 20 m from the edge of the Oiroa awa (Creek) and 10 m from the edge of other permanent and intermittent stream (Table IX.6.4.1). The Drury – Opāheke Structure Plan generally envisions a riparian planting width of 20 m. This is primarily in relation to stream erosion issues. The Stormwater Management Plan (for the precinct and prepared by Woods) states that the ecologists (Bioresearches) have confirmed that the proposed stormwater management strategy in the Woods SMP will mitigate any stream erosion that may occur post-development. Having reviewed the EclA, there is no supporting information to support this assessment. The assessment in the EclA regarding the riparian width is limited to the width required for self- sustaining vegetation corridors and does not clearly consider the width required to reduce erosive flows in the watercourse. Whilst SMAF1 is a recognised control, the applicant needs to demonstrate that will appropriately address the effects and inform their assessment with appropriate technical information rather than relying on the region-wide provisions of the AUP:OP. Whilst the SMP proposes stormwater management controls, the detailed	Please refer to the detailed response provided in the Ecology Response memo prepared by Viridis at Attachment 13.	No further information requested.	N/A - No further information requested.

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		assessment of which will be undertaken by others under separate cover, this does not appear to be supported by any assessment of the resilience of the stream bed/banks to the changes in the hydrological regime that are already apparent and therefore likely to be exacerbated even with the region-wide provisions of the AUP:OP applied. It is envisioned that this would require a quantified assessment that accounts for the stability of the stream bed/banks and wetlands to indicate a change in erosion potential by quantifying the duration of exceedance of critical shear stress; and the ecological implications of any increased level of erosion.			
Transportation					
Proposed access #3					
T1	Please provide traffic modelling outputs for proposed access #3, and identify the development triggers for this access.	Both the proposed Structure Plan and Section 6.3 of the ITA refer to 3 new access points serving the proposed Plan Change area: #1 at Oira Road #2 east of Oira Road, at the eastern boundary of the site #3 west of Oira Road. However, the traffic modelling assessment in Section 7 of the ITA only considers accesses #1 and #2, identifying the development triggers for these 2 accesses.	With the development growth scenarios assessed in the ITA, it is not anticipated that a third access will be required until the 2050s, which is beyond the transport assessment horizon. Assessing the likely location and operation of such a third access will require a level of detail regarding transport characteristics, background growth and other factors that are too uncertain at this time. As such the precinct provisions require a further assessment of transport effects beyond the currently sought activity levels (refer to Activity IX.4.1(A4) and Special Information Requirement IX.9(1) of the proposed Precinct provisions).	No further information requested.	N/A - No further information requested.
Structure Plan collector road					

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T2	Please provide a justification for the removal of the proposed collector route through the proposed Plan Change site, and assess the effects of this removal. Conversely, please amend the proposed Structure Plan to include this collector route on the eastern edge of the Plan Change site as suggested, and assess the impacts of this shift within the ITA’s traffic modelling.	The existing Drury-Opāheke Structure Plan includes a future collector road through the proposed Plan Change site, connecting the SH22/Oira Road intersection to Burt Road, and on to the proposed Drury West Arterial. The Structure Plan acknowledges that the location of this future collector may change. We understand that, as a single Campus site, Fisher and Paykel do not wish for this collector road to pass through the site. Section 6.1 of the ITA refers to a potential alternative collector road alignment along the eastern edge of the proposed Plan Change site. However, the proposed Structure Plan proposes only a walking and cycling link in this location. In addition, Section 7 of the ITA has not accounted for this collector traffic, when assessing the operation of proposed intersection #2. We recommend that this collector route be retained, either in the original position through the Plan Change site, or via the alternative alignment on the eastern edge of the site. If the latter, this may require proposed access #2 be located on this new collector route, rather than directly on SH22 as proposed, due to the close proximity of intersections.	The collector road is not considered necessary to support the transport network in this area, and therefore it was not specifically added into the Saturn network. The Saturn model provided by AFC at the time of this assessment did not include the collector road in either the original location (dissecting the PC Site and connecting to Oira Road) or shifted to the eastern edge of the site. It is considered that the package of Pukekohe Arterials that now have granted designations are the more likely and appropriate transport upgrade for this area, as they will bring network capacity and resilience. It is noted that the 2048 Saturn model network presented within the Pukekohe Arterials ITA (produced by SGA, dated September 2023) also does not show any collector road connection in that location. Further, given the need for this collector road to include a bridge over the rail line, it is considered highly unlikely to ever be built. It is also worth noting that the Council Structure Plan identified the collector road going through the St Ignatius school site, which sat outside the structure plan process itself. It is considered unlikely that AT would seek to compulsorily acquire land from a recently constructed school.	We disagree that the future collector road is not necessary to enable development in Drury West. While SGA has identified new arterial road connections, it has not identified a complete list of streets necessary to allow suitably fine-grained urban connectivity. Regardless of whether the collector road crosses the rail corridor, it would provide an important access function to the future urban area between the rail corridor and SH22. Without that collector road, the future urban area immediately east of the Proposed Plan Change area (ie 110 and 250 Karaka Road) will be bounded by • SH22 to the north, • The rail corridor to the south, • The Proposed Plan Change area to the west, and • The future Jesmond Road arterial extension to the east. The implication is that approximately 20 Ha of future development area immediately east of the Plan Change (future THAB zone) will have no feasible access except • Directly onto SH22, in close proximity to proposed traffic signals at Jesmond Road and at the Proposed Plan Change site, or • Via the proposed Ngākōroa Station access road (refer Drury West Arterial NOR1). Neither of these would be appropriate access points. We recommend that the proposed collector road be retained, on the eastern edge of the Plan Change site. This would allow both the proposed Fisher and Paykel campus, and the future THAB zone opposite it, to gain access via a single signalised intersection on SH22. Consider providing the proposed collector road along the eastern edge of the Plan Change site. Alternatively, demonstrate how safe and appropriate access can be provided to the future development area immediately east, should this collector not be provided.	It is reiterated that the future collector road previously identified on Auckland Council’s Drury – Opāheke Structure Plan (2019) is not necessary to support the local street network, as the traffic modelling has demonstrated that the network will operate in a reasonable manner without it. No further routes are considered necessary, although some additional access intersections to land blocks may be required. We also note that this collector road was not designated as part of the Pukekohe Notice of Requirement and roading designation process led by Te Tupu Ngātahi Supporting Growth Alliance, recently approved which sought to ensure the necessary designations were in place to provide for the integrated development of this FUZ area. The distance between the eastern edge of the Plan Change area and the west of Jesmond Road is approx. 500m. Further, the proposed Precinct Plan 1 – Indicative Access Network (refer Attachment 3) shows the indicative location of the access has been moved some 100-150m away from the eastern site boundary, meaning that it will likely be 600-650m from the Jesmond Road intersection, and 250-300m from the Oira Road intersection. The future urban area that lies immediately east of the Proposed Plan Change area (i.e. 110 and 250 Karaka Road) can be readily accessed in the future via a new intersection along that 500m frontage without interfering with either the secondary site access into the Plan Change area or the Jesmond Road intersection. The Karaka Road Structure Plan (refer Attachment 2) identifies a recommended active modes connection and public transport

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				route (frequent & express bus) to the immediate east of the plan change area (albeit not designated). As an alternative to the above solution of the neighbouring site immediately east of the Plan Change area having access directly to/from SH22, the indicative active mode / public transport route could theoretically be upgraded to a collector road that while not providing access over the rail line, could provide vehicular access to the adjacent land block at 250 Karaka Road, in the future at the time of this site being developed. This is considered feasible, but less desirable, given that a direct access to SH22 is available as described above. If this new collector road were to be provided along the eastern boundary of the Plan Change area, it would still provide sufficient separation to the secondary access to / from the Plan Change area, which is proposed to be situated 100-150m to the west of the site boundary.
Structure Plan active mode connection				
T3	Please provide commentary on providing an interim active mode connection on SH22, between the Plan Change site access and the Ngākōroa station access.	The proposed Structure Plan includes a walking and cycling connection linking the proposed Plan Change site to Ngākōroa station. This connection is critical to provide access to the Plan Change site via public transport and active modes. Collectively, these modes account for up to 20% of inbound trips (ITA table 7-5), which without the link would likely all be car trips. However, the active mode connection relies on third party land and as such, the timeframe for its delivery is uncertain. Until either this third party land is developed and the link is provided, or SH22 is urbanised, there will not be an active mode connection between the Plan Change site and Ngākōroa station. We suggest that the Plan Change include the provision of an interim active mode facility on the south side of SH22, linking	This has been addressed within the response to Item L5 above. We note that the response provided to item L5 relies (in the first instance) on the neighbouring development area providing an active mode connection to Ngākōroa station. As discussed in item T2 above, deleting the proposed collector road leaves this development area difficult to access, putting this active mode connection at risk. The alternative to an active mode connection referred to in L5 is an employee shuttle. We note that this is unlikely to be as attractive and well utilised as a direct active mode connection to the station. We recommend instead that the active mode connection along the rail corridor, as set out in Attachment 5 – FPH Funding Plan.xlsx be progressed ahead of any shuttle. No further information requested.	It is agreed that an active mode corridor along the rail line between Ngākōroa Train Station and the Plan Change area would be desirable, however as this lies across either private land or KiwiRail land, Fisher & Paykel Healthcare is unable to guarantee that such a facility could be constructed prior to the occupation of any buildings within the Plan Change area and cannot be required to provide it. As noted in the previous Clause 23 response to RFI L5, if physical access to the Site cannot be achieved through a direct link, FPH would look to implement options to support employee travel via the railway station (e.g. a shuttle connecting with the Site) until a permanent solution is developed. The purpose of the shuttle option would be to ensure

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	the Plan Change site access to the Ngākōroa station access.			that if a more direct connection over private land were not able to be provided by the time the development enabled within the Plan Change site becomes operational and buildings are ready to be occupied by employees, that staff can gain safe and convenient access to / from the train station and the future FPH Campus. It is therefore considered that a staff shuttle is the only way to guarantee a safe and convenient access method, and that the expected PT trip rate can be realised. The positioning of a new collector road would not solve the issue, as it would also lie across private land and therefore could not be provided by the applicant or required through this Plan Change. It is reiterated in response to items T2 and T3 that the Applicant is unable to accommodate a public collector road within the bounds of the Plan Change area due to the sensitive nature of the business, nor is a public road required as the Plan Change area will be developed for a self-contained and private Campus style development.
Activities permitted by Light Industry zoning				
T4	Please provide a sensitivity test assessment of 'typical' Light Industrial activities that the proposed Plan Change would enable.	The ITA assesses the impacts of the proposed Fisher and Paykel campus. However, the proposed Plan Change would enable a much wider range of potential land use developments to take place on this site. Should the Plan Change proceed, but Fisher and Paykel not develop the proposed campus, other land uses that comply with the Light Industry zoning would follow in its place. It is not clear whether those other land uses would have a greater or lesser impact on the transport network, than the Fisher and Paykel campus.	As established in table 7-6 within Section 7.2.5 of the ITA, the total trips generated in 2048 by the FPH site are 1,030 and 560vph in AM and PM respectively. These trips correspond to a total 2048 development yield of 128,900sqm of commercial and industrial GFA, which corresponds to FPH trip rates of 0.80 and 0.43 trips per 100sqm in the AM and PM peak scenarios respectively.	No further information requested.
				N/A - No further information requested.

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		The Institute of Transportation Engineers (ITE) provides a range of trip rates for different Light Industry classes. These include: • General Light Industry trip rates (Land Use 110) of 0.75 and 0.68 trips per 100sqm GFA in the AM and PM peak respectively. • Industry Park trip rates (Land Use 130) of 0.43 trips per 100sqm GFA in both the AM and PM peak hours. The definitions of the two ITE activity classifications appears to be a matter of scale, where General Light Industry appears to relate to smaller specific properties, whereas Industry Park appears to relate to a mix of different industrial activities over a much greater land area. A typical threshold between General Light Industry and Industrial Parks seems to be around 100,000sqm GFA. This suggests that if the PC site were to be rezoned to Business Light Industry and F&P decided not to develop at all within the site, then the zone would align with the Industry Park description, having a mix of different industrial activities, and therefore have similar or lesser trip rates than the F&P activity. However, if F&P were to sell or lease smaller pockets of land for other industrial activities, the General Light		

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		Industry description would apply, which has a higher trip rate in the PM peak and therefore would potentially have a greater effect on the external road network or the timing of the PC site’s accesses. To address this eventuality, it is proposed to include two separate activity classes within the precinct provisions, depending upon the specific activities proposed. These are: Permitted activities: • Manufacturing and research and development of medical products and systems and ancillary activities (representing the F&P site uses)); • Warehousing (using ITE activity 150, with AM and PM trip rates of 0.18 and 0.20); • Storage and lock-up facilities (using ITE activity 154, with AM and PM trip rates of 0.09 and 0.11); and • Industrial Parks enabling over 100,000sqm GFA of mixed light industrial activities (using ITE activity 130, with AM and PM trip rates of 0.432 and 0.43). Restricted Discretionary activities: • Other industrial activities.		

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			The reason it is proposed to limit the permitted activities in this way is to provide certainty that only the specific operations that FPH does in New Zealand, along with other activities assessed by Mr Hughes as being low traffic generating activities within the B-LIZ are provided for as permitted activities. This will ensure that the Transport upgrade trigger table accurately captures the activities capable of being developed within the Precinct. All other industrial activities that are either not directly associated with FPH operations or are not similarly low traffic generating industrial activities will require restricted discretionary consent, and a new Integrated Transport Assessment (ITA) will be required to be prepared to accompany the consent application. These changes are reflected in the updated Table IX.4.1 (Activity Table) (refer Attachment 1). Further, a new IX.9(2) Special Information Requirements section has been added to specify the requirements of an ITA required to assess such other industrial activities.		
Traffic modelling report					
T5	Please confirm whether a traffic modelling report is available.	The ITA includes a relatively detailed explanation of the traffic modelling assumptions and methodology, but only relatively high level summaries of the SATURN model results, for select intersections. Flow, delay and difference plots would be useful to better	A modelling report was not produced, but a high level of detail was provided within the ITA. As such, Flow, Delay and Difference plots are provided as an attachment to this response. The coding	No further information requested.	N/A - No further information requested.

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	understand the context of the summary results	for the file names is provided below. • Difference plots: AM and PM flow and delay differences between Council Structure Plan land use and F&P Plan Change. All 2048 Scenario 7 (no infrastructure upgrades). • Flow, delay & v/c plots as number and bandwidth for 2048 F&P Plan Change, scenario 7, AM and PM. • Node turning flow & delay plots for 2048 F&P Plan Change, Scenario 7. Node key: ○ 7157 = Oira / SH22 ○ 7206 = Jesmond / SH22 ○ 9554 = Burtt / Jesmond ○ 3057 = Gt Sth / SH22 ○ 3059 = SH1 / SH22 IC West ○ 3060 = SH1 / SH22 IC East ○ 7505 = Glenbrook / SH22 ○ 3061 = Waihoehoe / Gt Sth		
Application of trip generation assumptions				

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T6	Please review the calculation of inbound and outbound vehicle trips to the Plan Change area, and update these as required.	The trip generation assumptions documented in Section 7.1 of the ITA seem valid. However, the application of the inbound/outbound trip split from Table 7.4 appears to contain an error. For example: - Table 7-6 estimates 373 am peak, inbound, vehicle trips, due to the proposed office development in 2038 - This has been calculated based on: 1,438 staff x 90% onsite x (16.5%+27.2%) am arrivals x 88% inbound x 75% car mode share - However, this double counts the inbound percentage reduction, as the (16.5%+27.2%) am peak arrivals are by definition all inbound. These do not need to be factored down by a further 88%, and we suggest that this calculation should be: 1,438 staff x 90% onsite x (16.5%+27.2%) am arrivals x 100% inbound x 75% car mode share = 424 trips - Similarly, outbound am peak trips should be: 1,438 staff x 90% onsite x (16.5%+27.2%) am arrivals / 88% inbound x 12% outbound x 85% car mode share = 66 trips - That is: the 12% of trips that are departures should be in addition to the 88% that are arrival trips, not a portion of them	During the preparation of the ITA, it was acknowledged that the FPH survey results were for arrivals only, however it was considered unrealistic to have 100% inbound vehicles without any outbound vehicles. It was therefore decided to use the ITE trip distribution rates. Notwithstanding, we have undertaken further sensitivity testing to test 100% inbound and 12% outbound in the AM peak, and 17% inbound and 100% outbound in the evening peak. In 2038, the results show the SH22 / Oira Road / Site Access intersection operates at a LOS A in both AM and PM peak with negligible increases in overall intersection delay of 1 second in each peak as a result of the trip distribution amendments. In 2048, the AM results show a minimal impact on the SH22 / Oira Road / Site Access intersection with an increase in average intersection delay from 9.7 seconds to 9.9 seconds and an overall intersection LOS A. The eastern site access signalised intersection operates at a LOS B in the AM Peak with an average delay of 12.8 seconds. The PM peak in 2048 is the more constrained peak period however still	No further information requested.	N/A - No further information requested.

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			operates satisfactorily with the adjusted distribution rates for the SH22 / Oira Road / Site Access intersection with an average delay of 38.5 seconds and an overall intersection LOS D. It is noted that the left turn out of the site access (southern approach) operates at a LOS F, however the delay of 91 seconds is considered acceptable in the peak period. It is likely that FPH workers would adjust the time they commuted and leave earlier if this site access became an issue. The eastern site access operates satisfactorily in the PM peak with an average delay of 38.7 seconds and an overall intersection LOS D. The results show that by adjusting the trip distribution assumptions to include 100% inbound and 12% outbound in the AM peak, and 17% inbound and 100% outbound in the evening peak, the proposed intersection layout operates satisfactorily in the 2038 and 2048 AM and PM peaks.		
Unexpected modelling outcomes					
T7	Can the applicant provide any explanation for the unexpected modelling outcomes for intersection 4, in Tables 7-13 to 7-15?	The modelling presented in Tables 7-13 to 7- 15 shows unexpected outcomes for intersection 4 (Great South Road/SH22). For scenario 5 for example, very high delays are shown in Table 7-13 (no development), but much lower delays when the proposed Fisher and Paykel development is introduced in Table 7-15. Flow and delay difference plots (refer	For 2038, Scenario 5 represents a redistribution of traffic when the Pukekohe Arterials are not in place, and when the Council Structure Plan land use scenario is run. The precise reasons for this are unknown, but it is expected that as the Council Structure	No further information requested.	N/A - No further information requested.

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		comment #5 above) may assist in clarifying the cause of this unexpected outcome.	Plan scenario provides residential housing, and therefore follows the same commuter directions as background traffic, the Saturn model redirects a certain proportion of Pukekohe traffic onto Burt Road and other east / SH22 west diversion routes, which creates an issue at the SH22 / GSR intersection.		
U-turns on SH22					
T8	Please clarify why there is a high U-turn demand from SH22 (east) in Table 7-25.	Table 7-25 includes 147 U-turn manoeuvres at the Oira Road/SH22 intersection, for the pm scenario with 2 development accesses. No other modelling scenario documented in the ITA includes any U-turns.	The 2048 Saturn model for Scenario 7 shows a high demand for right turning vehicles from SH22 into Jesmond Road, that exceeds the right turn lane capacity. It is therefore assumed that the Saturn model sends the additional supply that cannot turn right, through the intersection and along SH22, to then U-turn at the Oira Rd roundabout and back to turn left into Jesmond Road. The U-turn was accidentally omitted from the reporting of Table 7-23 of the ITA. There were 147 light vehicles, and 3 heavy vehicles U-turning vehicles included in the modelling (and in the overall reported total volumes), however this U-turn row was inadvertently omitted from the report. It is now included in the reported results. Although it is more likely that the SH22 / Jesmond Road intersection will be designed to adequately accommodate the	No further information requested.	N/A - No further information requested.

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		necessary turning flows, the U-turns were retained within the Saturn model, and therefore the SH22/Oira Road intersection modelling results. This adds further conservatism to the modelling assumptions, as those U-turns are not likely to occur in practice given that the Jesmond Road / SH22 intersection is highly likely to be designed to accommodate all required movements.		
Structure Plan				
Structure Plan				
SP1	Please provide an evaluation of the applicants proposed structure plan and plan change in relation to the following key outcomes from section 3.13 or the Drury – Opāheke Structure Plan 2019: <i>3.13.10 The south western industrial area</i> <i>This industrial area should be designed, zoned and serviced to:</i> <i>promote an innovative and employment focussed creative business environment</i> <i>achieve high employment densities in locations that are within walking distance of the</i> <i>protect and enhance the blue- green network that supports the area including through water</i>	Refer to Attachment 14 for an assessment against each of the matters.	No further information requested.	N/A - No further information requested.

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<i>sensitive design, greenways, riparian enhancement margins and avoiding bulky buildings and outdoor storage areas close to streams</i> <i>provide for a high standard of building design amenity where the industrial zone boundary is either: on a street (with a residential zone on the other side of the street), or is adjoining an open space zone; including avoidance of excessively bulky buildings close to the street or open space</i> <i>...</i> <i>...</i> <i>promote the cultural and heritage values of the area</i> <i>provide for good walking and cycling connections to the nearby residential areas and centres</i> <i>avoid urban development in the 1 in 100-year floodplain.</i> 3.13.11 Blue-green network This area includes all the parks and reserves, awa (streams), riparian margins, floodplains, significant ecological areas, the coastal edge, estuaries, Te				

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Mānukanuka o Hoturoa / Manukau Harbour and aquifers. Development in these areas or on land potentially discharging to these areas should be designed, zoned and serviced to: • maintain and enhance the cultural, recreational and life-supporting capacity of the streams, the harbour and aquifers • avoid urban development in the 1 in 100-year floodplain and areas subject to coastal inundation and coastal erosion • provide for restoration and enhancement of riparian margins and floodplains • maintain and enhance biodiversity including through wetland and native forest restoration • provide for an interconnected network of walking and cycling greenways.				
SP2	Please explain whether or not F&P intends to use either all of the proposed plan change area for its own business activity, or whether it plans to use part only and if so what proportion of the land and which part?	This information assists in understanding the employment benefits that are being proposed in the context of the wider Drury – Opāheke Structure Plan 2019 indicated growth pattern and the council’s capacity responsibilities under the RPS and NPS-UD. While some estimates are provided it is not clear whether they apply to the whole plan change area, part of it or to the wider flow-on employment elsewhere.	FPH intends to use the entire plan change area to support its business activity as demonstrated by the indicative Masterplan. The indicative Masterplan provides for up to approximately 10,550 employees at any one-time	No further information requested. N/A - No further information requested.

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	Please confirm the expected employment numbers and employment densities for the plan change area based on the above? Please provide estimated employment numbers in the event that the proposed zoning becomes operative and F&P for any reason decides not to use the area for it’s own activities and the entire plan change area becomes available for the range of activities that would reasonably be expected to occur in a light industry zone but with allowance for the bespoke precinct rules.	It is also necessary to understand the employment outcome if the plan change area is not used for the proposed F&P activities and is instead used for other activities that could reasonably be expected to occur in this zone and precinct.	(excluding partnership development area). This is based on the existing design and operations of buildings at the East Tāmaki Campus. However, the nature of activities at FPH means that manufacturing staff operate over multiple shifts during the day meaning that the overall number of employees that the site could generate is estimated to be up to 18,000 employees. An additional area of land (approximately 6ha) has been identified for future “partnership opportunities” adjacent to SH22. This area provides an opportunity to enhance research outcomes through partnerships with healthcare providers, research institutions, the local community and Mana Whenua and deliver greater amenity for staff through partnership with other businesses (e.g: childcare, fitness, short and long-term accommodation options). Whilst there are no definitive plans for this area, high-level estimates based on a typical employment density of 34 employees per hectare on light industrial land, this equates to an additional 200 employees on the Site.		
SP3	Please provide an economics assessment of whether the provision for light industry activities and employment in the applicants plan change area would reach a level to the extent that this would significantly reduce the need	This information assists in understanding the proposal in the context of the wider Drury – Opāheke Structure Plan 2019 indicated growth pattern and the council’s capacity responsibilities under the RPS and NPS-UD.	Please refer to the detailed response provided in the Economics Response memo prepared by Property Economics at Attachment 8.	No further information requested.	N/A - No further information requested.

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	for any of the light industry land indicated in the Drury – Opāheke Structure Plan 2019 area (about 236ha gross), to meet the 30yr demand for the catchment? In responding to this, please advise whether in the economists view the proposed F&P activities are distinguishable from other light industry activities to the extent that it influences the answer to the above question?				
SP4	Please provide an approximate estimate of the expected dwelling numbers if the plan change area was used for residential activity as indicated in the Drury – Opāheke Structure Plan 2019 instead of Business – Light Industry Zone. Please provide the estimate at current commercially feasible residential density for the southern Auckland urban edge.	The applicant's economics report estimates that enabled residential capacity generally exceeds NPS-UD requirements. However, no specific estimate of the forgone residential capacity appears to be provided. This is important to understand what dwelling capacity would be forgone in the context of the yields proposed in the Drury – Opāheke Structure Plan 2019 and the capacity requirement of the RPS and NPS-UD.	Please refer to the detailed response provided in the Economics Response memo prepared by Property Economics at Attachment 8.	No further information requested.	N/A - No further information requested.
SP5	Please provide a preliminary engineering and commercial feasibility assessment for the feasibility of typical light industry buildings on the steeper gradient land near Oira Stream, considering earthworks and retaining walls required? For clarity: - this is only to a prelim level - applies only to the area west of the 20m contour but includes both the plan change	The cost of earthworks and retaining walls on steeper land may make typical light industry building and yard formats not cost effective to develop at an acceptable rate of return. The land at the western edge of application area grades down with increasing steepness closer to Oira Stream. This is relevant to decision making on the appropriateness of the zone and is relevant to some of the key outcomes in the Drury – Opāheke Structure Plan 2019.	The indicative Masterplan provided at Attachment 2 demonstrates FPH's current thinking on development across the Site over the next 30+ years. This has been developed in conjunction with civil and geotechnical engineers who have not identified any feasibility concerns with industrial development in the proposed building locations shown on the Masterplan. The Masterplan also incorporates requirements around riparian planting and setbacks which would need to be factored into future	No further information requested.	N/A - No further information requested.

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	area and the additional structure plan area in the southwest. If the applicant is not proposing to use some or all of this steeper area for light industry uses, then please provide more information on what land use is proposed instead?		development across the western portion of the Site. Further, FPH intends to hold and develop the land for their highly specialised operations which could also include ancillary activities to light industrial uses including office / training spaces, recreational facilities for employees, car parking, open spaces and stormwater management areas. If the land is too expensive or impractical to develop (at the time of development) for a specific light industrial typology/use the proposed zoning and provisions provide alternative uses for the land. We also note that in other Plan Changes promulgated by Auckland Council (e.g. PC78), the delivery of cost-effective design solutions with an acceptable rate of return is not a matter that is considered or addressed in the development of rules and standards. As such, it is not considered necessary or appropriate to speculate on the commercial feasibility of development over the long-term.		
SP6	Please provide a fuller explanation of the need for and rational for the additional applicant’s structure plan area that is outside the plan change area in the southwest?	It’s not clear why the applicant’s structure plan includes an area that is not in any of the FUZ, the applicants plan change area, or the Drury – Opāheke Structure Plan 2019 area.	The Structure Plan encompasses FPH’s entire landholding in this area. Whilst it is unlikely that this landholding will be required in the medium-to-long term, it could support some level of development should this be required. We also note that the neighbouring St	No further information requested.	N/A - No further information requested.

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		Ignatius school site has been pulled into the amended Structure Plan area despite being excluded from the 2019 area. The Plan Change boundary extends out to the current Rural Urban Boundary (RUB). On more detailed inspection, it appears that RUB in this location has not been considered with any detail during the development of the AUP given it is aligned with an unformed paper road, rather than a naturally defensible boundary such as a stream or rail corridor. Development of the Site therefore has the potential to create a small “landlocked” piece of rural land. As such, potential urban development of this land would represent a logical extension of the urban area should this be required in the future.			
SP7	Please provide a structure plan funding plan that clearly sets out for each item of the main required bulk infrastructure: • what the estimated cost is • whether there is committed funding for it • who is providing the funding • who will construct it • when will they construct it?	The funding plan in the applicant’s structure plan contains insufficient information. Parts of it may also be inconsistent with the funding information in the applicant’s ITA.	Please refer to the Funding Plan included at Attachment 5. The estimated costs have not been included (and are not required by the funding plan template), given the uncertainties associated with a number of these infrastructure projects that are expected to be required and constructed over the medium to long term and given that the infrastructure upgrade projects do not rely on any Council or AT funding. Staging of land development within the Plan Change area is dependent on the transport upgrade	No further information requested.	N/A - No further information requested.

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	Please advise of any land development staging dependencies for the applicant's proposal that arise from the above.		requirements set out in Standard IX.6.2 Staging of Development with Transport Upgrades and Standard IX.6.9 Water Supply and Wastewater Connections included within the proposed Precinct provisions (refer Attachment 1).		
SP8	Based on your answers to the employment density and alternative residential density questions above, please provide an estimate of the numbers of people within that part of RTN station catchment that is within that applicants plan change area? As there few existing roads in this area, a simple circular radius is sufficient for the walkable catchment. The council generally uses and 800m catchment but as Government is considering others you may wish to also include others as well such as 1200m.	This information helps to assess the application relative to the Drury – Opāheke Structure Plan 2019 key outcomes and the investment inherent in the RTN station.	The indicative Masterplan identifies 5 buildings (B1, 2, 3, 10 & 11) being located within an approximate 800m radial catchment of the Ngākōroa Railway Station with the potential to accommodate up to 4,150 employees at any given time. This increases to approximately 6,500 employees at a distance of 1200m.	No further information requested.	N/A - No further information requested.