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E38, E27 & PC79 COMPLIANCE SUMMARY – 88,130,133 UPPER OREWA ROAD AND 53A,53B,55 RUSSELL ROAD, OREWA

Further to your recent instructions, we have reviewed the proposals compliance against E38 and E27 and PC79.

1 E38 & PC79 COMPLIANCE SUMMARY

Table 38.8.1.2.1 Access to rear sites provides assessment criteria for JOALS based on the number of rear sites they serve. E38.8.1.2(1) states that a single jointly owned access lot or right-of-way easement must not serve more than 10 proposed rear sites. E38.8.1.2(3)-(4) states that accessways servicing more than 6 lots must be provided separate pedestrian access, with a minimum width of 1m.

Table E38.8.1.2.1 Access to rear sites

	Total number of rear sites served		
	1	2 – 5	6 - 10
Minimum legal width	3.0m	3.5m	6.5m
Minimum formed width	2.5m	3.0m	5.5m
Minimum service strip	0.5m	0.5m	1.0m
Maximum length	50m	50m	100m Note 1
Maximum gradient	1 in 4	1 in 5	
Minimum vertical clearance from buildings or structures	3.8m		
Minimum inside turning radius for bends	6.5m		

Table E38.8.1.2.1 is amended by PC79 as follows:

Table E38.8.1.2.1 Access to rear sites

		Total number of rear sites served		
	1	2 – 3 ~~5~~	4-5	6 ~~64~~ - 10
Minimum legal width	3.0m	3.5m	4.4m	6.9m~~75 6.5~~
Minimum formed width	2.5m	3.0m	3.0m	5.5m
Minimum service strip	0.5m	0.5m	0.5m	1.0m
Maximum length	50m	50m	50m	100m ~~Note 1~~ Note 1
Maximum gradient	1 in 4	1 in 5		
Minimum vertical clearance from buildings or structures	3.8m			

In accordance with PC79, accessways servicing more than four lots must be provided separate pedestrian access, with a minimum width of 1.4m when adjacent to the vehicle access and 1.8m when not adjacent to the vehicle access.

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Table 1: E38.8.1.2.1 & E27.6.6 compliance assessment table

JOAL	Scheme Plan	Units	Rear Access Units Served	Legal Width	Formed width	Service Strip Width	Pedestrian Access Width	Max Gradient	Turning Radius	Maximum length	Compliance – E38 AUP (OP)	Compliance – E38 PC 79	E27.6.6 PC79 – Compliance	Private/Public Collection
1	1500	25	15	12m	6.0m	1.5m	1.5m both sides	7.2%	7.0m	160m	**Does not comply**: -More than 10 lots -Exceeds 100m length	**Does not comply**: -Exceeds 100m length -More than 10 lots	**Complies**	**Recommend Private on JOAL collection due to length**
2	1501	5	0	4.5m	4.5m	NA	NA	12.5%	8.0m	90m	**Does not comply:** -No service strip	**Does not comply:** **-No service strip**	**Complies**	**Recommend Public on Road collection**
3	1502	41	19	10m	6.0m	0.8m	1.2m both sides	11.5%	>6.0m	290m	**Does not comply**: -More than 10 lots -Longer than 100m -Less than 1m service strip	**Does not comply:** -Exceeds 100m length -Less than 1m service strip -More than 10 lots	**Does not comply**	**Recommend Private on JOAL collection due to length**
4A	1503	17	15	11.0m	6.0m	1.0m	1.5m	5%	>6.0m	80m	**Does not comply**: -More than 10 rear lots	**Does not comply**: -More than 10 lots	**Complies**	**Private on JOAL collection due to length** **Recommend addition of turning head**
4B	1503	6	6	7.5m	5.5m	0.5m	1.5m footpath in one direction	5%	NA	40m	Does not comply: -Less than 1m service strip	Does not comply: -Less than 1m service strip	**Complies**	**Private on JOAL collection due to length.**

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														Recommend addition of turning head
5A	1508	4	4	5.0m	4.0m	NA	1.0m footpath in one direction	5%	3.5m	50m	**Does not comply**: -Less than 6.5m turning radius -Less than 0.5m service strip	**Does not comply**: -Less than 0.5m service strip	**Does not comply**	**Public on road collection**
5B	1509	20	8	9.0m	6.0m	0m	1.5m	8.5%	NA	160m	**Does not comply**: -Exceeds 100m length -Less than 1m service strip	**Does not comply**: -Less than 1.0m service strip	**Complies**	**Private on JOAL collection due to length**
6	1513	6	5	7.0m	5.5m	NA	1.5m footpath in one direction	2.3%	10.0m	75m	**Does not comply:** -Exceeds 50m length -Less than 0.5m service strip	**Does not comply:** -Exceeds 50m length -Less than 0.5m service strip	**Complies**	**Due to length, recommend private on JOAL collection with turning head**
7	1512	6	1	4.5m	3.5m	NA	1.0m footpath in one direction	6.0%	>6m	40m	**Complies**	**Complies**	**Complies**	**Public on Road collection**
8	1514	16	0	8.0m	6.0m	1.0m	NA	9.1%	NA	135m	**Complies**	**Complies**	**Complies**	**Recommend all public on Road collection**
9	1506	28	27	10.0m	6.0m	0.5m	1.5m	12%	2.5m	210m	**Does not comply:** -more than 10 lots	**Does not comply:** -Less than 1m service strip	**Does not comply**	**Recommend Private on JOAL collection due to length**

											-Less than 6.5m turning radius -Less than 1m service strip			
10	1505	7	6	6.5	5.5m	NA	1.0m footpath in one direction	12.5%	2.5m	100m	**Does not comply**: -Less than 6.5m turning radius -Less than 1.0m service strip	**Does not comply**: -Less than 1.0m service strip	**Complies**	**Private on JOAL collection**
11	1507	6	6	7.0m	5.5m	NA	1.5m footpath in one direction	0.5%	NA	90m	**Does not comply:** **-Less than 1.0m service strip**	**Does not comply**: -Less than 1.0m service strip	**Complies**	**Recommend Private on JOAL collection with turning head due to length**
12	1616	0	0	10.0m	6.0m	1.0m	1.0m	17%	8.5m	50m	**Complies**	**Complies**	**Complies**	**Private on JOAL collection**
37	1511	3	0	4.0m	4.0m	NA	N/A	4.5%	NA	20m	**Complies**	**Complies**	**Complies**	**Public on Road collection**
30	1510	12	5	6.5m	5.5m	NA	1.0m footpath In one direction	12.1%	0m	80m	**Does not comply:** -Exceeds 50m length -Less than 6.5m turning radius -Less than 0.5m service strip	**Does not comply:** -Exceeds 50m length -Less than 0.5m service strip	**Complies**	**Private on JOAL collection**
34	1515	3	0	6.0m	5.0m	1.0m	NA	12.1%	<6.5m	70m	Complies	Complies	**Complies**	**Public on Road collection**

40 &40A	1504	25	25	9.0m	6.0m	NA	1.5m	12.5%	7-12m	200m	**Does not comply**: -More than 10 lots -Exceeds 100m length	**Does not comply:** -More than 10 lots -Exceeds 100m length	**Does not comply**	**Recommend Private on JOAL collection due to length**
Stage 2														
13	1526	40	0	10.0m	6.0m	0.5m	1.5m both sides	8.6%	NA	190m	**Complies**	**Complies**	**Complies**	**Public on Road collection**
14	1520	5	0	6.5m	5.5m	1.0m	NA	8.0%	NA	50m	**Complies**	**Complies**	**Complies**	**Public on Road collection**
15	1522	5	0	6.5m	5.5m	1.0m	NA	9.1%	NA	50m	**Complies**	**Complies**	**Complies**	**Public on Road collection**
16	1521	9	9	8.5m	5.5m	0.75m	1.5m footpath in one direction	6.0%	0m	150m	**Does not comply:** **-Exceeds 100m length** **-Less than 6.5m turning radius** **-Less than 1.0m service strip**	**Does not comply:** **-Exceeds 100m length** **-Less than 1.0m service strip**	**Complies**	**Private on JOAL collection**
17	1523	8	0	6.5m	5.5m	1.0m	NA	17.2%	10.0m	80m	**Complies**	**Complies**	**Complies**	**Public on Road collection**
18	1528	5	0	4.0m	4.0m	NA	NA	11.5%	NA	55m	**Complies**	**Complies**	**Complies**	**Public on Road collection**
20	1533	4	0	6.5m	5.5m	1.0m	NA	8% or (100% for 3m)	NA	40m	**Complies**	**Complies**	**Complies**	**Public on Road collection**
23	1531	5	0	4.5m	4.5m	NA	NA	9.6%	NA	50m	**Complies**	**Complies**	**Complies**	**Public on Road collection**
26	1534	6	6	7.5m	5.5m	0.5m	1.5m footpath in	12.5%	0m	130m	**Does not comply:**	**Does not comply:**	**Complies**	**Recommend Private on JOAL**

							one direction				**-Exceeds 100m length** **-Less than 1.0m service strip** **-Less than 6.5m turning radius**	**-Exceeds 100m length** **-Less than 1.0m service strip**		**collection due to length**
27	1535	9	6	7.5m	5.5m	0.5m	1.5m footpath in one direction	12.5%	0m	100m	**Does not comply:** **-Less than 1.0m service strip** **-Less than 6.5m turning radius**	**Does not comply:** **-Less than 1.0m service strip**	**Complies**	**Private on JOAL collection**
28	1524	4	0	5.0m	4.0m	NA	1.0m footpath in one direction	20%	NA	45m	**Complies**	**Complies**	**Complies**	**Recommend Public on Road collection**
29	1536	3	0	4.5m	4.5m	NA	NA	11%	2.4m	30m	**Complies**	**Complies**	**Complies**	**Public on Road collection**
31	1539	6	0	6.5m	5.5m	1.0m	NA	17.4%	NA	45m	**Complies**	**Complies**	**Complies**	**Recommend Public on Road collection due to frontage**
32	1538	6	0	6.5m	5.5m	1.0m	NA	13.1%	NA	45m	**Complies**	**Complies**	**Complies**	**Private on JOAL collection** **Recommend Public on Road collection due to frontage**
33	1540	10	0	7.3m	6.0m	0.5m	NA	20%	NA	70m	**Complies**	**Complies**	**Complies**	**Private on JOAL collection** **Recommend Public on Road**

														collection due to frontage
35	1542	11	4	9.0m	5.5m	1.0m	1.5m footpath in one direction	20%	NA	110m	**Does not comply:** **-Exceeds 50m length**	**Does not comply:** **-Exceeds 50m length**	**Complies**	**Recommended private on JOAL collection due to length (Turning head required)**
36	1537	10	10	10.5m	6.0m	0.75m	1.5m footpath	12.5%	0m	135m	**Does not comply:** **-Exceeds 100m length** **-Less than 1.0m service strip** **-Less than 6.5m turning radius**	**Does not comply:** **-Exceeds 100m length** **-Less than 1.0m service strip**	**Complies**	**Private on JOAL collection**
38	1543	6	6	8.0m	5.5m	1.0m	1.5m footpath in one direction	12.5%	NA	45m	**Complies**	**Complies**	**Complies**	**Recommended Public on Road Collection**
39	1544	14	6	6.5m	5.5m	NA	1.0m footpath in one direction	10%	0m	105m	**Does not comply:** **-Exceeds 100m length** **-Less than 6.5m turning radius**	**Does not comply:** **-Exceeds 100m length**	**Does not comply**	**Private on JOAL collection**
22	1525	18	7	10.0m	6.0m	0.5m	1.5m both sides	10%	NA	220m	**Does not comply:** **-Exceeds 100m length** **-Less than 1.0m service strip**	**Does not comply:** **-Exceeds 100m length** **- Less than 1.0m service strip**	**Complies**	**Recommend Private on JOAL collection due to length**

24	1530	3	2	4.5m	3.5m	NA	1.0m footpath in one direction	2.7%	NA	20m	**Complies**	**Complies**	**Complies**	**Public on Road collection**
25	1529	6	6	7.5m	5.5m	0.5m	1.5m footpath in one direction	1.7%	NA	40m	**Complies**	**Complies**	**Complies**	**Public**
28	1524	4	0	5.0m	4.0m	NA	1.0m footpath in one direction	20%		50m	**Complies**	**Complies**	**Complies**	**Public**
19	1527	5	3	6.5m	5.5m	NA	1.0m footpath in one direction	12.6%	NA	50m	**Complies**	**Complies**	**Complies**	**Public**
21	1532	13	13	10.0m	6.0m	0.5m	1.5m both sides	8.0%	NA	175m	**Does not comply:** **-Exceeds 100m length** **-Exceeds 10 Lots** **-Less than 1.0m service strip**	**Does not comply:** **-Exceeds 100m length** **-Exceeds 10 Lots** **-Less than 1.0m service strip**	**Complies**	**Recommend Private on JOAL collection with turning head due to length**
41	1541	5	0	6.5m	5.5m	1.0m	NA	16.5%		65m	**Complies**	**Complies**	**Complies**	**Recommend Public on road collection**

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It is noted that:

- JOAL 16 in Stage 2 will be widened by 1m at the entry and 2m throughout the JOAL
- JOAL 26 & 27B in Stage 2 will be widened by 1m throughout
- JOAL 36 in Stage 2 will be widened by 0.5m at the entry and 3.5m throughout the JOAL

Updated cross sections and plans reflecting the above changes are planned to be provided in the 02/07/25 formal RFI response.

In regard to waste collection:

- Private on JOAL collection refers to an RTS 8m truck collection waste from within the JOAL
- Public on Road collection refers to the waste collection service operated by Auckland council

It is recommended that:

- JOALS 4A,4B,6 and 11 of Stage 1 is recommended to be serviced via private on JOAL waste collection due to the length of the JOAL and provide an adequate turning head to allow an RTS 8m truck to turn around within the JOAL; and
- JOAL 21 of Stage 2 is recommended be serviced via private on JOAL collection due to the length of the JOAL.

Detailed plans including the above recommendations will be included in the formal RFI result on 02/07/25.

There are eight JOALs that provide an inside turning radius <6.5m. A more detailed analysis of the non-compliance of inside turning radii will be conducted with the updated plans in the 02/07/25 formal RFI response.

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2 E27/PC79 ASSESSMENT

Table 2: PC 79 and E27 assessment

PC79 ID/E27	Assessment Criteria	Assessment
E27.6.3.4	**E27.6.3.4 Reverse Manoeuvring** (1) Sufficient space must be provided on the site so vehicles do not need to reverse off the site or onto or off the road from any site where any of the following apply: (a) four or more parking spaces are served by a single access; (b) there is more than 30m between the parking space and the road boundary of the site; or (c) access would be from an arterial road or otherwise within a Vehicle Access Restriction covered in Standard E27.6.4.1.	The proposal includes a total of 73 vehicle crossings within 10m of an intersection (17 in stage 1 & 56 in stage 2) and therefore within a vehicle access restriction that would need to reverse off the site onto the local road network. No reversing onto the NOR 6 road will be required. **Does not comply** This non-compliance is assessed against the criteria outlines in Rule E27.8.2 (8) of the Unitary Plan and is provided in Table 3.
E27.6.3.6	**E27.6.3.6 Formation and Gradient** (1) Except for Standard E27.6.3.6 (2) below, the whole area of parking and loading spaces, and manoeuvring areas and aisles must be formed, drained, provided with an all-weather surface to prevent dust and nuisance, and be marked out or delineated. This must be done before the activity to which those parking and loading spaces relate commences, and maintained for as long as that activity is continued. (2) Parking and loading spaces and manoeuvring areas and aisles do not need to be provided with an all-weather surface in the following zones: (a) Rural – Rural Conservation Zone; (b) Rural – Rural Coastal Zone; (c) Rural - Mixed Rural Zone; and (d) Rural – Rural Production Zone. (3) The gradient for the surface of any parking space must not exceed: (a) 1 in 25 in any direction for accessible spaces for people with disabilities; or (b) 1 in 20 (five per cent) in any direction for other spaces (4) The gradient for the manoeuvring area must not exceed 1 in 8	All gradients for manoeuvring areas do not exceed 1 in 8 and parking spaces are understood to provide a maximum gradient of 1 in 20. **Complies.**
E27.6.4.3	**E27.6.4.3 Width of vehicle access and queuing requirements** (1) Every on-site parking and loading space must have vehicle access from a road, with the vehicle access complying with the following standards for width: (a) passing bays are provided in accordance with Table E27.6.4.3.1; and (b) meeting the minimum formed access width specified in Table E27.6.4.3.2 (2) Access must be designed so that vehicles using or waiting to use fuel dispensers, ticket vending machines, remote ordering facilities and devices, entrance control mechanisms, or other drive-through facilities do not queue into the adjoining road reserve or obstruct entry to or exit from the site.	It is recognised that the underlining zoning is rural and thus technically the rural standards of the AUP apply. In this regard the rural standard is a minimum driveway width of 3m and maximum of 6m. As such technically all single width driveways **do not comply** with this rural standard. However, given the site will in fact be urban in nature, it is considered the urban standards are more applicable which the proposal does comply with. No accessways providing less than a 5.5m formed width longer than 50m are proposed. The proposal complies with E27.6.4.3 (a) and (b)

<table>
<tr><td></td><td></td><td>A compliance assessment table has been prepared and can be seen in Table 1Error! Reference source not found. below</td></tr>
<tr><td>E27.6.4.4</td><td>E27.6.4.4 Gradient of vehicle access
(1) The gradient of the access must not be steeper than specified in Table E27.6.4.4.1
<table><tr><th colspan="2">Access type</th><th>Maximum gradient</th></tr><tr><td>(T156A)</td><td>Vehicle access serving one residential rear site</td><td>1 in 4 (25 per cent)</td></tr><tr><td>(T157)</td><td>Vehicle access serving any other residential activities (including rear sites)</td><td>1 in 5 (20 per cent)</td></tr><tr><td>(T158)</td><td>Vehicle access used by heavy vehicles</td><td>1 in 8 (12.5 per cent)</td></tr><tr><td>(T159)</td><td>Vehicle access serving all other activities</td><td>1 in 6 (16.7 per cent)</td></tr></table></td><td>The following Lots (vehicle access areas) in stage 1 do not comply with the 1 in 20 (5%) maximum gradient:
- Lots 6-11, 17 & 18, 26-27, 32-45, 47, 49, 51, 53, 143-149, 56-74, 226, 225, 170-185, 187, 189, 225-226, 229-242, 209, 97-105, 276, 274, 272, 270, 279, 309-314, 308, 352-353, 338-351, 323-326, 328-331, 373, 391, 393, 410, 411, 461-466, 445-458, 443, 441, 439, 460, 424, 426, 428
The following Lots (vehicle access areas) in stage 2 do not comply with the 1 in 20 (5%) maximum gradient:
- Lots 870-878, 809-826, 770-774, 764-769, 695-682, 677, 675, 674, 650-654, 668-672, 636, 633, 717-739, 600,603, 631, 629, 627, 1301-1303, 1330-1337, 1346-1353, 1138-1141, 1152-1160, 1175-1187, 1189, 1226, 1108-1112, 1092-1096, 1048, 980-981, 975-976, 952-965, 1047, 1000, 995-998
Does not comply
This non-compliance is assessed against the criteria outlines in Rule E27.8.2 (8) of the Unitary Plan and is provided in Table 3</td></tr>
<tr><td>18</td><td>E27.6.1 Trip generation
(1) Where a proposal (except where excluded in Standard E27.6.1(2)) exceeds one of the following thresholds:
(a) A new development or subdivision in Table E27.6.1.1;
(b) 100 v/hr (any hour) for activities not specified in Table E27.6.1.1 requiring a controlled or restricted discretionary land use activity consent in the applicable zone where there are no requirements for an assessment of transport or trip generation effects. This standard does not apply to development activities provided for as permitted in the applicable zone.</td><td>The proposed development is for approximately 1250 dwellings and 813 peak hour trips; therefore, exceeds thresholds in Table E27.6.1. of TA1 and T1.
Requires Assessment.
The vehicle trip generation assessment is triggered regardless of PC79 and is assessed in the ITA.</td></tr>
<tr><td>20</td><td>E27.6.2 Number of parking and loading spaces
(6) Bicycle parking:
(e) The activities specified in Table E27.6.2.5 must provide the minimum number of bicycle parking spaces specified;
(aa) For residential developments, the required secure long-stay bicycle parking must be located and designed in a manner that (is):
i) Not required of any required outdoor living space or landscaped area;
ii) In a location accessible from either the road, vehicle access, pedestrian access or car parking area;
iii) Sheltered from the weather;
iv) Lockable and secure;
xii) The following bicycle parking requirements apply to new buildings and developments.</td><td>Approximately 1250 dwellings are proposed with a garage car parking space. Each dwelling has a dedicated garage; therefore, no dedicated bicycle parks are required.
Upon subdivision each Lot will hold a single residential dwelling and therefore no short stay spaces are considered to be required. It is likely that visitors will park their bicycles within the garage of the resident they are visiting.
As such, it is considered that the proposed bicycle parking</td></tr>
</table>

	Table E27.6.2.5 Required bicycle parking rates (T81) **Visitor (short-stay) minimum rate** 1 per 20 for developments of 20 or more dwellings **Secure (long-stay) minimum rate** 1 per dwelling without a dedicated garage or basement car parking space	arrangement is satisfactory and compliant. **Complies.**
21	**E27.6.2 Number of parking and loading spaces** (8) Number of loading spaces: (a) All activities must provide loading as specified in Table E27.6.2.7. (b) Residential activities where part of the site has frontage to an arterial road as identified on the planning maps, must provide loading as specified in Table E27.6.2.7A **Table E27.6.2.7A Minimum small loading space requirements** Activity | GFA/Number of dwellings | Minimum rate (T111B) | Developments where all dwellings have individual pedestrian access directly from a public road | No loading space required | Up to 9 dwellings without individual pedestrian access directly from a public road | No loading space required | Greater than 9 dwellings up to 5,000m^2 without individual pedestrian access directly from a public road | 1* | Greater than 5,000m^2 | N/A * Refer to T137A of Table E27.6.3.2.1 Minimum loading space dimensions	Upon subdivision one dwelling is proposed per Lot which will not trigger the requirement for loading when assessed as residential activity. Similarly, if assessed as a rural activity no loading is required. Dwellings which front NoR6 are anticipated to have direct pedestrian access to this road. **NA**
22	**E27.6.2 (9) Fractional Spaces** (9) Fractional spaces: (c) Where the calculation of the permitted parking results in a fractional space, any fraction that is less than one-half will be disregarded and any fraction of one-half or more will be counted as one space. If there are different activities within a development, the parking permitted for each activity must be added together prior to rounding.	Fractional space calculations are considered when assessing PC79. **Complies.**
23	**E27.6.3.1 Size and location of parking spaces** (1) Every parking space must: (a) Comply with the minimum dimensions given in Table E27.6.3.1.1 and Figure E27.6.3.1.1; except accessible parking dimensions and accessible route requirements must be designed in accordance with the New Zealand Standard for Design for Access and Mobility – Buildings and Associated Facilities (NZS: 4121-2001).	All proposed car parking spaces comply with the minimum Unitary Plan dimensions. **Complies.**
24	**E27.6.3.2 Size and location of loading spaces** (1) Every loading space must: (d) Comply with the following when any yard of a site is used to provide the loading space (where it is permitted within the zone). i) The use of the loading space does not create a traffic hazard on the road at any time; and (e) Have a maximum crossfall of 1:50 (2%) in all directions. **Table E27.6.3.2.1 Minimum loading space dimensions** (T137A) **Activities requiring a small loading space under Standard E27.6.2(8)(b)** Length of loading space(m) 6.4 Width of loading space (m) 3.5	No loading spaces are required, and none have been provided. **NA**
25	**E27.6.3.2(A) Accessible parking**	For approximately 1250 dwellings 51 accessible parking spaces are

	(1) Accessible parking must be provided for all new activities, changes of activity type, and / or the expansion or intensification of an existing activity in all zones, except for those listed below in E27.6.3.2(A)(2); (2) Accessible parking is not required in the following zones, unless car parking is provided on site, in which case the required number of accessible parking spaces must be determined in accordance with Table 1 or Table 2 below, whichever is relevant: Business Zones: (a) Business – City Centre Zone; (b) Business – Metropolitan Centre Zone; (c) Business – Town Centre Zone; (d) Business – Local Centre Zone; (e) Business – Mixed Use Zone; (f) Business – Neighbourhood Centre Zone. Residential Zones: (a) Residential – Terrace Housing and Apartment Buildings Zone. (3) For residential developments in residential zones (excluding the Terrace Housing and Apartment Buildings Zone unless car parking is provided on site), accessible parking spaces must be provided for developments of 10 or more dwellings on a site. (4) The required number of onsite accessible parking spaces provided must be calculated using the following method: (i) For non-residential land uses: Step 1 – Use the Parking Demand Guidelines in Appendix 23 to determine the theoretical parking demand Step 2 – Use Table 1 – Number of accessible parking spaces – Non-Residential, below to determine the required number of accessible car park spaces based on either the number of parking spaces that are proposed to be provided or the theoretical parking demand calculated in Step 1, whichever is higher. **Table 1 – Number of accessible parking spaces – Non-Residential land uses** **Total number of parking spaces provided or theoretical parking spaces, whichever is the higher** / **Number of accessible parking spaces** **1-20** / **Not less than 1** **21-50** / **Not less than 2** **For every additional 50 parking spaces or part of a parking space** / **Not less than 1** (ii) For retirement villages, supported residential care, visitor accommodation and boarding houses The same method for calculating the required number of onsite accessible parking spaces for non-residential uses in 4(i) applies. (iii) For residential land uses The required number of accessible parking spaces provided must be in accordance with Table 2 below: **Table 2 – Number of accessible parking spaces – Residential land uses** **Number of dwellings** / **Number of accessible parking spaces** **10-19** / **Not less than 1** **20-29** / **Not less than 2** **30-50** / **Not less than 3** **For every additional 25 dwellings or units** / **Not less than 1**	required, which the proposal does not achieve; however, accessible users could utilise the vehicle access to park their vehicle instead of using the garage. Many of the dwellings are anticipated to have a pedestrian path adjacent to the vehicle access (indicated by the front door location), which could be used as a clear zone. This non-compliance is assessed against the criteria outlines in Rule E27.8.2 (8) of the Unitary Plan and is provided in Table 3. **Does not comply.**
26	**E27.6.3.3 Access and manoeuvring**	No loading spaces are required

	(2A) For every loading space required by Table E27.6.3.2.1 (T137A) the access and manoeuvring areas associated with that loading space must accommodate the 6.4m van tracking curves set out in Figure E27.6.3.3.3.	**N/A.**
27	**E27.6.3.4 Reverse manoeuvring** (1) Sufficient space must be provided on the site so vehicles do not need to reverse off the site or onto or off the road from any site where any of the following apply: (a) Four or more parking spaces are served by a single access; (b) There is more than 30m between the parking space and the road boundary of the site; or (c) Access would be from an arterial road or otherwise within a Vehicle Access Restriction covered in Standard E27.6.4.1	See response to E27.6.3.4. **Does not comply**
28	**E27.6.3.4A Heavy vehicle access** (1) Where a site in a residential zone provides heavy vehicle access it must provide sufficient space on the site so an 8m heavy vehicle does not need to reverse onto or off the site or road, with a maximum reverse manoeuvring distance within the site of 12m. (2) Heavy vehicle access and manoeuvring areas associated with access required by E27.6.3.4A (1) must comply with the tracking curves set out in the Land Transport New Zealand Road and traffic guidelines: RTS 18: New Zealand on-road tracking curves for heavy motor vehicles (2007).	No loading spaces are required **N/A.**
29	**E27.6.3.5 Vertical clearance** (1) To ensure vehicles can pass safely under overhead structures to access any parking and loading spaces, the minimum clearance between the formed surface and the structure must be: (a) 2.1m where access and/or parking for cars is provided for residential activities; (b) 2.3m where access and/or parking for cars is provided for all other activities; (c) 2.5m where access and/or accessible parking is provided and/or required; (ca) 2.8m where loading is required for residential activities denoted with an asterisk (*) in Table E27.6.2.7A; (cb) 3.8m where heavy vehicle access in Standard E27.6.3.4A is provided; or (d) 3.8m where loading is required in Table E27.6.2.7	All garages are understood to have at least 2.1m vertical clearance. **Complies.**
30	**E27.6.3.7 Lighting** (1) Lighting is required where there are 10 or more parking spaces which are likely to be used during the hours of darkness. The parking and manoeuvring areas and associated pedestrian routes must be adequately lit during use in a manner that complies with the rules in Section E24 Lighting. (2) Lighting is required, in residential zones to primary pedestrian access, vehicle access, parking and manoeuvring areas, where any of the following apply: (a) There are four or more dwellings accessible from a primary pedestrian access which is not adjacent to a vehicle access; (b) There are 10 or more parking spaces; or (c) There are 10 or more dwellings. Adequate must be provided during the hours of darkness in a manner that complies with the rules in Section E24 Lighting.	Given the proposal is more comparable to a residential activity, assessing the site against the residential requirements lighting needs to be considered. There are proposed to be more than 10 parking spaces which are likely to be used during hours of darkness; therefore, lighting will be required. Refer to Greenwood's lighting plan.
31	**E27.6.4.3 Width of vehicle access, queueing and speed management requirements** (1) Every on-site parking and loading space must have vehicle access from a road, with the vehicle access complying with the following standards: (a) Passing bays are provided in accordance with Table E27.6.4.3.1; and (b) Meeting the minimum formed access width specified in Table E27.6.4.3.2; and	Traffic calming can be provided within the JOALs as and where required. A minimum of 5.5m formed access width is provided in the JOALs where the JOAL services 10 or more parking spaces, therefore, no passing bay will be required.

	(c) Meeting the minimum speed management measure spacing specified in Table E27.6.4.3.3. … Emergency responder access requirements are further controlled by the Building Code. Plan users should refer to the Building Code to ensure compliance can be achieved at building consent stage. Granting of a resource consent does not imply that waivers of Building Code requirements will be granted. Fire and Emergency New Zealand publishes guidance in the context of Building Code requirements. **Table E27.6.4.3.3 Speed management requirements** (T156A) Residential Zones **Length of vehicle access** Exceeds 30m **Location of minimum speed management measures** Not more than 10m from the site boundary with the legal road; and Not more than 30m spacing between speed management measures. *Note: Where heavy vehicle access and speed management measures are required, the design of speed management measures should include consideration of heavy vehicle requirements.*	**Complies**
32	**E27.6.6 Design and location of pedestrian access in residential zones** (1) Where two or more dwellings are proposed in residential zones, primary pedestrian access must be provided which meets the following: (a) Have the minimum pedestrian access width and separation specified in Table E27.6.6.1 for its full length; (c) Have a gradient no greater than: (i) 1 in 12 for pedestrian access which is not adjacent to vehicle access; (ii) The maximum vehicle access gradient as specified in Table E27.6.4.4.1 where the pedestrian access is adjacent to vehicle access; (e) Have a surface treatment which is firm, stable and slip resistant in any weather conditions; (f) Provide direct and continuous access to the dwellings from a public footpath; (g) Be free from permanent obstructions and have a clear height of at least 2.1m; (2) A minimum clear width of 3m and a minimum clear height of 2.1m for its full length is required for primary pedestrian access where not adjacent to vehicle access and serving: (a) Up to three dwellings and has a length greater than 50m; or (b) Four or more dwellings. (3) For the purposes of (2) above, the clear width may include: (a) The minimum 1.8m formed primary pedestrian access width; (b) Landscape treatment with a maximum mature height of 600mm; (c) Lighting infrastructure. (4) Standards E27.6.6(1), (2) and (3) above do not apply where: (a) Up to three dwellings are proposed on a site and vehicle access is provided to each dwelling; or (b) A dwelling directly fronts and has direct access to a street. (5) For four or more dwellings in residential zones, pedestrian access must be provided to each parking space within a parking area consisting of four or more parking spaces served by the same vehicle access and: (a) Have a minimum width of 1.2m; (b) Be vertically separated from trafficable areas as shown in Figure E27.6.4.3.1; (c) Connect to the primary pedestrian access or the dwellings associated with those parking spaces; (d) Have a surface treatment which is firm, stable and slip resistant in any weather condition; and	The design of the JOALs is discussed in Section 9.3.4. Grade separated pedestrian facilities are provided on all local roads, this is discussed in further detail in section 7.3. JOALs which serve more than 3 dwellings and do not have frontage to a local road only provide 1.2m pedestrian footpaths which does not comply with the standard, this is highlighted in Table 1. **Does not comply** This non-compliance is assessed against the criteria outlines in Rule E27.8.2 (8) of the Unitary Plan and is provided in Table 3.

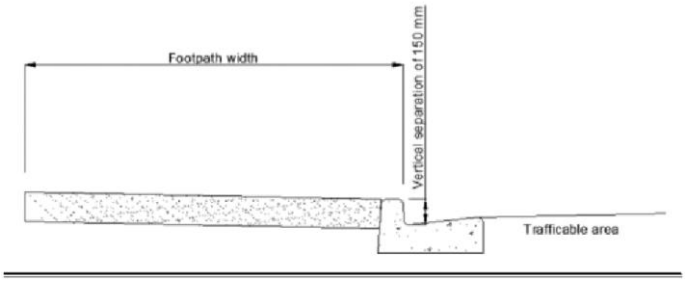
(e) Be free from permanent obstructions and have a clear height of 2.1m for its full length.

This standard does not apply where the pedestrian access forms part of a primary pedestrian access.

Table E27.6.6.1 Primary Pedestrian Access width and separation requirements

Location of site	The total number of parking spaces or dwellings served by a vehicle and/or Primary Pedestrian Access	Minimum formed Primary Pedestrian Access width where not adjacent to vehicle access	Minimum formed Primary Pedestrian Access width and separation where adjacent to vehicle access
(T156A)	Serves 2-3 dwellings	1.8m	No requirement under E27.6.6(1) to (3)
(T156B)	Serves 4 to 19 parking spaces or 4 to 19 dwellings, whichever is the greater	1.8m	1.4m (including the kerb), which must be vertically separated from trafficable areas as shown in Figure E27.6.4.3.1
(T156C)	Serves 20 or more parking spaces or 20 or more dwellings, whichever is the greater	1.8m	1.8m (including the kerb), which must be vertically separated from trafficable areas as shown in Figure E27.6.4.3.1

Figure E27.6.4.3.1 Vertical separation of pedestrian access



33	**E27.6.7 Provision for electric vehicle charging** *Purpose: to ensure that any undercover car parks for new semi-detached dwellings or for new dwellings within a terrace or apartment*	The proposal includes detached dwellings and therefore is not included in this rule; however, duplex dwellings with garage

	building are provided with the capability to install Electric Vehicle Supply Equipment. (1) Any new dwellings with car parking (with the exception of new detached dwellings) must provide each undercover car park with the capability to install Electric Vehicle Supply Equipment with designated space for the necessary conduit, circuit and metering between the carpark and an electrical distribution board on the same building storey, or ground level if the car parking space is at ground level. Note: (a) This standard does not apply to any car parking permanently allocated to visitors. *Refer to the following standards and guidelines:* - *Australian/New Zealand Wiring Rules AS/NZS 3000:2018* - *SNZ PAS 6011:2021 Electric Vehicle Chargers for Residential Use* - *SNZ PAS 6011:2021 Electric Vehicle Chargers for Commercial Applications* - *WorkSafe EV charging safety guidelines 2nd addition plus addendums 1 and 2*	parking is also proposed meaning electric vehicle charging provisions can be added as required. **Complies.**

Standard E27.6.4.4 specifies the maximum gradient for access is 1 in 20 (5%), Standard 6.3.4 specifies that reversing onto the local road network should not occur within a vehicle access restriction, Standard E276.6 specifies that 1.4m vertically separated pedestrian access is required for accesses serving more than 3 Lots and Standard E27.6.3.2(A) specifies that 51 accessible parking spaces are required. The proposal does not comply with any of the above standards; Accordingly, an assessment against the criteria outlined in Rule E27.8.2 (8) of the Unitary Plan has been undertaken and is provided in Table 3.

Table 3: Plan Change 79 Amended Assessment Criteria E27.8.2 (8)

Assessment Criteria	Comment
E27.8.2 (8) any activity or development which infringes the standards for design of parking and loading areas or access under Standard E27.6.3, E27.6.4.2, E27.6.4.3, E27.6.4.4 and E27.6.6:	
(a) effects on the safe and efficient operation of the adjacent transport network having regard to:	
(i) the effect of the modification on visibility and safe sight distances;	The non-compliance of maximum parking gradients, vertically separated pedestrian access, reversing onto the road network within a vehicle access restriction and accessible parking is not expected to impact the visibility or safe sight distances.
(ii) existing and future traffic conditions including speed, volume, type, current accident rate and the need for safe manoeuvring;	The non-compliance of maximum manoeuvring gradients is unlikely to affect the existing and future traffic conditions, as mentioned in Section 9.4 all non-compliant Lot driveways provide a downgrade from the site to the fronting road, the user class is 1A (residential, domestic and employee parking) and the maximum car park size is two parking spaces (fronting a local road). Based on this, Australian and New Zealand standards support the use of 1:8 gradients within the site without a 1:20 platform, the proposal meets the use of 1:8 gradients. The non-compliance of reversing onto the road network within a vehicle access restriction is also unlikely to affect the existing and future traffic conditions. As mentioned in Section 9.2 of the ITA, all driveways located on a major road of an intersection are located at the top of a 'T' intersection. Figure 3.1 of AS / NZS 2890.1 details prohibited locations for driveways. As seen in the ITA Section 9.2.4, domestic driveways located at 'the top of a 'T' are excluded from this prohibition and are considered acceptable. This is due to driveways in this location access

	domestic driveways are low volume and being opposite the intersection (i.e. top of the T) have excellent visibility to the intersection. These have been approved for this reason in most subdivision in Auckland. Driveways within a vehicle access restriction on a minor road generally provide 8-10m of separation which is considered to be minimal non-compliance and unlikely to affect existing and future traffic conditions. In regard to the non-compliance of vertically separated pedestrian access or accessible parking it is not anticipated to affect existing and future traffic conditions.
(iii) existing pedestrian numbers, and estimated future pedestrian numbers having regard to the level of development provided for in this Plan;	Existing pedestrian numbers are negligible as there is minimal development on the proposed site. The non-compliance outlined above is unlikely to affect existing and future pedestrians.
(iv) existing community or public infrastructure located in the adjoining road, such as bus stops, bus lanes and cycleways; and	There are no bus stops, bus lanes or cycleways along in the vicinity of the site.
(v) The extent to which the management plan for the development identifies and mitigates risk to all site and road users	No management plan is considered necessary to be provided.
(b) effects on pedestrian amenity or the amenity of the streetscape, having regard to;	
(i) the effect of additional crossings or crossings which exceed the maximum width; or	NA.
(ii) effects on pedestrian amenity and the continuity of activities and pedestrian movement at street level in the Business – City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone and Business – Local Centre Zone	NA.
(c) the practicality and adequacy of parking, loading and access arrangements having regard to:	
(i) site limitations, configuration of buildings and activities, user requirements and operational requirements;	As highlighted in Section 8.5 of the ITA, the site is not flat in nature and therefore roads are required to be steeper than 8% to practicably gain access. All accesses do not exceed a gradient of 1 in 8 which is considered to be acceptable. In regard to accessible parking provisions, no dedicated accessible parking has been provided; however, the applicant has informally provided accessible parking across the site. Accessible parking users could make us of the access instead of the garage which is understood to provide the required width and comply with the 1 in 25 gradient. Detailed plans will be provided as part of the formal RFI response on 02/07/25.
(d) the safety and practicality of pedestrian access, in residential zones, having regard to:	
(i) site limitations, configuration of buildings and activities, user requirements and operational requirements;	See above.

(ii) the number of dwellings / future occupants that a primary pedestrian access is serving;	The anticipated number of dwellings each JOAL will be serving can be seen above in Table 1.
(iii) the extent to which a primary pedestrian access is direct, continuous, obstruction free and safely accommodates different users and abilities including minimisation of gradients, provision of landing areas and avoidance of steps;	Generally primary pedestrian access is direct, continuous and obstruction free. All local roads are proposed to include a pedestrian footpath in both directions; road gradients meet the legal limits for public roads in Auckland.
(iv) space limitations and constraints within basement parking areas;	N/A.
(v) the safety of pedestrians where a pedestrian access crosses trafficable areas, considering the design of the crossing, visibility between drivers and pedestrians, and vehicle speeds;	In regard to safety of pedestrians in and around trafficable areas: - Trafficable areas within JOALs have been designed to be low-speed environments as PC79 compliant speed management measures being provided to enforce lower vehicle speeds; - All proposed accessways provide a downgrade from the site to the fronting Road/JOAL ensuring adequate pedestrian-vehicle visibility; and - 1.2m pedestrian footpaths are provided on both sides of all JOALs where required which does comply with NZS 4121 for accessible users and reduces the need to cross trafficable areas. It is considered to be unlikely for conflict between pedestrians and vehicles to occur and therefore no safety concerns are anticipated for pedestrians.
(vi) the extent to which the design incorporates Crime Prevention Through Environmental Design Principles;	This is not considered to be a traffic engineering matter and is understood to have been addressed via other disciplines within this resource consent application.
(vii) the extent to which the design incorporates Universal Design principles, including the extent to which a primary pedestrian access is not adjacent to vehicle access and includes steps, provides a footpath and/or ramps as specified in NZS 4121:2001 Design for access and mobility: Buildings and associated facilities;	It is understood that universal design principles have been implemented. Not a traffic engineering matter.
(viii) the need to separate pedestrian areas from vehicle access, parking, manoeuvring and reversing areas; and	See response to (v).
(ix) the avoidance of conflict between users.	See response to (v).
(e) the safety and functionality of emergency responder access.	Not a traffic engineering matter.

It is therefore considered that the proposed non-compliance of reversing onto the local road network, maximum access gradients of 1 in 20, 1.4m vertically separated pedestrian access and accessible parking is satisfactory.