Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure L:

Transport Performance & Optimisation (TPO)

Phil Harrison

Richard Black

Chris Freke

09 October 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962

2.0 Technical Specialist Memo – Transport / Traffic

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Phil Harrison – Traffic Engineer (Consultant on behalf of Transport Performance and Optimisation) Richard Black – Statutory Planner (Consultant on behalf of Transport Performance and Optimisation) Chris Freke – Principal Planner (Auckland Urban Development Office)
Qualifications & Relevant Experience:	<u>Phil Harrison:</u> I hold the qualification(s) of: Master of Science in Transportation Engineering and have 40 years of experience in traffic engineering and transport planning. I am a Chartered Member of Engineering New Zealand. I have prepared expert evidence and technical assessments for resource consent applications, plan changes, notices of requirement for designation and fast-track applications, and have appeared as an expert witness before consent authorities on multiple occasions and at the Environment Court. <u>Richard Black:</u> I hold the qualification(s) of: Bachelor of Applied Science in Environmental Management (Honours), and have 22 years of experience in planning. I am a full member of New Zealand Planning Institute and am certified under the MfE Making Good Decisions Programme. I have prepared expert evidence and technical assessments for resource consent applications, plan changes, notices of requirement for designation, and have appeared as an expert witness before consent authorities on multiple occasions and at the Environment Court. <u>Chris Freke:</u> I hold the qualification of Bachelor of Town Planning and have 40 years of experience in land use and transport.

	I am a full member of the New Zealand Planning Institute. I have prepared expert evidence and technical assessments for resource consent applications, plan changes, notices of requirement for designation, and have appeared as an expert witness before consent authorities and at the Environment Court. I was Auckland Transport's lead planner in its submission to and appeals to the Beachlands South private plan change and settlement of those appeals which resulted in the operative Beachlands South Precinct provisions.
Preparation in Accordance with the Code of Conduct:	Phil Harrison: I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified. Richard Black: I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified. Chris Freke: I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**) and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.
Signature:	
Date:	09/10/2026

3.0 Executive Summary / Principal Issues

This memo provides Transport Performance and Optimisation's comments on the transport aspects of the Beachlands South substantive application. It is based on the final application package dated 25 September 2026, which replaces the lodged documents. The Transport Initial Review (14 August 2026), prepared by Auckland Transport (now part of Auckland Council), was provided to the applicant as the transport s67 information request. It contains 32 information requests and two advice notes, and the applicant's responses are in the s67 response table (Attach 0B2). This memo records what remains outstanding from that review. Item numbers in brackets (for example, IR 5) refer to the Initial Review, which is attached (section 10). References to Transport Performance and Optimisation in this memo include the transport functions previously carried out by Auckland Transport.

Of the 32 requests, four are resolved (IR 1, 3, 18 and 30), 21 are partly resolved and seven are not resolved (IR 2, 5, 7, 9, 25, 29 and 32). Many of the partly resolved items rely on matters being dealt with at Engineering Approval, but the conditions that would secure them have not been included in Attach 0C. Several conditions the applicant says it has offered are also not in Attach 0C.

The principal issues are:

1. **Whitford Bypass.** The Precinct requires the Bypass beyond 1,900 dwellings. The applicant does not propose it, relying on a forecast of 1,589 vehicles per hour (vph) through Whitford in the 2041 morning peak, only 11 below the 1,600 vph at which the plan change modelling found the Bypass was needed. The applicant's own sensitivity tests go over 1,600 vph. Transport Performance and Optimisation recommends a traffic-based trigger that defers further development if 1,600 vph is reached, until the Bypass or agreed mitigation is in place (Condition N1). No condition caps the dwelling yield, so a maximum yield condition is also recommended (Condition N12).
2. **Departures from the Precinct transport triggers.** These are the omission of the Site C upgrade and the Whitford Bypass, deferral of the full Jack Lachlan Drive, Site B and Site E upgrades until after the first 68 lots, and the ferry capacity trigger at row (e) not being met. Internal collectors, the bus route and active mode links are not tied to any stage or dwelling number.
3. **Monitoring and review.** A monitoring and review condition that replicates the Precinct's special information requirements is also recommended (Condition N14). It would give an evidence base, using actual trip generation and the timing of land uses, for any future change to the development thresholds, including the stage at which the Whitford Bypass is needed.
4. **Road width departures.** No justification or safety assessment has been provided for the roads that are narrower than Council's road design standards. The cross sections would become approved plans, so the widths would be fixed at consent.
5. **Schools.** No school transport assessment has been provided. School bus turning, layover and drop-off are deferred to a plan certified before the school opens, by which time the frontage roads will have been built. The conditions normally applied to new private schools, or to designations for new state schools, are also missing.
6. **Safety for people walking and cycling.** There are no crossings at the Site A, B and E roundabouts, the roundabout entries are not designed to slow drivers enough, cyclists have no priority across side roads on Jack Lachlan Drive, and some driveways lack clear views of footpaths and cycleways. Conditions are also recommended setting a 50 km/h design speed

through the Site A roundabout (Condition N15), and requiring an active mode crossing of Whitford-Maraetai Road near Trig Road West if the Site C upgrade is omitted (Condition N16).

Transport Performance and Optimisation considers two matters to be critical information gaps under s67: the road width departures and the school frontage road layout. Two further information gaps are also identified: whether safe layouts can be achieved at the external intersections within the land available, and the ferry demand information required by I458.9(4)(e). The other outstanding matters can be managed through conditions and are dealt with in sections 6 and 9.

With the information gaps in section 7 closed and the conditions in section 9 imposed, Transport Performance and Optimisation expects that the transport effects can be appropriately managed. On the information available, we do not consider any transport effect to be an adverse impact of the scale contemplated by s85(3) FTAA. The Whitford Bypass threshold is the matter closest to that, and the recommended trigger condition is intended to manage it.

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- Attach 0A.1 Legal Memorandum
- Attach 0B Planning Assessment (AEE), Attach 0B1 Rules Assessment and Attach 0B2 s67 Response Table (Traffic tab)
- Attach 0C Proposed Conditions of Consent and Attach 0C1 Appendix 1 to Conditions
- Attach 1 Design Report Revision C dated 12 August 2026
- Attach 4, 4.1 and 4.1 Urban Design Assessment
- Attach 8 Integrated Transport Assessment (Hughes Traffic and Transportation)
- Attach 9R Roading 1, Attach 9S Roading 2, Attach 9T Roading 3, Attach 9U Roading 4 (Harrison Grierson).
- Transport Information Initial Review (14 August 2026) and pre-lodgement feedback to Beachlands South Limited Partnership (1 May 2026), both prepared by Auckland Transport (now part of Auckland Council)
- Preliminary comments of other Auckland Council and PT CCO specialists (5. Specialist Input\Prelim)

5.0 Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

Transport Performance and Optimisation has not identified any transport reasons for consent that conflict with the updated AEE, which now records non-compliance with Table I458.6.3.1 rows (a) to (d) (non-complying under I458.4.1(A8)) and row (e) and the ferry capacity table (discretionary under I458.4.1(A9) and (A10)). The following should be checked by the Council planner:

- Primary pedestrian access (E27.6.6) Where a JOAL serves 6 to 19 dwellings, the PPA must be physically separated from vehicles. The JOAL designs separate the PPA by a mountable kerb only, which we do not consider achieves this (ITA p115). Unless the design changes, this is an infringement of E27.6.6. It is not listed among the E27 reasons for consent (Attach 0B, p77). (IR 7)
- Accessible parking (E27.6.3.2A) ITA Table 7-10 (p95) shows C9-A and C9-B each providing 1 space where 2 are required, and VC4 providing 3 where 4 are required, although the ITA states every super lot complies. Assessed building by building, these are shortfalls that are not listed in the AEE. Assessed across the whole development, they are not. The planner should confirm which approach applies. (IR 21)

Transport Performance and Optimisation agrees that the AEE correctly records the road design infringement under I458.4.1(A29), including the Sub-precinct D collector designed as a local road without cycle provision (Attach 0B, p82), and the CM2 loading shortfall under E27.4.1(A2) (Attach 0B, p77). The ITA does not assess the Sub-precinct D change (section 6.5).

6.0 Specialist Assessment

Key Headings

6.1 Existing environment

6.2 Potential effects

6.3 Proposed mitigation

6.4 Alignment with planning provisions

6.5 Recommended conditions

6.6 Engagement with the applicant's specialists

6.7 Site visit

6.8 Overall position

IR numbers refer to items in the Initial Review (14 August 2026), provided to the applicant as the transport s67 information request (attached, section 10). Transport Performance and Optimisation has checked each response in the applicant's s67 response table against the ITA, plans and conditions, and has not accepted a response unless the substance is reflected in those documents.

6.1 Existing environment

Whitford-Maraetai Road is the key external route for Beachlands South (ITA p124). It is mostly an 80 km/h rural road with a poor safety record: 110 reported crashes since 2021, including one fatal and 14 serious, most of the serious ones involving drivers losing control (ITA pp17 to 18). The Whitford roundabout is already over capacity in the morning peak, with queues of about 1 km (ITA Table 7-2). Jack

Lachlan Drive is the main access to the Pine Harbour ferry, but walking and cycling links to it are poor, and public transport use in Beachlands is low, at about 7% (ITA pp16, 138).

6.2 Potential effects

Traffic through Whitford (IR 2). The PC88 Precinct provisions require the Whitford Bypass beyond 1,900 dwellings. The applicant does not propose it, relying on a forecast of 1,589 vehicles an hour through Whitford in the 2041 morning peak (ITA Table 8-7). That is only 11 below the 1,600 at which the plan change modelling found the Bypass was needed, and the applicant's own sensitivity tests go over it (1,604 to 1,632). The risk is that traffic reaches the point the Bypass is needed without anything requiring it to be built. The inputs behind the forecast also need checking. The ITA uses a 2025 base flow of 1,246 vph southbound through Whitford, but the Trig Road count in ITA Attachment 3 (D8) shows 1,117 vph. The calculations behind the 6.16% work from home reduction have not been provided, the survey dates and durations of the 2025 counts are not stated, and the combined sensitivity test (1,632 vph) appears only in the s67 response, not the ITA. Traffic is assessed only to 2041, not the 10 years beyond completion that was requested. The application seeks "approximately 2,000 dwellings" but no condition caps the number, and the ITA indicates the 1,600 vph threshold is reached at about 2,037 dwellings (ITA p137). A maximum yield condition is recommended (Condition N12).

Whitford Village and other external intersections (IR 4, 11). Even after the Whitford roundabout upgrade, drivers on Whitford Park Road would face average delays of about two minutes and queues of over 400 m in the 2041 morning peak (ITA Attachment 1). The ITA reports the roundabout as working well overall because the main road flows freely, which hides this effect on the village.

Site C (IR 4). Removing the Trig Road signals (Site C) only slightly increases delays for Trig Road traffic (ITA Table 8-9). The Site C information has its own gaps. Table 8-9 reports LOS A for the signalised option with a 48 second Trig Road delay, which would normally be LOS D at signals. If the signals are not needed, a pedestrian and cycle crossing at or near Trig Road (for example to serve the Whitford Tennis Club) should be considered and secured with a trigger. This addresses the added safety risk from Beachlands South traffic, including at off-peak times. The applicant suggests crossings could be looked at with the Site B upgrade, but nothing in the conditions secures one near the Whitford-Maraetai Road / Trig Road West intersection. Condition N16 provides for this.

Safety for people walking and cycling at intersections (IR 10, 11, 17). There is no way to cross either arm of Whitford-Maraetai Road at the new Jack Lachlan Drive roundabout (Site A), only a "future" crossing opportunity on the northern arm. At the Whitford, Somerville and Sandstone roundabouts (Sites B, E and D), the applicant's own drawings show the entries are not shaped to slow drivers enough, and no crossings are shown at Sites B or E, including in Whitford Village. At Road 20, drivers may make U-turns further along an 80 km/h road with a history of loss-of-control crashes (ITA p31). None of these effects is assessed in the ITA. At Site A, sheet 3530 Rev B appears to give northbound cyclists an off-road route but leaves southbound cyclists riding through the two-lane roundabout. Design speeds are also inconsistent. The s67 response says Site A is designed for the existing 80 kph limit, but sheet 3530 Rev B bases its diverge and two-lane lengths on 60 kph. The Road 20 design assumes 90 kph, and the posted limit is 80 kph. The applicant supports lowering the limit to 60 kph but has not provided operating speed data for Whitford-Maraetai Road between Road 20 and the Beachlands Road roundabout, which the Initial Review asked for (IR 32). It has also not commented on the extra pedestrian demand across

Whitford-Maraetai Road expected from the fast-track proposal to the north of Site A and the community activities proposed on the pony club land. Until the design speed is confirmed, Transport Performance and Optimisation cannot confirm that Site A and Road 20 suit the speeds drivers will actually travel at. Any change to the speed limit would be decided through Auckland Council's speed limit process, which must comply with the Setting of Speed Limits Rule 2024, and cannot be secured by a consent condition. Transport Performance and Optimisation recommends a condition requiring the Site A roundabout to be designed for a 50 km/h speed through the roundabout, with approaches that safely bring drivers down from the current 80 km/h limit (Condition N15). This supports a future speed limit reduction without relying on one.

Internal roads (IR 5, 13, 14). Several roads are narrower than the Precinct and Auckland Council standards, including the Village Centre collector (20 m instead of 23 m) and parts of Jack Lachlan Drive (20.7 m instead of 23 m), and a collector in Sub-precinct D has become a local road with no cycle lane (Attach 0B, p82). No safety assessment has been provided, so Transport Performance and Optimisation cannot confirm buses, servicing, footpaths, cycle lanes and parking will work on them. On Jack Lachlan Drive, cyclists have no priority across side roads and driveways, and the western shared path narrows to 1.5 m where driveways cross it (sheet SK88). Of the other departures, Street Type 1.1.8 (Village Secondary) may be too narrow for buses and service vehicles, and Street Type 1.1.10 (Local Street Industrial) for vehicle crossings and lot access. The draft shared path sections also show some cross falls steeper than 2%.

Public transport, schools and the ferry (IR 6, 26 to 29). The development relies on a large shift to ferry, bus and active modes. No bus stops have been confirmed at Marina Point or the primary school. The schools generate about 790 morning peak trips (ITA Table 8-8), and no school transport assessment has been provided. Current ferry use and future demand have not been assessed, nor has overflow ferry parking on Jack Lachlan Drive, where the new cycleway runs. The active mode staging plan is still being finalised, and the gap in shared path continuity near the school interface has not been addressed. The schools are in Stage 1.

Site access (IR 7, 8, 20). On shared driveways (JOALs), the footpath is separated from vehicles only by a mountable kerb, which does not meet the AUP standard (E27.6.6). Some basement and ground level driveways do not give drivers a clear view of people on the footpath or cycleway. Driveways for narrow lots fronting cycleways are not assessed until building consent. Where the building itself blocks the view, the fix may mean moving the access or changing the building edge. That could take the building out of general accordance with the approved plans and require an s127 variation, so the applicant should show a concept for each affected access.

Matters agreed. The assessed yield of about 2,000 dwellings (IR 1, but see the yield cap above), traffic distribution (IR 3), right turn bays on Jack Lachlan Drive (IR 18), corrected modelling (IR 30), no slip lanes at Sites B and E (IR 11), JOAL widths (IR 22) and cul-de-sac turning (IR 19).

First 68 lots. The first 68 lots are proposed to be occupied before the Whitford, Somerville and full Jack Lachlan Drive upgrades. The ITA estimates these lots add about 16 vehicles an hour (ITA p146). We consider that figure is probably too low (we calculate 28 outbound trips using the ITA trip generation and

distribution figures), but even this higher figure is small enough that occupying these lots before the upgrades is acceptable.

6.3 Proposed mitigation

The applicant proposes upgrades at Sites A, B, D and E and on Jack Lachlan Drive (Condition 122), internal roads and paths built with each stage (Condition 116), traffic monitoring every 500 dwellings (Condition 117), a school transport management plan before each school opens (Condition 119A), and driveway checks at building consent (Conditions 96A and 121A). It does not offer the Whitford Bypass, the Trig Road signals or the final ferry capacity upgrade.

Transport Performance and Optimisation considers the mitigation falls short in five ways:

- **Monitoring.** Condition 117 does not count traffic through Whitford, needs no certification and has no consequence if 1,600 vehicles an hour is reached, so it cannot replace the Bypass.
- **Staging.** Stages can be built "in any stage order", and the collector roads south of the Village Centre, the bus route and the walking and cycling links are not tied to any stage. Condition 122(b) would also let those lots be occupied before the full-length Jack Lachlan Drive cycleway is built, although the s67 response says the cycleway is part of Stage 1.
- **Site C crossing.** In omitting the Site C signals, there is no condition that requires the provision of an alternative safe crossing of Whitford-Maraetai Road for pedestrians, who will face increased problems in crossing due to the additional traffic generated by the development.
- **Conditions not offered.** The ITA and s67 response rely on road safety audits, JOAL speed management, bus-capable roads and a ferry reassessment, but none are offered in the conditions.
- **Fixed at subdivision.** Road widths and the school frontage roads are fixed at subdivision, before the conditions that would deal with them apply. These are the critical information gaps in section 7.

6.4 Alignment with planning provisions

The Precinct ties development to road upgrades and ferry capacity at set dwelling numbers (Standard I458.6.3). Departing from those triggers is non-complying or discretionary (I458.4.1(A8) to (A10)). The applicant's legal memo calls the departures "largely technical" (Attach 0A.1, para 2). Transport Performance and Optimisation does not agree for transport: the triggers are how the Precinct stops development getting ahead of its infrastructure, so departures need evidence and conditions that test the outcome.

On the specific provisions:

- **I458.8.2(3)(e)** asks whether intersections provide safe movement for pedestrians and cyclists. This has not been shown for Sites A, B, C, D and E.
- **I458.6.14 and I458.8.2(14)** (road design) ask whether constraints make full widths impractical and whether the design still gives a connected, multi-modal street network. The ITA's response on whether full widths are impractical deals specifically only with Jack Lachlan Drive (ITA pp157 to 158), not the other narrower roads. The applicant says the width departures are "not a relevant resource consent matter". That is not correct as the ITA treats them as infringements of

I458.6.14 (p150), and the legal memo lists the 20.7 m Jack Lachlan Drive reserve as a departure from Precinct Appendix 1 (Attach 0A.1, para 14(e)).

- **I458.9(4)(e) and (5)** require ferry demand information and ongoing transport monitoring. The ferry information is missing, and Condition 117 does not give effect to the monitoring in a way that controls outcomes.
- **E27.6.6** requires a physically separate footpath on JOALs serving 6 to 19 dwellings. This is not met, and the infringement is not listed in the AEE (section 5).

6.5 Recommended conditions

Transport Performance and Optimisation's recommended conditions are set out in full in section 9. The most important are:

- a traffic-based Whitford Bypass trigger (N1), with Condition 117 amended to count traffic at the Whitford roundabout and require certification, and a cap on dwelling yield (N12);
- delivery of collector roads, the bus route and walking and cycling links by stage (N10 and amended Condition 5);
- school bus and drop-off layouts approved before the frontage roads are designed (amended Condition 119A);
- road safety audits for the external intersections and Road 20 (N2), and a crossing at Site A and pedestrian works in Whitford Village (amended Condition 122);
- JOAL speed management, cycle priority on Jack Lachlan Drive, bus-capable roads and certified driveway designs (N3, N5, N4, and amended Conditions 96A and 121A); and
- monitoring that replicates the Precinct's special information requirements, as an evidence base for any future change to the upgrade thresholds, including the timing of the Whitford Bypass (N14), a 50 km/h design speed through the Site A roundabout (N15), and an active mode crossing near Trig Road West if Site C is omitted (N16).

6.6 Engagement with the applicant's specialists

Transport Performance and Optimisation's transport specialists have met with the applicant's project team on several occasions:

- 1 April 2026: presentation of the draft design to Auckland Council's pre-application team.
- 17 April 2026: urban design, architecture and open space (Parks) session.
- 21 April 2026: transport presentation covering the internal roading structure and its connection to the wider network.
- 17 August 2026: traffic and transport meeting on how the Precinct transport triggers are dealt with in the technical reports and conditions, including the 68 initial dwellings.

6.7 Site visit

No site visit has been undertaken.

6.8 Overall position

Transport Performance and Optimisation does not oppose the application in principle but does not support it on the information available. The road width departures and the school frontage layout are critical information gaps (section 7). Most other matters can be resolved through the conditions in section 9. Council does not support omitting the Whitford Bypass unless the traffic-based trigger (N1) is imposed.

7.0 Section 67 Information Gap

At the time of writing this Memo we have identified the following information gaps:

Description of Missing Information

7.1 **Road width departures (IR 5).** A justification and safety assessment for each road width departure listed in the Initial Review, covering bus operation, servicing, street furniture, footpath and cycle widths and on-street parking, and an assessment of the Sub-precinct D collector designed as a local road without cycle provision (Attach 0B, p82). Risk: High.

7.2 **School frontage road layout (IR 6, 28).** A concept layout, with vehicle tracking for a 13.5 m bus, showing that school bus stops, turning, layover and drop-off can be accommodated within the school sites or the road reserve of the school frontage roads, including how the primary school on Road 02 will be served. Risk: Medium to High.

7.3 **Feasibility of safe layouts at Sites A, B, D and E (IR 10, 11, 32).** Confirmation that pedestrian and cycle crossings will be provided, and that the Austroads entry path radius failures at Sites B, D and E (sheets 3506, 3516, 3525) can be resolved or the layouts shown to be safe, within the land available at each site. Confirmation of the design speed at Site A, with current operating speed data for Whitford-Maraetai Road between Road 20 and the Beachlands Road roundabout, and confirmation that the same speed has been used in the Site A, Road 20 and Trig Road assessments. Risk: Medium to High.

7.4 **Ferry demand information (IR 29).** Existing two hour AM peak patronage, remaining capacity and forecast demand at each ferry trigger, as required by I458.9(4)(e). Risk: Medium.

Why is this Information Essential?

Road widths (7.1). The cross sections would be approved plans, and the road reserve widths are fixed by the subdivision. A condition cannot add width the scheme plans do not allow for, so the narrower roads cannot be corrected at Engineering Approval. There is currently no safety assessment on which Auckland Council or the Panel can rely.

School frontages (7.2). The school frontage roads are designed and built before Condition 119A applies. If bus and drop-off space does not fit within the road reserve, it cannot be added later by condition.

External intersections (7.3). The intersection sites are constrained by third party land. If safe layouts cannot be achieved within the land available, the upgrades the application relies on may not be

deliverable as safe intersections for drivers or people walking and cycling, and I458.8.2(3)(e) could not be met. The detailed design can be left to conditions once feasibility is shown.
Ferry (7.4). The Precinct requires this information for applications that infringe the ferry capacity thresholds. Without it, Transport Performance and Optimisation cannot confirm whether ferry capacity keeps pace with development, although the effect beyond 1,900 dwellings could be managed by a reassessment condition.

Other matters raised in the Initial Review that remain outstanding, including the Whitford Bypass trip generation inputs, the primary pedestrian access on JOALs, the basement visibility splays and Road 20, are not listed here because Transport Performance and Optimisation considers they can be managed through conditions. More minor points from the s67 check include the 67 m queue on the Site A north approach against the turning lane length, the 1.5 m footpath at Site B (1.8 m is used elsewhere) and the Jack Lachlan Drive carriageway west of the creek (10 m in the ITA against 8.4 m on SK88). The table below summarises the gaps.

Information gap	Nature of deficiency	Decision-making impact	Risk / uncertainty created
7.1 Justification and safety assessment for road width departures (IR 5)	A justification and safety assessment for each departure listed in the Initial Review, covering bus operation, servicing, street furniture, footpath and cycle widths and on-street parking. An assessment of the Sub-precinct D collector designed as a local road without cycle provision (Attach 0B, p82).	The cross sections are approved plans and widths are fixed by subdivision. Transport Performance and Optimisation cannot confirm the narrower roads will operate safely.	High. Cannot be corrected by condition or at Engineering Approval.
7.2 School frontage road layout (IR 6, 28)	A concept layout with vehicle tracking for a 13.5 m bus showing school bus stops, turning, layover and drop-off within the school sites or the road reserve of the school frontage roads, including how the primary school on Road 02 is served.	Transport Performance and Optimisation cannot confirm school buses and drop-off can operate without blocking the frontage roads (791 vph AM peak trips).	Medium to High. Frontage roads are built before Condition 119A applies.
7.3 Feasibility of safe layouts at Sites A, B, D and E (IR 10, 11, 32)	Confirmation that crossings can be provided, and the entry path radius failures at Sites B, D and E (sheets 3506, 3516, 3525) resolved or shown to be safe, within the land available. Confirmation of the design speed at Site A, with operating speed data for Whitford-Maraetai Road.	Transport Performance and Optimisation cannot confirm the external upgrades can be built as safe intersections for people walking and cycling, or that I458.8.2(3)(e) is met.	Medium to High. Detailed design can follow by condition once feasibility is shown.

Information gap	Nature of deficiency	Decision-making impact	Risk / uncertainty created
7.4 Ferry demand information (IR 29).	Existing two hour AM peak patronage, remaining capacity and forecast demand at each ferry trigger (I458.9(4)(e)).	Transport Performance and Optimisation cannot confirm ferry capacity keeps pace with development beyond 1,900 dwellings.	Medium. Effect could be managed by a reassessment condition.

8.0 Recommendation

Transport Performance and Optimisation does not oppose the Beachlands South application in principle but does not support it on the information currently available.

Transport Performance and Optimisation's support depends on:

(a) the information gaps in section 7 being closed, in particular the road width departures, the school frontage road layout and the pedestrian and cyclist safety matters at the external intersections; and

(b) the condition amendments and new conditions in section 9 being adopted, in particular the traffic-based Whitford Bypass trigger (Condition N1), a maximum dwelling yield (Condition N12), the monitoring and review condition (Condition N14), the amendments to Conditions 117, 119, 119A and 122, and conditions securing the internal staging of collectors, the bus route and active mode links.

9.0 Proposed Conditions

Transport Performance and Optimisation has reviewed the transport conditions in Attach 0C and Appendix 1 (Attach 0C1). Transport Performance and Optimisation accepts Conditions 113, 115, 118, 120, 121 and 123 as drafted, subject to the new conditions below.

Transport Performance and Optimisation recommends the amendments and new conditions set out in the table. The applicant's wording is taken from Attach 0C (25 September 2026). Text added by Transport Performance and Optimisation is shown in red underline, and text deleted by Transport Performance and Optimisation in red strikethrough. New conditions are numbered N1 onwards for reference only.

No.	Condition (Transport Performance and Optimisation changes shown)	Commentary
App. 1	A2515591.00-3530 Jack Lachlan Dr / Whitford Maraetai Rd RBT Upgrade Plan Sheet 1 of 8, Revision ~~A~~B	Sheet 3530 Rev B is the current Site A layout. Drawing 3000 Rev B is marked "For Information" and shares its number with the Roading Overall Layout Plan. SK87 and SK88 are stamped "DRAFT ONLY"

	A2515591.00-3000 Bus Stop Pair Locations, Revision B (to be reissued "For Consent" under a unique drawing number) ~~A2515591.00.SK87 Proposed Jack Lachlan Drive Shared Path Design, Revision A~~ ~~A2515591.00.SK88 Proposed Jack Lachlan Drive Shared Path Design, Revision A~~	and show the path narrowing to 1.5 m. The final design is secured by Condition 122(a). The Technical Documents list is still "To be confirmed".
5	Except as provided for in these conditions, prior to any building being occupied for an individual stage or part of a development that is being progressed the required infrastructure ~~shall~~must be constructed and operational. Upon completion of a stage or part of a development that is being progressed, an updated staging plan must be provided to Council documenting: (a) all previously implemented stages (b) the remaining stages to be completed and the anticipated timeframe for each stage to be completed; and (c) the transport infrastructure to be delivered with the next stage, including roads, bus stops and walking and cycling connections, and any interim provision (such as temporary turning heads or temporary paths) until the permanent connection is built.	Condition 4 allows stages in "any stage order", and "required infrastructure" is not defined. The addition makes the transport content of each update visible to Council. Delivery of the collector network is secured by new Condition N10.
96A	Prior to the issue of building consent for any dwelling or building ~~on an individual residential lot~~ requiring a new vehicle crossing or basement access ramp, the Consent Holder must submit plans to Council for certification demonstrating that: (a) the vehicle crossing complies with AUP E27 width, number and separation requirements; (b) the vehicle crossing achieves the required separation ~~form~~from intersections; (c) any basement access ramp complies with the applicable AUP E27 gradient, transition and safety platform requirements; ~~and~~ (d) pedestrian and cyclist visibility at the access is achieved; and (e) parking spaces and manoeuvring areas, including vehicle tracking where a garage opens directly onto a JOAL, and parking space gradients comply with AUP(OP) Standard E27.6.3.	"Submit" should become certification. The applicant's s67 response says long sections will be provided for any building with basement access, but the condition only covers individual residential lots. Also corrects a typo.

114	Prior to occupation of any dwelling within each stage of the development or part of the development proposed to be progressed, the bicycle parking requirements specified in AUP(OP) ~~standard E27.6.2(5)~~ Table E27.6.2.5, including on-site secure and visitor bicycle parking, must be provided. The bicycle parking ~~shall~~must be designed and provided in accordance with AUP(OP) ~~standard E27.6.2(5)~~ Standard E27.6.2.4(6).	Aligns the condition with the provisions relied on in the s67 response.
116	Prior to the occupation of any building within a stage of the development or part of the development proposed to be progressed, all internal roading, intersections, accessways, footpaths, cycleways, bus stops and associated transport infrastructure required to serve that stage or part-stage must be completed for that stage or part of the development proposed to be progressed. The bus stops required to serve a stage are those on roads within or fronting that stage, and each must include kerbs, hardstand, a shelter and footpath connections.	Clarifies bus stop provision requirements.
117	In accordance with Special Information Requirement I458.9(5) a Transport Monitoring Report ~~shall~~must be prepared by a suitably qualified transport engineer for every 500 dwellings or residential lots cumulatively within the precinct (e.g., 500, 1,000, 1,500, ~~and 1,900~~2,000). At each of these thresholds, a Transport Monitoring Report must be submitted to Council for certification within 3 months of the threshold being reached. In addition to the matters in I458.9(5), each report must include the traffic survey and forecast required by Condition N1.	The listed thresholds end at 1,900, whereas I458.9(5) says "and so on". The report needs certification, and must measure the flow the applicant relies on in place of the Whitford Bypass (see N1).
119	In accordance with Special Information Requirement I458.9(9) a Transport Design Report is required for any new road intersection or upgrading of existing road intersection identified on Precinct Plan 6, and must be submitted to Council for certification prior to ~~construction commencing on these intersections~~Engineering Plan Approval for those intersections. The report must include: (a) pedestrian and cycle crossing provision and cycle priority; (b) bus stops and bus vehicle tracking, where the intersection is on the bus route; (c) the design speed, with justification against both the posted speed limit and surveyed operating speeds; and	As drafted, the report has no content and is not certified, so it cannot be relied on to resolve the matters Transport Performance and Optimisation has deferred to detailed design.

	(d) the findings of the road safety audit required by Condition N2 and the designer's response.	
119A	Prior to Engineering Plan Approval for any road fronting a school site, the Consent Holder must submit to Council for certification a school frontage layout plan showing school bus stops, bus turning and layover areas, pick-up and drop-off areas and pedestrian crossing points, with vehicle tracking for a 13.5 m bus. Pick-up and drop-off areas and any bus layover areas must be accommodated within the school site. The road and internal access arrangements must be designed and constructed in accordance with the certified plan. The layout plan may show interim works where a road is built before the school is established, provided the vested road reserve can accommodate the ultimate layout and the interim works do not add undue cost to the future school works. Prior to occupation of any school activity, the Consent Holder must submit a School Transport Management Plan to Council for certification, prepared by a suitably qualified transport specialist and following consultation with ~~Auckland Transport~~ the school operator and the Ministry of Education where applicable. [...] (i) monitoring and review of the plan following commencement of school operation, at least annually for the first three years of operation, with the results provided to Council. [...] Where any school activity is to be operated by a party other than the Consent Holder, the Consent Holder must, before transferring or leasing the school site, register a consent notice on the record of title requiring that no school activity is occupied until a School Transport Management Plan has been certified under this condition, and that the certified plan is implemented and maintained for as long as the school activity operates. The Consent Holder must also give the school operator a copy of this condition and the certified plans and confirm this to Council in writing. The consent notice must also require the school operator to complete any works shown on the certified school frontage layout plan that were not completed through the subdivision.	The school frontage roads are built in earlier stages, so bus and drop-off space must be fixed before Engineering Approval, not before the school opens. The applicant's reference to consulting Auckland Transport is deleted because Council certifies the plan, and consultation with the school operator and the Ministry of Education stays "where applicable". Unchanged parts of the condition are shown as [...]. The consent notice secures compliance if the school site is transferred or leased. The conditions normally applied to designations for new state schools and to consents for new private schools should also be applied to the proposed schools.

121A	Prior to the issue of building consent for any building containing a basement or ground-level vehicle access for buildings within CM3, VC1, VC3 and VC4, the Consent Holder must submit to Council for certification redesigned complying plans demonstrating that either: (a) the relevant vehicle access achieves the pedestrian and cyclist visibility splays required by Auckland Transport Practice Note 07 or any equivalent ~~Auckland Transport~~Auckland Council standard applicable at the time of detailed design; or (b) the relevant access has been redesigned or relocated so that the required visibility splays are achieved. Where a visibility splay for a vehicle crossing in the Marina, Coastal or Employment precincts relies on an adjacent lot corner, any fence, wall or planting within the splay must be visually permeable and maintained as such, secured by consent notice.	Transport Performance and Optimisation supports the new condition but plans should be certified, not just submitted. The ITA relies on permeable fencing on lot corners (p119), which no condition secures.
122	The following Road upgrades as shown on Engineering Plans A2515591-3500 ~~Rev A~~ to A2515591-3625 ~~Rev A~~ (inclusive), at the revisions listed in Appendix 1, by Harrison Grierson and Ferry Capacity upgrades must be carried out and be operational in accordance with the timing outlined below: (a) Prior to the occupation of any of the lots or dwellings within Stage 1 (including Stage 1A and Stage 1B): (i) Site A on Precinct Plan 6: Upgrade of Whitford-Maraetai Road/Jack Lachlan Drive intersection, including the active mode facilities shown on drawing A2515591.00-3530 Rev B and a pedestrian and cycle crossing of Whitford-Maraetai Road, the design of which must be approved by Council; [...] (b) Prior to the occupation of any dwellings or residential lots (except up to 68 residential lots delivered in accordance with (a)): [...] Site (B) on Precinct Plan 6: Upgrade of Whitford Park Road / Whitford Road / Whitford-Maraetai Road roundabout to provide an additional traffic lane on the Whitford Road (western) approach and an additional lane on the Whitford-Maraetai Road	Sheet 3530 is now Rev B. Site A has no crossing of Whitford-Maraetai Road, and the ITA describes pedestrian works in Whitford Village as "integral" to Site B (p76), but neither is secured. Row (b) corrects a typo. Site C: see Condition N16.

	(eastern) approach, and pedestrian improvements in Whitford Village including crossing points on the roundabout approaches; [...] Ferry Upgrades, row (b): Prior to the occupation of more than 500 dwellings or residential lots Ferry Upgrades, row (e): Replace with Condition N13 (ferry capacity reassessment). The applicant says one is proposed (Attach 0A.1 para 10(d)), but none is in Attach 0C.	
184	The engineering plans must include but not be limited to the following information: [...] (c) Vehicle tracking for all intersections, cul-de-sacs, turning heads and mid-block horizontal curves according to the Auckland Transport Engineering Standards (Design Code Urban and Rural Roadway Design).	Cul-de-sac tracking was provided only as screenshots in the s67 table.
N1	**Whitford-Maraetai Road traffic trigger** (a) Each Transport Monitoring Report required by Condition 117 must include: (i) a survey of the AM peak hour traffic flow on the Whitford-Maraetai Road approach to the Whitford Road / Whitford Park Road / Whitford-Maraetai Road roundabout, counted on at least three weekdays (Tuesday to Thursday) during school term; and (ii) a forecast of that flow at the next 500 dwelling threshold, using the methodology in the ITA with updated traffic generation and distribution assumptions that align with the survey results. (b) If the surveyed flow, or the forecast flow at the next threshold, exceeds 1,600 vehicles per hour, no further dwellings or residential lots may be occupied until either: (i) the Whitford Bypass (Precinct Plan 6, Site F) is constructed and operational; or (ii) alternative mitigation has been certified by Council as addressing the effects the Bypass is intended to manage.	Table I458.6.3.1 row (e) requires the Bypass beyond 1,900 dwellings. The applicant relies instead on the PC88 reference flow of about 1,600 vph, with a forecast of 1,589 vph (ITA Table 8-7). This condition tests that forecast as the development is built out, and it operates as a condition precedent.
N2	**Road safety audits** Prior to Engineering Plan Approval for the works at Sites A, B, D and E, Intersections 1 to 5 and the Road	The applicant says road safety audits will be done, but no condition secures them. Sheets

	20 intersection, the Consent Holder must obtain an independent detailed design road safety audit in accordance with current NZTA road safety audit guidance, and provide the audit, the designer's responses and the client decisions to Council. The audits for Sites B, D and E must address the entry path radius at each approach.	3506, 3516 and 3525 show entry path radius failures at Sites B, E and D.
N3	**JOAL speed management and pedestrian access** Prior to occupation of any dwelling served by a JOAL listed in Section 7.13 of the ITA, speed management measures complying with Table E27.6.4.3.3 of the AUP(OP) must be installed on that JOAL within 10 m of the road boundary and at intervals of no more than 30 m, as shown on plans certified by Council. On JOALs serving dwellings without road frontage, the primary pedestrian access must be located on the side serving those dwellings.	The ITA says "a condition has been prepared" (pp117 to 118), but none is in Attach 0C. Engineering Approval may not apply to private JOALs.
N4	**Bus-capable roads** All roads on the bus route shown in ITA Figure 7-4 must have a minimum carriageway width of 7 m. Prior to Engineering Plan Approval for any of those roads, the Consent Holder must provide vehicle tracking for the 13.5 m urban bus check vehicle at every intersection and horizontal curve on that road, for approval by Council.	The s67 response says bus-capable design "can be provided by way of a consent condition", but none is in Attach 0C.
N5	**Cycle priority on Jack Lachlan Drive** Where the bi-directional cycleway on Jack Lachlan Drive crosses a side road, JOAL or vehicle crossing, a raised priority crossing, or an alternative treatment approved by Council, must be provided. The design must be approved by Council at Engineering Plan Approval, and the crossing must be constructed with the relevant section of cycleway under Condition 122.	Drawings 3045 and 3046 show the cycleway crossing side roads with no priority treatment.
N6	**Temporary turning heads** Where a road ends at a stage boundary before its extension is constructed, the Consent Holder must provide a temporary turning head before any dwelling or building served by that road is occupied. The turning head must accommodate the design vehicle for that road under Condition 184(c) and, as a minimum, Council's standard refuse collection vehicle and a FENZ fire appliance, as shown by vehicle tracking approved at Engineering Plan Approval. When the road is extended, the turning head must be removed and the road reinstated.	Requested for Location 5 and other stage boundaries (IR 12). Not secured.

N7	**Road 20 intersection** The Road 20 / Whitford-Maraetai Road intersection must be constructed in accordance with drawing A2515591.00-3301 Rev C, including the solid median island, and be operational before Road 20 is opened to traffic.	The Road 20 layout is not listed in Condition 122 and has no timing.
N8	**Consent notices: access and JOALs** (a) A consent notice must be registered on the record of title of each residential lot fronting a collector road with a cycleway, preventing direct vehicle access to that road. (b) The Residents Society consent notice must require all JOALs to be kept clear of parked vehicles at all times, supported by signage or road marking.	Avoids repeated vehicle crossings over the cycleway, and secures the s67 response's reliance on JOALs "remaining clear for vehicle movements at all times".
N9	**Road cross sections** The road cross sections on drawings A2515591.00-3250 to 3256 fix the road reserve, carriageway, cycleway and footpath widths for each road type. Kerb types, berm treatments, street furniture, tree pits and other details may be refined at Engineering Plan Approval with Council's agreement, provided those widths are not reduced.	Makes clear what is fixed at consent and what is left to Engineering Approval. This is subject to the width departures being resolved first (section 7, gap 7.1).
N10	**Delivery of the transport network by stage** Prior to the occupation of any dwelling or building within a stage, the collector roads, bus route roads and bus stops, and walking and cycling links shown within or fronting that stage on the Proposed Staging Plans (A2515591.00-1000 Rev B and A2515591.00-1001 Rev B) must be constructed and operational, together with any connection needed to link them to the existing road network or to a completed stage.	Conditions 4, 5 and 116 do not tie the collector network, bus route or active mode links to any stage or dwelling number. Note, Drawings 1000 and 1001 are marked "For Information".
N11	**Public access easement** Prior to the issue of a s224(c) certificate for the stage containing the central active mode link to Jack Lachlan Drive, an easement in gross in favour of Auckland Council must be registered over that link, providing 24-hour public access for walking and cycling (1.8m minimum width and physically separated).	The link relies on a public access easement over a private JOAL. The existing easements condition only covers easements shown on the scheme plans.
N12	**Maximum dwelling yield**	The application seeks approximately 2,000 dwellings and the ITA assesses up to 2,000, but

	The total number of dwellings and vacant residential lots enabled by this consent must not exceed 2,000.	no condition caps the yield. Part 4 of the application previously stated 2,700. The ITA indicates the 1,600 vph threshold is reached at about 2,037 dwellings (ITA p137). A cap of 2,000 matches the assessed yield. Any increase would need a variation supported by an updated transport assessment.
N13	**Ferry capacity reassessment** (a) Before more than 1,500 dwellings or residential lots are occupied, the Consent Holder must submit to Council for certification a Ferry Capacity Assessment prepared by a suitably qualified transport engineer. The assessment must include: (i) surveyed two hour AM peak patronage at Pine Harbour, counted on at least three weekdays (Tuesday to Thursday) during school term, and the remaining capacity; (ii) forecast ferry demand at each 500 dwelling threshold through to full development; (iii) park and ride demand and on-street parking demand on Jack Lachlan Drive, and any overflow onto the cycleway; and (iv) any measures required to manage a shortfall in ferry or parking capacity. (b) No more than 1,900 dwellings or residential lots may be occupied until either: (i) the assessment shows that ferry capacity will meet forecast demand at each remaining threshold; or (ii) the measures identified in (a)(iv) are in place, or alternative mitigation has been certified by Council as addressing the shortfall.	Table I458.6.3.1 requires capacity for 1,150 passengers before more than 1,900 dwellings are occupied. The ITA and Planning Assessment say this will not be met and that a reassessment condition is proposed (Attach 0A.1 para 10(d)), but none is in Attach 0C. This condition provides it, and gives effect to I458.9(4)(e). Triggering the assessment at 1,500 dwellings leaves time to act before 1,900. A consent condition cannot require Council to provide ferry services, so the hold point in (b) is what secures the outcome.
N14	**Transport monitoring and review** (a) In addition to the matters required by Conditions 117 and N1, each Transport Monitoring Report must address the special information requirements in I458.9 and include:	The Precinct relies on its special information requirements (I458.9) to test development against its transport assumptions, but Condition 117 refers only to I458.9(5). This condition gives an evidence base, from actual trip generation and the timing of land uses, for any future change to the

	(i) surveyed trip generation and mode share for the activities occupied at the time, compared with the ITA assumptions; (ii) the land uses established to date and those expected before the next threshold; and (iii) the operation of the intersections at Sites A to E and the Whitford roundabout, and public transport and ferry use. (b) Under s128(1)(a) of the RMA, Council may review the transport conditions of this consent within six months of certifying each Transport Monitoring Report, to deal with any adverse transport effect the report identifies, including the timing of the Whitford Bypass.	upgrade thresholds, including the stage at which the Whitford Bypass is needed.
N15	**Site A design speed** The Whitford-Maraetai Road / Jack Lachlan Drive roundabout (Site A) must be designed so that vehicles travel through the roundabout at no more than 50 km/h, with approaches designed to bring vehicles safely down from the posted speed limit at the time of design. The Transport Design Report required by Condition 119 must demonstrate this using surveyed operating speeds.	Sheet 3530 Rev B uses a 60 kph design speed, the s67 response says Site A is designed for 80 kph, and the posted limit is 80 kph (IR 32). A 50 km/h speed through the roundabout supports the crossing required by Condition 122(a)(i) and any future speed limit reduction, which is decided separately under the Setting of Speed Limits Rule 2024.
N16	**Crossing near Trig Road West** If the Site C upgrade (Whitford-Maraetai Road / Trig Road West) on Precinct Plan 6 is not constructed, a pedestrian and cycle crossing of Whitford-Maraetai Road must be provided at or near that intersection, in a location and form approved by Council, prior to the occupation of more than 1,200 dwellings or residential lots.	The applicant says existing pedestrian demand is negligible, but Beachlands South will add traffic at all times of day, which makes crossing harder for existing users such as the Whitford Tennis Club. The applicant has said it can include crossing measures near Trig Road if Transport Performance and Optimisation advises. This condition secures them. Trigger aligns with the Site C row in Table I458.6.3.1.
Advice notes	1. Other approvals are required outside this consent, including encroachment licences from Auckland Council for any private utilities located within roads to be vested. 2. Nothing in this consent varies the binding agreement between the developer and Auckland	Raised as advice notes in the Initial Review. The applicant responded "Noted" to the first and did not respond to the second. The existing general advice note on other consents does not mention encroachment licences.

	Council. Compliance with that agreement remains necessary. 3. The Transport Design Manual (TDM) sets out the engineering design requirements for works within the transport corridor. Please note, any future works within an Auckland Council transport corridor, or land to vest with Auckland Council will need to be designed to comply with the Auckland Code of Practice for Land Development and Subdivision Chapter 3: Transport (ATCoP) or latest Transport Technical Design Manual (TDM). Design which cannot be executed in accordance with the TDM will require a Departure from Standards, which is at the discretion of Auckland Council's appropriate delegation to approve.	

10.0 Supporting Documents

Attached: the Initial Review prepared by Auckland Transport (now part of Auckland Council), "Beachlands South – Transport Information Requirements Review" (14 August 2026), provided to the applicant as the transport s67 information request. IR numbers in this memo refer to the items in that document.

Beachlands South – Transport Information Requirements Review

Project	Beachlands South – 110 Jack Lachlan Drive and 620, 712, 758 and 770 Whitford-Maraetai Road
Application	Fast-track Approvals Act substantive application, lodged 29 June 2026
Subject	Transport information required
Prepared by	Auckland Transport
Date	14/08/2026

1. Purpose

This document consolidates the transport review of the Beachlands South substantive application lodged under the Fast-track Approvals Act 2024 and sets out the information required from the applicant in order for the transport effects of the proposal and the proposed mitigation to be fully assessed.

Matters where the lodged documents are considered to respond adequately to the pre-lodgement and specialist feedback, stormwater and flood risk, rural to urban road transitions, blue-green and integrated design, safety and CPTED, and the overall structure of development staging have not been carried forward into requests.

2. Key actions

The requests are ordered so that the matters requiring attention first appear in Part A. In summary, the applicant is asked to provide:

- confirmation of the residential yield for which approval is sought, noting the application documents describe both approximately 2,700 and up to 2,000 dwellings (item 1);
- further justification and sensitivity testing of the trip generation, externalisation and work from home assumptions, which determine whether the 1,600 vph Whitford Bypass threshold is exceeded, together with the underlying 2025 traffic count data (item 2);
- a traffic distribution diagram showing how development traffic has been assigned to the network, including the proportion assumed to use Road 20 (item 3);
- the information needed to consider the proposed removal of the Precinct Plan 6 Site C upgrade, and the applicant's view on crossing facilities in lieu of signalisation (item 4);
- justification and safety assessment for each departure from Auckland Transport and Auckland Council minimum road widths (item 5);
- a school transport assessment, noting the schools are proposed through land use consent rather than designation (item 6);
- a complete assessment and revised design of primary pedestrian access, which does not currently meet Standard E27.6.6 as a permitted activity (item 7); and
- a more detailed assessment of visibility splay shortfalls, which may not be capable of resolution after consent is granted where the obstruction is a proposed building (item 8).

Part A also seeks confirmation that delivery of the external upgrades, collector links, active mode connections and bus infrastructure is secured against the Precinct triggers and the binding agreement (item 9). Part B sets out the remaining requests, which concern design, safety and delivery detail. The

distinction is one of sequence and emphasis; all of the requests are considered necessary for a full assessment of transport effects.

3. Documents reviewed

- Attachment 8 – Integrated Transportation Assessment, Hughes Traffic and Transportation, dated 24 June 2026
- Attachment 2.8 – Beachlands South Streetscape Strategy (Revision A), Jasmax / Studio Pacific Architecture
- Attachment 3 – Beachlands South Open Space Strategy (Revision A), Jasmax
- Attachment 4 – Urban Design Assessment (Revision A), Jasmax
- Attachment 9F – Stormwater Management Plan
- Attachment 9R – Roading Plans 1 to 4, Harrison Grierson, dated May 2026
- Attachment 0C – Proposed Conditions of Consent, and Appendix 1 to Conditions (staging plans)
- Attachments 9ZD and 9ZE – Scheme Plans 1 and 2
- Attachment 5 – Beachlands South Precinct Sustainability Assessment, Stantec
- Fast-track Approvals substantive application form, Unio Environmental Limited, dated 26 June 2026

4. Part A – Key matters

No.	Application document and reference	Information requested
1	ITA Section 6 / Substantive Application Part 4 (page 20) – development yield	Substantive Application Part 4 describes approximately 2,700 residential dwellings, while ITA Section 6 assesses up to 2,000 dwellings and the ITA staging programme reaches 1,965 dwellings by 2041. **Please confirm** the residential yield for which approval is sought, and confirm that the transport assessment, trip generation, intersection modelling and infrastructure triggers have been prepared on that basis. If the yield exceeds that assessed in the ITA, the transport assessment will need to be updated accordingly.
2	ITA Sections 8.3, 8.6 and 8.8 – trip generation assumptions and the Whitford Bypass threshold	The ITA forecasts a 2041 southbound AM peak flow on Whitford-Maraetai Road of 1,589 vph, below the 1,600 vph threshold that triggers the Whitford Bypass. That outcome depends on the cumulative effect of several assumptions that reduce forecast trip generation, and small changes to any of them place the flow above the threshold. The applicant's own sensitivity test, reducing the work from home component from 15% to 10%, produces 1,604 vph. A two year delay in completion, an increase in the external proportion of generated traffic from 45% to

No.	Application document and reference	Information requested
		47%, or a reduction in the factor applied to existing traffic leaving Beachlands from 7.5% to 6.5% would each have the same effect. The 6.16% hybrid worker assumption is also questioned. Hybrid workers are widely observed to work from home on Mondays and Fridays rather than Tuesday to Thursday, and Tuesday to Thursday flows are the more appropriate basis for assessing effects. If the Tuesday to Thursday hybrid proportion were closer to 2%, the threshold would be exceeded. **Please provide** further justification for the 6.16% figure and the statistical probability calculations from which it is derived, including the extent to which it reflects evidence that the incidence of working from home has fallen slightly since the 2023 Census. **Please provide** further sensitivity testing illustrating the cumulative effect of overestimating the trip generation reduction factors, including a forecast that retains the PC88 assumptions for externalisation. It is also usual to assess network performance for at least 10 years beyond completion, to confirm capacity for further growth before new infrastructure is required. The review requirements within the Precinct plan may provide a basis for revisiting conditions if the information provided supports this. **Please provide** the details of the 2025 traffic count on which the analysis relies, including the date, duration and location of the count, vehicle classifications and turning counts. No such information has been provided.
3	ITA Section 8.9 – traffic distribution and assignment	It is not clear how development traffic has been distributed onto the network. The northbound flow on Whitford-Maraetai Road approaching the Jack Lachlan Drive intersection is forecast to reduce as a result of the development, which suggests that all development generated traffic has been assumed to enter Beachlands South via Road 20. **Please provide** a traffic distribution diagram showing how generated traffic has been assigned to the network, inbound and outbound, for both AM and PM peaks, including all external intersections and the resulting link flows with background traffic. **Please confirm** the proportion of development generated traffic arriving from the south that is expected to enter the site via Road 20.
4	ITA Section 8.8 – Precinct Plan 6 Site C upgrade (Whitford-Maraetai Road / Trig Road)	The ITA concludes that the Site C upgrade is no longer required, departing from the transport infrastructure package anticipated by the Beachlands South Precinct. The conclusion relies on the revised yields, externalisation and work from home assumptions addressed in item 2. Auckland Transport's comments on the appropriateness of removing this upgrade will be made at a later stage of the process; the requests

No.	Application document and reference	Information requested
		below are directed at obtaining the information needed to reach that view. **Please provide** the basis for the revised trip generation and externalisation assumptions as they apply specifically to the Site C testing, and modelling that demonstrates the intersection performance with and without the upgrade in place. **Please provide** the applicant's view on pedestrian and cycle crossing facilities at this location in lieu of the signal upgrade, and what those facilities might entail. There are existing and future active mode demands to cross Whitford-Maraetai Road here, which may be affected by increases in traffic, including outside peak periods.
5	Attachment 2.8 Beachlands South Streetscape Strategy / ITA Section 7.3 – collector and local road widths	A number of proposed collector and local road widths, and some footpath and cycle facility widths, are below Auckland Transport and Auckland Council minimum standards. The ITA provides justification based on urban design outcomes, active mode emphasis and site constraints. **Please provide** justification and a safety assessment for each departure, specifically addressing Street Type 1.1.6 (2.85 m is insufficient to accommodate street furniture and through path functions, noting the 24 m Main Street Collector standard in AC CPLDS Chapter 3, Transport 3.2.3.1), Street Type 1.1.8 Village Secondary (bus capability, service and delivery vehicle access, and traffic lane widths), Street Type 1.1.9 (17.8 m against the standard 18 m), Street Type 1.1.10 Local Street Industrial (approximately 20 m is generally required for efficient vehicle crossings and lot access), and Street Type 1.1.11 (reduction from 18 m to 16.6 m, and its dependence on subdivision layout, vehicle access and on-street parking effects), together with the 20 m Village Centre collector proposed in place of 23 m and the reduced width sections of Jack Lachlan Drive. Justification should address bus operation, servicing, street furniture, footpath and cycle facility widths, on-street parking effects, and safety outcomes.
6	ITA Section 7.3 – schools access and transport effects	The schools are proposed to be established through land use consent rather than designation, so the transport procedures usually secured through a designation need to be addressed through this process. The ITA addresses school collector cross sections but no school specific transport assessment was identified. **Please provide** a school transport assessment addressing school bus access, circulation, turning and layover (including for a secondary school serving a wider rural catchment); drop-off and pick-up arrangements and parking management on school related roads;

No.	Application document and reference	Information requested
		pedestrian and cycle crossing provision on school frontages; and the location of all school access points by mode. **Please confirm** the outcome of engagement with the Ministry of Education on school access points, and how designation style transport conditions, for example a school travel plan and a transport management plan, are proposed to be replicated through the land use consent, including any effects of the co-location of the primary and secondary schools.
7	ITA Section 7.12 – primary pedestrian access	The assessment of primary pedestrian access (PPA) does not appear to be complete, focusing primarily on apartment building access, yet the ITA states that PPA requirements are complied with across the whole proposal. The application includes a number of JOALs where dwellings are proposed as part of this application rather than vacant lots. The PPA to these dwellings is crossed by vehicles, sometimes on the opposite side of the JOAL to the dwellings, and the roading plans show all JOAL PPAs separated by mountable kerb only. That design does not meet Standard E27.6.6 of the AUP as a permitted activity. For some JOALs the PPA is also proposed on the side where future dwellings will have frontage to the public road, rather than the side where the only access is via the JOAL. **Please provide** a full assessment of all PPAs and revise the design of the PPAs to align with the requirements of the standard.
8	ITA Section 7.15 – visibility splays	A number of basement vehicle accesses without adequate visibility splays are flagged in the ITA, some on roads with cycle facilities, and the ITA states these infringements will be resolved through subsequent design stages. The extent to which the splays are restricted is not clear, and where the obstruction is a proposed building, it is unclear how the matter could be resolved after consent is granted. **Please provide** a more detailed assessment of the visibility splay shortfalls and propose mitigation to address any significant shortfalls, particularly near cycleways.
9	Attachment 0C Proposed Conditions and Appendix 1 to Conditions – staging, triggers and delivery	Proposed conditions link infrastructure delivery to staging and dwelling thresholds, and the staging plans indicate early delivery of the primary collector network. **Please confirm** that delivery of the external intersection upgrades, the primary collector links (particularly those south of the Village Centre), the active mode connections and the bus infrastructure is secured by conditions tied to identified stage or dwelling triggers and confirm that the proposed conditions do not alter or defer the development triggers established by the Precinct.

No.	Application document and reference	Information requested
		Please identify each respect in which the proposed staging and infrastructure package departs from the binding agreement between the developer, Auckland Council and Auckland Transport, and how each departure is proposed to be addressed.

5. Part B – Design, safety and delivery matters

No.	Application document and reference	Information requested
10	ITA Section 7.7 / Attachment 9R Roading 1 (page 18) / Precinct provision I458.8.2(3)(e) – Jack Lachlan Drive / Whitford-Maraetai Road roundabout (Site A)	The revised roundabout design responds to third party access constraints and removes the separated southbound through lane shown in the PC88 concept. It remains unclear whether pedestrian and cycle crossing facilities are provided in accordance with the Precinct provisions and Auckland Transport's feedback on pedestrian connectivity at this location. **Please confirm** the pedestrian and cycle crossing facilities proposed on each approach, demonstrate how these give effect to I458.8.2(3)(e), and where facilities are not proposed, explain how existing and future pedestrian demand across Whitford-Maraetai Road will be safely accommodated. **Please confirm** that it is feasible to extend the proposed footpath shown on Roading sheet 2 past the kerb and channel on the Whitford-Maraetai Road approach to the roundabout.
11	ITA Section 7.7 – external roundabout upgrades (Sites B, D and E)	Appendix 2 (Stage 2) shows two-lane entries at the Whitford Roundabout (Site B) and the Somerville Roundabout (Site E). **Please provide** justification for the two-lane entries at these roundabouts, including whether protected left turn (slip) lanes would provide a safer outcome for pedestrians and cyclists, and confirm that the proposed geometry remains consistent with the upgrade concepts anticipated by the Precinct. **Please confirm** large vehicle tracking through each external roundabout for the design vehicles adopted, and that SIDRA analysis, road safety audit and Engineering Approval will apply to the final layouts. Where partial widening treatments are proposed, please explain the basis for the extent of widening shown.
12	ITA Sections 7.2 and 7.3 – Jack Lachlan Drive	Auckland Transport sought refinements at Intersections 1 to 3, including boundary adjustments to achieve safe geometry, raised safety concerns

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	Intersections 1 to 5	regarding staggered movements at Intersection 4 prior to extension of the collector road to Whitford-Maraetai Road, and identified the need for interim turning provision at Location 5 if the collector extensions are staged. No specific response to these matters was identified in the ITA. **Please respond** to each matter, including any boundary or geometry adjustments proposed at Intersections 1 to 3, an assessment of the interim operation and safety of Intersection 4 prior to the collector road extension, and the interim turning provision proposed at Intersection 5.
13	ITA Section 7.2 / Precinct provision I458.8.2(3)(e) – cycle priority crossings on Jack Lachlan Drive	Auckland Transport sought priority crossing treatment at JL1, two-way cycle crossings across the southern legs of all collector road intersections with Jack Lachlan Drive, and signalisation of the Kahawairahi Drive / Jack Lachlan Drive intersection. **Please confirm**, for JL1 and each collector road intersection with Jack Lachlan Drive, the crossing treatment proposed, whether cyclists and pedestrians hold priority, and how continuity of the bi-directional cycleway is maintained across each side road. **Please also confirm** how the Jack Lachlan Drive cycle facilities integrate with the existing northern greenway and the internal cycle network.
14	ITA Section 7.2 – western end of Jack Lachlan Drive	The ITA states that at the western end of Jack Lachlan Drive a 3 m shared path is proposed, as space constraints affect the feasibility of continuing the bi-directional cycleway. The berm on the southern side rises up, and a number of vehicle crossings climb from the kerb to dwellings that sit above the road. **Please confirm** that it is feasible to build a shared path through this area with an acceptable cross fall that does not require regrading of driveways outside the road reserve. **Please also comment** on whether an off road route to the north of Jack Lachlan Drive could bypass this section and connect with the other parallel pathways.
15	ITA Section 7.2 – active mode links and vesting	The ITA references active mode links to Jack Lachlan Drive and the marina at the northern end of the site. The link to Jack Lachlan Drive appears to travel through a JOAL, which requires specific design and public access consideration. **Please confirm** whether these links are intended to be public and vested, and if so, whether they meet design requirements.
16	ITA Section 7.2 / Attachment 3 Open Space Strategy – staging of the	Auckland Transport identified staging of the walking and cycling network as important given existing constraints on the surrounding network and sought clarity on the timing of pedestrian and cycle connectivity to the ferry terminal.

No.	Application document and reference	Information requested
	walking and cycling network	**Please provide** a staging plan for the walking and cycling network identifying when each key active mode connection is delivered relative to dwelling and stage thresholds and confirm what interim provision applies where a permanent connection is delivered in a later stage. **Please confirm** the staging of the coastal greenway walk and cycle connection to the marina in particular, given it provides a more direct and higher standard connection than the western end of Jack Lachlan Drive. **Please also address** the gap in shared path continuity identified near the school interface and confirm walking and cycling connectivity to and around the future school sites.
17	ITA Section 7.1 / Roading 3 – Road 20 / Whitford-Maraetai Road intersection	The proposed left-in / left-out access at 712 Whitford-Maraetai Road (Road 20) is likely to be an attractive alternative to Jack Lachlan Drive for motorists entering the development from the south, and equally attractive for motorists leaving the site. The temptation to turn right out of Road 20, or to turn left and undertake a U-turn, will be substantial. Demand to turn left from Road 20 to travel north is likely to be limited, and a left-in only arrangement may be a safer outcome. **Please explain** how U-turns would be prevented, and whether a left-in only control, with no exit onto Whitford-Maraetai Road, would still provide the network resilience outcomes sought. No design for this intersection is included in the Roading 3 plan set. **Please provide** a plan and tracking assessment consistent with the other intersections.
18	Roading Plans – right turn provision on Jack Lachlan Drive	**Please confirm** whether a right turn slot from Jack Lachlan Drive into Road 24 (the business road) is proposed, and whether right turn slots are proposed at Karo Road and Mahutonga Avenue. If so, please provide concept plans.
19	ITA Section 7.3 – cul-de-sacs and turning heads	Limited information is provided regarding the proposed public road cul-de-sacs and turning heads. **Please confirm** that the proposed road reserve area at the turning heads provides adequate space for a compliant standard design and provide vehicle tracking as required.
20	ITA Section 7.8 – individual lot access and basement ramps	The application includes individual residential lot development, being standalone, terrace and semi-detached dwellings, with associated vehicle access. The assessment of vehicle crossing widths, separation and number in Section 7.8 does not include these individual lot vehicle crossings.

No.	Application document and reference	Information requested
		Please provide a full assessment of all vehicle crossings proposed, noting that the density and proximity of some of these crossings could create safety issues on the proposed public roads. JOAL long sections are provided, but there is limited detail regarding the basement ramps proposed. **Please provide** an assessment of basement ramp grades, in particular where ramps adjoin proposed public roads. It is not clear that all ramps comply with safety platform requirements.
21	ITA Section 7.9 – accessible parking	The ITA incorrectly states that accessible parking is not required for individual dwellings on individual lots. Accessible parking requirements should be considered for all dwellings proposed, including the standalone and terrace typologies. Accessible parking spaces located in a garage, carport, or on a parking pad directly adjoining the dwelling do not need to be marked as accessible but must meet the dimensional requirements of the standard. **Please provide** a full assessment of accessible parking requirements covering all dwellings proposed.
22	ITA Section 7.9 – parking dimensions and gradients	The ITA only assesses car parking associated with apartment buildings. **Please provide** an assessment of the car parking located in JOALs where no apartment buildings are proposed, and parking associated with individual dwellings, including vehicle tracking where necessary. **Please provide** an assessment of car parking space gradient. There is no reference to this in the ITA, and it is not clear that all JOAL and individual dwelling parking spaces comply with the maximum grade requirements.
23	ITA Section 7.9 – bicycle parking	Bicycle parking for the individual lot dwellings has not been considered. All dwellings without a garage require at least one secure bicycle parking space. **Please assess** bicycle parking requirements for all dwellings and confirm compliance.
24	ITA Section 7.10 – loading and servicing	The ITA notes that loading spaces are proposed for various super lots and that provision complies, but it is not clear where all of these spaces are located on the plans provided. **Please provide** a more detailed assessment of the location and size of the loading spaces proposed and required, demonstrating compliance and that loading activities will not affect the operation of adjacent roads.

No.	Application document and reference	Information requested
		Where loading is proposed in basements, please confirm that the vertical clearance can accommodate the trucks anticipated. **Please provide** an assessment of how waste collection is proposed to occur for the apartment buildings.
25	ITA Section 7.13 – speed management on JOALs	A number of JOALs require speed management, and it is proposed that this be addressed by way of a condition. The general placement and location of speed management on JOALs is typically resolved at resource consent stage. **Please update** the JOAL designs to include the required speed management.
26	ITA Section 7.3 / Attachment 0C Proposed Conditions – bus capable road design	**Please confirm** how the bus capable design of the primary collector network, including kerb to kerb width, geometry, and swept paths for the AT 12.6 m urban bus and school buses, will be secured through detailed design and Engineering Approval, and identify the conditions relied upon. **Please confirm** that likely future bus corridors have been provided for in the road design, including through the Village Centre and toward Pine Harbour, and that public transport operation will not be compromised by on-street parking or cycle facility layouts.
27	ITA Sections 7.2 and 7.3 – bus stops and passenger facilities	The ITA defers bus stop locations to detailed design in consultation with Auckland Transport, and the staging table does not identify when public transport infrastructure will be delivered. **Please provide** indicative bus stop locations across the network, including at the schools, Village Centre and Marina Point; the stop treatment proposed, being in-line or indented, with justification for the approach adopted; provision for shelters and passenger facilities; and the delivery timing or staging triggers for bus infrastructure, including any interim measures required to enable early introduction of bus services.
28	ITA Section 7.3 – school bus provision	**Please provide** vehicle tracking and layout information demonstrating school bus turning, U-turn and layover provision on the school collector roads, and confirm whether bus stop indents or in-line stops are proposed at the school frontages, with reasons for the treatment selected. Provision should be demonstrated on site rather than deferred, noting the operational difficulties experienced where bus infrastructure has been retrofitted at existing schools.
29	ITA Sections 5 and 12.7 – ferry	Jack Lachlan Drive is the primary access route to the Pine Harbour ferry terminal, and existing ferry patronage forms a significant part of the

No.	Application document and reference	Information requested
	capacity, patronage and landside demand	existing transport environment. Auckland Transport has already commissioned higher capacity vessels and berthing improvements, and the developer is contributing toward ferry upgrades under the existing agreement, which is understood to cover the initial trigger levels. **Please quantify and comment on** existing ferry patronage and **confirm** the ferry passenger capacity assumed at each Precinct trigger level and the point at which reassessment of capacity is proposed relative to the staging programme. **Please provide** an assessment of landside demand associated with ferry use, including park and ride demand and on-street parking demand along Jack Lachlan Drive at each stage of development, and confirm how any shortfall or displacement of parking onto the upgraded corridor will be managed.
30	ITA Appendix 1 – SIDRA modelling check	The SIDRA model for the PM peak at the proposed Jack Lachlan Drive / Whitford-Maraetai Road roundabout appears to have reversed the flows for the Whitford-Maraetai Road north approach, using a southbound through flow of 36 vph and a right turn flow of 298 vph, whereas the do minimum model uses a southbound through flow of 312 vph and a right turn flow of 23 vph. **Please check and confirm** the inputs and, if an error is confirmed, provide corrected modelling.
31	ITA Section 7.3 / Attachment 0C Proposed Conditions – design standards and flexibility	**Please confirm** that the final design of roads and intersections will comply with the Auckland Transport Design Manual and the Auckland Council Code of Practice for Land Development and Subdivision, and how refinements to road cross sections, for example kerb widths, will be managed through the Engineering Approval process. **Please confirm** that the indicative streetscape features and cross sections in the ITA and the Streetscape Strategy, and the Appendix 1 Functional Table, are not intended to be fixed as consent conditions, and identify which elements of the road design the applicant considers should be secured by condition.
32	Speed limit Whitford-Maraetai Road	A fast-track proposal to the north of the Jack Lachlan Drive / Whitford-Maraetai Road intersection, together with proposed additional community activities on the land occupied by the pony club, would require a roundabout and would increase pedestrian demand across Whitford-Maraetai Road. The existing 80 km/h speed limit may therefore present safety issues. The applicant is asked to comment on the implications. If the applicant considers the existing speed environment to be closer to 60km/h currently, please provide evidence this is based on.

6. Other matters and advice notes

The following are not information requests but should be reflected in the proposed conditions or noted when conditions are considered.

- The proposed conditions should reflect the other approvals required outside the fast-track process, including encroachment licences for any private utilities located within roads to be publicly vested.
- The proposal departs in some respects from the binding agreement between the developer, Auckland Council and Auckland Transport, and compliance with that agreement remains necessary.