

5 July 2021

Gen Hewett
Senior Advisor
Environmental Protection Authority
Wellington

Dear Gen

Wooring Tree development, Cromwell

Thank you for your letter of 21 June 2021 seeking additional information concerning the application by Wooring Tree Property Development LP in relation to the Wooring Tree Estate resource consent application under COVID-19 Recovery Fast-Track Consenting) 2020.

I have set out below the responses to the additional information request.

I have provided the question from the Panel minute. Below that I have set out the response by the applicant.

The significant majority of responses are in the form of supplementary reports or information. These are provided as attachments. I have labelled these Attachments A-S. Those documents are attached to this letter.

Thank you for your assistance. If there are any elements of clarification or additional information I can assist with, we would be pleased to do so.

Question 1A

1. *A complete and accurate summary of the proposal and consents being applied for including:*
 - a. *The key elements of the proposal under each type of consent type – e.g. subdivision, land use, NES, discharge permits, water permits etc*

Response:

Below is a list of the consent sought as part of this application together with the activity status.

1. [Land use consents](#)
 - a. Retail activity in a residential zone not meeting residential zone standards 11 to 15 and 7.3.6: **non-complying activity.**
 - b. Comprehensive residential development in the Wooring Tree overlay - Rule 7.3.3 (viii): **Restricted discretionary activity.**

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- c. Exceedance of traffic generation standards (7.3.6(i)) and amenity and security standards (7.3.6(ii)): **Discretionary activity.**
 - d. Travellers accommodation in a Residential Area2 (11): **Non-complying activity.**
 - e. Development of commercial building within a residential front yard in breach of rule 7.3.6 (iii) (b): **Restricted discretionary activity.**
 - f. Approval of building platforms that do not meet the side yard rule 7.3.6(iii) (c): **Restricted discretionary activity.**
 - g. Height exceedance by two commercial buildings in the residential zone in breach of rule 7.3.6(iii) (f): **Restricted discretionary activity.**
 - h. Exceedance of building coverage of commercial building on residentially zoned land in breach of rule 7.3.6 (iv): **Restricted discretionary activity.**
 - i. New buildings within the Business Resource Area 2 and Wooing Tree overlay – Rule 8.3.3(ii): **Restricted discretionary activity.**
 - j. Buildings located within 30m of the northern boundary of the Wooing tree overlay – Rule 8.3.5 (ii) (xiv): **Non-complying activity.**
 - k. Residential activity within a rural zone _ Rule 4.7.2 (1): **Controlled activity.**
 - l. Activity status for breach of front side and rear yards for development within the rural zone – Rule 4.7.3: **Restricted discretionary activity.**
 - m. Development of a “cellar door” within the rural zone which is not selling products grown on site – Rule 4.7.5(iv): **Non-complying activity.**
 - n. Exceedance of the yard requirements for travellers accommodation in the Rural zone – Rule 4.7.6 : **Restricted discretionary activity.**
 - o. More than one sign and signs exceeding 1.1m² in area - Rule 12.7.5 (i)(a): **Restricted discretionary activity.**
 - p. More than one sign and signs exceeding 3m² on a construction site – Rule 12.7.5(i)(b) : **Restricted discretionary activity.**
 - q. Provision of a trailer mounted signs -Rule 12.7.5(iv): **Non-complying activity.**
 - r. Structures within a building line being the gateway signage – Rule 12.7.7: **Restricted discretionary activity.**
 - s. Vehicle crossings within 40m of an intersection – Rule 12.7.1(ii) : **Restricted discretionary activity.**
2. Subdivision
- a. Subdivision of land within Resource Areas 3 and 11 that breach Rule 7.3.3(i)(c) : **Non-complying activity.**
 - b. Subdivision of land in Business Resource Area 2 – Rule 8.3.2 (ii): **Controlled activity.**

c. Subdivision of land within the rural area with site areas of less than 2ha. - Rule 4.7.5 (iii); **Non-complying activity.**

3. National Environmental Standard – No consents are triggered. This is horticultural land. However, the assessment by Opus identifies that any level of contaminant does not trigger either NES or regional plan standards.

4. Discharge permits – Nil. There is discharge of stormwater to ground but this meets the requirements for a permitted activity.

5. Water permits – Nil.

b. *Information on staging; including an index plan illustrating the various stages and sub-stages (including the consented Stage 1A and 1B) and an inventory listing the proposed allotments (and individual lot sizes) proposed in each stage/sub stage*;

Response:

Attachment A is the updated Staging Plan for the Wooing Tree development showing all substages including all the existing substages 1A and 1B.

Attachment B provides a schedule of the different lots including lot sizes that apply to each stage.

c. *A description (schedule) of the proposed lots which the global reductions in bulk and location standards (i.e. side yard reductions and building coverage exceedances) are sought for; and*

Response:

Attachment C provides a description of the proposed lots which are seeking specific reductions in the bulk and location standards.

d. *A schedule of the key plans/info that condition 1 (“in accordance with”) usually refers to.*

Response:

Attachment D provides a suggested condition of consent (if the application is approved) scheduling the documents and plans forming part of the consent.

As a result of ‘comments’ received from the Central Otago District Council, the applicant is making some design changes to the Hospitality Centre. In particular, this will include the deletion of Building 10 and some other consequential changes. This will result in a new plan set from Adapt and FDA. Consequently and with the Panel’s approval, the updated schedule of plans and a compiled plan set will be provided as part of the response to comments on the application.

2. *Further information on potential reverse sensitivity effects on nearby established external activities in close proximity to the proposed development such as vineyard, orchards and state highway as a result of the proposal and reduced buffer distances (from that contained in the Operative District Plan (ODP)) to supplement the information on pages 31 and 41 of the AEE. This information shall address:*

a. *Information on day and night time noise levels over the application site for internal and external living environments and how those levels relate to the ODP noise standards and applicable WHO standards for acceptable noise levels.*

Response:

Attachment E is a report by Marshall Day Consultants addressing issues of reverse sensitivity from adjacent vineyards, orchards and the State Highway, and how these relate to applicable noise standards.

- b. *Information on potential for air quality effects from nearby rural land uses, including dust, smoke, odour and spray drift over the application site, including consideration of any relevant industry standards.*

Response:

Attachment F is an air quality report by Pattle Delamore on reverse sensitivity issues.

PDP concludes that:

“Based on consideration of potential smoke, dust, odour and spray activities, PDP considers that the proposal to intensify the residential development will have a less than minor potential for reverse sensitivity effects on the growers. PDP considers that the mitigation already provided by the project design, and the covenant on objections to fruit growing activities to the west, are appropriate to address the scale of the reverse sensitivity impacts of the proposal.”

- c. *In terms of the “no complaints” covenant, what is the:*
- i. *rationale for, and efficacy of, such a tool in terms of the avoid remedy and mitigate approach promoted by Part 2 of the RMA; and*
 - ii. *the effects basis for the limit of coverage of the “no complaints” covenant within the site.*

Response:

Simpson Grierson have provided a legal opinion on the appropriateness of a no complaints covenant and how this relates to the requirements to avoid, remedy or mitigate effects under the RMA; and the limit on the no complaints coverage. This legal opinion is set out at Attachment G.

Attachment H sets out the no complaints covenant in favour of the adjacent orchard.

- d. *Aside from any “no complaints” covenant and the noise attenuation condition proposed to apply for new residential buildings on certain areas of the site, what (if anything) is proposed to mitigate potential effects in respect to noise and the air quality effects (if any) from nearby rural land uses, including dust, smoke, odour and spray drift?*

Response:

The noise report by Marshall Day Consultants and the air quality report by Pattle Delamore identifies appropriate methods to control reverse sensibility issues. These are set out in the Marshall Day report

Marshall Day recommends:

- (i) Minor adjustments to existing condition 47 dealing with noise.
- (ii) A new condition dealing with ventilation and temperature control inside homes that requires windows to be closed in order to achieve internal noise levels.
- (iii) A noise control fence along the boundary between State Highway 6 and 8B and residential sections.

The proposed conditions of consent set out at Attachment S have been modified to take account of Marshall Day’s recommendations under (i) and (ii).

In terms of the noise attenuation treatment at the residential boundary nearest the State Highways, options are being examined partly in response to the Marshall Day report and partly as a result of the CODC comments on noise and vibration.

The appropriate condition of consent will be addressed as part of WTPDLP's response on the comments received. Consequently, in Attachment S this aspect of the noise conditions is a placeholder only.

In terms of air quality, the report by Pattle Delamore indicates that there are no additional conditions required to beyond those already included in the application to mitigate the effects of dust (from external sites), smoke odour or spray over drift.

- e. *With respect to mitigation in respect to noise and potential air quality effects from nearby rural land uses, including dust, smoke, odour and spray drift, any changes or improvements to conditions to secure those outcomes, including if relevant:*
 - i. *The condition framework proposed to ensure an effective noise (and potentially air quality) buffer and "elevated contour";*
 - ii. *Any redesign to subdivision layout or setbacks to achieve the required noise and air quality buffer distances; and*
 - iii. *Any other requirements for dwellings that should be addressed in conditions of consent.*

Response:

In Attachment S the modified condition on noise is set out in Condition 47 and the new condition on ventilation and temperature control is set out at Condition 47B.

There are no additional conditions recommended by Pattle Delamore to address air quality and reverse sensitivity other than those already included as part of the consent.

3. *Clarification as to the staging proposed. If staging is sought and flexibility is allowed for in the order of construction and boundary of stages, commentary as to the potential for changes in staging from that indicatively proposed to have additional or unanticipated effects and assessment of any such effects.*

Response:

Attachment I addresses the issue of flexibility that is sought around the order in which staging can proceed, the rationale for this, and the effects of allowing this flexibility in the delivery of staging.

4. *The application states that "this proposal does not seek consent for the detailed design of individual homes" and acknowledges that "the higher density sites may trigger resource consent when housing is proposed" (presumably as a "comprehensive residential development" in the Residential Resource Area in the Wooing Tree Overlay Area). Notwithstanding these two statements in the application, it is noted that urban design guidelines are proposed to be "implemented during the course of the development" in order to provide for "a diverse range of typologies". If these guidelines are not to be imposed through conditions of consent on the land use or subdivision consents, then comment is requested on what reliance can and/or should the Panel place on those guidelines to achieve the outcomes proposed in the application?*

Response:

Simpson Grierson have provided an opinion on the application of non-statutory design guidelines for home construction, and what reliance the Panel can provide on these. This is shown at Attachment G.

Wooing Tree intends to impose covenants on each of the titles which requires compliance with the design guidelines. A copy of these covenants is provided at Attachment J.

The following additional condition of consent is proposed. This condition references back to the design guidelines.

Add the following Condition.

Consent Notices

84A. A covenant shall be attached to the title of each residential lot stating that any building constructed on the lot must comply with the Wooing Tree design guidelines, and is subject to the design approval process as set out in the guidelines

Included as Attachment K is the actual design guidelines. Attachment L (L1 and L2) provides a perspective of houses along road 5 complying with the guidelines. This perspective is included to illustrate the quality of design and the on site amenity this will create for buildings constructed in accordance with the guidelines. The covenant on the title ensures compliance with the guidelines. The requirement for this covenant is a condition of this consent.

5. *Comment is requested on whether there should be covenants on the subdivision consent to secure:*
- a. consented yards (prohibit further reductions in yards)*
 - b. maximum building coverage conditions (prohibit exceedance)*
 - c. any other development rules applied through conditions of consent.*

Response:

This matter differs between land which is currently zoned residential, and land which is currently zoned business.

On the residential land, in my view, no covenants are necessary to apply to the subdivision.

The development will be controlled by:

- the plans and conditions of this consent;
- relevant District Plan provisions; and
- the Wooing Tree Guidelines (a non-statutory document, but one which will guide and set the quality of development of housing within the Wooing Tree Estate).

If a development seeks to exceed the entitlements set out in the conditions of this consent, for example in areas such as consented yards or building coverage; then that development will be subject to the normal application of the planning provisions. Resource consent would be required to exceed the building envelope. This would be subject to the normal tests of RMA. That would be an application to CODC. The normal requirements around notification and assessment of applications would apply.

Where there is a fundamental difference is on land currently zoned Business that is to be developed for housing.

The conditions of this consent (Condition 67) addresses this situation and stipulates that these buildings must meet certain controls including yards, coverage, height, and excavation. Essentially this sets up a rule regime appropriate to a residential context, rather than a business.

It would be possible for a new property owner, having obtained freehold title, to not rely on this consent and instead seek to consent a building platform reliant on the bulk and location controls of the business zone.

This potential “gap” is appropriately addressed through a consent notice applied to the titles of all lots which in whole or in part occur on land currently zoned business. This could be imposed by way of a consent notice or covenant. On balance, a consent notice would be preferable because it gives the enforcement power to the Council.

The consent notice would cover the following matters:

- (a) the lot cannot be used for any shop, office or business activity (excluding a home occupation);
- (b) any building would comply with the provisions set out in Condition 67 dealing with building height, yards, coverage, parking, signage, excavation, relocatable buildings and acoustics.

Condition 67A would state:

“A consent notice shall be registered against the title of Lots 202-214, 218-221, 237-241, 284-286 and 391-410 stating that:

(a) Any building or activity on the site shall not be used for a shop, office, or other business activity as defined within the Central Otago District Plan, provided this shall not preclude a home occupation being operated from any dwelling or accessory building on the lot.

(b) Any dwelling or residential building or other structure built on the site shall comply with the following:

- (i) front and side boundary set backs as shown on plans by Baxter Design dated 18 March 2021 plan numbers 2952 SK 116;*
- (ii) not exceed a maximum building coverage as set out in Rule 7.3.6(iv) of the CODC district plan as at 5 July 2021, except that:*
- any site shown as medium density on Plan 2002-002 Rev D shall not exceed a building coverage of 80%; and*
 - sites outside the medium density area shown on Plan 2002-002 Rev D that are less than 325m² net site area, not exceed a building coverage of 55%.*
- (iii) the following development rules for the Wooing Tree overlay applying to Residential Resource areas of the Central Otago District Plan as at July 2021*
- Rear yards (Rule 7.3.6(iii)(c)(iii));*
 - Height (Rule 7.3.6(iii)(f));*
 - Carparking (Rule 7.3.6(v));*
 - Signs (Rule 7.3.6(vii));*
 - Excavation (Rule 7.3.6(x));*
 - Relocatable buildings (Rule 7.3.6(xi));*
 - Acoustics (Rule 7.3.6(vii)(b))”*

6. *The Panel has been provided with two versions of an infrastructure report prepared by Patterson Pitts Group, one dated March 2021 and the other dated April 2021. Please confirm which version should be relied upon.*

Response:

I confirm that the correct infrastructure report is the April 2021 report. For clarity reasons, I attach a duplicate of that report. This is Attachment M.

7. *The AEE/application states “this application is advanced on the basis that there is a commitment by the Wooing Tree Partnership to provision of the underpass at the time the roundabout is constructed”. Comment on how the commitment by the applicant to the provision is secured?*

Response:

Attachment N is a letter from Veros (the project managers employed by Wooing Tree Property Development LP to deliver the project) outlining the contracts and commitments between Waka Kotahi, NZTA and Wooing Tree to deliver the underpass.

8. *The traffic assessment at paragraphs 7.3.7 – 7.3.11 concludes initial pedestrian crossing provision could be made through refuges in the context of a speed limit between two roundabouts which “could reasonably be reduced to 60 km/h”. The roundabouts in question have not yet been constructed and the current speed limit is understood to be 80 km/h. Please comment on:*
- current measured speed on State Highway 8B in the vicinity of the proposed pedestrian crossing places*
 - the suitability of refuges as a pedestrian crossing solution if the speed environment exceeds 60 km/h.*

Response:

Attachment O is a report prepared by Carriageway addressing the interim pedestrian refuge on State Highway 8B.

This is covered by condition 80 as set out in the suggested conditions of consent forming part of the application.

9. *The traffic assessment identifies shortcomings with respect to turning areas and queueing space in car parking for the non-residential aspect of the development. Please provide details of the solution to those shortcomings along with revised plans.*

Response:

Attachment O provides an assessment of the turning areas and queuing spaces within the non-residential carparks within the Wooing Tree development.

A revised parking layout plan is provided by FDA. This is shown at Attachment O.

As a consequence of the advice of Mr Carr, the following conditions are included after the current condition 66. These additional condition addresses the operation of the carpark and loading bays.

66A All parking spaces marked as X as shown in the letter by Carriageway Consulting on “Response to EPA matters” shall not be available for public use and shall be signposted as “Reserved: staff parking only”.

10. *Confirmation as to whether the National Policy Statement on Urban Development (NPS UD) is a relevant and applicable document pursuant to Schedule 6, clause 31(1)(c), and an explanation as to the reasoning underpinning the response.*

Response:

Attachment G is a legal opinion by Simpson Grierson outlining the application of the National Policy Statement on Urban Development.

11. *A complete assessment pursuant to s104D(1)(b) of the RMA.*

Response:

Attachment P is a complete assessment under section 104D(1)(b).

12. *The Detailed Site Investigation Report prepared by Opus is dated November 2016. Please confirm nothing has changed or occurred since the date the report was finalised which would alter the conclusions reached.*

Response:

Attachment Q is a letter from Opus updating their November 2016 report.

Attachment R is a letter from Grape Vison who is the vineyard operator and has knowledge over changes in the operation of the vineyard since 2016. He confirms that there has been no change.

A new condition requiring validation of land contamination issues to ensure levels are below comply with the National Environmental Standard for assessing and Managing Contaminants in Soil to Protect Human Health (2011) after removal of the vineyard infrastructure and making good the ground, is suggested.

13. The letter from Aukaha (attachment K) includes 3 recommendations. One refers to the Heritage New Zealand Pouhere Taonga Archaeological Discovery Protocol, another requests suitable, locally sourced native plants are included in any landscape planting to compliment the surrounding environment. Please comment on the following:
- Whether proposed condition 61 corresponds to the Heritage New Zealand Pouhere Taonga Archaeological Discovery Protocol?
 - Whether locally sourced native plants should be required as a condition of consent (either directly or through inclusion of that requirement in a relevant report or planting plan)?

Response:

Condition 61 was put in place to give effect to the undertakings to Ahukaha over accidental discovery.

The nature of the condition, i.e. immediate cessation of work, informing NZHPT (and in this case CODC and Ahukaha), and not recommencing any work until authorisation has been obtained from NZHPT) is taken from other similar conditions relating to accidental discovery. It is understood NZHPT does not have a documented protocol as such but these conditions are consistent with their preferred practice.

In preparing this response, the applicant has had the benefit of reviewing the NZHPT submission. That supports the approach to accidental discovery, but seeks a rewording of condition 61 and a new condition and advice note added. The reworded condition below directly follows the NZHT submission.

“Accidental Discovery

- 61 *The Heritage New Zealand Pouhere Taonga Archaeological Discovery Protocol, or an accidental discovery protocol modified to reflect the specific project detail and approved in writing by Heritage New Zealand and Ahukaha, , shall be operated under for any accidental archaeological discoveries that occur during construction works.*
- 61A *Prior to commencing ground disturbing activities, the Consent Holder shall ensure that all staff (including all sub-contractors) involved in, or supervising, works onsite are familiar with the Wooing Tree Estate Accidental Discovery Protocol.*

ADVICE NOTE

Under the Heritage New Zealand Pouhere Taonga Act 2014, an archaeological authority must be obtained from Heritage New Zealand Pouhere Taonga prior to the modification, damage or destruction of any archaeological site, whether the site is unrecorded or has been previously recorded. An archaeological site is described in the Act as a place associated with pre-1900 human activity, which may provide evidence relating to the history of New Zealand. These provisions apply regardless of whether a resource consent or building consent has been granted by Council.”

Condition 15 requires a detailed Landscape Plan for street environments and vested parkland.

Condition 48 requires a detailed Landscape Plan for the retained in private ownership northern boundary interface.

Condition 1 requires the development to be undertaken “in accordance with the assessment and reports forming part of the application” including the Urban Design Assessment by Baxter Design.

The Urban Design Assessment refers to the palette of planting which includes the native planting.

While this connection is intended and understood as a commitment by the applicant, it is accepted that in hindsight the condition could be more explicit. Consequently, it is recommended that Conditions 15 and 48 be reworded as follows:

Condition 15:

The consent holder shall provide a detailed Landscape Plan showing the location, variety and installation details of all street trees to be planted with associated automated irrigation, and landscaping of parks to vest in the Council, for approval by the Council's Parks and Reserves Manager under the engineering approval process. The Landscape Plan should be applied at 224C certification. The Landscape Plan shall identify locally sourced native plants and generally be in accordance with the planting palette outlined in the 'Urban Design Assessment' by Baxter Design.

Condition 48:

Prior to the commencement of any stage of the subdivision adjoining Lot 803/804, the consent holder shall prepare a Landscape Plan and Cycleway Plan generally in accordance with the plans shown in the Baxter Design masterplan and intended to inform a park-like environment. The Landscape Plan shall include locally sourced native plants as referred to in the Baxter Urban Design Assessment Plant Palette. The Landscape Plan shall be to the satisfaction of the CODC.

Other Matters

14. Section 14.15 of the planning analysis and AEE refers to section 19(f) "Any other matter that the Minister considers relevant". It goes on to record that the Referral order does not specify any other matters the Minister considers relevant, despite the Minister being requested in the application for referral to give consideration to the Cromwell Spatial Framework Plan under this clause. The application/AEE suggests the Panel is free to (and should) consider the Framework Plan as a matter that is relevant and reasonably necessary to determine the consent application pursuant to section 31(1)(d).
15. The Framework Plan is acknowledged as not being a statutory document under the Resource Management Act.
16. Please comment on the following:
 - a. whether a non-statutory strategic framework plan may be considered pursuant to section 31(1)(d)?
 - b. Whether the Minister's decision not to specify the Framework Plan as a relevant matter under section 19(f) has any implications for the Panel in the context of section 31(1)(d)
 - c. If the framework plan were to be considered, whether any issues as to weight arise in considering the framework plan? The Panel note in an RMA context that the weight accorded to a growth strategy can be affected by considerations such as whether the strategy has been prepared pursuant to provisions of the RMA, whether it is consistent with the district plan, whether it has been incorporated into the district plan in any way, whether the rigour of consultation was known, and whether it had been through a submission and hearing process. Are these considerations in an RMA context applicable in the context of the FTA?

Response:

Attachment G is a legal opinion by Simpson Grierson. This addresses issues of the National Policy Statement on Urban Development, and the Cromwell Spatial Framework Plan.

NPS UD

17. Section 15.3 of the planning analysis and AEE states "There are no relevant National Policy Statements". The section goes on to refer to the NPSUD, the fact that Cromwell in 2018 had a population less than 10,000 people, and records consequently that the NPSUD "does not strictly apply in terms of requiring a growth management strategy".
18. Notwithstanding the above the analysis/AEE states the NPSUD does apply to "planning decisions by any local authority that effect an urban environment". An urban environment means an area of land "intended to be

predominantly urban in character” and “is or is intended to be, part of a housing and labour market of at least 10,000 people”. The analysis/AEE then asserts Cromwell is expected to grow to 10,000 people.

19. Please comment on the following:

- a. *the implication or effect of the terminology “intended to be” in the NPSUD provisions quoted above. Does that wording enable or require the Panel to apply the NPSUD in the context of Cromwell currently being a housing and labour market of less than 10,000 people but being expected to exceed 10,000 people in the future (exact timing of the crossing of the threshold being unknown).*
- b. *Whether the anticipated timing of crossing of the 10,000 person threshold is relevant? (Potentially by reference to the definitions in the NPSUD of short-term, medium-term and long-term?).*

Response:

Attachment G is a legal opinion by Simpson Grierson. This addresses issues of the National Policy Statement on Urban Development in the Cromwell Spatial Framework Plan.

In this letter there have been some requested changes to the conditions of consent. This response at Appendix S sets out an updated list of the conditions. Changes are highlighted in red.

The applicant will be requesting some further changes to the conditions in response to the comments received from affected parties.

Any questions, do not hesitate to contact me.

Yours faithfully



John Duthie
Tattico Limited

LIST OF ATTACHMENTS

Attachment A – Updated Staging Plan

Attachment B – Schedule of lots for each stage

Attachment C – Schedule of lots with special bulk and location standards

Attachment D – Suggested conditions of consent specifying plans and reports

Attachment E – Noise report by Marshall Day

Attachment F – Air quality report by New Zealand Air

Attachment G – Legal opinion by Simpson Grierson: No complaints covenants

Attachment H – No complaints covenant

Attachment I – Order of staging

Attachment J – Proposed covenant to be placed on each title addressing compliance with design guidelines for Wooing Tree.

Attachment K – Design Guidelines

Attachment L – Perspective of dwellings constructed under the guidelines (L1 and L2)

Attachment M – Infrastructure report by Paterson Pitts Group – April 2021

Attachment N – Letter by Veros outlining underpass commitment.

Attachment O – Traffic assessment by Carriageway

Attachment P – Assessment under s104D(1)(b)

Attachment Q – Letter by Opus updating November 2016 report

Attachment R – Letter from Grape Vision

Attachment S – Updated full set of consent conditions