

BEFORE THE INDEPENDENT HEARINGS PANEL

IN THE MATTER of the Resource Management Act 1991 (**RMA**)

AND

IN THE MATTER of Intensification Planning Instrument (**IPI**)
Proposed Plan Change (**PC**) 78: Intensification
to the Auckland Unitary Plan Operative in Part
(**AUP**)

AND

IN THE MATTER of Hearing Topic 020A Precincts – 1201
Britomart Precinct

**STATEMENT OF REBUTTAL EVIDENCE OF DANICA THERESE
ABEAR TORRES ON BEHALF OF AUCKLAND COUNCIL
GEOSPATIAL MODELLING - HEARING TOPIC 020A**

Date: 14 February 2023

INTRODUCTION

- 1 My full name is Danica Therese Abear Torres. I am employed as a Senior Geospatial Specialist by Auckland Council.
- 2 I have the qualifications and experience set out in my evidence in chief (**EIC**), dated 16 November 2023. In addition, I was the recipient of the Special Achievement in GIS (SAG) Award in 2022 by ESRI for my work in developing Pocket Maps, a mobile app showing publicly accessible areas across Aotearoa.
- 3 I repeat the confirmation given in that statement that I have read and agree to comply with the Code of Conduct for Expert Witnesses.

SCOPE OF EVIDENCE

- 4 This statement of rebuttal evidence addresses specific matters raised in the evidence of Mr Vijay Lala on behalf of Cooper and Company Limited for Hearing Topic 020A.
- 5 In paragraph 6.20 of Mr Lala's evidence, he considers there to be an error in Mr Warren Nicholson's shading analysis. I provided Mr Nicholson with the base of the model he used for the analysis. I acknowledge there to be an error in the Council's GIS model in relation to the heights modelled within the Britomart Precinct, which is affected by the special height control.
- 6 My evidence addresses matters under the following headings:
 - 6.1 Error in modelled heights affected by the Harbour Edge Height Control Plane;
 - 6.2 Affected parcels in the model; and
 - 6.3 Confirmation of an isolated incident.

ERROR IN THE MODELLED HEIGHTS AFFECTED BY HARBOUR EDGE HEIGHT CONTROL PLANE

- 7 In his primary evidence, Mr Lala has raised issues regarding the shading analysis Mr Nicholson undertook for the Britomart Precinct. In mid-January 2024, Mr Nicholson asked me to check the Council's GIS model special height control layer that was provided to Architectus.
- 8 The raster file used to create the special height control layer was from a previous 2009 height study of the City Centre. The special height control layer includes the area affected by the Harbour Edge Height Control Plane which applies at the western end of Quay Street. The extent of the Harbour Edge Height Control Plane is shown in yellow on map H8.11.4 in **Attachment A**, which shows all the special height controls.
- 9 **Attachment B** is a composite map showing the Special Height Control Area in the area of Britomart Precinct from the legacy Auckland Council District Plan – Central Area Section 2005. In the pdf map, the height contours appear to be correct. However, when I checked it against the corresponding raster file, there was a difference in height. I believe that the error occurred during the creation of the original raster file.
- 10 The error seems to be more pronounced on the northern side adjoining Quay Street of the Harbour Edge Height Control Plane where the modelled buildings are around 8-10m lower than they should be. On the southern side of the Harbour Edge Height Control Plane adjoining Customs Street East, there appears to be a height difference of around 2m.

AFFECTED BUILDINGS IN THE MODEL

- 11 As a result of the error in the raster file relating to the heights in the Harbour Edge Height Control Plane, there are 12 modelled

buildings in the Britomart Precinct where the building height in the special height control layer was incorrectly modelled.

- 12 The affected buildings are subject to the heights in the Harbour Edge Height Control plane and are highlighted purple in **Figure 1** below.

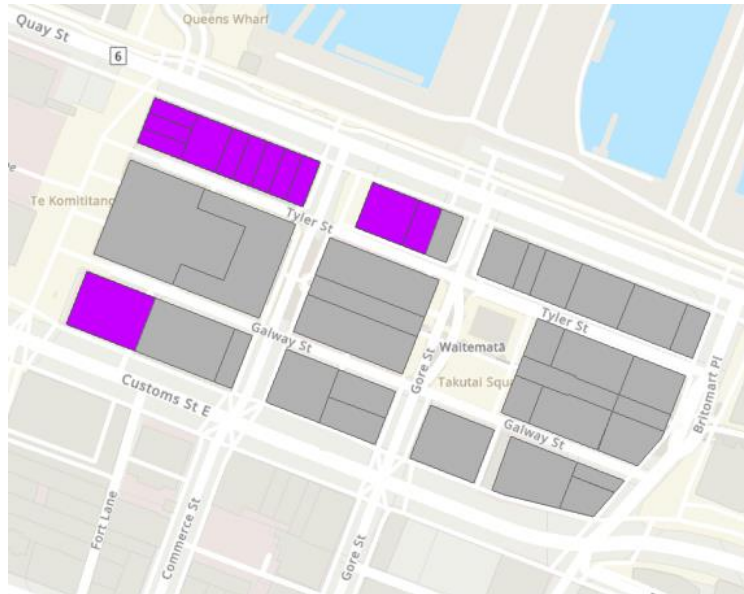


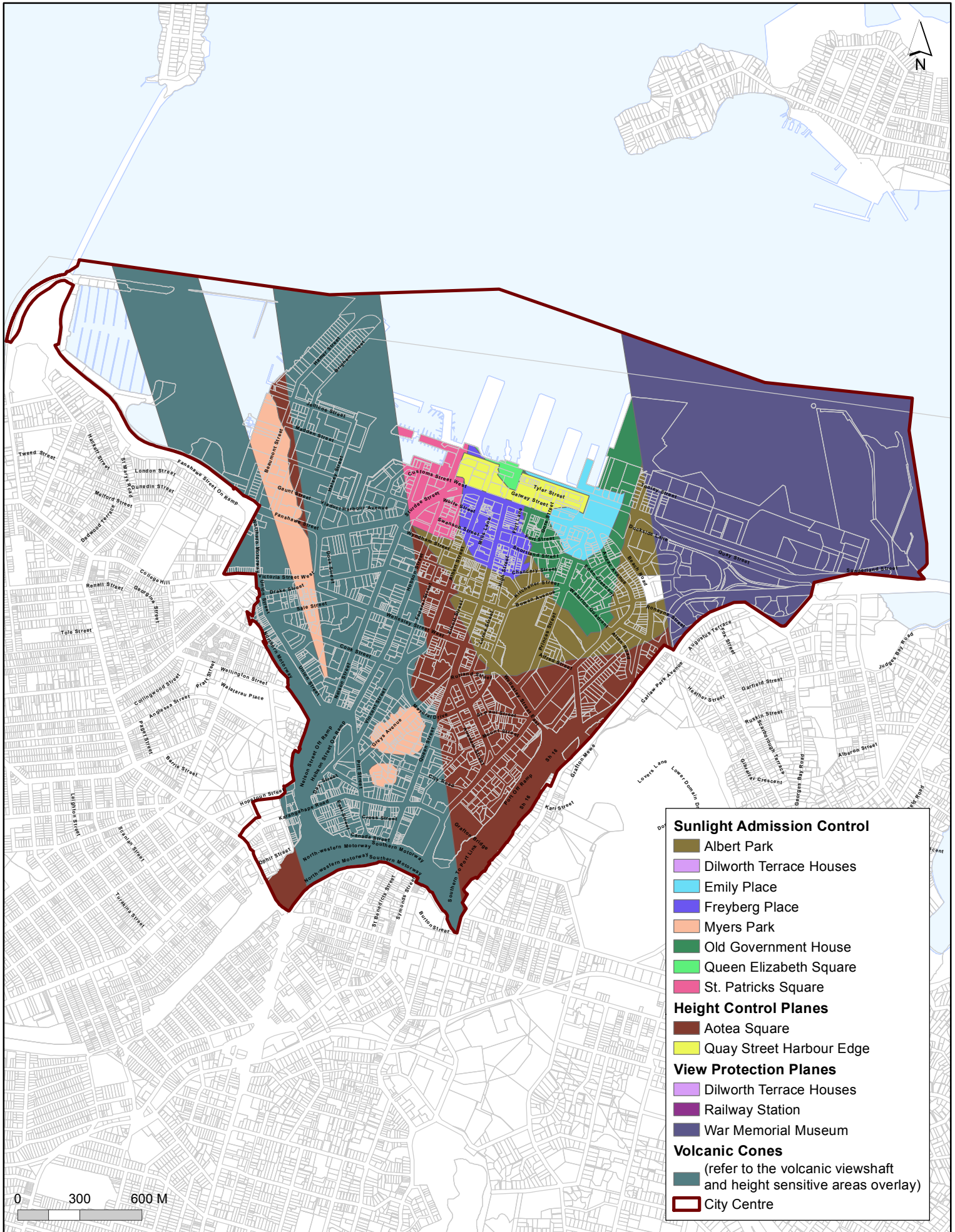
Figure 1: 12 affected building models in Britomart Precinct highlighted in purple.

CONFIRMATION OF AN ISOLATED INCIDENT

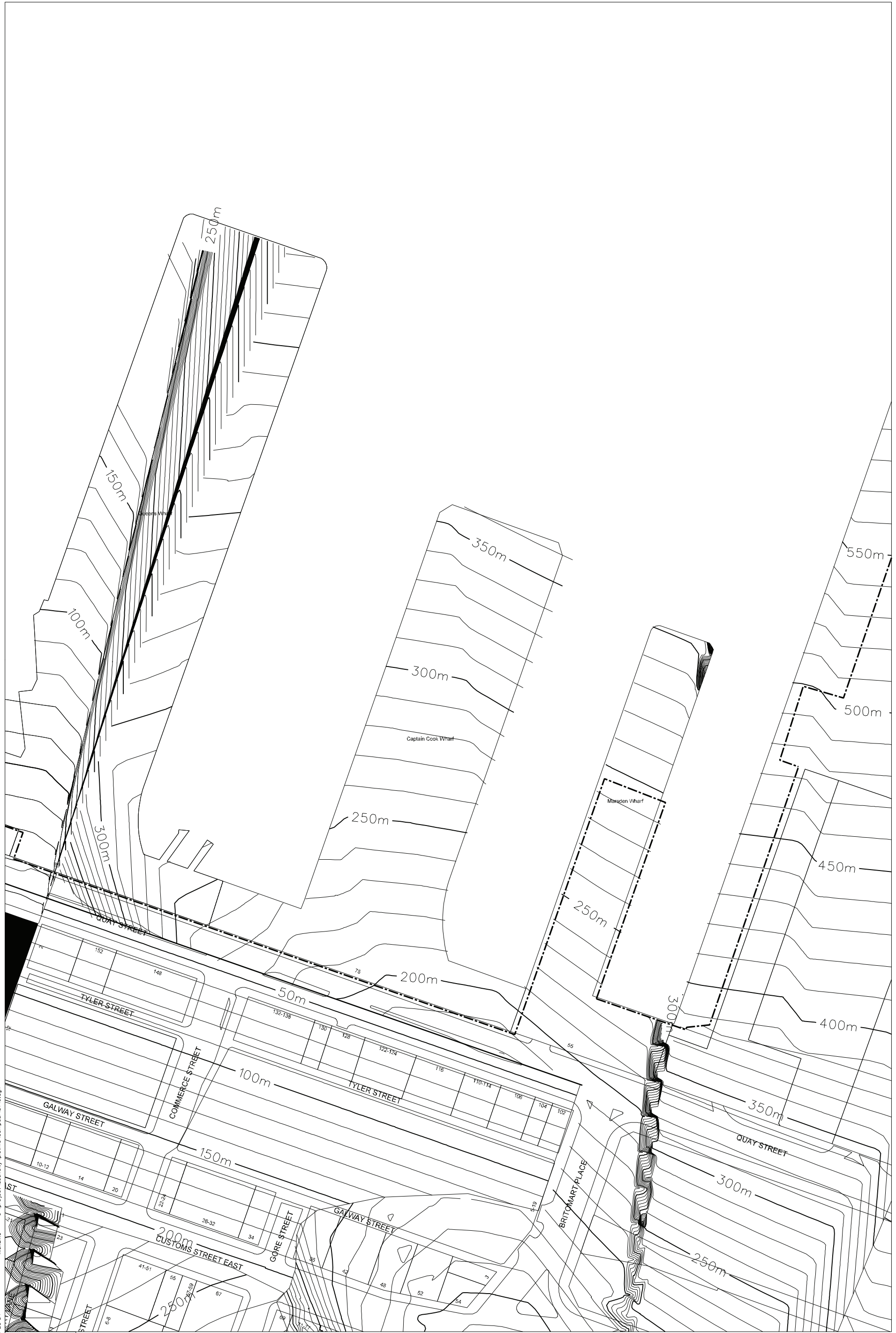
- 13 After becoming aware of the error, a random spot check of building heights within the special height control layer and comparison of them to the composite map was conducted to determine whether the issue was widespread.
- 14 Based on my spot checks, I consider that the error appears to be isolated to the buildings affected by the Harbour Edge Control Plane as the other buildings I checked across the City Centre that are subject to special height controls all appear to be showing the correct heights.

Date: 14 February 2024

Danica Therese Abear Torres



City Centre zone: Special height controls



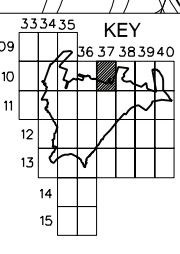
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 date plotted: 23 AUG 1999 14:20:34

CODE	CM
REFERENCE	3710
SHEET NO	CM8

AUCKLAND CITY

DATE: AUGUST 1999

A1 PLOT SCALE 1:1000
A3 PLOT SCALE 1:2000



Composite Map combining the Central Area Special Height Controls, Sun to Public Places, Views, Special Heights (Aotea Square and Quay Street) Showing Maximum Allowable building heights above MSL (L&S Auckland Datum 1946)

MAP BASE REF. C:/Planning/Y mad/Lis/Isthmus/Landbase dated: 18 August 1999

The information contained on this drawing is an indication only of the calculated effect on building height of the sunlight, views and special height control rules. For an absolute determination of this height, refer to these rules in the District Plan.