

The Minister for the Environment  
c/o Environmental Protection Authority  
Private Bag 63002  
Waterloo Quay  
Wellington 6140

Your reference: 2020-B-07179

27 November 2020

Dear Minister Parker,

**RE: COVID-19 Recovery (Fast-Track Consenting) Act 2020 – Nola Estate – Comments sought**

We are responding to your invitation for comments on an application before you for referral to the Expert Panel under the COVID-19 Response (Fast Track Consenting) Act 2020.

The application is made by CPM 2019 Ltd and is located at 460 to 478 West Coast Road (excluding 466 West Coast Road) and 317 to 345 Glengarry Road, Glen Eden, Auckland (Lot 22 DP 19309, Lot 23 DP 19309, Lot 24 DP 19309, Lot 25 DP 19309, Lot 26 DP 19309, Lot 27 DP 19309, Lot 28 DP 19309, Lot 30 DP 19309, Lot 31 DP 19309, Lot 32 DP 19309, Lot 35 DP 19309, Lot 36 DP 19309, Lot 37 DP 19309, Lot 38 DP 19309, Lot 39 DP 19309, Lot 40 DP 19309).

Having reviewed the application material provided, we can advise that Auckland Council has some significant concerns with the proposed development. A summary of Council's collective response can be found in Enclosure A.

In response to the information requirements stated in your undated letter referenced 2020-B-07179:

- 1. Are there any reasons that you consider it more appropriate for the project, or part of the project, to continue to proceed through existing Resource Management Act 1991 (RMA) consenting processes rather than the processes in the Act?*

The Council have held a pre-application meeting on Option a) which was discussed based on one site plan. Option b), the revised proposal went to the Auckland Urban Design Panel, and again comprised only high-level details. At this stage very little is known on the effects of the proposal on key infrastructure and suburban character and amenity.

Preliminary comments have indicated that Council are of the view that the proposal would warrant public notification due to the intensity of development proposed within the Single House Zone. As such it is considered that this proposal will benefit from being processed through the typical RMA process to enable the applicant to work with Council Controlled Organisations (in particular Auckland Transport and Watercare) and Council Specialists to ensure the effects of the proposal are appropriate and can be managed/mitigated. This process will also enable public participation. In addition, the transportation effects from the development are likely to extend beyond the immediate neighbours, with upgrades of roundabouts and intersections likely required. A typical RMA process will enable

determination of whether to notify this application wider than just the immediate neighbours.

It is also noted there is a difference in opinion regarding the activity status for the proposal in terms of whether the Non-Complying activity status is applicable, as well as whether the proposal is an Integrated Residential Development.

2. *Does the Council consider there is potential for significant adverse effects?*

It is felt that the proposal has the potential for significant adverse effects. Please refer to the detailed comments provided within Enclosures A, B and C attached.

3. *Does the applicant, or a company owned by the applicant, have any environmental regulatory compliance history in your City?*

The following companies have been reviewed for previous compliance history:

- Aedifica NZ Limited
- Vinegar Lane Corporate Trustee Limited
- Sirius Limited
- Evolution Investment Trust Limited
- NH Trustees no.11 Limited
- MDEV-NZ Limited
- CPM 2019 Limited
- NFK Infrastructure Limited
- NFK General Partner Limited
- Waimumu Road Limited
- Bruce McLaren Road Limited
- Woodglen Road Limited

Abatement notice ABT21507726 was issued to Bruce McLaren Road Limited on 3 September 2020 instructing them to install and maintain suitable sediment controls at 105-117 Bruce McLaren Road.

No further enforcement action has been identified.

If you have any further queries regarding this response, please feel free to contact me.

Yours sincerely,



Ian Smallburn  
General Manager – Resource Consents  
Auckland Council

Enclosed:

Enclosure A: Summary of Auckland Council collective response – Nola Estate

Enclosure B: Comments from Auckland Council Specialists and Asset Owners

Enclosure C: Comments from the Local Board, Councillors and IMSB – Nola Estate

## Enclosure A: Summary of Auckland Council collective response – Nola Estate

Auckland Council has some significant concerns with the proposed development. These are summarised as follows:

- Auckland Transport does not currently have enough information to determine whether the proposal will result in adverse transport effects, or whether any potential mitigation measures will be suitable to manage effects generated by the proposal. The applicant has advised that specific information relating to transport effects can form part of the detailed design to be provided at a later stage. However, in our view, the information needs to be provided up-front as part of the application to enable an assessment of the transport effects in relation to the transport network. Specific concerns are held towards:
  - The left-in-left-out access onto West Coast Road, being an arterial road.
  - The West Coast Road/ Parrs Cross Road roundabout is likely to require upgrades, modelling is required to understand the correct treatment/intersection design.
  - Improvements to the Glengarry Road and West Coast Road intersection may be required, modelling and trip generation is required.
  - Upgrades to the bus stops nearest the site (152 on Glengarry Road and 151 and 154 on West Coast Road) should be considered as part of mitigation measures due to the proposal's reliance on minimising private vehicle use and the fact the bus stops are not part of a rapid transit service and Glen Eden Train Station and Sunnyvale Train Station are not considered to be within walking distance being 1.6 and 2km away respectively.
  - Auckland Transport do not support option a) with two proposed access points onto West Coast Road and the inclusion of one-way roads.
- Healthy Waters does not currently have enough information to determine whether the proposal will result in adverse stormwater or flooding effects, or whether any potential mitigation measures will be suitable to manage effects generated by the proposal. No stormwater or infrastructure report has been provided with the application. The increased impervious surfaces will increase stormwater flows from the site that may increase the risk to the immediate downstream properties. The applicant will need to prepare and have authorised by Healthy Waters a stormwater management plan (SMP) for connection to the regional stormwater Network Discharge Consent (NDC). It is anticipated that amendments to the proposal concept are required to manage quality, hydrology and flooding within the sites. The proposal will be considered unserviceable if authorisation for connection to the NDC cannot occur.
- Watercare Services Limited does not currently have enough information to determine whether the proposal will result in adverse effects on the public wastewater or water networks, or whether any potential mitigation measures will be suitable to manage effects generated by the proposal. No water and wastewater flow or water supply-demand data was provided for the proposed commercial centre, café and community centre as part of this application. Watercare Services Limited have identified that there are minor capacity constraints in the downstream local wastewater network. This will be the applicant's responsibility to mitigate any potential overflow risk as a result of the proposed development, through public network extensions or upgrades, depending on the agreed solution. The local water network also needs to be upgraded to ensure a resilient supply to the proposed development.
- Council's Plans and Places (Policy) Specialist finds that there is nothing about the proposal, under Option a) or Option b), that distinguishes it from a standard residential development and does not consider the proposal to be an Integrated Residential Development. The communal facilities proposed are not for exclusive use by the residents being also available for public use and are therefore not considered

to be “supporting communal facilities”. The proposal is significantly more intense than what is anticipated by the Single House Zone, with potentially significant adverse effects on the existing suburban character of the neighbourhood. The Single House Zone provides for development that is predominantly one to two storeys in height and provides quality on-site residential amenity consistent with a suburban built character. Multi-unit development is not anticipated within the Single House Zone. The policy framework of the Single House Zone should be read as a whole. Development is expected to be of a scale that is compatible with the existing suburban built character of the neighbourhood, regardless of whether the development is an Integrated Residential Development or not.

- Council’s Urban Design Specialist finds significant issues were raised at both the pre application meeting and by the Auckland Urban Design Panel (AUDP) primarily regarding the proposed density and repetitive nature of the building typologies, particularly along the boundary and road interfaces. Effectively responding to these concerns would require fundamental changes to the distribution of density on the site, the building typologies and therefore the overall site layout. As the proposals presented to MfE are unchanged, these significant urban design concerns remain. Overall, whilst additional density may be able to be accommodated in this location, significant concerns remain with the poor response to existing suburban built character particularly along the edges of the site and the uniform and repetitive distribution of density across the site. As proposed, the distribution of density and long block lengths would not be in keeping with the character and amenity values of the existing neighbourhood, as required by the Single House Zone. Onsite amenity, particularly in relation to the privacy and usability of outdoor space has not been appropriately considered. Fundamental changes would be required to gain urban design support to the proposal.
- Council’s Landscape Specialist finds that overall, from a landscape and visual effects perspective both options proposed would result in significant landscape character effects in terms of not being consistent with the anticipated character of the Residential – Single House Zone. These effects will be experienced by a large audience when travelling along West Coast Road (an arterial urban road). In addition to this there is considered to be significant adverse visual amenity effects on immediately adjoining neighbours who either directly adjoin the site or view the site from the opposite side of West Coast Road or Glengarry Road.

From a planning perspective, the proposal is considered to be contrary to the high-level policy framework promoted by the Auckland Plan and the Auckland Unitary Plan. The subject sites sit outside of an identified Development Area or Node in the Auckland Plan and form part of the ‘Existing Urban Area & Rural Settlements’. The ‘Existing Urban Area & Rural Settlements’ areas have been identified as being unlikely to undergo significant growth, this is seen to be consistent with the Auckland Unitary Plan zoning for these areas. The Auckland Unitary Plan zoning of Residential – Single House Zone does not anticipate a level of development that is multi-unit in nature. The zone anticipates one to two storey high buildings consistent with a suburban character. All types of development (including non-residential activities) should be in keeping with the scale and intensity of development anticipated by the zone so as to contribute to the amenity of the neighbourhood. The proposal (either option) does not respond to either the existing established suburban character or the planned character of the zone.

More detail is required to better understand the potential adverse effects of the proposal. In addition to the potential adverse effects identified above, other potential effects include construction effects, noise effects, contamination remediation effects, ecological effects, geotechnical considerations and residential amenity (from over intensified development). For a development of this scale, the quality of urban design response is also important and detailed architectural design drawings have not been provided.

In terms of activity status for the proposal as it relates to the Single House Zone chapter (H3) in the Auckland Unitary Plan (Operative in Part) (**AUP(OP)**), it is noted that Council's position remains as per that expressed in the pre-application meeting and in subsequent correspondence. Should it be considered that the proposal meets the definition of 'Integrated Residential Development' in the AUP(OP), Council would consider the overall activity status to be Non-Complying. This is due to the proposal triggering the need for consent under H3.4.1(A1) as an activity not provided for in the Single House Zone (which has a Non-Complying activity status) as well as under H3.4.1(A9) as an Integrated Residential Development (which has a discretionary activity status). The most restrictive activity status must apply and therefore the overall activity status is Non-Complying. Additionally, Option a) proposes a 500m<sup>2</sup> Commercial Building, which is also not contemplated within the Single House Zone with only dairies and restaurants up to 100m<sup>2</sup> or service stations on arterial roads being contemplated. Therefore, this aspect of the proposal would also be an "activity not provided for" and considered a Non-Complying activity under H3.4.1(A1).

This approach is considered consistent with Council's assessment requirements following the decisions of the Environment Court in the Auckland Council v Budden ([Auckland Council v London Pacific Family Trust NZEnvC 030 \[2018\]](#)) declaration proceedings. Council maintain that the legal advice in which these matters were discussed in relation to an entirely separate application for consent and of which a short summary has been provided to the applicant's solicitors, Berry Simons, remains subject to legal and professional privilege.

The Local Board have raised concerns around the proposed development in relation to the Single House Zoning. They consider that the development's scale is not in keeping with the character and amenity values of the established residential neighbourhood, insufficient consideration has been given to parking particularly for visitors, lack of provision for laundry services, traffic effects particularly for residents of Glengarry Road who utilise the Glengarry Road/ West Coast Road intersection, limited and problematic access to schools and lack of open space provision within the development. The Local Board see the proposal as being more appropriately processed under the Resource Management Act 1991 rather than the fast-track process and should be dealt with on a notified basis.

Councillor Cooper, Ward Councillor for Waitakere and Chair of the Regulatory Committee has raised concerns about lack of open space and traffic congestion with West Coast Road being an arterial road, and the non-residential uses in the surrounding environment which are well utilised.

Councillor Henderson, Ward Councillor for Waitakere Ward has raised concerns regarding the proposed reserves being held in private ownership and would rather they be vested to Council. Cr Henderson comments on recent issues with subdivisions where the maintenance of these spaces had been unclear or vested to individual ownership of nearby residents without a body corporate entity being set up.

Councillors Henderson, Darby and Cooper all noted their support of the Auckland Council response on the proposal.

The IMSB recommends engagement with Mataawaka Whenua (Ngā Tūmanako) as well as Mana Whenua.

## Enclosure B: Comments from Auckland Council Specialists and Asset Owners – Nola Estate

### Asset Owner / Specialist Response

**From:** Tessa Craig – Principal Development Planner, Auckland Transport

**Date:** 23 November 2020

### Overall Summary:

#### Proposal

The proposal includes two alternative design options with variations in the access and roading layout, as follows:

- (a) Two access points off West Coast Road - a one-way lane into the site at the eastern end of the West Coast Road frontage and a second entry/exit access off West Coast Road closer to the existing roundabout, internal roads including a one-way road through the middle of the site and two entry/exit access points off Glengarry Road. 249 residential units accessed via rear lanes/JOALs and a commercial unit on the West Coast Road frontage.
- (b) Differing from option a) with a single entry/exit access off West Coast Road and all roads within the site two directional. 248 residential units, a café, 3 commercial units and a community centre on the West Coast Road frontage.

The proposed vehicle crossings on West Coast Road (an arterial road) are a Restricted-Discretionary Activity under Rule E27.4.1(3)(c) of the AUP, allowing effects on the transport network and building frontage, pedestrian priority, pedestrian safety, street and pedestrian amenity to be considered. It is noted that the development triggers the requirement for an Integrated Transport Assessment (ITA) exceeding the threshold of 120 dwellings and having an overall activity status of non-complying (although there is dispute over activity status).

#### Overall View

Auckland Transport does not currently have enough information to determine whether the development will result in adverse transport effects, or whether any potential mitigation measures will be suitable to manage effects generated by the development. Matters which the applicant has advised can form part of the detailed design, need to be provided up front as part of the application, to enable an assessment of the transport effects in relation to the transport network.

Of the two options presented, option b) is Auckland Transport's preferred option (noting we require traffic modelling and several mitigation measures), as it includes only one access on West Coast Road and the roads within the site are all two way.

#### Specific Concerns

The applicant has stated that a left-in-left-out only access can be accommodated on West Coast Road (see point 5 of the TPC letter dated 1 October 2020), however, there is concern that there would not be enough space on West Coast Road to install a solid median to prevent right turn movements. In addition, left turn movements out of the site onto West Coast Road are likely to result in issues whereby vehicles are trying to U turn at the roundabout, favouring the right-hand lane, to head east along West Coast Road. This may cause queuing on the south side of West Coast Road and into the development and potential adverse effects on road safety where dangerous manoeuvres are undertaken.

In addition, there is potential for vehicles to take a short cut through the development site if the access points on West Coast Road are not suitably restricted and the correct speed calming measures are not installed. If a vehicle access on West Coast Road is included in the final design, it would need to be limited to left in only (no exit from the site onto West Coast Road).

The West Coast Road/ Parrs Cross Road roundabout is likely to require upgrades to provide safe crossing points and to mitigate the effects of the additional traffic generated by the development, modelling is required to understand the correct treatment/intersection design. Vehicles accessing the site from Glengarry Road may experience difficulty in making right turns into Glengarry Road from West Coast Road and right out of Glengarry onto West Coast Road. We do not have the modelling or trip generation to be able to understand whether any improvements to this intersection are required.

It should be noted the bus stops nearest the site (152 on Glengarry Road and 151 and 154 on West Coast Road) are not part of a rapid transit service and nor are Sunnyvale or Glen Eden rail stations considered within a reasonable walking distance (being 1.6 and 2km away respectively). Given the applicants' desire to minimise reliance on private motor vehicles, upgrades to these bus stops should be considered as part of mitigation measures to encourage residents to use public transport.

Regarding active modes connectivity, an accessway (8m wide) from the site onto West Coast Road is supported and encouraged. Safe crossing points should be provided for pedestrians and cyclists on all arms of the West Coast Road/Parrs Cross Road intersection. Residents are likely to want to access to Parrs Park to the north, the nearby shared path and the bus stop on Parrs Cross Road and safe crossing facilities are required to accommodate this. Within the site, all roads should be two-way with appropriate speed calming. One-way roads inconvenience drivers and are often not obeyed but are hard to police/monitor.

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## Asset Owner / Specialist Response

**From:** Mark Iszard, Growth and Development Manager, Healthy Waters

**Date:** 19 November 2020

### Overall Summary:

1. Generally, the site is well serviced for stormwater (SW) with a large public SW network located at the low point (western boundary) of the site.
  - a. However no infrastructure report or SW assessment has been provided above a brief letter from Civix Consultants advising that adequate serving is available.
2. An overland flow path crosses the site from Glengarry Rd through the site to discharge at the lower eastern boundary where it passes through several existing residential houses before exiting onto West Coast Rd at the vehicle access to Parrs Park. This will need to be catered for in the development of the site, and the shown open spaces through the site along the general alignment of this OLFP looks to be an appropriate response.
3. The site is currently relatively undeveloped and the increase in impervious surfaces will increase SW flows from the site that may increase the risk to the immediate downstream properties increased impervious surfaces as a result of this development will also increase the risk to the immediate downstream properties which will need to be addressed
4. As the development is (likely) proposing to connect to the public SW network as well as vest new infrastructure with Auckland Council, a stormwater management plan (SMP) is required to be prepared and authorised by Healthy Waters to authorise connection to the public SW network under HWs regional stormwater Network Discharge Consent as a brown field large site (greater than 5000m<sup>2</sup>).  
<http://www.aucklanddesignmanual.co.nz/regulations/technical-guidance/ndc>.
  - a. This will require that the site meets the requirements set out in schedules 2 & 4 of the Network Discharge Consent which seek to manage quality, hydrology, and flooding within the development area.
    - i. To achieve this authorisation, it is likely that the development concept will need to be amended to provide the necessary space and management areas to achieve these performance requirements.
    - ii. Approval to have the SW discharges authorised under this NDC cannot be undertaken by the EPA or Resource Consents Department How we go about this is a little unclear at the moment.
    - iii. If no authorisation is able to be provided, then the site would need to be considered to be un-serviced and not able to adequately manage the SW effects and runoff. This would raise a Red Flag.
    - iv. To manage this risk, we would encourage the applicant to engage early with Auckland Council Healthy Waters department as the holder of this consent to develop a suitable stormwater management plan for the site and provisional approval which would allow the applicant to enter any hearings with this provisional approval already in place.
5. We note that a stream survey assessment has been undertaken by the applicant's team and they found no signs of any permanent or intermittent streams. This would typically be verified by a Council ecologist, but timeframes do not provide for this to occur. We would recommend that prior to any hearing or review of the application by the EPA that a peer review of this assessment be undertaken which should also take into account new NES for wetlands.

*State if any important information is missing, and if so how this may affect your considerations.*



6. As noted above point 1a above, no SW or infrastructure report has been provided by the applicant and as such we are unable to provide any analysis or review of their proposal.

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## Asset Owner / Specialist Response

**From:** Amir Karimi, Development Engineer, Watercare

**Date:** 23 November 2020

### Overall Summary:

We have completed an assessment for the proposed residential development, including a small commercial centre with two alternative designs proposed:

- (a) a 249 unit residential development, including a 500m<sup>2</sup> local commercial centre and 100m<sup>2</sup> café, along with 1,705m<sup>2</sup> of reserve area; or
- (b) a 248 unit residential development, including a 300m<sup>2</sup> local commercial centre and 100m<sup>2</sup> café, along with a 100m<sup>2</sup> community centre and 2,886m<sup>2</sup> of communal open space area (across eight areas).

No water and wastewater flow or water supply-demand data was provided for the proposed commercial centre, café and community centre as part of this application. The design flow is assumed using Code of Practice flow allowance for commercial activity.

Based on the information available, there are minor capacity constraints in the downstream local wastewater network. The developer needs to undertake an asset survey, to confirm the network capacity and address any potential issue by upgrading the network. It is likely that the local wastewater network will need to be upgraded.

The local water network also needs to be upgraded to ensure a resilient supply to the proposed development.

### Water Supply

The 100mm road crossing on West Coast Road and the 100mm AC along the northern part of the development requires upgrading with 200mm ID watermains.

Watermains within the development along the proposed public roads need to be sized appropriately for firefighting requirements and looped to ensure water quality, operational and resilience considerations.



Upgrade existing  
100mm road crossing  
and 100mm AC along  
West Coast Road.

### Wastewater Network

The development proposes two connection points, one to the existing 150mm AC main running parallel to West Coast Road at wastewater manhole MH ID: 446884, and one to the existing 150mm PVC main running perpendicular to West Coast Road at wastewater manhole MH ID: 434057.

Based on the information available, both the static capacity assessment and hydraulic modelling results indicate existing network capacity issues in the downstream local network. It is required that on-site survey is undertaken by the developer to confirm the downstream network pipe sizing, and the operational/sealed status of low-lying manholes immediately downstream of the proposed connection point, along the 150mm & 225mm pipelines prior to crossing West Coast Road, to confirm the network capacity.

This will be the developer's responsibility to mitigate any potential overflow risk as a result of the proposed development, through public network extensions or upgrades, depending on the agreed solution.

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## Asset Owner / Specialist Response

**From:** Emily Ip, Senior Policy Planner – Plans and Places

**Date:** 23 November 2020

### Overall Summary:

#### Consideration of proposal as an Integrated Residential Development

The applicant has put forward two designs for consideration. PRR00035146 comprises a 249-unit residential development, including a 500m<sup>2</sup> local commercial centre, a 100m<sup>2</sup> café and 1705m<sup>2</sup> of reserve area. For simplicity, I will refer to PRR00035146 as Option 1.

The alternative design, Option 2, comprises a 248-unit residential development, a 300m<sup>2</sup> local commercial centre, a 100m<sup>2</sup> café, a 100m<sup>2</sup> community centre and 2,886m<sup>2</sup> of communal open space area across two areas.

In August 2020, Ciaran Power (Plans and Places) provided advice on whether Option 1 constitutes “integrated residential development” under the AUP(OP).

The AUP(OP) defines “integrated residential development” as (emphasis added):

***A residential development on sites greater than 2,000m<sup>2</sup> which includes supporting communal facilities such as recreation and leisure facilities, supported residential care, welfare and medical facilities (inclusive of hospital care), and other non-residential activities accessory to the primary residential use. For the avoidance of doubt this would include a retirement village.***

By way of summary, Ciaran considered that:

- The proposal is a residential development across 4.3 ha and therefore meets the first criteria of being on sites greater than 2000m<sup>2</sup>.
- The proposed commercial activity falls outside the ambit of a non-residential activity in the context of an integrated residential development and is not considered to be a supporting communal facility. Therefore, this component should be considered as a separate activity to the integrated residential development activity.
- Supporting communal facilities are non-residential facilities accessory to the primary residential use, available for communal use by residents within the integrated residential development.
- If the roads and reserves are to be vested to council, then this would preclude them being considered a supporting communal facility to the integrated residential development because they would be available to the public and not be integrated into the development. Therefore, the proposal would not have communal facilities supporting the development and would be considered as a regular residential development and not an integrated residential development.
- The supporting communal facility of an integrated residential development is a component that should be integrated into the development for exclusive use of the residents of the development, and the inclusion of reserves in the development does not necessarily distinguish the proposal as being different to a standard residential development.

Overall, the Option 1 was considered to be a standard residential development, and not an integrated residential development.

Although Option 2 identifies possible uses within the proposed open space area, I do not consider Option 2 to be a significantly different to Option 1 in terms of the provision of supporting communal facilities.

“Communal” is defined in the Oxford English Dictionary as:

*Participated in or shared by the whole community or by members of a group; owned in common; collective.*

Therefore, in the context of an integrated residential development, “communal facilities” are facilities shared by the residents of that development. There is an implied perception therefore that supporting communal facilities would be for the exclusive use of the residents of the integrated residential development. It is that element which enables the integrated residential development to be distinguishable over a standard residential development.

While residents of the development can use the proposed communal facilities/open space, these facilities are not integrated with the residential development in any way. If the roads are to be vested to council and the open space will be available for public use, they would be considered public spaces, not communal spaces. The public roads and open space will also cause the development as proposed to be fragmented once the development is completed. If the facilities identified in either options were intended to be made available to the public, the facilities would not be considered “supporting communal facilities” as they would be considered public facilities for use of the general public, not just the residents of the development.

In my view, the comments in respect of integrated residential development previously provided by Plans and Places still stand. There is nothing about this development, under Option 1 or Option 2, that distinguishes this development from a standard residential development. For the reasons outlined above, I do not consider this application to be an integrated residential development.

As noted in the pre-application consenting memo, the Resource Management Amendment Act 2020 has removed the non-notification presumption for discretionary residential activities. In this respect, this application will require a full section 95A assessment to determine if it should be publicly notified regardless of whether the application is considered as discretionary (as an integrated residential development) or non-complying (triggered by more than one dwelling per site).

#### Significant Adverse Effects

The proposal is significantly more intense than what is anticipated by the Single House Zone, with potentially significant adverse effects on the existing suburban character of the neighbourhood.

The Single House Zone provides for development that is predominantly one to two storeys in height and provides quality on-site residential amenity consistent with a suburban built character. Multi-unit development is not anticipated within the Single House Zone.

Objective H3.2(1) states that development is to maintain and is in keeping with the amenity values of established residential neighbourhoods while Objective H3.2(3) seeks to provide quality onsite amenity for residents and adjoining sites. The subject sites are located in an established residential neighbourhood on the urban fringe of the city, however the scale and intensity of the development is not considered to maintain, nor is it in keeping with the amenity values of this residential neighbourhood.

Policy H3.3(8) provides for integrated residential development on larger sites. Although I do not consider this application to be an integrated residential development, when the policy framework of the Single House Zone is read as a whole, development is expected to be of a scale that is compatible with the existing suburban built character of the neighbourhood, regardless of whether the development is an integrated residential development or not.

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## Asset Owner / Specialist Response

**From:** Michael Kibblewhite, Urban Design Specialist, Auckland Council

**Date:** 23 November 2020

### Overall Summary:

Ministry for the Environment (MfE) have been provided with two design options for this proposal, the first was reviewed by Auckland Council at a pre application meeting on 14.09.2020, the second was reviewed by the Auckland Urban Design Panel (AUDP) on 22.10.2020.

#### Option 1/

Revision 6: A 249 unit residential development, including a 500m<sup>2</sup> local commercial centre and 100m<sup>2</sup> café located along the West Coast Road frontage with car parking accessed from both West Coast Road and the internal road network, along with 1,705m<sup>2</sup> of reserve area; or

#### Option 2/

Revision 10: A 248 unit residential development, including a 300m<sup>2</sup> local commercial centre and 100m<sup>2</sup> café located along the West Coast Road frontage with car parking accessed only from the internal road network, along with a 100m<sup>2</sup> community centre and 2,886m<sup>2</sup> of communal open space area (across eight areas).

It should be noted that significant issues were raised at both the pre application meeting and by the AUDP primarily regarding the proposed density and repetitive nature of the building typologies, particularly along the boundary and road interfaces. Effectively responding to these concerns would require fundamental changes to the distribution of density on the site; the building typologies and therefore the overall site layout. As the proposals presented to MfE are unchanged, these significant urban design concerns remain.

### Density & Interfaces

The distribution of density across the site is fairly uniform. Long runs of two-level terraces are used in the north and south of the site and the blocks surrounding the central open spaces are three-level typologies. From an urban design perspective, there are significant concerns regarding the intensity of development how it relates to the existing and planned built character of the Residential – Single House zone, particularly at the boundary and road interfaces. The applicant has noted that the proposed development will create 191 lots additional to that provided for by the Single House Zone. Regardless of the status of the application in respect of Integrated Residential Developments, it is considered that the proposal still requires assessment against Policy H3.3(1) “*require an intensity of development that is compatible with either the existing suburban built character where this is to be maintained or the planned suburban built character of predominantly one to two storey dwellings*”. This view was shared by the AUDP, who recommended “*a reduction in density, bulk and mass along the edges.*”

It is strongly recommended that more breaks be included in the long block lengths and a greater range of dwelling typologies provided for including duplexes and standalone typologies. This is particularly important to provide an appropriate transition into the existing neighbourhood, along the east and southern boundaries and the Glengarry Road interface. This view was supported by the AUDP and Kainga Ora.

It is my view that the wider neighbourhood character needs more consideration, and the edges of the development should respond to this by using more breaks in the blocks, duplexes and single house typologies, while the built form internal to the site could accommodate additional height including walk-up and/or traditional apartment typologies of three-four storeys, to redistribute the density reduction on the edges.

## Site Layout

In general, the proposed road network creates a logical and legible block structure. One key difference between the two options is the central spine road. Option 1 shows this as a 13m wide, one-way road and Option 2 shows this as 15m wide, two-way. Option 2 is preferred from an urban design perspective to ensure appropriate provision for pedestrians and berm/street tree planting.

It is noted that Kainga Ora have suggested deletion of the central spine road to create space for other users. Without further detail of how this would affect the site layout, including how clear 'fronts' and 'backs' are provided to the dwellings, I am unable to comment on the appropriateness of this option.

Both options propose a road connection to West Coast Road, in between the existing dairy and the proposed commercial facilities. Provision of a walking and cycling connection to West Coast Rd and Parrs Park is supported. Provision of vehicle access from West Coast Rd supporting the commercial facility and avoiding traffic via Glengarry Rd and the proposed internal roading network is preferred from an urban design perspective.

The use of rear lanes enables the streets to be largely free from vehicle crossings which is supported, however there are concerns that the block depths are too tight. This is illustrated where outdoor living is proposed to the front of dwellings, utilising the mandatory 3.0m front yard setback. It would be more appropriate to locate outdoor spaces to the private rear, however at present, the lot depths would not allow for a compliant outdoor space dimension. Front yard outdoor living can be supported, however adverse privacy and amenity issues can arise and where possible, this should be avoided. There are several instances where outdoor spaces are located on the street when locating to the rear would provide better privacy with negligible impact on solar access, provided the appropriate dimensions can be achieved.

There are some blocks where it is not clear which is the 'front' or 'back', particularly the three storey blocks adjoining the communal reserve space. This requires further consideration.

## Built Form / Design & Appearance

No dwelling elevations or designs have been provided as part of this fast track application, other than the precedent imagery included on the Concept Plans. I am therefore unable to comment in any detail on the architecture, design and appearance of the proposed development other than in relation to the block lengths and heights as indicated on the concept plan.

From an urban design perspective there are significant concerns regarding block lengths and the repetitive nature of the typologies. This was shared by the AUDP, who stated that they support *"increased heights towards the centre of the site with the use of the range of different typologies for example walk-up apartments. This could also include for example the use of duplexes at the edges. This will create greater variation of heights throughout the overall development"*.

Opportunities exist to more positively respond to key frontages and corners, with marker building treatments (e.g. intersection of West Coast Road and Parrs Cross Rd).

Detailed design should ensure that a range of architectural treatments be used to ensure sufficient variety is provided, along with a variety of roof forms provides opportunities for vertical articulation and variation.

## Communal Facilities



Revisions 06 & 10 provide for a ~992m<sup>2</sup> privately owned communal open space, with Revision 10 further breaking this down into an informal recreation grass space, playground, bbq area and multi purpose games area. Detailed design of this space would be required. This communal space is fronted by public streets on two edges, and three storey terraces to the north. Shading impacts from these three storey blocks would need to be further understood to confirm the appropriateness of height in this location. Further information regarding the ownership and management of this space is required to ensure maintenance in perpetuity.

### **Private Open Space**

There are significant concerns regarding the outdoor living spaces for the units fronting West Coast Road and the Parrs Cross Road roundabout, with the AUDP also having “*significant concerns regarding the liveability (size/depth/ability for onsite landscaping) of the private open spaces given the high traffic volumes on this arterial road*” as well as the repetitive nature of the building frontages. The AUDP recommended breaking these blocks into two with a north-south orientation. The current layout and lot size is considered to be inadequate to appropriately mediate the transition from private outdoor living to a busy arterial road (noting that the West Coast Road frontage has no berm). The size of these lots would need to be increased to provide sufficient space for landscape treatment; or the unit orientations amended to provide for side yard outdoor space (i.e. a duplex arrangement). This could also impact overall density. This issue was also identified by the AUDP and Kiwibuild/ Kainga Ora.

Opportunities exist for other lots where outdoor space fronts the street to relocate this to the rear, improving privacy and amenity outcomes without reducing solar gain (e.g. blocks fronting central spine road should relocate the outdoor space to the rear, fronting the rear lanes).

### **Conclusion**

Overall, whilst additional density may be able to be accommodated in this location, significant concerns remain with the poor response to existing suburban built character particularly along the edges of the site and the uniform and repetitive distribution of density across the site. As proposed, the distribution of density and long block lengths would not be in keeping with the character and amenity values of the existing neighbourhood, as required by the Single House Zone. Onsite amenity, particularly in relation to the privacy and usability of outdoor space has not been appropriately considered. Fundamental changes would be required to gain urban design support to the proposal.

#### Further Information:

- Detailed dwelling design plans including plans, elevations, sections, cladding materials, colour palettes & perspectives
- Communal open space detailed design
- Commercial facility detailed design
- Private lot landscape treatment including outdoor space treatment
- Site facilities including storage, refuse/recycling storage & collection, letterboxes, washing lines etc
- Lighting (streets, lanes, communal open space, commercial facilities)
- Rear lane and communal carparking design including pedestrian connections from carpark to dwellings

## Asset Owner / Specialist Response

**From:** Ainsley Verstraeten, Principal Landscape Architect, Auckland Council

**Date:** 23 November 2020

### Overall Summary:

Overall, from a landscape and visual effects perspective I am of the opinion that both options of the proposed development would result in significant landscape character effects in terms of not being consistent with the anticipated character of the Residential – Single House Zone. These effects will be appreciated by a large audience when travelling along West Coast Road (an arterial urban road). In addition to this I consider there to be significant adverse visual amenity effects on immediately adjoining neighbours who either directly adjoin the site or view the site from the opposite side of West Coast Road or Glengarry Road.

While I do consider the site to be able to accommodate height and intensity greater than the zoning anticipates, this would only be if the edges of the development responded to the existing neighbourhood context and scale. This is likely to result in development on this site being lower in density and scale along the boundaries (more consistent with the existing neighbourhood character and anticipated Single House Zone character) with more intensive development internalised within the site. Neither option proposed achieves this.

The planned character for this site is the existing character – given the established nature of the neighbourhood. The existing character has been informed by the legacy district plan permitted density of 350m<sup>2</sup>, which is greater than what the Single House Zone provides for. In my view the proposed site layout, design and intensity does not respond to this character.

In addition to the intensity of the proposal these effects are exacerbated by the repetitive nature of the architectural design. A greater level of variation would assist in reducing the perceived bulk of the development. This is noted within the AUDP recommendations.

### Further information

- Landscape treatment within the private lots has not been provided and this is likely to be a key consideration when assessing the beneficial effects of a development that proposes to be significantly more intense than the Single House zone anticipates.
- A landscape and visual effects assessment that included visual simulations from public viewpoints.

## Asset Owner / Specialist Response

**From:** Hester Gerber, Parks Planning Team Leader: Parks Sports and Recreation

**Date:** 19 November 2020

### Overall Summary:

#### Preamble:

This response is prepared based on the information received as outlined in the undated letter from Sara Clarke, Manager, Fast-Track Consenting Team, Ministry for the Environment and the Application prepared for CPM 2019 Ltd by Civix.

The overall application has been identified to be a Discretionary Activity and it is acknowledged that from a Regulatory Services perspective the status will need to be confirmed.

The AUP (OP) defines an integrated residential development as:

*A residential development on sites greater than 2,000m<sup>2</sup> which includes supporting communal facilities such as recreation and leisure facilities, supported residential care, welfare and medical facilities (inclusive of hospital care), and other non-residential activities accessory to the primary residential use. For the avoidance of doubt this would include a retirement village.*

In light of the above and having regard to the effects that could be assessed under the RMA for discretionary activities, comments from Parks Planning on behalf of the asset owner and as specialists will be provided.

### Comments:

#### Boundary treatments (Asset Owner)

Council (Panuku) has a current interest in 315A Glengarry Road, Glen Eden. It has recently been rezoned to Residential Single House and is currently on the market for sale. Limited details have been provided as part of this referral request to identify any land owner issues and should the land be developed any effects on the land owner or interested parties (i.e. through sales and purchase agreement) will need to be considered at that time.

#### Privately owned parks and open spaces (Asset owner)

It is acknowledged that the parks and open spaces proposed in both the options for development provided will be privately owned. From a Parks perspective there would be no requirement to comment on these privately owned parks infrastructure.

It is however to be noted that where parks are developed and maintained privately that communities are uncertain about who is responsible or liable for that infrastructure. It is therefore suggested that the privately owned infrastructure is sign posted so it can inform the users of its nature. This is particularly important as the application has indicated that the communal open spaces will be available to the wider community.

Should the privately owned spaces be developed with for example play equipment, then this will be for the owners of those facilities and not Council to maintain. Normally it is custom that a legal instrument is created to guide the liabilities and responsibilities over this infrastructure. Structures for public use may also need to receive building consent certification in terms of its construction and safety.

### Road network (Asset owner)

It is noted that under the applicant's assessment on page 5 & 6 of the application that a comment has been made that "internal roads to be vested may also arise." If this is the case then Parks would have an interest in the streetscape proposed for those roads to be vested and landscape plans for the design, species selection and maintenance will be required for asset owner endorsement.

### Parks network and accessibility (Parks specialist)

It is acknowledged that the park and open space network for this residential development will be privatised. Considering its layout and the connections it could provide within its location the following comments from Council's Parks and Places specialist will need be considered within its wider external context, especially as it is the intention to open it up for the public to access and use.

Thomas Dixon therefore notes the following that I adopted for the purpose of this response:

*Looking at the plans, we agree with concerns already raised regarding the number, size and shape of proposed open space parcels. The four main reserve parcels are located apart from each other, and are not large enough to provide for any park services aside from informal open space amenity. In their current form they act as private open space for the buildings adjacent, and offer limited value to the public open space network. So we are supportive of these remaining in private ownership, but remaining accessible to the public.*

...

*There are no proposed walkway/cycleway connections through or adjacent to this site in the Waitakere Greenways Plan. We consider it important that safe access is provided for both this new community and existing community nearby to access Parrs Park, the premier park in this local board area. Currently the off street connections proposed offer limited improvements for access north-south through the development and safely across the street into Parrs Park.*

*An ongoing Play Provision assessment has identified no need for improved play facilities in this area, which is already well provided for. However, the developer could consider how they can create opportunities for informal play, playable spaces, and activation of the open spaces that they provide."*

In light of Thomas' comments I note that under objective E27.2 (5) it is required that "(p)edestrian safety and amenity along public footpaths is prioritised." Here Policy E27.3 (2) in support also '(r)equire major proposals for discretionary consent to prepare an integrated transport assessment including provision for pedestrians, cyclists, public transport users, freight and motorists.' [emphasis added].

Connectivity and creating opportunities for communities to be active and connected are specifically addressed in the Auckland Plan 2020.

### Conclusion:

1. There would be no need for Council to take on any of the parks and reserves provided within the development and these are to be retained and maintained in private ownership. Their access to the public is supported.

2. Should internal roads be vested then Parks as asset owner would need to endorse the streetscape planting.
3. The applicant is encouraged to address safe pedestrian and cycle connectivity through the site.

There are no red flags identified unless there is a change in the vesting of assets proposed.

Information requirements:

Detailed landscape drawings will be required should roads be vested in Council.

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## Asset Owner / Specialist Response

**From:** Ana Paskaleff, Senior Compliance Monitoring Officer and Richard Preece, Team Leader  
Compliance Monitoring Central

**Date:** 19 November 2020

### Overall Summary:

The following companies have been reviewed for previous compliance history:

- Aedifica NZ Limited
- Vinegar Lane Corporate Trustee Limited
- Sirius Limited
- Evolution Investment Trust Limited
- NH Trustees no.11 Limited
- MDEV-NZ Limited
- CPM 2019 Limited
- NFK Infrastructure Limited
- NFK General Partner Limited
- Waimumu Road Limited
- Bruce McLaren Road Limited
- Woodglen Road Limited

Abatement notice ABT21507726 was issued to Bruce McLaren Road Limited on 3 September 2020 instructing them to install and maintain suitable sediment controls at 105-117 Bruce McLaren Road.

No further enforcement action has been identified.

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## Enclosure C: Comments from the Local Board, Councillors and IMSB – Nola Estate

### Local Board/ Councillor/ IMSB Responses

**From:** Cr Linda Cooper, Waitakere Ward Councillor, Chair of the Regulatory Committee

**Date:** 17 November 2020

#### Overall Summary:

Hello Brogan

I'm not sure if you wanted a response but here are some comments.

1. Good to see provision for open space, a commercial centre and a community centre in the mix. A few Waitakere Ranges local board members have been concerned about their perceived lack of open space. (However Parrs Park -large- is across the road)
2. Public transport is close but extra traffic will be a concern here as a busy arterial road and also with the high visitor numbers to Parrs Park ( soccer and swimming pool and passive recreation for people and dogs) , Hoani Waititi marae and associated , kohanga reo and Kura and Kura Kaupapa maori all located across the road. It can be a very congested area at the best of times.
3. We do need the housing.
4. It is walkable or a short bus ride to the Sunnyvale and Glen Eden train stations.

Cheers

Linda

**Date:** 25 November 2020

#### Overall Summary:

Kia ora Brogan

I support the staff response to this application.

Nga mihi

Linda

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## Local Board/ Councillor/ IMSB Responses

**From:** Cr Shane Henderson, Waitakere Ward Councillor

**Date:** 18 November 2020

**Overall Summary:**

Kia ora Brogan,

Thanks for giving us the heads up, and I endorse the comments of Cr Cooper.

I would add that the proposed green space is welcome, but we need to make sure maintenance is vested in Council. We have had issues with subdivisions recently where this has been unclear or vested into individual ownership with nearby residents, without a body corp. I have this situation in my own subdivision in fact!

Any attempts to make this area friendly for bicycles and other active modes, plus any attempts to carbon offset through tree planting, will be very welcome.

Cheers,

**Shane Henderson BA. LLB.**

Councillor (Waitakere) | Finance and Performance Committee (Deputy Chair)

Auckland Council

Phone: s 9(2)(a)

Email: s 9(2)(a)

**Date:** 26 November 2020

**Overall Summary:**

Wonderful response and I support it

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## Local Board/ Councillor/ IMSB Responses

**From:** Cr Chris Darby, Chair of the Planning Committee

**Date:** 17 November 2020

**Overall Summary:**

Thanks for the heads-up Brogan.

I don't know the area or project at all so will largely defer to Crs Cooper and Henderson.

At this stage, the only thing I would add is a request that the project goes before the Auckland Urban Design Panel.

Ngā mihi

Chris

**Chris Darby**

**Councillor** | North Shore ward

**Chair** | Planning Committee

p. [redacted] s 9(2)(a)

e. [redacted] s 9(2)(a)

**Date:** 25 November 2020

**Overall Summary:**

Kia ora Brogan

Thank you for your work and draft response to Minister Parker. I concur with the staff view and feedback received from various units, the local board and ward councillors.

[...]

Ngā mihi

Chris

**Chris Darby**

**Councillor** | North Shore ward

**Chair** | Planning Committee

p. [redacted] s 9(2)(a)

e. [redacted] s 9(2)(a)

## Local Board/ Councillor/ IMSB Responses

### Waitakere Ranges Local Board Response

**From:** Local Board Chair Greg Presland, Waitakere Ranges Local Board

**Date:** 23 November 2020

#### Overall Summary:

Thank you for the opportunity to comment on this proposal. We understand that the timeframe is short and have had only limited time to consider the application in detail.

We acknowledge that there is an affordable housing crisis in Auckland that needs to be addressed urgently. We also support in general the construction of Kiwibuild homes to address a clear shortfall in the housing market.

However we do not consider that use of the fast track consenting process is appropriate in the circumstances and submit that it would be more appropriate for the project, or part of the project, to go through the standard consenting or designation process under the Resource Management Act 1991 (see section 23(5)(b) of the COVID-19 Recovery (Fast-track Consenting) Act 2020).

The reasons for this are generally set out in Council's planning advice but include the following:

1. The land is zoned Residential Single House Zone under the Auckland Unitary Plan. This generally provides for development to "be of a height, bulk and form that maintains and is in keeping with the character and amenity values of the established residential neighbourhood". This development would be of a unique scale for the area.
2. We note Council's preliminary view that the application should be dealt with on a notified basis. The fast track process should not be used to facilitate an application that should otherwise receive the benefit of public input.
3. We have mixed views about parking requirements. Some of us are concerned that insufficient consideration has been given to carparks, particularly for visitors as well as the lack of provision for laundry services.
4. There is some support for the community hub concept in the proposal.
5. We are concerned about protecting provision of open space in the area, particularly for children. The development is opposite Parrs Park but this park is already heavily utilised. Also West Coast Road is busy and would pose a danger to young children trying to cross. As a suggestion there is a parcel of land being sold at 315A Glengarry Road adjacent to the proposed development and this parcel could theoretically be incorporated into the development to improve the level of open space.
6. The implications for the local road system are significant. The development is on a busy road by a major roundabout. AT's suggestion that all traffic should enter the site from Glengarry Road has some merit but would have major implications for other Glengarry Road residents as the Glengarry Road/West Coast Road is often congested, particularly in the morning and as suggested by AT some intervention may be required.
7. Access to local schools is problematic and limited.

These comments are provided by way of local board feedback to a planning proposal. Some consideration will be given to the formal delegation but the time frame prevents this from being completed.

**Greg Presland | Local Board Chair**

Waitākere Ranges Local Board

Mobile: s 9(2)(a)

Email: [REDACTED] s 9(2)(a)  
Auckland Council, 39 Glenmall Pl, Glen Eden, Auckland 0602  
Visit our website: [aucklandcouncil.govt.nz](http://aucklandcouncil.govt.nz)

**From:** *Local Board Member Sandra Coney, Waitakere Ranges Local Board*

**Date:** 25 November 2020

**Overall Summary:**

I guess

- Lack of open space provision
- Distance from amenities to be found in township

Sandra

**From:** *Local Board Advisor Brett Lane, Waitakere Ranges Local Board*

**Date:** 25 November 2020

**Overall Summary:**

Hi Brogan

On transport connections... Sunnyvale Station is likely closer than Glen Eden, and there's walking-cycling connections nearby. The reference to GE station being too far to walk made me wonder why AT doesn't reference the nearest station?

Regards Brett  
Local Board Advisor – Waitakere Ranges

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## Local Board/ Councillor/ IMSB Responses

### IMSB Comments

**From:** *Tau Henere, Deputy Chairman, Independent Maori Statutory Board*

**Date:** 19 November 2020

**Overall Summary:**

Kia ora Brogan

Totally acceptable to me although I would like to know from someone what Maori/Mataawaka/Iwi input is in the project.

Tau

**From:** *Beth Tauroa, Principal Advisor Environmental Outcomes, Independent Maori Statutory Board*

**Date:** 25 November 2020

**Overall Summary:**

Kia ora Brogan,

Has there been engagement with Mataawaka?

The Board recommends engagement with Mataawaka as well as Mana Whenua.

*NB: Hoani Waititi Marae located opposite side of West Coast Road from the proposal site was opened in 1980 and established the second kohanga reo in the country. From these foundations Ngā Tūmanako kapa haka was established (Te Toawhakaihuwaka o Te Matatini ki te Ao (Supreme winners Te Matatini 2019). Ngā Tūmanako is the name of the whareniui at Hoani Waititi Marae and represents the aspirations of the Māori community of West Auckland. For this pan-tribal group the whareniui became the heart of the community where the children who attended kohanga reo, kura and wharehura were often exposed to various tribal tikanga, karakia, whaikōrero and mau rākau of their elders. (Te Whakawhanaungatanga Report for Tāmaki Makaurau 2019 p.14&15).*

*Nga mihi,*

**Beth Tauroa**  
**Principal Advisor Environmental Outcomes**  
**Independent Māori Statutory Board**

Ph [REDACTED] s 9(2)(a)

Visit our website: [www.imsb.maori.nz](http://www.imsb.maori.nz)

27<sup>th</sup> November 2020

Ministry for the Environment  
PO Box 10362  
Wellington  
6143  
Ref: 2020-B-07179  
Dear Ms Clarke

**COVID-19 Recovery (Fast-Track Consenting) Act 2020 – Nola Estate – Comments sought**

Thank you for your letter in relation to the Nola Estate Covid-19 recovery fast-track application. We have provided a response to Auckland Council as an Agency Lead (and an Asset Owner and Subject Matter Expert). I have attached the response for your information.

As you are aware, West Coast Road is an arterial road and any new vehicle access to the road requires consent as a Restricted-Discretionary Activity under the Auckland Unitary Plan (Rule E27.6.4.1(3)(c)). The matters for discretion are (E27.8.1(12):

- (a) adequacy for the site and the proposal;
- (b) design and location of access;
- (c) effects on pedestrian and streetscape amenity; and
- (d) effects on the transport network.

Regarding the proposed vehicle access points on West Coast Road, we have outlined the following concerns in our response to Auckland Council:

- Inability to prevent right turns out of the access points onto West Coast Road, due to the road width not being wide enough to accommodate a solid median to prevent movements;
- Vehicles exiting the site onto West Coast Road favouring the right-hand lane to make a U turn at the roundabout and head east along West Coast Road, resulting in queuing and dangerous manoeuvres;
- Vehicles using the access points to take a short cut through the residential development, if correct speed calming measures are not included in the road design.

In addition, the response also outlines other matters that we consider need to be addressed as part of the full application, including the requirement for an Integrated Transport Assessment and traffic modelling to determine mitigation measures that may be required.

Should you have any queries in relation to this letter, or our response to Auckland Council, please contact me either via the number below or via email: s 9(2)(a)

Yours sincerely

**Tessa Craig**  
Principal Planner | Development Planning | North West  
Planning and Investment  
Level 6, 20 Viaduct Harbour Avenue  
M s 9(2)(a)

**Enclosed:** Asset Owner and Specialist Input Request Details – Response to an Application to the Expert Panel

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## Asset Owner and Specialist Input Request Details – Response to an Application to the Expert Panel

<b>From</b>		Brogan McQuoid, Team Leader – Waitakere Resource Consents		
<b>Date that invitation from MfE was received:</b>	<b>Current Working Days</b>	<b>Brief sent</b>	<b>Asset Owner / Specialist report due</b>	
13/11/2020	WD 2 17/11/20 20	17/11/2020	23/11/2020	
<b>Proposal</b>		<p>Construction and subdivision of a residential development, including a small commercial centre with two alternative designs proposed:</p> <p>(a) a 249 unit residential development, including a 500m<sup>2</sup> local commercial centre and 100m<sup>2</sup> café, along with 1,705m<sup>2</sup> of reserve area; or</p> <p>Note this was subject to the pre-app</p> <p>(b) a 248 unit residential development, including a 300m<sup>2</sup> local commercial centre and 100m<sup>2</sup> café, along with a 100m<sup>2</sup> community centre and 2,886m<sup>2</sup> of communal open space area (across eight areas).</p> <p>Note this was subject to the AUDP, I have attached the docs and recommendations from this for your review</p> <p>Please consider the two options put forward in light of the previous comments provided for PRR00035146 and the changes proposed under option 2 and consider in terms of Transport matters is one option preferred to the other and/or is there elements of one of option preferred to the other and therefore a hybrid of both maybe preferred?</p> <p>Please including any additional addendum commentary to that previously provided.</p> <p>Include comments on whether you think there is the potential for any significant adverse effects.</p> <p>Noting the following in the application document which may be of specific interest:</p> <ul style="list-style-type: none"> <li>• Pre-app response comments pages 563-566</li> <li>• Civil Engineering report – pages 446 -491</li> <li>• Geotech report – pages 514 – 554</li> <li>• TPC traffic comments – pages 266 – 273</li> <li>• Todd Langwell comments in response to transport issues raised in pre -app – pages 274 - 279</li> </ul>		
<b>Site address and Legal Description:</b>		The project is located at 460 - 465 West Coast Road, 467 - 478 West Coast Road, and 317 - 345 Glengarry Road, Glen Eden, Auckland.		
<b>Applicant</b>		CPM 2019 Ltd, contact – Kieran Doe		

Related applications and consents (old Regional Permits, related current consents or applications)	PRR00035146
Applicant's stated Activity Status	Discretionary Activity
Link to plans and relevant information	<a href="https://1drv.ms/u/s!AqvTd_nDdyD5qhYAvqxZq8eSOXBD?e=9e4etc">https://1drv.ms/u/s!AqvTd_nDdyD5qhYAvqxZq8eSOXBD?e=9e4etc</a>

## Asset Owner / Specialist Response

**From:** Tessa Craig, Principal Development Planner, Auckland Transport

**Date:** Monday 23 November 2020

### Overall Summary:

#### Proposal

The proposal includes two alternative design options with variations in the access and roading layout, as follows:

- a) Two access points off West Coast Road - a one-way lane into the site at the eastern end of the West Coast Road frontage and a second entry/exit access off West Coast Road closer to the existing roundabout, internal roads including a one-way road through the middle of the site and two entry/exit access points off Glengarry Road. 249 residential units accessed via rear lanes/JOALs and a commercial unit on the West Coast Road frontage.
- b) Differing from option a) with a single entry/exit access off West Coast Road and all roads within the site two directional. 248 residential units, a café, 3 commercial units and a community centre on the West Coast Road frontage.

The proposed vehicle crossings on West Coast Road (an arterial road) are a Restricted-Discretionary Activity under Rule E27.4.1(3)(c) of the AUP, allowing adequacy for the site and proposal, design and location of access, effects on pedestrian and streetscape amenity, and effects on the transport network to be considered.

#### Overall View

Auckland Transport does not currently have enough information to determine whether the development will result in adverse transport effects, or whether any potential mitigation measures will be suitable to manage effects generated by the development. Matters which the applicant has advised can form part of the detailed design, need to be provided up front as part of the application, to enable an assessment of the transport effects in relation to the transport network. It is also noted that the development triggers the requirement for an Integrated Transport Assessment (ITA) exceeding the threshold of 120 dwellings and having an overall activity status of Non-Complying (although there is dispute over activity status).

Of the two options presented, option b) is Auckland Transport's preferred option (noting we require traffic modelling and several mitigation measures), as it includes only one access on West Coast Road and the roads within the site are all two way.

#### Specific Concerns

The applicant has stated that a left-in-left-out only access can be accommodated on West Coast Road (see point 5 of the TPC letter dated 1 October 2020), however, there is concern that there would not be



enough space on West Coast Road to install a solid median to prevent right turn movements. In addition, left turn movements out of the site onto West Coast Road are likely to result in issues whereby vehicles are trying to U turn at the roundabout, favouring the right-hand lane, to head east along West Coast Road. This may cause queuing on the south side of West Coast Road and into the development and potential adverse effects on road safety where dangerous manoeuvres are undertaken.

In addition, there is potential for vehicles to take a short cut through the development site if the access points on West Coast Road are not suitably restricted and the correct speed calming measures are not installed. If a vehicle access on West Coast Road is included in the final design, it would need to be limited to left in only (no exit from the site onto West Coast Road).

The West Coast Road/ Parrs Cross Road roundabout is likely to require upgrades to provide safe crossing points and to mitigate the effects of the additional traffic generated by the development, modelling is required to understand the correct treatment/intersection design. Vehicles accessing the site from Glengarry Road may experience difficulty in making right turns into Glengarry Road from West Coast Road and right out of Glengarry onto West Coast Road. We do not have the modelling or trip generation to be able to understand whether any improvements to this intersection are required.

It should be noted the bus stops nearest the site (152 on Glengarry Road and 151 and 154 on West Coast Road) are not part of a rapid transit service and nor are Sunnyside or Glen Eden rail stations considered within a reasonable walking distance (being 1.6 and 2km away respectively). Given the applicants' desire to minimise reliance on private motor vehicles, upgrades to these bus stops should be considered as part of mitigation measures to encourage residents to use public transport.

Regarding active modes connectivity, an accessway (8m wide) from the site onto West Coast Road is supported and encouraged. Safe crossing points should be provided for pedestrians and cyclists on all arms of the West Coast Road/Parrs Cross Road intersection. Residents are likely to want to access Parrs Park to the north, the nearby shared path and the bus stop on Parrs Cross Road and safe crossing facilities are required to accommodate this. Within the site, all roads should be two-way with appropriate speed calming. One-way roads inconvenience drivers and are often not obeyed but are hard to police/monitor.

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