

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

Your reference: BRF659

1 November 2021

Dear Minister Parker,

RE: COVID-19 Recovery (Fast-Track Consenting) Act 2020 – Summerset Retirement Village – Half Moon Bay project – 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 to Ministry for the Environment is made by Summerset Villages (Halfmoon Bay) Limited and is located on a 2.9 hectare site in Bucklands Beach.

Having reviewed the application material provided, we can advise that Auckland Council has some concerns with the proposed development, as follows:

- Auckland Councils processing planner considers there is the potential the proposed new development, by virtue of its scale (height), to adversely affect the existing and planned suburban character of the neighbourhood.
- Watercare have advised that the proposed development is likely to exceed the capacity of the existing public water network, and more detailed information is required to assess the exact impact of the development on the network and the extent of upgrades required.
- The local board have raised a number of concerns in relation to the size of the application and reasons for consent, parking, proximity to schools, traffic, amenity and infrastructure. Their comments are attached.

In addition to the above, Auckland Council Landscape, Urban Design and Development Engineer experts, along with Parks and Healthy Waters, have also reviewed the information, and have not identified any significant effects, subject to further clarification (see attached). Auckland Transport have advised they have insufficient information to assess the effects of the proposal.

Yours sincerely,



Ian Smallburn
General Manager – Resource Consents
Auckland Council
Enclosed:

- Response Template
- Comments from key experts, Auckland Transport, Watercare, Healthy Waters and Local Board

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Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

This form is for local authorities to provide comments to the Minister for the Environment on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Local authority providing comment	Auckland Council
Contact person (if follow-up is required)	Tracey Grant
	Matthew Paetz
	Ian Smallburn

Comment form

Please use the table below to comment on the application.

Project name	Summerset Retirement Village, Half Moon Bay
General comment – potential benefits	The applicant is an established retirement home provider, and the proposal will provide additional living options for the elderly – both to service the local area and wider Auckland community. There are also economic benefits from job creation during construction, and operation of the village.
General comment – significant issues	See attached documentation. Uncertainty exists on the effects of the height of the buildings proposed. Also there is uncertainty with regard to the water requirements for the proposal, and whether the existing water infrastructure is sufficient.
Is Fast-track appropriate?	It is considered that this proposal could be processed through the Fast Track process, however, specific care is required to assess the effects of the proposed development, particularly as it relates to height and infrastructure. The local board have also raised concerns in relation to a number of matters. See attached documentation for further information.
Environmental compliance history	Auckland Council has no compliance issues associated with Summerset.
Reports and assessments normally required	The attached specialist comments provide further detail on the information that would be required. In addition to those included in the attached comments, assessment would be required of the following: <ul style="list-style-type: none"> Noise – during construction and operation Earthworks effects Stormwater effects Commentary on groundwater effects.

Iwi and iwi authorities	Refer to Auckland Council website which contains all the latest iwi information for this site: https://www.aucklandcouncil.govt.nz/building-and-consents/resource-consents/prepare-resource-consent-application/Pages/engaging-with-mana-whenua.aspx .
Relationship agreements under the RMA	.
Insert responses to other specific requests in the Minister's letter (if applicable)	All questions addressed above and in attached documentation.
Other considerations	It is noted that a resource consent already exists for a retirement village on a portion of the site.

Note: All comments, including your name and contact details, will be made available to the public and the applicant either in response to an Official Information Act request or as part of the Ministry's proactive release of information. Please advise if you object to the release of any information contained in your comments, including your name and contact details. You have the right to request access to or to correct any personal information you supply to the Ministry.

Asset Owner / Specialist Response

From: Tessa Craig, Major Developments Interface Lead

Date: Friday 22nd October 2021

Overall Summary:

Thank you for the opportunity to provide comment on the referral of Summerset Retirement Village – Half Moon Bay for consideration under the COVID-19 Recovery (Fast-track Consenting) Act 2020 (FTCA). Auckland Transport does not currently have enough information to assess the effects of the Project.

Auckland Transport requests that, should the Project be accepted for fast-track consenting, the full application material include an Integrated Transport Assessment (ITA). The main objective of an ITA is to ensure that the transportation effects of a new development proposal are well considered that there is an emphasis on efficiency, safety and accessibility to and from the development by all transport modes where practical; and that the adverse transport effects of the development have been effectively avoided, remedied or mitigated.

The preparation of an ITA seeks to ensure that appropriate thought is given to the zoning or land use proposed so that integrated transport and land use outcomes occur. [Guidance](#) to assist in preparing an ITA is available, along with a draft template, on the AT website. An Integrated Transport Assessment provides a more comprehensive assessment than a Traffic Impact Assessment (TIA), with an emphasis on considering the full range of transport modes. An ITA considers measures to reduce travel demand, how to utilise the existing network more efficiently, encouragement of other modes and then finally adding road capacity as a last resort.

The ITA should include an assessment of whether the surrounding roading network is able to accommodate the additional traffic volumes from the residential activity/development. The impact of the additional traffic on the Sea Spray Drive/ Sorrel Crescent intersection and Sea Spray Drive/ Bucklands Beach Road intersection should be assessed. It should be noted that the roads within the development are not proposed to be vested, and would not meet Auckland Transport standards, therefore would not be accepted for vesting now, or in the future.

Further detail should be provided within the application of the proposed pedestrian connections to the existing street network, and to the existing pathway network in Kaniere Park. The connections should be CPTED compliant and meet Auckland Transport Design Manual standards.

In addition, the ITA should consider whether any traffic or speed calming measures are required within Thurston Place, to protect vulnerable road users/ pedestrians from the development. For example, at the site access points.

A Construction Traffic Management Plan will be required, a draft should be submitted with the application to understand heavy vehicle routes, frequency and hours of operation.

Parks Asset Owner / Specialist Response

From: Matt Keyse – Parks Planner

Date: 22 October 2021

Overall Summary:

Background information:

Zone:	Residential – Mixed Housing Suburban Zone
Overlays:	N/A
Controls:	Macroinvertebrate Community Index – Native & Controls: Macroinvertebrate Community Index – Urban
Precinct:	N/A
Designations:	N/A

Parks Planning Considerations

The key considerations of Parks Planning are the impact of the development on Kaniere Park located south (downslope) of the site. As the site and Kaniere Park do not share a common boundary (except for a very small portion of land at the north-western corner of the park) effects on the park are largely limited to those resulting from:

- The proposed buildings being above the 8 m permitted height limit under the Residential – Mixed Housing Suburban Zone.
- Infrastructure such as stormwater and path connections to be located within Kaniere Park.
- Any potential flooding or stormwater diversion entering the Park as a result of the development.

Positives of application

From information provided in the pre-application meeting held with the applicant, the application documentation and plans provided positives of the application include:

- The potential bulk and dominance effects resulting from the over height buildings has been considered in the building design and site layout. The buildings are proposed to have stepped façades, the highest buildings are located to the centre of the site and some mature vegetation and trees onsite is identified to be retained which will assist in some softening of the buildings when viewed from Kaniere Park.
- The buildings are orientated toward Kaniere Park which assists in providing passive surveillance.
- The documentation provided with the application highlights intentions to connect a path through the site with the existing walkway in Kaniere Park. The path is proposed to have public access easements.

Key Issues from a Parks Planning Perspective

The key issue from a Parks Planning perspective with the project going through the COVID-19 Recovery Act 2020 fast track consenting process is potentially not having the information required to fully understand the effects the development will have on Kaniere Park. This relates to the effects of bulk and dominance resulting from the building height infringements proposed, the infrastructure which may be proposed to be located in Kaniere Park and any potential flooding impacts which may result from the development of the site due to Kaniere Park being downslope from the development.

Parks Planning information, reports and assessment requirements:

- a) Shading diagrams to determine the impact shading may have on Kaniere Park.
- b) Identification of permitted building height on the visual renders provided to help in determining the height of the proposed buildings in comparison to permitted building height.

- c) Engineering plans to identify any proposed infrastructure connections with existing public infrastructure in the Kaniere Park e.g. stormwater.
- d) Engineering reporting to provide evidence the development will not result in Kaniere Park being more susceptible to flooding.
- e) Plans identifying details of the proposed path to connect with existing public walkways within Kaniere Park to ensure they are appropriate for public use, for example in regard to gradient and from a crime prevention through environmental design (CPTED) perspective.
- f) Further information on who is proposed to have maintenance responsibilities for the path proposed on the western boundary along with identification of the instruments which will be put in place to allow public access and formalise these agreements.

Overall position of Parks Planning

Overall, it is considered that the development could be suitable from a Parks Planning perspective, however, further detail should ideally be provided to fully understand the impact the development will have on Kaniere Park and public users of the area.

It appears the effects resulting from the proposed over height buildings have been considered in the layout of the development and building design. However, the impacts relating to shading, for example, which could significantly impact on the amenity and useability of Kaniere Park, are currently unknown.


Similarly, little is known of the potential infrastructure likely to be located in Kaniere Park, which if not sympathetic to the reserve, could also impact its amenity and useability. It is likely infrastructure such as stormwater lines connecting to existing public infrastructure in the reserve can be done in a way to not impact the park negatively, but again further information is required to fully determine this.

The information provided indicates that flooding will not be increased as a result of the development however, further information and proper assessment from a qualified engineer should be provided due to the significant detrimental effects increased flooding could have on the useability of Kaniere Park.


Finally, Parks Planning sees the proposed path through the site as a positive outcome for the area. However, further detail on the alignment and design along with the intended responsibilities around aspects such as maintenance would ensure the path is safe, useable and meets Council standards.

Should the Environmental Protection Authority (EPA) decide to allow the development to go through the Covid-19 Fast Track process, it is recommended that the proposal address the information requirements identified in this memo so adequate advice can be provided by Auckland Council's Park Planning team to the EPA to assist in their decision-making processes.

Prepared by:


Matt Keyse, Parks Planner
Parks Sports and Recreation

Parks Agency Lead:


Hester Gerber, Parks Planning Team Leader
Parks Sports and Recreation

Asset Owner / Specialist Response

From: Shahram Morteza Nia, Development Engineer, Watercare

Date: 26 October 2021

Overall Summary:

Watercare has assessed the proposed comprehensive care retirement village on a 2.9 hectare site at 25 Thurston Place, Half Moon Bay in Bucklands Beach, Auckland, comprising:

- Approximately 211 independent apartment living units
- 118 assisted living suites, including 20 memory care suites, 48 care suites, 50 serviced apartments.

No wastewater flow data and water supply demand nor a plan showing the water and wastewater connection points was provided as a part of the referral application. Based on the very limited information provided to MfE, Watercare has undertaken a very high-level assessment for this development. The design flow is assumed using Watercare Code of Practice.

Water supply: The proposed development is likely to exceed the capacity of the existing public water network. The applicant will be responsible for upgrading the network infrastructure. More detailed information is required to assess the exact impact of the development on the network and the extent of upgrades required.

Wastewater: Based on the information available, the local network downstream of the development site appears to have sufficient capacity for expected flows from this development, and as such this development can be approved. No upgrades are expected to be required.

Water Supply:

A number of assumptions have been made based on available data to undertake the assessment. Upgrades are expected but the extent of upgrades required depends on some assumptions particularly around the firefighting requirements.

- Demand assumptions - Typical 6.3 l/s PHD (329 units)
- Firefighting requirements - Being apartments and the area is residential therefore FW2 would only be expected from the network; therefore, the building would need to provide any additional requirements (sprinkler / onsite storage). To identify possible upgrades an estimated sprinkler expectation of 22.5 l/s plus hydrant requirements 25 l/s. This would need to be confirmed and re-assessed if higher requirements are expected.

Upgrades based on typical demand and sprinkler requirements:

- Replace existing 50mm rider main on the western side of Thurston Place (including reconnection of existing customer connections) with a new 150mm ID WM;
- Install a new 150mm WM road crossing;
- Replace the existing 100mm AC WM on northern side of Sorrel Crescent (between No.29 & junction with Sea Spray Drive, existing 150mm PVC) including reconnection of existing customer connections.



Wastewater:

Based on the information available, the local network downstream of the development site appears to have sufficient capacity for expected flows from this development, and as such this development can be approved. No upgrades are likely to be required.

Asset Owner / Specialist Response

From: *Mark Iszard, Growth and Development Manager*

Date: *Thursday 28th October 2021*

Overall Summary:

The applicant is proposing to manage stormwater within the site and discharge to the stream within the property.

This would mean the stormwater system and discharge would be private and likely need to obtain a private stormwater discharge consent.

As such we have no red flags or further comments.

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Asset Owner / Specialist Response

From: Romel Layco, Senior Planner, Resource Consents Department, Auckland Council

Date: 21 October 2021

Overall Summary:

Auckland Unitary Plan (Operative in Part) Zoning

The land is zoned Residential – Mixed Housing Suburban for which the proposed development of the site is considered broadly consistent within the intent of the zoning of the site. A retirement village is classified as an integrated Residential Development and is a Restricted Discretionary Activity.

The built form of the proposal is, however, significantly higher by approximately up to three times for some elements than what is anticipated by the Residential – Mixed Housing Suburban zone, with potentially significant adverse effects on the existing and planned suburban character of this neighbourhood.

The Residential – Mixed Housing Suburban zone contemplates a suburban built character of predominantly two storey buildings, with height, bulk and the form of development being limited to achieve this. The zone description acknowledges that the zoning is widespread, covers many established suburbs and enables intensifications, while retaining a suburban built character.

Objective 4.2(2) states that development is in keeping with the neighbourhood's planned suburban built character of predominantly two storey buildings in a variety of forms. The Plan does not differentiate in standards between different listed residential activities. Objective 4.2(4) requires that development maintain a reasonable standard of sunlight access and privacy and minimise visual dominance effects to adjoining site. Policy 4.3(2)(a) seeks to limit bulk, height and form of the development and the Auckland Unitary Plan (Operative in Part) has set standards for the different residential zones to guide what is an appropriate height for each residential zone. Standard H 4.6.4, Building Height, states that the maximum height must not exceed 8 metres with a degree of flexibility for sloping roofs for up to 1 metre for a total of 9 metres total maximum building height. For the Residential – Mixed Housing Suburban zone, it infers that the planned suburban built character above 9 metres building height will not be achieved and that visual dominance effects will be substantial on the surrounding area.

The proposed development of up to 22 to 23 metres high is considered to be a substantial departure from the anticipated outcomes for the Residential – Mixed Housing Suburban

zone. Care will be needed to determine the effects of this extra height can be managed – including the effects on shading.

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TO : Tracey Grant

Date : 26 October 2021

FROM : John Newsome – Team Leader, Regulatory Engineering (south)

Engineering Review - Summerset Half Moon Bay - Thurston Place, Bucklands Beach

Earthworks

The balance of the required earthworks is significant and exceeds the normal 500m² area and 250m³ volume thresholds for earthworks within a residential zone specified in the Auckland Unitary Plan. However, I am satisfied that these works can be undertaken in a manner to ensure that there is no dust, soil erosion or siltation effects on the receiving environment. I am also satisfied that the excavation works, retaining wall construction and consideration to ground water draw-down can be undertaken with appropriate design, construction methodology and engineering supervision in order that any potential adverse effects can be mitigated. (refer geotechnical and ground water assessment report in support of the previous development - Riley Consultants Ltd report dated 9 March 2017.)

Servicing

It is apparent that public drainage infrastructure is available or can be provided to meet the Council's requirements for servicing this development. The general nature of these works has been provided but the specific design will be subject to engineering plan approval post consent approval.

Wastewater and water supply services

Existing wastewater and water supply services had been considered with Watercare Services as a part of the previous consent and had been found suitable to service the development. Whilst endorsement from Watercare is required for this consent, no problems are therefore anticipated.

An adequate water supply system exists in the road berm that will provide an adequate level of service to the development. Fire protection for the development will be provided by a private water supply system within the property.

Stormwater

Adequate disposal of stormwater can be achieved. The proposed stormwater detention facilities are approved in principle and enable the development to mitigate any potential downstream effects.

Flooding

The main part of the property involved with the development is not located within a possible overland flow path area, nor a flood plain or flood prone area. The overland flow path within the gully feature to the east and south has no impact on the development.

John Newsome
Team Leader – Regulatory Engineering (south)

Specialist Response

From: Stephen Quin, Principal – Landscape Architect. Auckland Council

Date: 26.10.2021

Overall Summary:

From the information sent through, I consider the issues relevant to landscape matters include:

- Adverse effects on visual amenity of adjoining sites, including visual dominance
- Adverse effects on visual amenity of the neighbourhood
- Compatibility with residential character
- Positive effects.

My preliminary view of the proposal based on the information received to date and discussed at the pre-application meeting is that there is potential for the development to successfully integrate within the site and its surrounding context in way that does not create significant adverse landscape effects. This preliminary view is informed by the following observations:

- The large size of the site and the proposed offset of buildings away from adjoining properties on the north east, east and south boundaries, and the spaces created around buildings facing these boundaries. The school and park properties adjoining the east and south boundaries are not as sensitive to over height buildings as residential dwellings.
- The proposed buildings on the north and west boundaries are consistent with those approved by the existing consent. Most of the properties adjoining these boundaries are unlikely to be further affected by the additional development proposed on the site.
- The existing vegetation in the gully wrapping around the east and south boundaries of the site that has the potential to provide a vegetated framework to integrate the proposed development into the site and its surrounding context, and visually buffer the built form.

However, my initial opinion of potential effects is dependent on mitigating factors, particularly:

- A landscape plan that seeks to visually buffer the proposed buildings through existing vegetation and proposed planting. It is considered that a landscape plan could also provide a positive effect through revegetation of the gully on the south and east boundary.
- Regarding existing vegetation, it is noted that many of the large tree specimens that buffer views to the site from the east are in the adjoining school property and therefore cannot be considered as mitigation of the proposal's adverse effects. It is therefore encouraged that the landscape plan takes this into account and proposes vegetation species of significant scale on the east and south boundaries, in addition to retaining existing trees in the site.
- The buildings' design having an appropriate modulation of form and articulation of façade that will help to break down the bulk and mass of the proposed buildings and integrate the built form with the existing and anticipated residential character. This will be of particular importance in views towards the site from adjoining properties, as well as from public views including from the Half Moon Bay Marina (View 1 in the plans) and Kaniere Park (View 2).

Further Information:

I consider the application documents presents the proposal at a 'preliminary/conceptual' stage. I am of the view, that to enable a more detailed assessment on the quality and merit of the scheme, the following information is required.

- Landscape Assessment to address the proposed building's effects on the residential landscape character and visual effects (including amenity and dominance). Visual effects should be assessed from adjoining properties, the surrounding streets including Thurston Place, and from other affected vantages such as in the vicinity of Half Moon Bay Marina.
- The landscape assessment should be supported by photographs and visual simulations.
- Details on proposed materials, colours and finishes of buildings and ancillary structures. Elevations of all buildings should be provided showing these details.
- Detailed Landscape Plan to enable a better understanding of the overall landscape treatment provided on-site and along its boundaries/interface, particularly in response to its residential MHS zoned character and mitigation of amenity effects on its neighbour/s.

Asset Owner / Specialist Response

From: Georgia Fear, Principal Urban Design, Auckland Council

Date: 26.10.2021

Overall Summary:

The subject site is located within the AUP: OP in Residential – Mixed Housing Suburban zone, which generally anticipates development of predominantly one to two storeys. The proposal infringes the height standard (H4.6.5) and may create a greater intensity than normally anticipated within this zone. The buildings scale and form have the potential to result in a visually dominant presence and shading to Kanieri Park, and visual dominance, overlooking and loss of privacy to the immediate adjoining neighbours along Thurston Place, Icarus Place and Proteus Place.

Whilst there are instances where greater height can be supported from an urban design perspective within the MHS zone, these are generally special circumstances where the site in question possesses certain characteristics which would help to accommodate the additional height and density (i.e. good separation to neighbouring properties, a generously proportioned site etc). In addition to this, there is an expectation that any development would also be specifically designed to respond to the site characteristics.

Overall from a high level, preliminary view of the proposal I consider the proposed Comprehensive Care Retirement Village has potential to be an appropriate use of the site and the site could appropriately accommodate additional height and building bulk.

I make the following preliminary comments:

- The site layout and the design approach of 10 individual buildings is an appropriate response to balance the functional requirements of a care village, and the planned character of the neighbourhood.
- The design approach to concentrate the building mass, in particular the higher height and longer length, to the site's centre is an appropriate response, and will limit the impact on the adjoining neighbours.
- Along the sensitive western boundary, the mass has been broken down into 5 individual buildings, with 'gaps' between these buildings reducing building bulk and visual dominance.
- In my view building articulation, gaps between buildings, and boundary setbacks (enabled by the large site area), together with an appropriate landscape response could appropriately manage the associated impacts of additional bulk and scale.
- Retaining existing, mature planting is encouraged, as this will provide immediate screening, helping to mitigate visual dominance and help the proposal sit within the context.
- The visuals provided show the upper levels of the proposed buildings are stepped back from the existing residential environment. It may be that a more appropriate transition of height along the western boundary in response to the adjoining context of one to two storey

residential dwellings is needed to ensure the proposed building form retains the existing suburban character.

- Further development of materials, colour, architectural devices and gestures that assist in reducing the bulk and scale of the building are suggested.
- The site's shape and location limit the streetscape interface to a small area on Thurson Place. I note at grade car parking is located along this street edge. The location and design of any car parking should seek to avoid adverse effects on pedestrian and streetscape amenity. This interface should be treated sensitively so as not to lower the residential amenity of the surrounding properties. The proposed building design will be required to provide adequate activation and opportunities for passive surveillance, which will positively contribute to the existing street environment.
- Very limited information on the proposal is available. To make a full urban design assessment further information, outlined below, would be required.

Further Information

As the subject site is proposed to be of a scale and bulk higher than anticipated amidst the established suburban residential environment, further information is needed to demonstrate the relationship of the proposed buildings to the adjoining residential neighbours and park. These shall include:

- Assessment of Environment Effects
- Urban Design Assessment;
- Full architectural drawing set including plans, sections and elevations
- Details on materials and external finishes
- Landscape plan
- Cross sections and perspectives showing levels, interface response, retaining (if any) and planting strategy across the site and its adjoining neighbours along the site interfaces;
- Shading analysis comparing the effects of a complying and infringing height / bulk; and
- A comprehensive signage strategy is important in relation to the proposed public footpath, pedestrian and vehicle entrances, access and wayfinding.

Project name: Summerset Retirement Village – Half Moon Bay.

Application number: PJ-0000766

The Howick Local Board (HLB) considers that the project: Summerset Retirement Village – Half Moon Bay, Application number: PJ-0000766 should NOT be referred to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

The main reason for this is due to the size of the project and also due to the number of rules that require a consent, under the Auckland Unitary Plan.

The rules which require a consent under the Auckland Unitary Plan are as follows:

C1.9(1) The Project does not comply with the following Mixed Housing Suburban zone standards: - H4.6.4 (Building Height)

H4.4.1(A8) The application is for an Integrated Residential Development

H4.4.1(A34) New buildings in the Mixed Housing Suburban Zone have the same activity status as the land use activity that the new building it will accommodate.

E7.4.1(A20) Dewatering or groundwater level control associated with a groundwater diversion authorised as a restricted discretionary activity under the Unitary Plan, not meeting permitted activity standards or is not otherwise listed: • **E7.6.1.6(2)** • **E7.6.1.6(3)**

E7.4.1(A28) The diversion of groundwater caused by any excavation, (including trench) or tunnel that does not meet the permitted activity standards or not otherwise listed: • **E7.6.1.10(1)(d)**, • **E7.6.10(2)(b)**, • **E7.6.1.10(4)(a) & (b)**.

E11.4.1(A8) Earthworks greater than 2,500m² where the land has a slope equal to or greater than 10 degrees.

E11.4.1(A9) Earthworks greater than 2,500m² within the Sediment Control Protection Area

E12.4.1(A6) Earthworks greater than 2,500m²

E12.4.1(A10) Earthworks greater than 2,500m³

E23.4.2(A53) Comprehensive development signage.

E40.4.1(A24) The construction of the Project will exceed the permitted 24 month period pursuant to **E40.4.1(A20)**.

HLB notes that some of these requirements for consent may be minor, however many would be well in excess of the limit where such a rule triggers the need for consent.

Other concerns raised by HLB, but not limited to:

PARKING

The possible impact on parking in surrounding residential streets – which ultimately compromises road safety (minimising visibility for residents exiting driveways, and for pedestrians) and minimizes on street parking for residents.

PROXIMITY TO SCHOOLS

Possible impacts to the two adjacent schools: Pigeon Mountain Primary School and Buckland Beach Intermediate School.

ADDITIONAL TRAFFIC

The effect of increased levels of traffic movements in these very narrow, quiet streets and any issues this may raise at nearby intersections with collector roads.

Also, the effect of increased traffic during the construction period, including heavy motor vehicles and any earthmoving vehicles. Also, any effect on existing services such as large delivery and rubbish removal vehicles once the village is in operation. How will this be managed to provide a safe street for pedestrians – particularly children; and minimize disturbance to neighbours?

Is the current road design adequate to manage increased traffic?

Whether there will be pedestrian crossing facilities to provide a safe street for pedestrians – particularly children and seniors, and children walking to school?

AMENITY

Impact on existing properties from the effects of the overall bulk and scale of the project and possible effect of noise from building mechanical services and other activities and service areas within the project.

INFRASTRUCTURE

Concerns around the age and condition of stormwater, wastewater and other infrastructure in the area.

HLB understands that we may provide more detailed “feedback.” neglect of which process this application will be dealt under and therefore reserve its’ right to do so at a later date.

HLB acknowledges the need to provide housing for seniors within the community but has weighed this up the expectation that the public have the legal opportunities to be involved and therefore consulted through the normal notification processes provided under the Resource Management Act 1991, particularly where there are effects “more than minor” to surrounding properties.

HLB also acknowledges that the project does not include an activity that is described as a *Prohibited Activity* in the Resource Management Act and that the activity status of all matters triggering a consent are *Restricted Discretionary Activity*. However, once again, it is due to the number of activities causing the requirement of a consent and the overall scale of the project that has led HLB to its’ decision.

HLB notes that no application for resource consent has been made by Summerset to Auckland Council in respect of the Project, however the previous owner, Half Moon Bay Holdings Limited, obtained resource consents BUN60082681, LUC60290675,

HLB would therefore ask that an updated project be directed through the same process, to Auckland Council, under the Resource Management Act 1991.

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