s 9(2)(f)(ii), s 9(2)(g)(i)

s 9(2)(f)(ii), s 9(2)(g)(i)

s 9(2)(f)(ii), s 9(2)(g)(i)

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)	Erik Oosthuizen s 9(2)(a)
	Ian Smallburn s 9(2)(a)
	Click or tap here to enter text.

Comment form

Please use the table below to comment on the application.

Project name	Verran Mews Project
General comment – potential benefits	Will add additional housing supply and choice in the Auckland region.
General comment – significant issues	• There are wastewater capacity constraints in the public wastewater line (see attached comments from Watercare for more details). • It is unclear whether there are other infrastructure restraints as little infrastructure information has been provided, in particular the management of stormwater. • The proposed development and increased impervious area will result in increased flow rates at the outfall locations to the stream. Slips have been identified within the catchment following the January and February 2023 storm events (see attached comments from Healthy Waters for more details). • The effects of the development on the existing downstream flood hazards are unclear and should be assessed further (see attached comments from Healthy Waters for more details). • Intended ownership or operation and maintenance responsibility of future stormwater quality management devices and other infrastructure has not been clarified. • Steep gradients of accessways may not be suitable for pedestrians and motor vehicles (see attached comments from Auckland Transport for more details). • Additional traffic entering the Verran Road, Waipa Street, and Verbena Road intersection may result in traffic effects as additional traffic generated by the proposal could cause adverse traffic effects if queued vehicles block movements (see attached comments from Auckland Transport for more details). • The development exceeds the height controls and planned building form in the AUP and is potentially inconsistent with the AUP policies which provide for a planned character of predominately 3 storey buildings.

	• The proposal does not identify Nationally or Regionally threatened species (see attached comments from the Council Ecologist).
Is Fast-track appropriate?	• There are issues associated with the infrastructure that is required to service the proposed development as highlighted by the Council's CCO's (Watercare, Healthy Waters and Auckland Transport). Further discussions and solutions are required to resolve these matters which will only be appropriately done through the existing RMA resource consenting process. • Further investigations are required for the Council to review the appropriateness of the proposal as the information currently available are insufficient to do so (refer to the various asset owner and specialist comments below). • It is the Auckland Council's view that the application should be appropriately processed through the existing RMA Resource Consenting processes for the reasons stated above.
Environmental compliance history	The following individuals/companies have been reviewed for previous compliance history: • Sweet New Zealand Co. Limited • Nelson Kao Loong FUNG • Ju LI There is no history of enforcement actions against these parties and there are no significant outstanding compliance concerns for the 3 abovementioned that we are aware of.
Reports and assessments normally required	• An AEE • Acoustic assessment • Integrated transport assessment • Ecological assessment • Geotechnical assessment • Water and Wastewater capacity assessment • Stormwater infrastructure report including a stormwater management plan and flood assessment • An Erosion and Sediment Control Plan (ESCP) in conjunction with an Earthworks Methodology • Urban Design assessment • Visual impact assessment • Construction, erosion and sediments effects assessment • Groundwater effects assessment • Cultural Values assessment
Iwi and iwi authorities	• Ngāi Tai ki Tāmaki, • Ngāti Maru, • Ngāti Pāoa, • Ngāti Tamaterā, • Ngāti Te Ata, • Ngāti Whanaunga, • Ngāti Whātua o Kaipara, • Ngāti Whātua Ōrākei, • Te Ākitai Waiohua, • Te Kawerau ā Maki, • Te Rūnanga o Ngāti Whātua

Relationship agreements under the RMA	NA
Insert responses to other specific requests in the Minister's letter (if applicable)	1. This is answered above. 2. This is answered above.
Other considerations	The Independent Māori Statutory Board requested that the Ministry ensures the initial engagement approach made by the applicant should be followed-up and a clear view from iwi on this application should be determined prior to any further progress.

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 and Specialist comments

Assets owner: Auckland Transport

From: *Marguerite Pearson, Principal Planner – Land Use Policy Planning Central, Auckland Transport*

Date: Thursday 13 April 2022

Overall Summary:

Auckland Transport (AT) has reviewed the application documents submitted for Verran Mews (the Project) for consideration under the COVID-19 Recovery (Fast-Track Consenting) Act 2020 (Covid 19 Recovery Act).

If the project is referred for processing by the EPA, AT has made comments on specific transport matters that should be addressed in the last section of this response.

Under the Auckland Unitary Plan (AUP) 23 Verran Road and the rear of 25 Verran Road are currently zoned Residential – Single House Zone.

- The AUP identifies a non-complying activity where more than one dwelling per site is proposed, therefore under rule E27.9(5) this development is likely to trigger the need for an Integrated Transport Assessment (ITA). AT's guideline for ITA can be found online here https://at.govt.nz/about-us/manuals-guidelines/integrated-transport-assessment-guidelines/.

- If an ITA is not required, then a traffic assessment report should be provided by the applicant.

- In addition to the above, the following drawings should be provided:

  a. A plan and long-section for the site showing the accessways (vehicle crossings) and internal driveways. This drawing should show the long section from the edge of the carriageway.
  b. Typical cross sections for the internal driveways.

c. Any retaining walls or other structures proposed within the road reserve.
d. Vehicle tracking drawings for the site (both cars and rubbish trucks) showing that no vehicles will need to reverse out of the site onto a road.

AT has not identified any red flags in regard to this proposal (based on the high-level documents provided), however AT consider there are three key matters of particular concern. These are:

- West Glade Crescent Accessway Gradients: the gradient of the accessway between the end of the existing formed carriageway of West Glade Crescent and the boundary of the site will be excessively steep, with gradients which are unsuitable for both pedestrians and motor vehicles.

- Gradient of Internal Driveway Providing Access to Verran Road: based on the topographical contour information in Council's Geomaps, it appears that the internal driveway providing access to Verran Road is approximately 70m long and has a gradient of 18%. AT is concerned the internal driveway providing access to Verran Road will not be suitable for pedestrians with impaired mobility or wheelchair users. The applicant cannot rely on this access as an alternative to the access onto West Glade Crescent.

- Intersection of Verran Road, Waipa Street, and Verbena Road: This intersection has a unique layout, with all traffic travelling between the proposed development and the wider area will need to pass through it. This intersection currently has a good safety record in terms of the number of recorded crashes, however AT is concerned that the additional traffic entering from the east leg (Verran Road) during the morning peak could cause a problem if queued vehicles block other movements. This is illustrated in more detail in Figure 1.

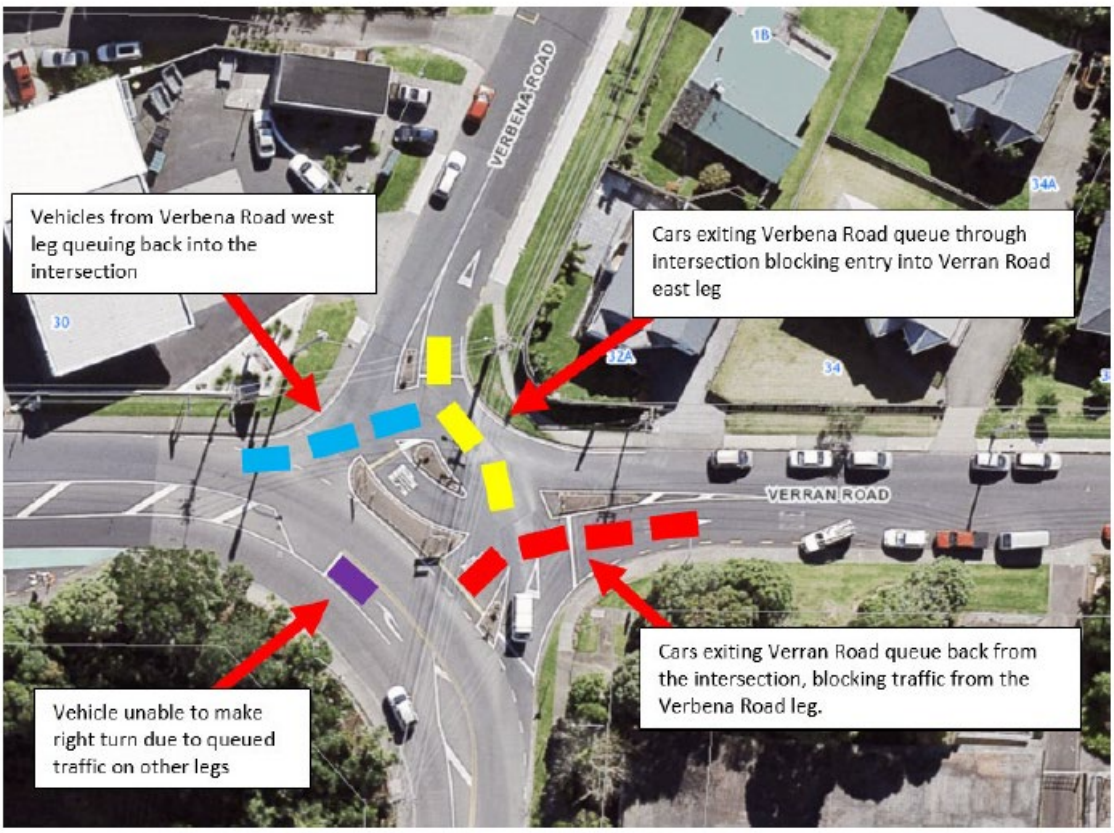

Figure 1: Possible adverse effects from additional traffic on Verran Road east leg in the morning peak.

Asset Owner: Healthy Waters

From: Hillary Johnston – Consultant Stormwater Specialist, Growth & Development, Healthy Waters

Date: 12th April 2023

Overall Summary:

Sweet New Zealand Co. Limited have submitted a Fast-Track application for subdivision and development which is proposed to include 110 residential units, associated community buildings, recreational areas, carparking, and access. The development site comprises 5 titles with a total combined area of 2.5813ha and is located at 19A-25 Verran Road and 19 West Glade Crescent, Birkenhead.

The assessment herein presents comments from the perspective of Healthy Waters as an asset owner, as well as from the perspective of a regulatory stormwater specialist.

The following application documents have been reviewed as part of this assessment:

- *25 – 27 Verran Road, Birkenhead Government Fast Track Application – Civil Engineering* prepared by Civix Limited dated 21.12.2022
- *Verran Road and West Glade Crescent – Fast Track Ecology* prepared by Bioresearches dated 08.12.2022

The proposal has been discussed with the following additional specialists:

- Wui-Shen Tay – Specialist, Catchment Planning, Healthy Waters
- Danny Curtis – Principal, Catchment Planning, Healthy Waters

Limited information has been provided in respect of the management and authorisation of stormwater runoff from the proposed development. It is unclear whether it is intended that stormwater networks constructed to service the development will be vested to Council as public stormwater assets. Sufficient information to understand the effects of the proposed development in relation to stormwater, or how potential effects would be avoided, remedied, or mitigated has not yet been provided.

The application documents do not provide a clear indication of potential effects of the removal of the existing stormwater management device located within the site, including any subsequent effects on existing downstream flood hazards. Further information in this regard should be provided.

Authorisation

The sites are within both the *Residential – Mixed Housing Suburban Zone* and the *Residential – Single House Zone* under the Auckland Unitary Plan. Healthy Waters Department holds a network discharge

consent which authorises the discharge of stormwater runoff from existing and future proposed public stormwater networks within urban zoned land[1].

The civil engineering memo does not include comments in respect of the requirements of Schedule 4 of the Region Wide Network Discharge Consent. Authorisation of the discharge of stormwater under the Region Wide Discharge Consent should be sought in the instance that stormwater networks are intended to be vested – this includes the preparation of a Stormwater Management Plan, outlining how the performance requirements of Schedule 4 will be complied with. Achieving compliance with the requirements of Schedule 4 of the Region Wide Network Discharge Consent may have material impact to the form and layout of the proposed development. It should be noted that engineering plan approval for proposed public stormwater networks will not likely be granted until a Stormwater Management Plan for the development has been reviewed and adopted under the Region Wide Network Discharge Consent by Healthy Waters.

Granting of the EPA Fast-Tack consent does not guarantee that public assets can and/or will be vested to Auckland Council Healthy Waters. Any proposed public stormwater infrastructure will need to meet the requirements of Schedule 2 and Schedule 4 of the Network Discharge Consent, together with the Stormwater Code of Practice, and any other design guidance relevant to stormwater infrastructure and intended asset owners.

The planning assessment in support of the application has identified consent is likely required under Chapter E8.4.1.(A10). If authorisation under the Region Wide Network Discharge Consent is sought and subsequently granted, a private diversion and discharge consent is not required under Chapter E8 of the Auckland Unitary Plan.

Water Quality

The proposed development will result in increased impervious area, increases in runoff flowrates, and increase in contaminant loading. The receiving environment includes areas which are subject to the Significant Ecological Area Overlay of the Auckland Unitary Plan.

The civil engineering memo outlines that it is proposed to treat all stormwater runoff from the proposed paved areas before discharging to the watercourse. The requirements of Schedule 4 of the Region Wide Network Discharge Consent include stormwater quality treatment of all impervious areas. Schedule 4 of the Region Wide Network Discharge Consent further requires that gross pollutant traps are implemented in waste storage areas within the development.

Further information is not provided regarding intended/appropriate stormwater quality treatment devices for the site and development. Intended ownership or operation and maintenance responsibility of future stormwater quality management devices has not been clarified.

It is recommended a condition is included which requires stormwater quality treatment of all impervious areas by devices which have been designed in accordance with GD01.

[1] Healthy Waters – Regionwide Stormwater Network Discharge Consent

Hydrology Mitigation

The site is subject to a Stormwater Management Area – Flow 1 (SMAF-1) overlay and stormwater runoff from the proposed development will discharge to a stream receiving environment. Consent has appropriately been sought under Chapter E10 of the Auckland Unitary Plan.

The civil engineering memo outlines that it is proposed to achieve SMAF-1 hydrology mitigation of runoff from the development through the provision of underground tanks with appropriately sized orifices. The civil engineering memo does not outline whether these stormwater tanks will be plumbed for potable reuse purposes and therefore it is not likely that the required SMAF-1 retention component will be achieved.

The provision of stormwater tanks to achieve SMAF requirements as a first order of preference is considered suboptimal and inconsistent with the hierarchy outlined within Table E10.6.3.1.1.(2). Given the proximity to the stream receiving environment, achieving SMAF 'retention' outcomes through the discharge of stormwater to ground (for example via bioretention devices) should be considered a priority in the development of the design of stormwater management for the site. This would likely have hydrological benefits in terms of maintaining pre-development conditions with a delayed runoff response, further water quality enhancement, temperature benefits, and promote groundwater interflow. A condition in this regard is recommended.

Erosion Mitigation

The proposed development and increased impervious area will result in increased flow rates at the outfall locations to the stream. Slips have been identified within the catchment following the January and February 2023 storm events. Specific design of outfalls will be required in this regard. Erosion protection should be implemented at the outfall locations that is sensitive to the stream receiving environment. 'Green outfalls' should be considered where possible. The detailed design of erosion protection will be developed in future and it is recommended that an ecological specialist provides input to the design. A condition in this regard is recommended.

Natural Hazards

The civil engineering memo provides a brief assessment of the existing overland flow paths identified within the site on Auckland Council's GeoMaps. The civil engineering memo concludes that there is no flood risk for proposed development within the site in the 1% AEP event. Appropriate freeboard levels shall be achieved within the development site in accordance with the Stormwater Code of Practice. No further mitigation of existing flood hazards has been proposed. No information has been provided on post development flow directed to the watercourse.

The existing 1% AEP floodplain extents within the site are identified as constrained to the stream gully which dissects the southern portion of the site. There are no habitable buildings between the site and the downstream Roseberry Avenue caul-de-sac that are at risk of flooding within the 1% AEP event. GeoMaps indicates that the overland flow path and floodplain downstream is mostly constrained to the Verran Road Gully Reserve stream channel.

It is likely that flow is throttled by the existing 300mm dia pipe beneath the Roseberry Avenue caul-de-sac. It is unclear whether the removal of the existing stormwater pond on the site will impact the existing downstream flood hazards. The effects of the development on the existing downstream flood hazards are unclear and should be assessed further.

Asset Owner: Watercare Services Ltd

From: *Ameya Bhiwapurkar, Development Engineer, Watercare Services Ltd.*

Date: 12/04/2023

Overall Summary:

The proposal is for an integrated residential development (IRD) consisting of approximately 110 dwellings and associated communal facilities located at 19A-25 Verran Road and 19 West Glade Crescent, Birkenhead, Auckland.
The total area of the subject site is 2.5813ha.

Proposal

Water
The site is currently supplied with potable water from existing meters located in the berm of Verran Road. These are individual supply meters for single houses and will be replaced with a bulk water supply meter capable of serving all 115 houses in the
development

Wastewater

Wastewater generated from the site is proposed to drain into the existing public network accessible via the pipe crossing West Glade Crescent. The network will be extended from West Glade Crescent into the site, with branches extending along the
major JOAL routes to provide gravity-driven wastewater drainage to most of the site. Two buildings will be situated below this level and will be served by private wastewater pump stations.

Watercare's comments on the proposal

Water

The existing Water supply network has sufficient capacity to cater to the additional developments without any further upgrades. The fire flow for this proposed development was not identified during this assessment. The developer needs to provide Hydrant test reports confirming the desired fire flow.

Wastewater

There is insufficient capacity to cater to the proposed development. The downstream network of the proposed discharge Wastewater (WW) line has several properties currently suffering from wastewater overflows. The additional flow from this development of 110 units will increase these properties' overflow volume and frequency.
There was insufficient information provided during the assessment. The developer must provide capacity calculations until the nearest 300mm WW line.

Specialist Response - Specialist – Earthworks and Streamworks, Auckland Council

From: *Shanelle Beer, Specialist – Earthworks and Streamworks, Auckland Council Specialist Unit.*

Date: 12th April 2023

Overall Summary:

The applicant proposes to undertake bulk earthworks of 32,350m^3 across a 2.58-hectare site and has identified the reason for consent under E11.4.1(A4) where earthworks are greater than 10,000m^2 up to 50,000m^2 on land with a slope less than 10 degrees. The area (m^2) of earthworks is specified on the cut and fill plan as 15,761m^2, however, upon comparing the proposed overall site plan with aerial imagery, it appears the earthworks are to take place within a Sediment Control Protection Area – within 50m of a stream and includes land with a slope greater than 10 degrees. Therefore, consent would be required under E11.4.1(A8) and E11.4.1(A9) of the AUP(OP). A proposed boardwalk/bushwalk pathway per the site plan also appears to be located within a Significant Ecological Area (SEA_T_8162) which may also require consent under E11.4.3(A28) and E11.4.3(A30) for earthworks greater than 5m^2 and 5m^3 within a SEA.

*An Erosion and Sediment Control Plan (ESCP) in conjunction with an Earthworks Methodology **has not** been provided as part of the application to demonstrate how potential sediment generated from the activity will be effectively managed.*

It is preferred to have an ESCP submitted upfront to facilitate a robust review of the sediment related effects. Given the earthworks are located within a Sediment Control Protection Area which includes land with a slope greater than 10 degrees, the potential sediment effects if not appropriately managed are deemed high risk. A set of earthworks plans, and supporting methodology would assist with understanding how the earthworks will be undertaken and how the erosion and sediment controls will be implemented. It is recommended that a ESCP designed in accordance with GD05 is submitted prior to works commencing to address potential effects. Uncontrolled sediment discharges are likely to flow overland towards the intermittent and permanent streams which form part of the Eskdale Stream catchment with the ultimate receiving environment being the Waitemata Harbour and Hauraki Gulf. Sediment can degrade aquatic values such as water quality, smother habitat for aquatic fauna within these receiving environments, and directly impact aquatic fauna by blocking their breathing apparatus.

An ESCP and supporting methodology in accordance with Auckland Council's Erosion and Sediment Control Guide for Land Disturbing Activities in the Auckland Region, June 2016, Incorporating Amendment 2", (GD05), would achieve appropriate sediment control during earthworks.

There is concern that there could be potential works within a watercourse has been identified at the upper reach of the intermittent stream on the site per the ecology report (per below). The community facilities (e.g. playground and bushwalk pathway) appear to encroach on this area. Further detail would be required regarding the set back of earthworks from the stream and should any streamworks activities be proposed, an assessment against Chapter E3 of the Auckland Unitary Plan (Operative

in Part) and the National Environmental Standards for Freshwater 2020 would be required as conditions would not be considered appropriate.

Specialist Response - Development Engineer

From: Nim Shihab.

Date: 13 April 2023

Overall Summary:

As requested, I have assessed the application against Council's relevant engineering policies. These include:

Geotechnical

A "Geotechnical Review" by ENGEO, has been submitted in support of the proposed development (Project No. 021483.000.001), which specifies geotechnical information and requirements for the project.

A full geotechnical report shall be submitted during resource consent and building consent stages. ENGEO comments that in order to progress with geotechnical investigation, they require the following to be available: 1) Confirmation of the development concept and earthworks plans for the development, or preliminary cut and fill plans if the design concept is not yet progressed. 2) Confirmation of the preliminary structural design and retaining concepts for the proposed development.

As per the review, the site is grassed and gently to moderately slopes (10° to 18°) from the northern boundary (~RL 82 m) to the head of the two gullies, to approximate RL 66 m (Photo 1). The slope then breaks steeply from RL 66 m and becomes densely vegetated down to the small stream at the base of the slope (~RL 54 m).

Based on this assessment, ENGEO consider that the site is generally geotechnically suitable for the proposed development as shown on the development plans they have been provided by BDG Architects dated 28 November 2022. Due to the sloping nature of the site and proximity to the gully system, there will be a need for robust geotechnical investigations to support the design process. However, from a geotechnical perspective, conventional geotechnical engineering measures will likely be suitable to mitigate the geotechnical risks and support the development.

Earthworks Issues

As per the Civil Engineering memo by Civix dated 21 December 2021, they have carried out preliminary bulk earthworks modelling for the site based on a layout comprising 115 residential units. The initial assessment has found compliant road grades and cross-sections can be achieved within the site and that the development layout can be achieved with reasonable earthworks and retaining structures to achieve buildable platforms and outdoor spaces.

Based on preliminary modelling by Civix, the volume of earthworks required to achieve the final development form will consist of 12,836.7 m³ of cut and 17,767.5 m³ of fill. Where retaining is required to establish suitably flat platforms, the maximum retained height will be 7.8 metres in cut.

Further earthworks details, including plans specifying cut and fill areas and volumes shall be provided at resource consent stage.

Erosion Mitigation

The proposed development and increased impervious area will result in increased flow rates at the outfall locations to the stream. According to Healthy Water's memo, slips have been identified within the catchment following the January and February 2023 storm events. Specific design of outfalls will be required in this regard. Erosion protection should be implemented at the outfall locations that is sensitive to the stream receiving environment. 'Green outfalls' should be considered where possible. The detailed design of erosion protection will be developed in future and it is recommended that an ecological specialist provides input to the design. A condition in this regard is recommended.

Stormwater

Healthy Waters were engaged to provide a stormwater assessment for the project based on the information currently available and the information detailed in the Civil Engineering memo by Civix dated 21 December 2021.

Healthy Water's comments and recommendations are detailed in their memo which was provided by Hillary Johnston.

Water Supply and Wastewater

Watercare were engaged to provide a wastewater and water supply assessment for the project based on the information currently available and the information detailed in the Civil Engineering memo by Civix dated 21 December 2021.

Watercare have specified that there is insufficient capacity to cater to the proposed development. The downstream network of the proposed discharge Wastewater (WW) line has several properties currently suffering from wastewater overflows. The additional flow from this development of 110 units will increase these properties' overflow volume and frequency.

There was insufficient information provided during the assessment. The developer must provide capacity calculations until the nearest 300mm WW line.

Transportation

A "Preliminary Assessment – Transport" by TPC (dated 16 December 2021) has been submitted based on the plan titled "Proposed Masterplan (For Preliminary Valuation Calculations Only)" by BDG Architects (Drawing No: CD-01).

Trip Generation & Effects

As per TPC's report, for Trip Generation & Effects, the proposal will generate approximately up to 70 vehicle trips per hour during the peak commute hours. These additional movements are likely to result in minor changes to the operation of nearby intersections and therefore the effects of the development are likely to be acceptable. During the next stage assessment more detailed analysis of the West Glade Crescent / Verran Road intersection and the Verran Road / Waipa Street intersection should be undertaken to confirm any adverse effects.

Access

The proposed vehicle crossings through the proposal site will be provided with a width suitable for two-way traffic flow and consistent with the E27 standards.

Within the site, the accessway will be provided as a slow speed environment with generally two-way flow possible from both roads. Vehicle circulation within the site is provided with a one-way loop road or some short accessways to parking areas ensuring all vehicles can enter and leave the site in a forward direction. The design and layout of the vehicle access areas is also considered to be generally consistent with the E27 standards.

Parking

A total of 92 parking spaces are proposed to serve the proposed dwellings on site. E27 standards have no minimum parking requirements and therefore the provision is consistent with the AUP requirements.

Parking dimensions have been considered in the concept design with all parking spaces have sufficient manoeuvring distance to access parking efficiently and safely.

Servicing

The proposal is expected to be serviced predominantly by trucks collecting refuse on a regular basis and to a lesser extent by trucks shifting furniture to and from the residential dwellings or making other deliveries.

Overall, it is considered that the design is adequate to meet the needs of the truck activity associated with the new residential development.

Public Roading

Auckland Transport were engaged to provide an assessment based on the proposed preliminary design. Their memo which includes comments and recommendations has been provided.

Specialist Response: Plans and Places, Auckland Council

From: *Todd Elder, Senior Planner, Plans and Places*

Date: 11 April 2023

Overall Summary:

(1) *The following is Plans and Places initial comments on the 19A–25 Verran Road and 19 West Glade Crescent, Birkenhead, Auckland application under the COVID-19 Recovery (Fast-track Consenting) Act 2020 ("FCTA"), requested by the Resource Consents Department of Auckland Council.*

(2) *Plans and Places considers the current AUP and PC 78 framework capable of managing the effects of the proposal. With that said, Plans and Places would raise the following activities to ensure they are included within the application for consideration:*

Chapter E38 Subdivision Urban: activities (A22) and (A23) of Table E38.4.2 Activity table – Subdivision in residential zones.

(A22)	Subdivision involving indigenous vegetation scheduled in the Significant Ecological Areas Overlay complying with Standard E38.8.2.5	RD
(A23)	Subdivision involving indigenous vegetation scheduled in the Significant Ecological Areas Overlay not complying with Standard E38.8.2.5	NC

(3) *Plans and Places seeks for the ongoing protection of the Significant Ecological Area (SEA) in a manner that is consistent with Chapter E38 Subdivision Urban.*

(4) *Further, Plans and Places seeks clarification for if the tracks into forested area will have public access.*

Specialist Response: Resource Consents Planner

From: *Sam Morrison, Senior Planner, Auckland Council*

Date: 11/04/2023

Overall Summary:

- Exceedances to the maximum height standards of the Single House Zone and Mixed Housing Suburban Zone may occur, and the proposed three to four storey buildings would be contrary to the planned suburban built character of one to two stories. Although, the development would be largely viewed as two to three storey buildings from the public realm including the adjoining streets (Verran Road and West Glade Crescent) and from adjacent sites. The buildings comply with height in relation to boundary, mitigating the effects of visual dominance, shading and overlooking on persons residing on the adjacent sites.

- The proposed buildings are reasonably well separated from the existing standalone dwellings on the adjacent properties, with taller buildings centralised within the subject site, the bulk and massing of the proposed buildings is partially mitigated by the modulation and physical separation of the proposed buildings, and the sloping topography of the subject site and surrounding land, and landscaped areas and open space incorporated into the proposed development also partially mitigate the adverse effects of visual dominance, shading and overlooking on persons residing on the adjacent sites. Parking spaces are generally internalised within the subject site and/or screened and softened by landscape planting to ensure a reasonable level of amenity is maintained on-site and on adjacent sites.

- The shortfall to the minimum landscaped area and exceedance to the maximum impervious area of the Mixed Housing Suburban Zone are mitigated by the balance of landscaped area and impervious area across the subject site, the provision of high-quality landscaping across the subject site and stormwater can be adequately managed through on-site stormwater management devices prior to discharging to the public stormwater network.

- Compliance or otherwise with the outlook space standards of the Mixed Housing Suburban Zone has not be determined. It is anticipated that the principal outlooks from the proposed dwellings will largely extend over the outdoor living spaces and landscaped areas on the subject site, providing a reasonable level of on-site amenity for residents. It is anticipated that the effects of overlooking can be minimised through adequate separation between the windows on the proposed buildings and dwellings on adjacent properties. Boundary fences could largely screen the living spaces on adjacent sites from overlooking where principal living rooms and spaces are proposed at ground level.

- Compliance or otherwise with the outdoor living space standards of the Mixed Housing Suburban Zone has not be determined. It is anticipated that outdoor living spaces of functional sizes and dimensions, which have access to sunlight and are accessible from the dwelling units they serve can be provided. Communal outdoor living spaces compliment the private outdoor

living spaces provided. Any shortfalls in the private outdoor living spaces can be partially mitigated by the communal outdoor living spaces, including those provided as part of the proposed community facility.

- Variations and glazing in the street-facing façades of the proposed buildings and landscape planting proposed across the subject site will achieve street frontages which are adequate in terms of their attractiveness and provision for passive surveillance.

- The proposed development comprises 110 dwelling units where around 89 dwellings could be established as a permitted activity if the subject site (gross area of 25,813m^2) was subdivided into 49 vacant lots and the Single House Zoned and Mixed Housing Suburban Zoned lots were all developed with one and three dwellings respectively. However, a large portion of the subject site is subject to the Significant Ecological Area Overlay so the development potential would in fact be far lower than 89 dwellings.

- Overall, the proposed development appears to be inconsistent with the objectives and policies of the Single House Zone and Mixed Housing Suburban Zone as they pertain to building height, bulk and intensity in particular as the development comprises buildings up to four storeys where one to two storeys is generally anticipated. A landscape and visual effects assessment (LVEA) was not provided in the lodged application. An LVEA is required to comprehensively assess the visual effects of the proposed building height exceedances.

Specialist Response: Urban Design, Auckland Council

From: *Shay Launder, Principal Urban Design, Auckland Council*

Date: 12.04.2023

Overall Summary:

The proposal presents a 110 unit development on a 2.5813ha. south facing site, zoned with a mix of Mixed Housing Suburban Zone and Single House Zone. The lower ~1ha of the site is subject to a Significant Ecological Area Overlay (SEA).
From an urban design perspective, I support in principle the higher intensification on the subject site with good access to public transport, amenities and facilities. However, I have some concerns about the degree of proposed development of this site given the topography, the degree of modification proposed, the intensity proposed, and the associated landscape effects including in relation to the SEA.

Site layout

Designs have improved from the proposal presented in 2021. The proposal provides a positive and legible connection between Verran Road and West Glade Crescent. The current design proposes a good structure for terrace housing, enabling good street frontage and private outdoor spaces.

Notwithstanding the above, the development involves significant cut and fill earthworks on a steep south facing section of the site. The apartment typology presented lacks sufficient information for assessment, without which I am unable to fully assess the merits of the proposal.

Consideration is needed regarding the development capacity of the site given the south facing gradient and proposal for considerable cut and fill earthworks.
I support Ian Munro's suggestion for a full urban design assessment of the final plan set, including ensuring that the proposed degree of development, typology, and distribution of blocks respond to site topography as best as possible.

Typologies

Terraced houses could function well within the structure of the site, with good street address and private OLS, however no floor plans have been provided for assessment. Terraced housing appears to integrate the gradient shifts within their footprint – ie, proposed as 3 levels at the street front and dropping to 2 levels at the back. This will need to be managed carefully to ensure onsite amenity and any effects to adjoining public realm and neighbours.

I note the approach to provide terraced housing at the periphery, with greater height internalised within the site, which can be supported in theory.

I remain concerned about the apartment typology given the site topography, however insufficient information has been provided to make an assessment.

JOAL condition and movement network

The JOAL condition appears well considered and designed with a generally clear movement strategy and provision of separated pedestrian areas and landscaping.

While common green areas are supported in principal, the proposed central green axis between apartments does not necessarily appear to correspond to desire lines or movement network. Given also that earthworks are likely to displace the current overland flow path, the rationale of this green link is unclear. A more activated green link could be better provided alongside the primary JOAL, from Verran Road and the common green areas (see Figure 1).

The provision of grouped and on-street parking is supported as this reduces the impact of cars within the development and increases pedestrian safety.

Further Information:

There is insufficient information about how the topography will be managed at a residential scale. Significant cut and fill earthworks are proposed, with some of the resultant terracing and retaining managed within the built form and it is unclear to what degree retaining walls will be relied upon. Information is needed to assess how this will impact upon dwellings and the street condition. This will be a critical element of the scheme.

There is insufficient information indicating the condition and interface of the apartment buildings within the centre of the site. If apartments are pursued, this will be a critical element of the scheme.
Cross sections will help to assess the above issues along with some views from the south showing the proposed bulk within its context.

Site assessment (Figure 1):

1. *Opportunity for primary sightlines and movement network to be strengthened with corresponding green network.*
2. *Cross sections are needed to assess the gradient shifts and typologies within the site (indicative locations only).*
3. *Further consideration of apartment layout and rationale is needed to ensure positive interface between buildings as well as at the interface with the street/JOAL and common green spaces.*

Specialist Response: Natural Environment Specialist Services, Auckland Council

From: Rue Statham, Senior Ecologist, Natural Environment Specialist Services, Auckland Council

Date: 11/04/023

Overall Summary:

I have been unable to visit the property. This review is based on desktop analysis of biodiversity records, and a review of the submitted reports by the applicant. A more thorough assessment of the proposed development would require a formal site visit.

The overall find of this review is that the application reveals discrepancies in the Assessment of Environmental Effects (AEE - Application), ecological reporting (EcIA), accompanying geotechnical / landscape reports, and Auckland Unitary Plan interpretation. The proposal lacks any detailed assessment on infrastructure requirements such as stormwater or wastewater connections.

The submitted EcIA is a synopsis following a walk-over survey of indeterminant duration (likely only a few hours) and is insufficiently detailed to fully understand the implications of the development and the impact to the Significant Ecological Area (SEA).

The report is contradictory when it states, "Fauna habitats assessed considered indigenous lizards, birds and bats", and yet continues, "Formal avifauna and herpetofauna surveys were not undertaken during the site visit." Reliance on 'opportunistic observations" is not a suitable substitute for robust and detailed ecological survey.

The ecology report appears to lack any formal desktop review. The author of the report would have been able to cite the four [at least] Nationally or Regionally threatened lizards known on to inhabit adjacent sites; Oligosoma aeneum (Copper Skink), Oligosoma ornatum (Ornate skink), Naultinus elegans (Elegant Gecko [Auckland Green Gecko]) and Mokopirirakau granulatus (Forest Gecko).

No formal or informal assessment was undertaken for nationally critical Chalinolobus tuberculatus (Long-tailed bat).

*The EcIA and AEE both state that SEA will be impacted by the development, however neither has quantified by how much; no area of loss has been described or calculated with the AEE stating, '**Some** vegetation removal may be required for infrastructure (e.g. pipelines) and the potentially for a bush walkway". [emphasis added].*
The EcIA mistakenly describes a modified channel as being artificial. However there may be an additional intermittent stream (as noted on GIS mapping), not surveyed by the ecologist.

The EcIA misinterprets the Unitary Plan with regards to classifying streams. The Unitary Plan is clear that channels that have been subject to channelisation or straightening are still considered natural streams and are not reclassified as artificial. Artificial channels are those that transfer water along channels where flow would not naturally occur, i.e. not part of a natural drainage pattern (see

Chp J1 definition River or Stream). It appears that the development would result in reclamation of a natural water course, possibly two (if another determined to be present).

The geo-technical report, including the cut and fill plan, do not align with the development concept plans, or the landscape plans. Including but not limited to retaining walls, citing of buildings (other than dwellings), and community facility (and associated curtilage).

The AEE lacks acknowledgement of standards that also must be applied and understood, including E38.8.2.5 and Chapter D9 with regards to SEAs, E3 Table E3.4.1 (A49) and National Environment Standards for Freshwater (NES-F) Regulation 57.

EcIA suggests that "The proposed development has the opportunity to increase the ecological value of streams and SEA habitats through appropriate pest plant and animal control, restoration planting and buffer planting". However, whilst this may be true, in part, these actions by default are required by standards in the Unitary Plan, as part of subdivision / development involving significant ecological. Therefore these are not actions that will mitigate any adverse effects resulting from the loss of freshwater or terrestrial habitats. Furthermore, other than weed and pest animal control, it is unclear from the report(s) what further enhancements are possible or will contain.

Specialist Response: Contamination, Air & Noise, Auckland Council

From: Bin Qiu, Senior Specialist, Auckland Council

Date: 6/4/2023

Overall Summary:

I have reviewed the application information and noted no acoustic report is provided within the application.

I believe detailed acoustic assessment is required for the proposed development in relation to the following matters:

- *Noise and vibration generated by the construction works for the redevelopment; and*
- *Noise emissions from the ongoing activities on site such as vehicles of residents and the communal facilities.*

The reasoning is:

- *The proposed development involves large scale of cut and fill earthworks and construction of multilevel buildings, these activities have potential to create high levels of noise and vibration which may exceed the AUP permitted noise and vibration limits outlined in Rule E25.6.27 and E25.6.30; without mitigation the construction noise and vibration may have an adverse effect to the neighbours.*

- *Once the site development is complete and in operation, the potential high noise sources from the site may include the residents' vehicles, centralised HVAC (if any), people at the playgrounds, multi-use game area including basketball court and community facility/building. These noises could exceed the AUP permitted noise limits (AUP E25.6.2) at the adjacent residential sites.*

Detailed assessment and suitable mitigation measures should be provided to assist the consenting authority in understanding the noise effect and determining if and what suitable measures are necessary to mitigate the adverse effect to a reasonable level.

This noise assessment should be prepared by an experienced acoustic expert and be submitted in the application for the resource consents.

No condition is suggested at this stage.

s 9(2)(f)(ii), s 9(2)(g)(i)

s 9(2)(f)(ii), s 9(2)(g)(i)

s 9(2)(f)(ii), s 9(2)(g)(i)

s 9(2)(f)(ii), s 9(2)(g)(i)

s 9(2)(f)(ii), s 9(2)(g)(i)

s 9(2)(f)(ii), s 9(2)(g)(i)

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s 9(2)(f)(ii), s 9(2)(g)(i)