

## **Review of Adequacy of Information for a Private Plan Change Request**

***Applicant:*** Beach Haven Road Apartments Limited

***Proposal:*** Private Plan Change request for land at 13 Cresta Avenue and 96 Beach Haven Road, Beach Haven, from 'Residential – Single House Zone' to 'Residential Mixed Housing Urban Zone', to enable the development of residential apartment blocks of more than two storeys in height.

***Date and Author of Report:*** 15 December 2023 / Andrew Temperley, TPC

### **Introduction**

1. This report provides a completeness and adequacy review of the information provided by the applicant as it relates to the Private Plan Change Request (PPC Request) to rezone land at 13 Cresta Avenue and 96 Beach Haven Road, Beach Haven, for the purpose of enabling more intensified urban development.

### **Intended audience**

2. This report has been requested to confirm whether the submitted information is sufficient for Council Officers to recommend that the PPC Request be accepted for public notification, pursuant to clauses 5 and 25(2)(b) of the First Schedule of the Resource Management Act 1991 (RMA).
3. Pursuant to clause 23(1) of the RMA's First Schedule (attached to this memorandum), any further information which is required before the PPC Request is accepted for public notification is detailed in the following sections of this memorandum.

### **Scope of review**

4. The scope of this report is limited to lodgement completeness and adequacy review of the information provided by the applicant in relation to the proposal's transport effects. This report is not a 'peer review', rather the focus of this report is on:
  - a. identifying any fundamental gaps
  - b. checking the fundamental facts (as opposed to opinions)
  - c. confirming sufficient detail is provided

5. This report does not provide an assessment or evaluation of the merits of the proposal. Nor does it contain any recommendation on whether or not the proposal should be approved or declined by the decision-maker.

## Fundamental gaps (gap analysis)

6. I have identified the following key gaps which I consider to be fundamental with regards to understanding the full scope of potential transport effects associated with the Proposed Plan Change (PPC).

- I. **Gap: Insufficient Assessment around potential long-term transport outcomes resulting from proposed Residential – Mixed Housing Urban Zone**

### Gap in the information submitted

The ITA considers only a single trip generation scenario under the proposed Residential – Mixed Housing Urban zone, comprising 80 apartments of one to two bedrooms. It is not clear as to whether this scenario represents the most intense use of the land which could be permitted under the new zone, and hence whether it represents the greatest traffic generation potential for the site.

I note that the architectural plans for the previous proposal for 81 dwellings under resource consent application BUN60397498 illustrate three storey apartment buildings on the site, to achieve this dwelling yield on the site. While the Unitary Plan policy for the Residential – Mixed Housing Urban zone refers to development being ‘typically up to three storeys’ and an objective to achieve ‘character of predominantly three storeys’, policy H5.6.4 refers to a height limit of 11 metres, which could potentially allow for residential buildings of up to four storeys in height.

### Request for information

I would recommend requesting further assessment from the applicant, of a more intense land use scenario for the site which could be permitted, based on permitted activities and the maximum permitted building height under the Residential – Mixed Housing Urban zone, including assessment of the transport effects of such a scenario.

### Why this is needed

To understand potential long-term transport effects which could result from permitted development activities within the Residential – Mixed Housing Urban zone.

**II. Gap: Lack of pedestrian crossing facility on Beach Haven Road to cater for new desire line from the subject site to Beach Haven local centre.**

Gap in the information submitted

While Section 2.3.2 of the TA Report acknowledges that there is no pedestrian cut-through on the splitter island on the western approach of the Rangatira Road / Beach Haven Road roundabout, it does not propose the provision of a new pedestrian crossing facility across Beach Haven Road in this vicinity, to cater for the new pedestrian desire line between the subject site and Beach Haven Local Centre.

In addition, the TA Report does not consider the potential safety conflict between the new pedestrian desire line, neighbouring vehicle crossings emerging onto Beach Haven Road and the location of twin bus stops on Beach Haven Road adjacent to the southern access point. Pedestrian movements accessing the site could hence conflict with bus movements and local vehicle turning manoeuvres.

Request for information

I would recommend requesting further work from the applicant to consider options to provide formal pedestrian crossing facilities to cater for the new desire line between the subject site and Beach Haven Local Centre, whilst also allowing for safe access to the bus stops on both sides of Beach Haven Road. If appropriate, this should consider options for short-distance relocations of the two bus stops, to alleviate potential conflict between pedestrians and buses.

Why this is needed

This information is needed to ensure that the PPC proposal can be integrated safely into the existing urban environment and appropriately fulfil desired transport outcomes of the Unitary Plan policy for the Residential – Mixed Housing Urban Zone, including promoting walkable neighbourhoods and achieving attractive and safe streets and public open spaces.

**III. Gap: Assessment of Vehicle / pedestrian visibility at exit onto Cresta Avenue**

Gap in the information submitted

While the TA report assesses vehicle intervisibility at the site exit onto Cresta Avenue, it does not assess vehicle-pedestrian intervisibility at this location.

Request for information

I would recommend requesting assessment of vehicle /pedestrian intervisibility at the site exit onto Cresta Avenue, according to an appropriate standard such as 'Australia / New Zealand Standard for Parking facilities Part 1: Off-street car parking', to ensure that appropriate pedestrian visibility splays can be achieved. This assessment should include confirmation that any new vegetation or boundary structures provided at the exit point to not adversely affect visual permeability.

#### Why this is needed

This information is needed to ensure that the site access arrangements will function safely and efficiently, integrating well with the surrounding environment, particularly as the proposed new vehicle accessway is bordered by the boundary fence to 15 Cresta Avenue immediately to the north and by vegetation immediately to the south.

## Fundamental facts

7. I have not identified any issues with regards to fundamental facts that have been presented by the applicant.

## Sufficient detail

8. Please refer to my comments under 'Fundamental Gaps', in which I have highlighted the following transportation related effects for which I consider that further detail and analyses is appropriate:
  - Further assessment around potential long-term transport outcomes resulting from Residential – Mixed Housing Urban Zoning
  - Further assessment in relation to the provision of pedestrian facilities between the subject site and Beach Haven Local Centre

## Additional Observation

9. The TA report for the plan change contains conflicting information in relation to bicycle parking provisions, as follows:
  - The adopted 'likely development scenario' proposes 72 bicycle parking spaces to serve 80 dwellings.
  - Section 6.3 of the TA report acknowledges that under Unitary Plan provision E27.6.2, 80 resident cycle spaces and 4 visitor bicycle parking spaces are required, with the intention that exact locations for cycle parking spaces would be confirmed in due course.

The former reference is thus inconsistent with Unitary Plan requirements and a shortfall in bicycle parking provision would trigger engagement with Auckland Transport at resource

consent phase. Notwithstanding this, the latter reference indicates that this issue could be appropriately addressed at the resource consent phase. I would recommend seeking confirmation from the applicant that the latter reference reflects the intention of the Plan Change proposal.

## Overall Findings

10. Following my review of the information provided in relation to the PPC at 13 Cresta Avenue and 96 Beach Haven Road, Beach Haven, my comments are as follows:
  - I consider that the existing transport environment is not currently subject to any significant congestion or safety issues.
  - I consider that, subject to my recommendations highlighted in this report, there is opportunity appropriately integrate the activity and transport provisions proposed under the PPC with the existing transport environment, without significant adverse traffic and safety impacts on adjoining road network.

## Appendix 1

### 23 Further information may be required

(1) Where a local authority receives a request from any person under [clause 21](#), it may within 20 working days, by written notice, require that person to provide further information necessary to enable the local authority to better understand—

- (a) the nature of the request in respect of the effect it will have on the environment, including taking into account the provisions of [Schedule 4](#); or
- (b) the ways in which any adverse effects may be mitigated; or
- (c) the benefits and costs, the efficiency and effectiveness, and any possible alternatives to the request; or
- (d) the nature of any consultation undertaken or required to be undertaken—

if such information is appropriate to the scale and significance of the actual or potential environmental effects anticipated from the implementation of the change or plan.

(2) A local authority, within 15 working days of receiving any information under this clause, may require additional information relating to the request.

(3) A local authority may, within 20 working days of receiving a request under [clause 21](#), or, if further or additional information is sought under subclause (1) or subclause (2), within 15 working days of receiving that information, commission a report in relation to the request and shall notify the person who made the request that such a report has been commissioned.

(4) A local authority must specify in writing its reasons for requiring further or additional information or for commissioning a report under this clause.

(5) The person who made the request—

- (a) may decline, in writing, to provide the further or additional information or to agree to the commissioning of a report; and
- (b) may require the local authority to proceed with considering the request.

(6) To avoid doubt, if the person who made the request declines under subclause (5) to provide the further or additional information, the local authority may at any time reject the request or decide not to approve the plan change requested, if it considers that it has insufficient information to enable it to consider or approve the request.