

Memorandum

18 August 2021

To: Jonathon Griffiths
 Natasha Rivai, Senior Planner, The Property Group

Cc: Eryn Shields – Team Leader: Regional, North, West & Islands Planning, Plans & Places

Subject: Preliminary review of reporting submitted in advance of an application for a Proposed Plan Change at 41-43 Brigham Creek Road, Whenuapai

From: Ciarán Power – Policy Planner, Regional, North, West & Islands Planning, Plans & Places

Purpose

- To provide a preliminary review of the documentation and reporting that has been submitted for review by Auckland Council specialists. The reporting pertains to a future Proposed Plan Change (PPC) to rezone 41-43 Brigham Creek Road from Future Urban Zone to Residential - Mixed Housing Urban Zone

Conclusions

- While this may appear to be a preliminary review of documentation associated with a future plan change to enable subdivision (and possibly 200 houses), achieving technical and planning solutions on-site does not equate to the Council and its CCO's supporting this proposal. This memorandum is not a merits-based assessment in the light of submissions and further submissions, site visits, and all technical and planning assessments.
 - The proposal is out of sequence with the Future Urban Land Supply Strategy 2017, as it is within Stage 2 of the Whenuapai Structure Plan and there is currently no provision for funding the full costs of transport infrastructure required. Stage 2 is not anticipated to be delivered until at least 2028.
 - Specialist review of this submitted documentation has revealed that the proposed infrastructure provisioning (wastewater stormwater & transportation) is inadequate to meet the requirements of the Resource Management Act 1991.
5. The following documentation was submitted to Auckland Council for review:
- Appendix 1: Register of Title
 - Appendix 2: Private Plan Change Plan
 - Appendix 3: Integrated Transportation Assessment
 - Appendix 4: Infrastructure Report
 - Appendix 5: Stormwater Management Plan
 - Appendix 6: Noise Report
 - Appendix 7: Ecological Wetland Assessment Report
 - Appendix 8: Planning Memo
6. The following specialists were engaged by Council to provide a preliminary review of the documentation:

Area of Expertise	Specialist
Planning input	Ciarán Power – Policy Planner, Regional, North, West & Islands Planning, Plans & Places
Contaminated land Specialist Input	Marija Jukic: Senior Specialist – Contamination Land: Contamination, Air & Noise Specialist Input

Ecology Specialist Input	Mark Lowe: Principal Environmental Scientist: Morphem Environmental Ltd
Wastewater Specialist input, Watercare	Ilse Gotelli: Head of Major Developments Major Developments, Watercare
Noise Specialist Input	Andrew Gordon noise specialist, Contamination, Air & Noise Team Specialist Unit
Stormwater Specialist Input	<ul style="list-style-type: none"> • Danny Curtis: Principal - Catchment Planning, Healthy Waters • Richard Challis: Senior Healthy Waters Specialist: Healthy Waters Growth & Development team
External Traffic Specialist Input	Jan Franta: Transportation Lead: Harrison Grierson
Auckland Transport Traffic Specialist Input	Rory Power: Principal Transport Planner: Auckland Transport
Urban Design Specialist Input	Vanita Ranchhod: Principal Strategic Advisor: Urban Design Strategy & Projects

Planning

Current Planning Environment

Auckland Plan

7. The Auckland Plan 2050 is the council's spatial plan, required under the Local Government (Auckland Council) Act 2009. The Auckland Plan 2050 contains a 30-year high level development strategy for the region based on a quality compact approach to accommodating growth. This approach anticipates most growth through intensification within existing urban areas, with managed expansion into the region's future urban areas and limited growth in rural areas. The Development Strategy has also been adopted as council's Future Development Strategy required under the National Policy Statement on Urban Development Capacity 2016 (NPS UDC). The NPS UDC has now been superseded by the National Policy Statement on Urban Development (NPS-UD). Under the NPS-UD, council has to review its Future Development Strategy in time to inform the 2024 Long-term Plan.

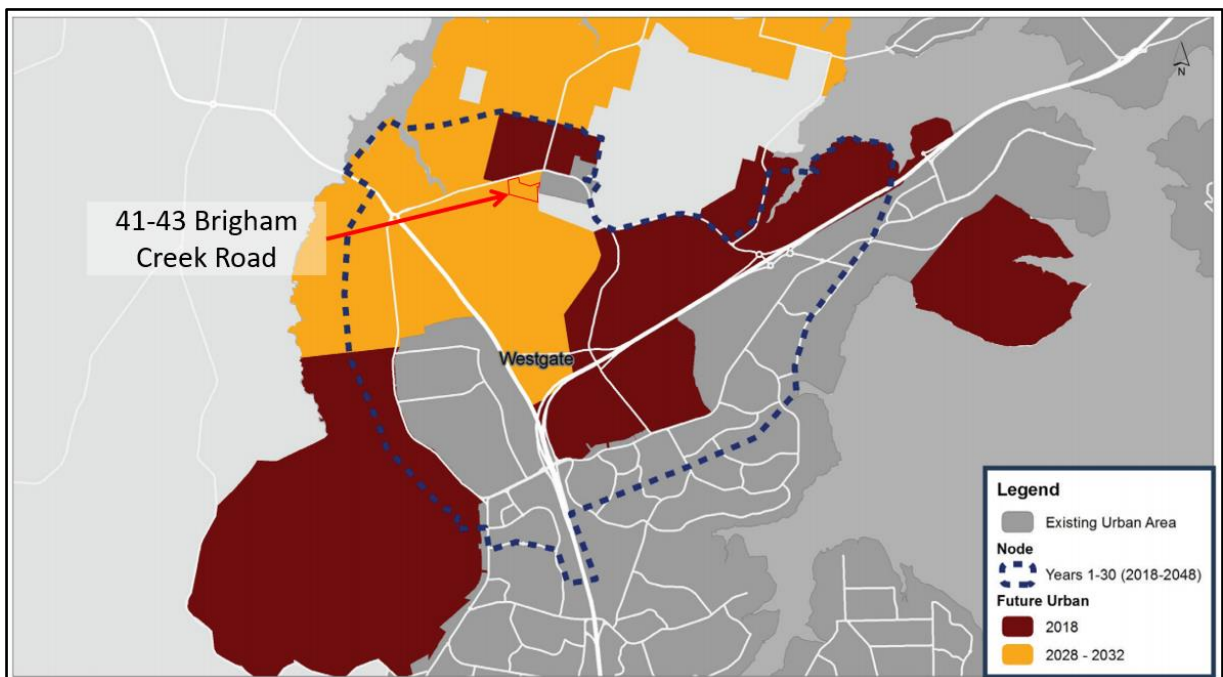


Figure 1: Node - Westgate showing future urban areas and sequencing including for the Whenuapai Future Urban area (source Auckland Plan 2050 Development Strategy)

8. The Development Strategy identifies Whenuapai as a future urban area and part of the Westgate node (see figure 1 below). The node provides a centre for urban development in the north west with anticipated residential development and intensification together with large business areas.

Future Urban Land Supply Strategy 2017

9. The Future Urban Land Supply Strategy 2017 (FULSS) sets out how Auckland is expected to grow and change over 30 years using the quality compact model. These strategies support the spatial prioritisation of the infrastructure investment and this needs to be linked to growth-enabling infrastructure included in this Infrastructure Strategy¹.
10. The FULSS implements the Auckland Plan and gives effect to the National Policy Statement on Urban Development Capacity 2016 (which has been replaced by the National Policy Statement on Urban Development 2020) by identifying a programme to sequence the development of future urban land over 30 years.
11. The sequencing and timing of development for the future urban areas has been incorporated into the Auckland Plan 2050. The FULSS relates to greenfield land only and ensures there is 30 years of development capacity at all times and a seven year average of unconstrained and “ready to go” land supply. It allows the council to consider the balance between the development of brownfield and greenfield land and ensure that the majority of Auckland’s growth is located within the existing urban area.
12. The subject site of the plan change request is within an area identified as being “development ready” between 2028 and 2032. In terms of the steps required for development, it is noted that the land already has Future Urban zoning under the Auckland Unitary Plan (AUP) and a structure plan has been completed. Land is being sought to be rezoned as part of this private plan change process, and some infrastructure provision is proposed to be funded by the applicant. Most bulk infrastructure is not planned or funded at this stage.

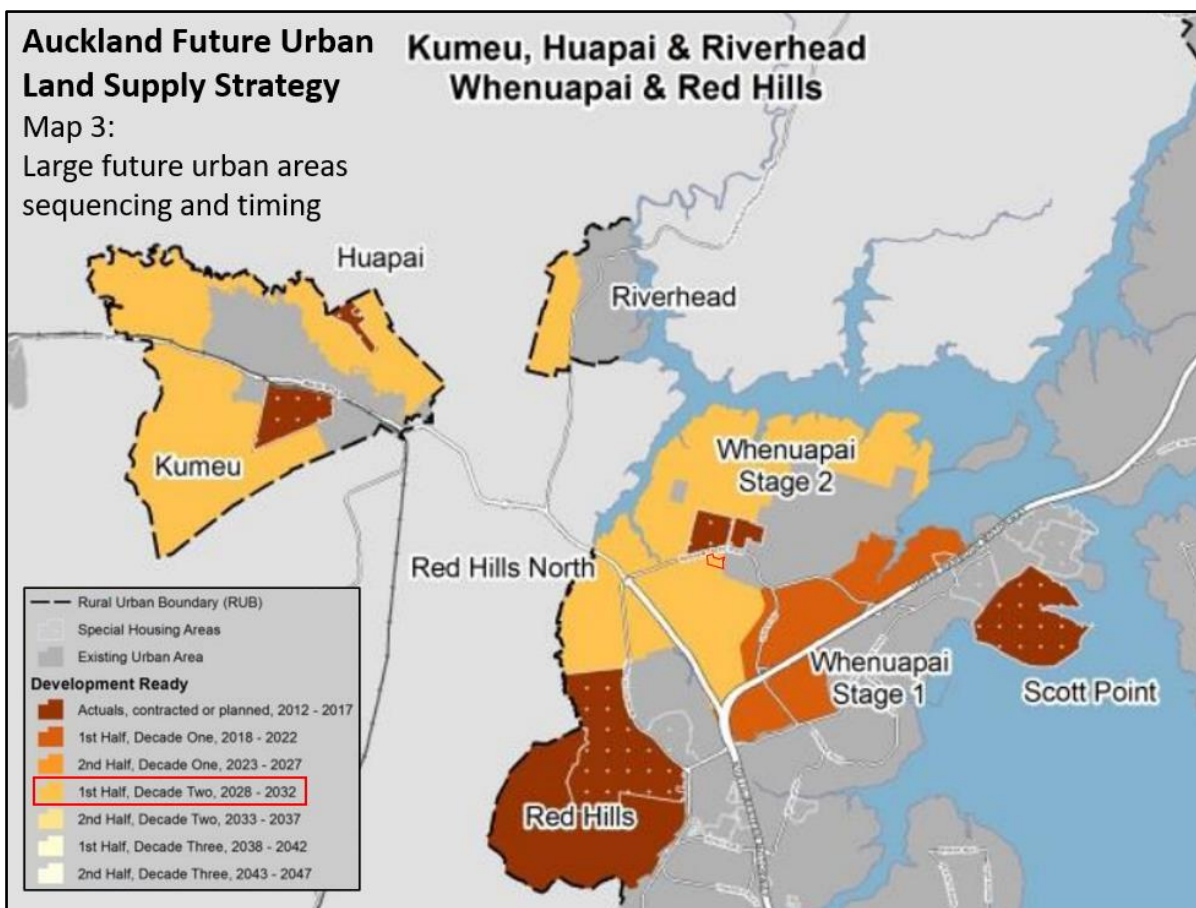


Figure 2: Inset map taken from Map 3: Large future urban areas sequencing and timing of the Auckland Future Urban Land Supply Strategy 2017

¹ <https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/budget-plans/The-10-year-budget-2021-2031/10yearbudgetfull/10-year-budget-2021-2031-volume-2.pdf>

Auckland Council Long Term Plan: 10-year Budget 2021-2031

13. Council has undertaken significant work in recent years to set strategic direction across the council group and a clear and consistent way and that direction guides council's infrastructure response. This is articulated in the Auckland Plan and the FULSS which has, in turn, informed the Whenuapai Structure Plan (WSP).
14. The FULSS sets out the strategy as to where, and when, investment in transport, wastewater and storm water infrastructure is to occur. This information informs the Auckland Council Long Term Plan: 10-year Budget 2021-2031.
15. There are significant funding deficits of a substantive nature that accompany out of sequence development, especially funding beyond the proposal site for its contribution to the wider networks.
16. Council and its Council Controlled Organisations are meeting existing funding requirements in correctly sequenced green field development, and major pieces of infrastructure that are not in sequence, may not be funded.
17. Although the applicant has proposed to fund infrastructure to mitigate the immediate effects of the proposed development, the council does not have enough information at this time to accurately assign a fair proportion of future transport costs to the applicant. These costs are not included in the Long-term Plan (LTP) and are unlikely to be determined until late 2021/2022. If the private plan change is accepted for processing, these are matters that will need to be addressed before the plan change is finally determined.

Whenuapai Structure Plan 2016

18. The zoning proposed in the request is largely consistent with the land use pattern set out in the council's WSP which was adopted in September 2016. An area suitable for medium density residential zoning was proposed in the northwestern portion of the structure plan (see figure 3 below) and it is within this area that the subject site is situated.

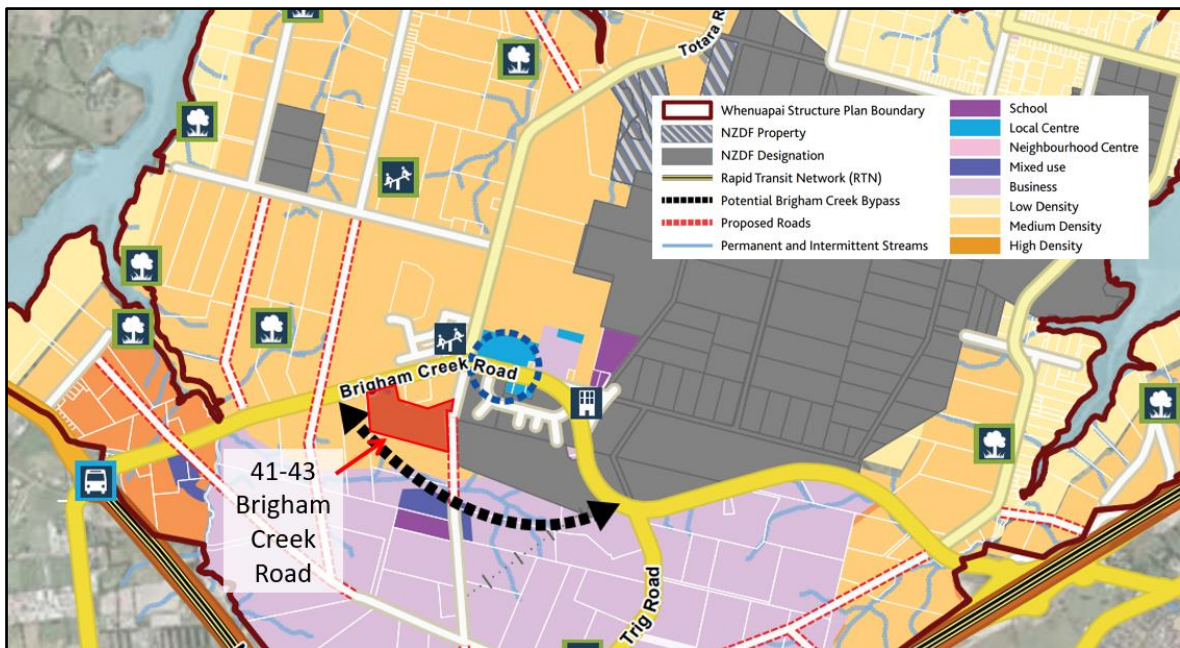


Figure 3: Inset map taken from Figure 16: The Structure Plan map of the Whenuapai Structure Plan 2016

19. However, this area has been identified in the WSP as being within Stage 2 of development (2028-2032) as further investment in new infrastructure beyond the next decade (post 2028) is required.

Proposed Plan Change 5

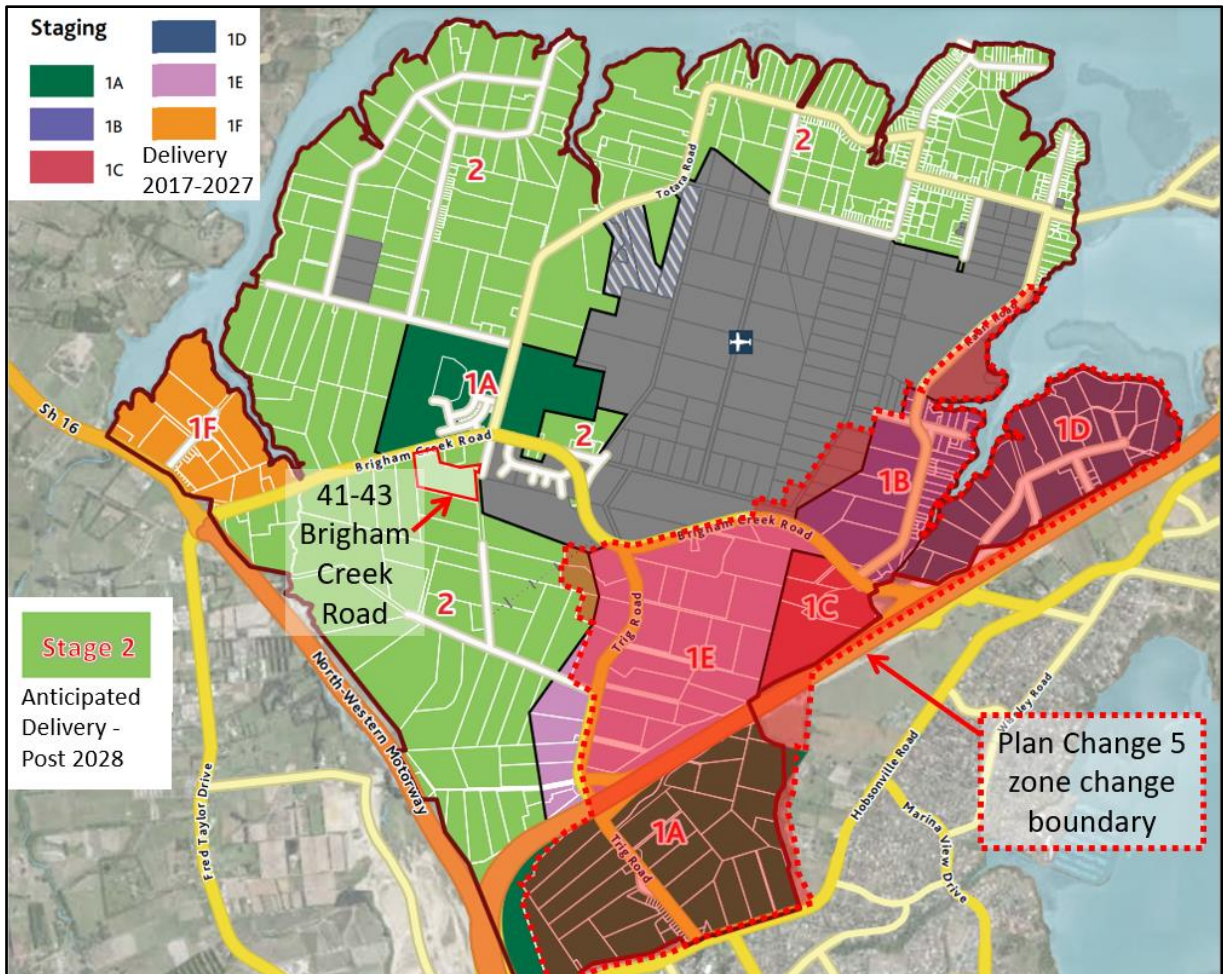


Figure 4: Inset map taken from Figure 17: Staging map of the Whenuapai Structure Plan 2016

20. Proposed Plan Change (PPC) 5 area boundary is consistent with the council's FULSS which splits Whenuapai into two stages. (See Figure 2: Inset map taken from Map 3: Large future urban areas sequencing and timing of the Auckland Future Urban Land Supply Strategy 2017) The ability to provide infrastructure was considered in the developmental of the FULSS.
21. The boundary of the PPC5 area (shown in dashed red line in Figure 4) was determined by the analysis in the WSP and further technical work on the ability to provide infrastructure to the plan change area in the next 10 years (2017 onwards) to mitigate adverse effects on the environment. This is because the AUP's Regional Policy Statement: *B2 Urban growth and form*, requires land to be developed in an integrated manner with infrastructure², to mitigate adverse effects on the environment.
22. Stage 1 is wholly provided for by PPC5 and a council-initiated plan change for stage 2, wherein the subject site is located, will be prepared when infrastructure to service stage 2 is able to be considered from approximately 2028 onwards. The PPC5 boundary also considers Watercare's ability to service the area and the Supporting Growth Strategy³ which identifies the transport infrastructure needed to support development in Whenuapai, and the wider northwest area.
23. A significant amount of infrastructure needs to be provided to service the wider Whenuapai area before the development potential of PPC5 can be realised, and any other proposed private plan changes within the stage 2 areas of Whenuapai.
24. To service the area's wastewater needs the Northern Interceptor needs to be built. It is not due for completion until 2026. A new pump station near Brigham Creek Road and a smaller pump

² B2.4.2.(6); Chapter B2 Tāhuhu whakaruru hau ā-taone - Urban growth and form; Regional Policy Statement, AUP

³ Supporting Growth - Delivering transport networks

station near Totara Road, planned for 2032, will then need to be built to connect to the Northern Interceptor.

25. In terms of transport infrastructure, Brigham Creek Road will need to be upgraded as will Totara Road leading into Whenuapai Village. The wider transport network (outlined in the Supporting Growth Strategy⁴) is needed to service development in Whenuapai.

Information Requirements

26. In consideration of the direction set by the NPSUD in Sub Part 2: 3.8 Unanticipated or out of sequence developments, the proposed plan change to rezone 41- 43 Brigham Creek Road from Future Urban Zone to Residential - Mixed Housing Urban Zone would be difficult to support based on the information submitted because:
- specialists who have reviewed the submitted documentation, have highlighted that there are significant issues with the proposed transport, wastewater water and stormwater infrastructure provisioning and,
 - the proposal is out of sequence of the WSP and the FULSS as the site is not expected to be rezoned until post 2028.
27. Considering the above, should a private plan change for the site at 41-43 Brigham Creek Road be pursued, a comprehensive assessment of environmental effects (AEE) will need to be prepared and submitted with any future application for a private plan change.
28. In accordance with s32(4A) of the RMA, your application will need to include the evidence of consultation with the relevant mana whenua groups and a summary of the consultation in the application documents.

“4(A) If the proposal is a proposed policy statement, plan, or change prepared in accordance with any of the processes provided for in Schedule 1, the evaluation report must -

- a) summarise all advice concerning the proposal received from iwi authorities under the relevant provisions of Schedule 1; and*
- b) summarise the response to the advice, including any provisions of the proposal that are intended to give effect to the advice.”*

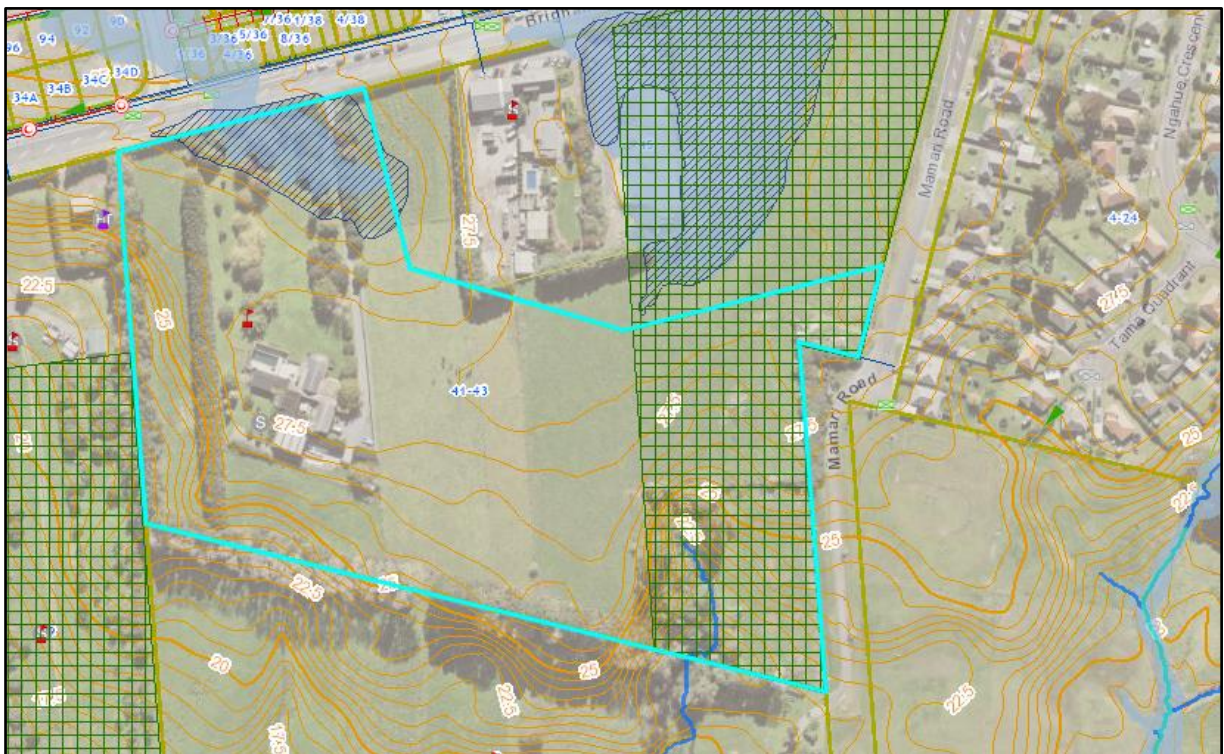


Figure 5: From Auckland Council Geomaps. Extent of Overland Flow Paths, Floodplain & flood prone areas and Historic Horticulture Overlay (green cross hatching) over 41-43Brigham Creek Road

⁴ Supporting Growth - Delivering transport networks

Contaminated land Specialist Input

29. Figure 5 above, shows part of the subject site has a historic horticulture overlay. Marija Jukic, Senior Specialist within the Contamination, Air & Noise Specialist unit reviewed the proposal documents and concluded that a Preliminary Site Investigation of Contaminated Land (PSI) report will be required to be prepared and submitted with any future application for a plan change of the subject site.
30. Please refer to Appendix 1: Contaminated Land feedback PPC 41-43 Brigham Creek Road.

Ecology Specialist Input

31. Part of the subject site features overland flow paths, floodplain & flood prone areas. The applicant has provided two reports which cover these topics:
 - a Wetland & Stream Ecology Report prepared by RMA Ecology Ltd dated 14 April 2021.
 - An Infrastructure Report prepared by Maven Auckland Ltd dated 12 April 2021,
32. Mark Lowe, Principal Environmental Scientist at Morphum Environmental Ltd acting on behalf of council reviewed the proposal documents where he concurred with the findings of the wetland assessment that there are no wetlands or streams on the subject property.
33. Please refer to Appendix 2 Ecological feedback PPC 41-43 Brigham Creek Road.

Wastewater Specialist input, Watercare

34. The subject site is not served by a public wastewater connection. Ilze Gotelli, Head of Major Developments at Watercare Services Limited has reviewed the submitted documents and has concluded that the submitted reports do not adequately confirm that the site can be serviced by water and wastewater.
35. Please refer to Appendix 3 Watercare feedback PPC 41-43 Brigham Creek Road.

Noise Specialist Input

36. Andrew Gordon, Specialist within the Contamination, Air & Noise Specialist unit reviewed the submitted noise report. He concluded that rezoning the site from Future Urban to Residential would not adversely affect adjacent land zoned Residential located to the north of Brigham Creek Road and land zoned Residential and Business located east of Mamari Road.
37. Please refer to Appendix 4 Noise Specialist Feedback PPC at 41-43 Brigham Creek Road.

Stormwater Specialist Input

38. Therese Malcon of Jacobs has been coordinating feedback from Danny Curtis, Catchment Manager of the Healthy Waters department of council. They both have reviewed the submitted stormwater management plan and infrastructure reports and Sameer Vinnakota: Environmental Planner at Jacobs, has collated their reviews and provided the response.
39. Please refer to Appendix 5 Healthy Waters Feedback PPC at 41-43 Brigham Creek Road.

External Traffic Specialist Input

40. Jan Franta of Harrison Grierson has been engaged by council to review the proposal from an independent traffic perspective. He has raised concerns around the timing of the plan change.
41. Please refer to Appendix 6 External Traffic Specialist Feedback PPC at 41-43 Brigham Creek Road

Auckland Transport Traffic Specialist Input

42. Rory Power, Principal Planner with Auckland Transport (AT), has reviewed the documentation that has been submitted and concluded that the Integrated Transportation Assessment (ITA) is the same version that was provided to AT in April 2021. This version has not addressed any of the points raised by AT in the 12 May 2021 meeting.

43. Please refer to Appendix 7 Auckland Transport Feedback PPC at 41-43 Brigham Creek Road.

Urban Design Specialist Input

44. The proposed plan change documents were sent to the Urban Design Unit (UDU) for their review because consideration should be given to Urban Design under s.7.14 Neighbourhood Design Statement of the Whenuapai Structure Plan - September 2016.
45. Vanita Ranchhod, Principal Specialist with the Urban Design Strategy unit states that an:
Urban design assessment should be provided for the proposal to assess matters such as lot layout regarding suitability solar orientation for future dwellings, movement permeability & connectivity that the subdivision layout would provide for future residential development.
46. Ms. Ranchhod recommends that you follow the structure of the example of the [Southern Structure Plan Area and Neighbourhood Design Statements \(Revision B\)](#) and states:
Whilst we would not necessarily anticipate as comprehensive a report developed as this – they should refer to Section C (Neighbourhood Design Statement: Design Considerations) and address the relevant matters that relate to their proposed residential development
47. Please refer to Appendix 8 Urban Design Feedback PPC at 41-43 Brigham Creek Road.

Summary

48. The proposed zoning of 41-43 Brigham Creek Road from Future Urban Zone to Mixed Housing Urban Zone is in accordance with the proposed future zoning plan of the Whenuapai Structure Plan.
49. However, the proposal is out of sequence with the FULSS, and it is within Stage 2 of the Whenuapai Structure Plan which is not anticipated to be delivered until at least 2028. Over the next ten years, Auckland Council has budgeted to direct its infrastructure funding for the upgrading and installation of infrastructure to other parts of the Auckland region where there is greater development pressure. E.g Drury and in Whenuapai PPC5 area, (the area identified in stage 1 of the Whenuapai Structure Plan).
50. Specialist reviews of this submitted documentation has revealed that the proposed infrastructure provisioning (wastewater stormwater & transportation) is inadequate to service the proposed change of zoning. Furthermore, additional reporting will be required to be submitted with any future proposal for a planned change on this site: a preliminary site investigation report for contaminated land and an urban design assessment.

From: [Marija Jukic](#)
To: [Ciaran Power](#)
Subject: RE: Contaminated Land specialist PPC 41-43 Brigham Creek Rd Document review
Date: Monday, 9 August 2021 10:36:48 am

Hi Ciaran,

Thanks for your email and brief. I have now reviewed the application documents from the perspective of contaminated land and would like to request the provision of a preliminary site investigation report (PSI) which details the all historical and current activities undertaken at the site that may potentially be contaminating. The PSI should be completed by a suitably qualified and experienced contaminated land practitioner in accordance with the Ministry for the Environment's (MfE) Contaminated Land Management Guidelines (CLMG), *No. 1 Reporting on Contaminated Sites in New Zealand* (revised 2011).

The PSI will allow the identification of any major constraints associated with the contamination status of the subject area, which would present an impediment to the proposed re-zoning of the land.

Thanks very much. Please don't hesitate to contact me if you have any questions.

Ngā mihi | Kind regards

Marija

**Marija Jukic | Senior Specialist – Contamination
Contamination, Air & Noise | Specialist Input**

Auckland Council, Level 6, 135 Albert Street, Auckland Central 1010
Private Bag 92 300 Auckland 1142



Visit our website: www.aucklandcouncil.govt.nz

From: [Mark Lowe](#)
To: [Ciaran Power](#)
Subject: RE: Ecological specialist input proposed plan change 41-43 Brigham Creek Rd
Date: Friday, 6 August 2021 10:28:08 am
Attachments: [image001.png](#)
[image002.png](#)

Hi Ciaran,

In summary, from the material provided I do not have any concerns from an ecology perspective.

- Based on the material provided, I concur with the wetland assessment that there are no wetlands or streams on the subject property. This is also supported from reviewing historical imagery.
- While no assessment of terrestrial vegetation has been provided, I do not anticipate the vegetation present to provide more than low ecological values.

The wetland assessment also noted a potential wetland feature outside of the subject site. If this is deemed to be a natural wetland it will trigger reasons for consent at the resource consent stage where consideration of maintaining hydrology will be required.

Given the above – I believe my involvement going forward will be minimal, but still happy to review the lodged material as required.

Kind regards,

Mark Lowe | [Principal Environmental Scientist](#)

From: [IGotelli \(Ilze\)](#)
To: [Ciaran Power](#)
Cc: [MWhitaker \(Michelle\)](#)
Subject: RE: Watercare Feedback PPC at 41-43 Brigham Creek Rd Document review
Date: Friday, 6 August 2021 9:10:16 pm
Attachments: [image004.png](#)
[image006.png](#)
[DEVELOPMENT CONSULTATION APPLICATION FORM.pdf](#)
[General Enquiry - Infrastructure Assessment form.pdf](#)

Hi Ciaran

I have reviewed the Infrastructure Report for the PPC at 41-43 Brigham Creed Road and comments as follows:

Wastewater

- The report correctly states that no wastewater services are available at this site
- Watercare confirms that the future pump station at Brigham Creek is current scheduled for completion in 2024.
- The report states that an interim solution will be not be required given the time. We note that they are not asking for an interim solution, but confirm that we would not allow an interim solution.
- The report notes that a private pump station will be required. We advise that Watercare will not accept a private pump station to service residential development and that private rising mains are not permitted in the public road reserve.
- A public pump station will need to be designed to service the entire wastewater catchment. No information is provided on the scale and wastewater flows of the entire catchment.

Water supply

- The applicant will need to apply to Watercare for a capacity assessment for both water supply and wastewater supply. This assessment will not be undertaken as part of review support for Council for pre-lodgement. This is a chargeable service and the applicant must apply directly to Watercare. It is advised that this is completed ahead of the formal lodgement of the plan change. I attach the forms.
- Watercare is not in position to comment further on this until the capacity assessment is undertaken.

Overall, the report does not adequately confirm that the site can be serviced by water and wastewater:

- A capacity assessment is required for both water and wastewater
- Watercare will not accept a private wastewater pump station
- If a public pump station is proposed, the applicant must demonstrate the servicing of the entire catchment and the location of the rising main and other infrastructure to convey flows to the new Brigham Creek pump station.

Please let me know if you have any questions.

Regards

Ilze

Ilze Gotelli | Head of Major Developments

Watercare Services Limited

Customer service line: +64 9 442 2222

Postal address: Private Bag 92 521, Wellesley Street, Auckland 1141, New Zealand

Physical address: 73 Remuera Road, Remuera, Auckland 1050, New Zealand

Website: www.watercare.co.nz



From: [Andrew Gordon](#)
To: [Ciaran Power](#)
Subject: RE: NOISE - FW: Proposed Plan Change at 41-43 Brigham Creek Rd Document review
Date: Thursday, 5 August 2021 8:08:20 am
Attachments: [image001.png](#)
[image002.png](#)

Hi Ciaran,

As requested, I have carried out a preliminary review of the following documents to identify any missing information and to assist the applicant in preparing a formal application: -

- Planning Memo
- Integrated Transport Assessment
- Noise Assessment
- Plan – Road Layout

Traffic Noise

-

As Brigham Creek Road is a key east-west connection through Whenuapai and road widening would be required to upgrade Brigham Creek Road to an urban arterial road, I agree traffic noise is likely to be unacceptable inside new residential units nearest to the road. Accordingly, Marshall Day Acoustics (MDA) recommend that affected residential units will require acoustic treatment to enable an acceptable internal noise level to be met. MDA recommend a maximum internal noise level of 40 dB LAeq(24h). This is supported.

The submitted report does not include a prediction of future traffic noise levels. Accordingly, noise contours should be calculated based on recognised best practice to identify future traffic noise levels across the site and the likely number of affected residential units and hence extent of acoustic mitigation. This information is required to inform the acoustic design considerations for the site layout (e.g. setback distances, building line restrictions). The most affected area of the application site is indicated below.

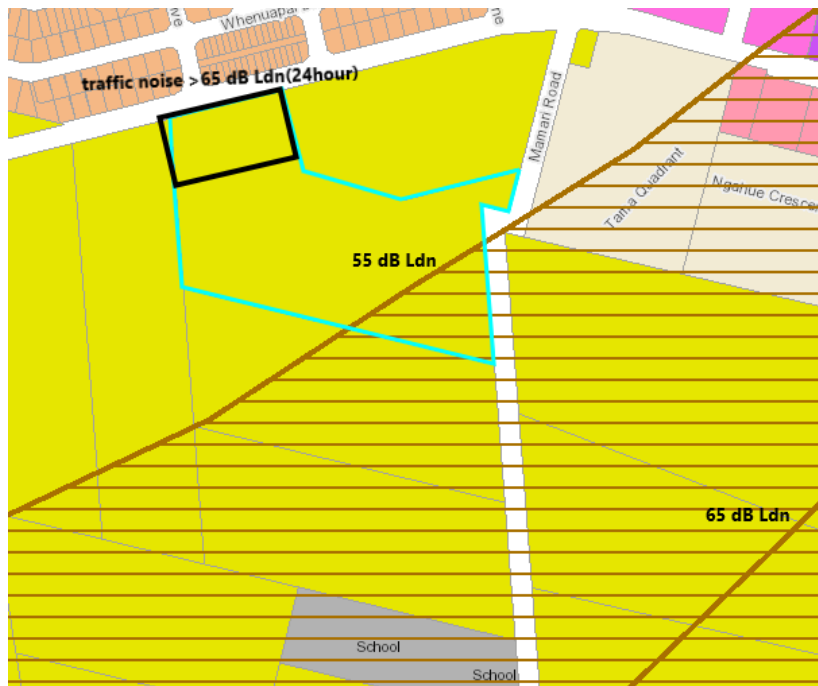
Aircraft Noise

As shown below, the south east corner of the application site is between the 55 dB Ldn and 65 dB Ldn noise contours and is part of the aircraft noise overlay for the Whenuapai Airbase.

Aircraft noise is likely to vary from 55 dB Ldn to 57 dB Ldn. In accordance with D24.4.1, new residential units within the overlay are required to be designed and constructed to meet an acceptable internal noise level. A different noise metric is used to road traffic, 40 dB Ldn, which takes into consideration the number of aircraft “events”, the loudness of events and the increased sensitivity at night.

The submitted report does not include more specific levels relevant for the area affected by aircraft noise. Accordingly, relevant Ldn levels should be specified to inform the acoustic design considerations for the site layout.

Road traffic and aircraft noise potential reverse sensitivity effects



Proposed change from Future Urban to Residential

As reported, assuming adjacent land remains zoned Future Urban, the permitted noise standards relevant to a new residentially zoned application site do not change, but the assessment location moves from within the notional boundary (specified in E25.6.3) to within the boundary (specified in E25.6.15). This would move the assessment location closer to the “noise maker” making compliance potentially more difficult.

For the application site the above scenario potentially affects the three adjoining sites at 39 (residential dwelling) and 45 Brigham Creek Rd (referred to as “contractors depot”) and 5 Mamari Road (residential unit) as shown below. For example, currently the contractors depot must comply during the day with 55 dB LAeq within the notional boundary at 41-43 Brigham Creek Rd approximately 53m away. With a residential zoning, compliance with 55 dB LAeq may have to be achieved immediately within the boundary (<1m away).

The submitted report does not include comments about moving the assessment location from “within the notional boundary” to “within the boundary” if adjacent sites remain zoned Future Urban. This information is required to assess potential reverse sensitivity effects on existing activities in the Future Urban Zone (e.g. the business operating from 45 Brigham Creek Road).



General

I agree with MDA that rezoning the site from Future Urban to Residential would not adversely affect adjacent land zoned Residential located to the north of Brigham Creek Rd and land zoned Residential and Business located east of Mamari Road.

It appears MDA have incorrectly stated in Table 1 that noise standards between Future Urban sites are set out in E25.6.15 – this is incorrect as E25.6.15 only applies to the interface between Future Urban and Residential. Permitted noise standards between Future Urban sites are set out in E25.6.3.

Let me know if you have any queries.

Regards

Andrew Gordon | Specialist
Contamination, Air & Noise Team | Specialist Unit

Auckland Council, Level 6, 135 Albert Street, Auckland 1010
Visit our website: www.aucklandcouncil.govt.nz

18 August 2021

Attention: Ciaran Power
Plans & Places, Auckland Council

Project Name: Plan Change: 41-43 Brigham Creek Road
Project Number: D.002295.01.

Sameer Vinnakota: Environmental Planner – Jacobs

Danny Curtis: Catchment Manager – Auckland Council

Subject: Proposed Plan Change at 41-43 Brigham Creek Road

Dear Ciaran,

In conjunction with Auckland Council Healthy Waters (Healthy Waters) we have undertaken a review of preliminary documents submitted for a proposed plan change to up zone 5.19 hectares at 41-43 Brigham Creek Road from Future Urban Zone to Residential Mixed Housing Urban Zone. The plan change has not been formally lodged with Auckland Council at the time this review was undertaken. The following matters have been identified following a review of the Stormwater Management Plan and an Infrastructure Assessment Report.

Gaps in the information submitted

The Stormwater Management Plan that has been provided is high-level and does not contain sufficient information on the following:

1. Soil infiltration: Details regarding what the soil conditions are, and their properties, in the proposed raingardens, given that the raingardens will be providing for the retention of stormwater volumes. This information should include soil infiltration testing on representative locations across the plan change area. This would be to determine if infiltration rates support retention.

Reason: Information regarding soil infiltration is needed to determine whether runoff can permeate the soil and the rate at which this will occur, in order to be satisfied that water will not be retained inappropriately or create additional ponding if it drains too quickly. This will inform what stormwater management methods are appropriate for the plan change area.

2. Please provide indicative delineation of post-development sub-catchments, pipe capacity assessments and assessments of downstream impacts.

Reason: Sub-catchments need to be clearly delineated. Pipe capacity assessments are needed to ascertain whether the stormwater network in the area can accommodate the amount of runoff anticipated with the level of development proposed. These assessments should be included with the assessment of effects on the environment accompanying the Plan Change as they may inform the potential staging of the development.

3. How will stormwater be managed under the potential development scenarios (i.e, whether the development will occur in parts or as a whole). Further information is needed regarding how the stormwater management approach will be implemented to ensure that stormwater effects can be managed appropriately. Further to this, if offsetting is proposed in private lots for road areas, then information on resultant flows is also needed.

Reason: Information regarding how the proposed development will be implemented is needed as it is noted that offset detention/retention for future public roads to be provided within lots is being considered. If staging is proposed or if s224(c) is obtained prior to the development of dwellings on lots, then how will offsetting be implemented?

4. Confirmation that the raingardens will be constructed to AT requirements, considering the number of dwellings proposed and taking into account proposed roads and driveway widths. These requirements should be reflected in the SMP so that they can be appropriately implemented through the consent process flowing through the Plan Change.

Reason: The site is approximately 5hectares and assuming that road reserves will occupy around 20 percent of the total site area, this leaves 4 hectares available for development. With approximately 200 lots proposed, this makes each lot area less than 200m². Once driveways are accommodated, it is unclear whether a minimum 20m² raingarden as per Auckland Transport requirements can be accommodated. If they are unable to be provided, it may be indicative that the proposed density of development is too great, thereby placing the efficiency of the stormwater network at risk unless additional information can be provided to demonstrate that the proposed design is appropriate. Essentially we are uncertain if management of stormwater can be achieved as outlined – need to be certain effects will be managed.

5. An explanation of why the natural catchment flow through the site is being altered, and the effects of this. Similarly, details on why the 100-year overland flows are being concentrated towards the south-east corner of the site prior to being discharged into the Sinton Stream.

Reason: Justification around altering the natural catchment flows and concentrating overland flows from the sub-catchment into the south-eastern corner will also mean that there will be concentrated flows along Mamari Road which appears to be a 'paper road'. Discharging overland flows to a single outlet is also not considered to be water sensitive design and it is therefore recommended to have staggered or staged outlets. Having concentrated flows towards the south-east will also potentially increase flooding risk on downstream properties.

6. Whether mana whenua engagement has been undertaken through the drafting of the SMP.



Subject: Proposed Plan Change at 41-43 Brigham Creek Road

Reason: Mana whenua engagement needs to be undertaken as per Schedule 4 of the NDC for greenfield sites.

7. How many devices are anticipated to be vested in Healthy Waters? Is there consideration of consolidation of devices for the Council family and indication of any communal devices proposed.

Reasoning: Vesting of assets in Healthy Waters imposes an ongoing maintenance cost, and if they are not constructed to the Council's standards, Healthy Waters will not accept them for vesting. In addition, consolidation of devices may be appropriate where there is limited space.

The above matters have been identified as further information that will be requested under clause 23 of the RMA, unless addressed in a revised SMP.

Yours sincerely

Sameer Vinnakota
Environmental Planner
sameer.vinnakota@jacobs.com

From: [Jan Franta](#)
To: [Ciaran Power](#)
Cc: [Gary Black](#); [Chloe Davison](#)
Subject: RE: Signed statement of works for proposed plan change 41-43 Brigham Creek Rd
Date: Monday, 2 August 2021 5:20:32 pm
Attachments: [image006.png](#)
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Hi Ciaran,

Thank you for your patience, please see our comments below for your consideration.

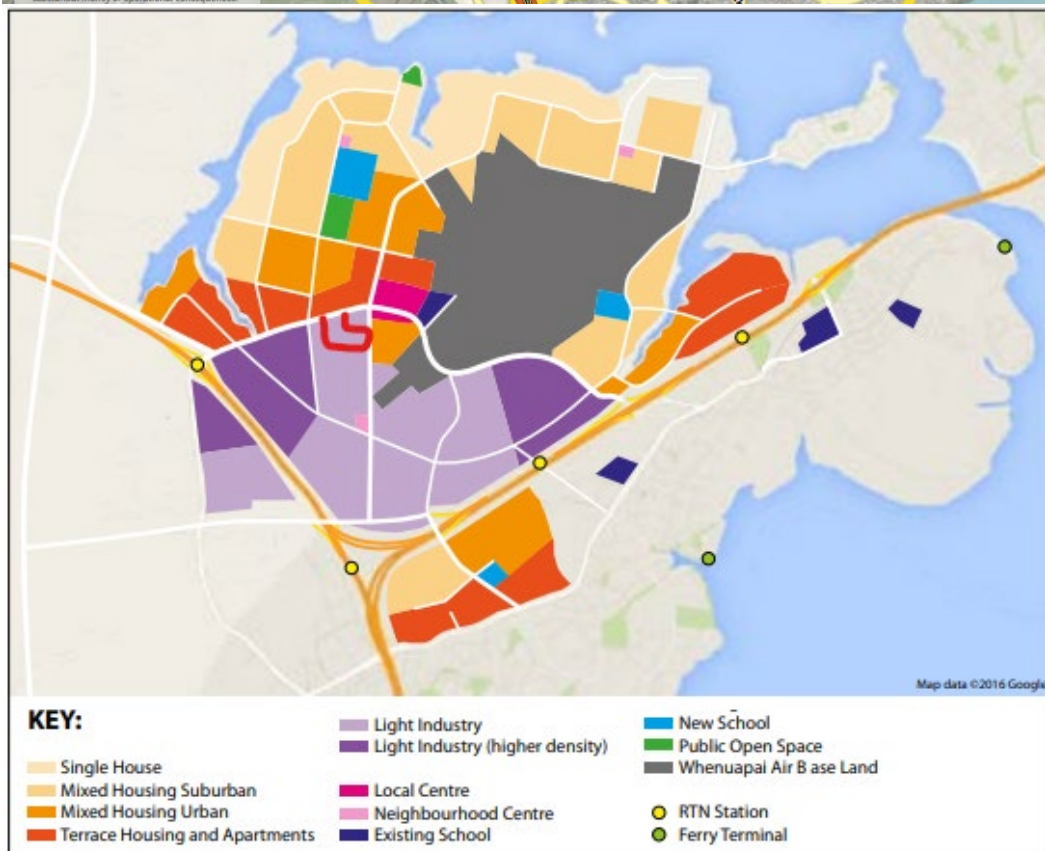
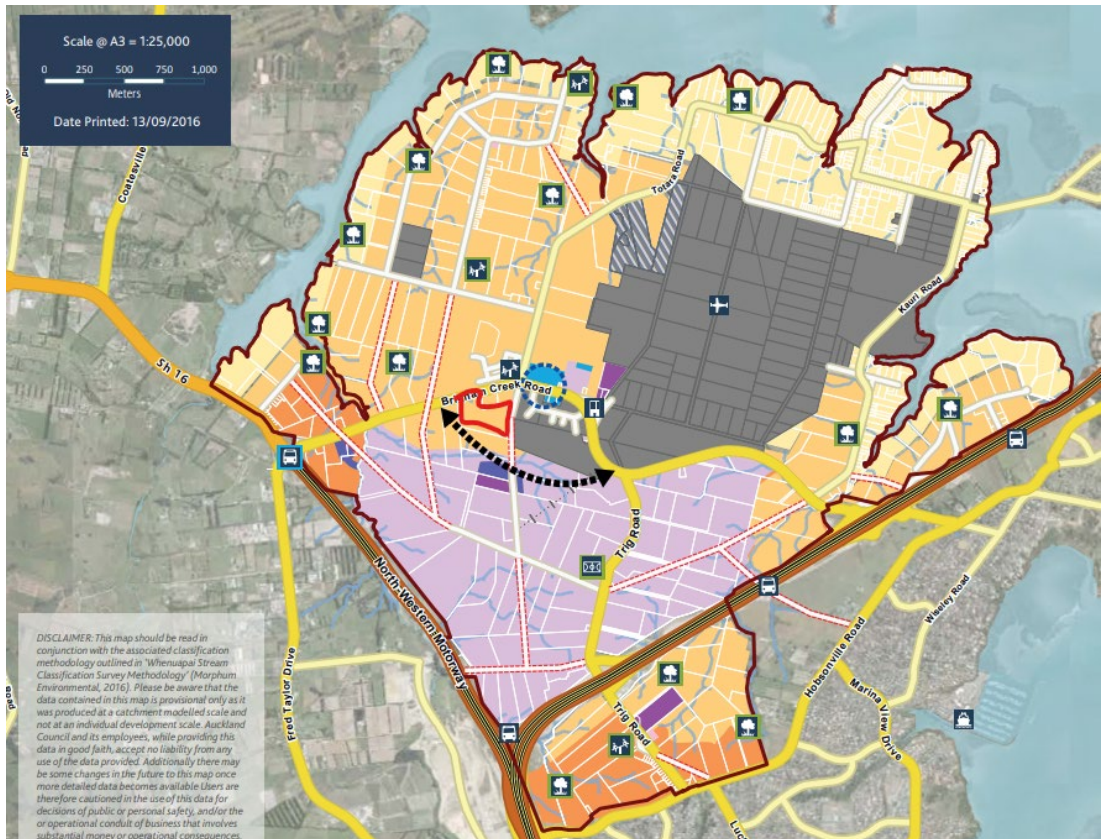
Summary

- The current zoning is Future Urban and the proposed plan change is to Mixed Housing Urban – this meets the requirements of the Whenuapai Structure Plan (WSP). Subject to due process and assessment during the application, this appears to be appropriate.
- However, there is a discrepancy between the WSP zoning (shown on page 46) and the overarching ITA (Flow, 2016), where this area is shown as Light Industry. Could the applicant provide a comparison of the two uses in the ITA as their trip generation and traffic composition are different.
- The ITA makes frequent reference to future infrastructure deliverable in Phase 2A (prior to the current scheduling) but is light on assessing traffic impacts in the interim.
- The primary concern therefore relates to the timing of the plan change and the ability for the traffic and transportation elements to accommodate the plan change and subsequent development prior to any other infrastructure upgrades.
- The plan change and subsequent development will be prior to the implementation of improved passenger transport service and therefore there is likely to be a reliance on the private vehicles and subsequent impact on trip rates.
- Consideration for the proposed cross intersection on Brigham Creek Road/Joseph McDonald Drive intersection arrangement.
- Consideration for cycle facility upgrades on Brigham Creek Road to tie into the existing facilities on the norther side of Brigham Creek Road.
- The current width of Brigham Creek Road measured on Council GIS is 22m. The proposed cross section as provided in the structure plan and provided in the ITA require a width of 32m and there is a shortfall in road width.

Preliminary Comments on Initial Review

1. Proposed Zoning

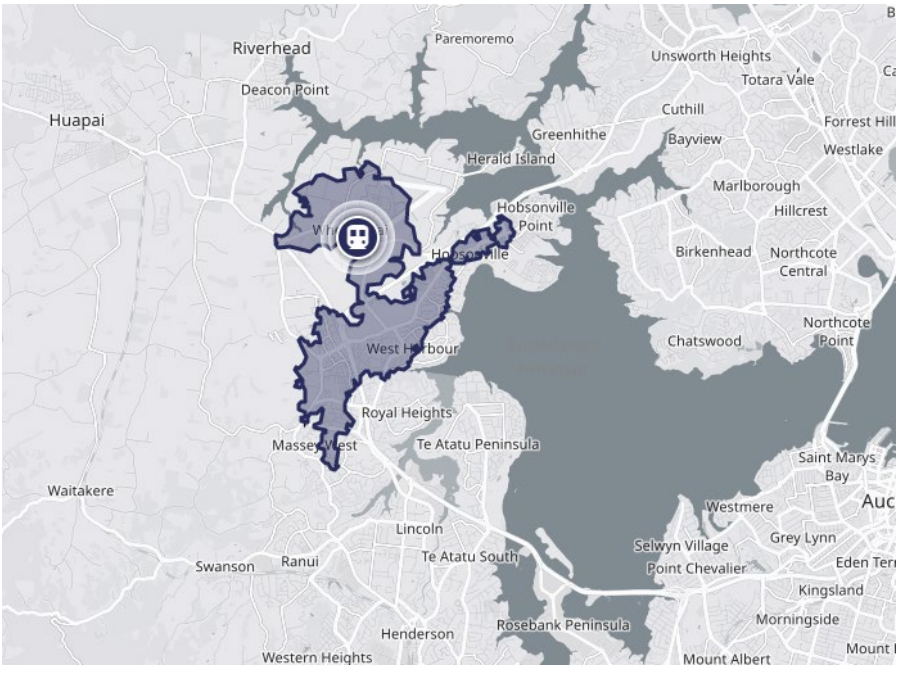
There is a discrepancy between the WSP zoning (shown on page 46) and the overarching ITA (Flow, 2016), where this area is shown as Light Industry. Could the applicant provide a comparison of the two uses in the ITA as their trip generation and traffic composition are different, and comment on possible implications?

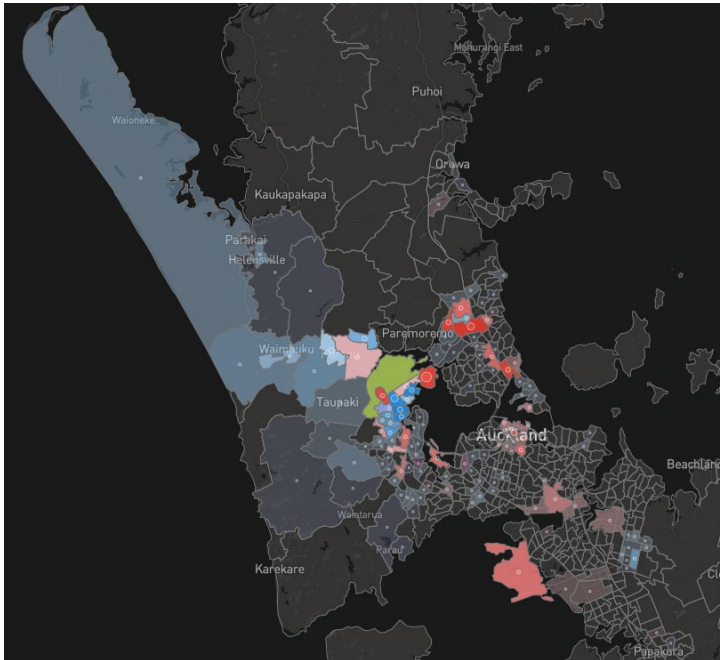


2. Bus Service

Existing public transport services as described in Section 2.5 of the ITA do not provide resilient connectivity to key destinations within Auckland. Whilst in future there are planned upgrades, this will impact on the ability of the proposed plan change to provide alternative options to the private vehicle for transport. The upgrades to public transport, as noted in the Whenuapai Structure Plan, do not have solid timeframes for delivery. At present, the 114 service is a local service that departs a minimum of once

per hour with lower frequencies in the early morning and evenings. The map below shows the catchment reach of public transport for a period of 30 minutes. As shown, a 30-minute journey catchment is unlikely to reach Hobsonville ferry terminal, but is likely to reach the Westgate bus services. Travel times at 8am from Brigham Creek Road to Auckland CBD during the AM peak periods is estimated to be from 1 hour 20 minutes to 1 hour and 45 minutes (Source Google Maps). Comparative travel times at 8am via private vehicle are typically 16-24 minutes (Source Google Maps). It is noted that Chloë's personal experience travelling during this peak period from West Harbour to the CBD are typically 45 minutes. This therefore demonstrates that until further services are developed the reliance on the private vehicle is likely to be significant.





Bus service Map (left), Whenuapai Travel Catchment (30 Mins) (middle), Census Data trip distribution for Whenuapai (right)

3. Trip rates and routing

The rates provided in the structure plan are based on the future upgrades to the local road network. The trip rates provided in the tables on Page 11 assume the trip rates from the structure plan, including a peak hour rate of 0.65 per dwelling during the peak commuter periods. The Structure Plan references the RTA Guide which was issued in 2002 with a revision in 2013 and reference surveys undertaken in Australia. Whilst this is an industry accepted standard, consideration to the limitations of each site should be undertaken to ensure appropriateness.

With few options for public transport available presently and no certainty when they will be implemented, we consider that the peak period trip rate is low and may underestimate the full impact of vehicle trips that may arise from the proposed plan change. It is further noted that under Research Report 453 in Table 7.4, the peak hour trips associated with a Suburban Dwelling is 1.2 trips per unit and an outer suburban dwelling is 0.9 trips per unit. Table 8.10 of RR453 shows that medium density residential developments have an associated peak hour trip rate of 0.8 per dwelling. Further assessment of appropriate trip rates should be considered to provide a rigorous assessment of likely impacts.

With respect to trip routing, it is noted that the extant development is low-density and associated with agriculture and the Whenuapai Air Base. Current census data is therefore, not representative of future residents of the area. It is recommended that if the applicant decides to use the 2018 Census for estimating trip distribution, they refer to a comparable recent development in vicinity to obtain realistic data.

4. Intersection with Brigham Creek Road

It is stated in Section 3.1 of the ITA that the concept layout of the site is an example of the type of development the plan change will enable. It is stated that this is not the final detailed form of development but represents the likely development for the site. From a transport perspective, the design shows a cross intersection on Brigham Creek Road with Joseph McDonald Drive. It is further stated in the ITA that *'traffic modelling and assessment will be necessary to verify the intended layout of the intersections and their suitability to accommodate the anticipated traffic flows as land use occurs'*. We agree with this assessment. A give-way controlled cross intersection is unlikely to be supported by AT and we consider that either a signalised intersection or a left in-left out configuration would provide the safest arrangement whilst also providing good outcomes for operation. Noting right turns could be accommodated via controlled movements from the signalised intersection at Brigham Creek Road/Mamari Road. We agree that the design of the intersection will be assessed at resource consent stage, however, consideration as to the effects of these upgrades should be considered as part of the proposed plan change.

5. Footpath/Cycleway on Brigham Creek Road

It is stated in the ITA that upgraded footpaths and cycle paths have already been provided on Brigham Creek Road that would allow immediate connection to a wider network in the vicinity of the site. However, along the site frontage on Brigham Creek Road there is an eastbound cycle facility and footpath but no westbound facility and no footpath on the southern side of the road (along the site frontage and to the intersection with Mamari Road). In Section 4.1 of the ITA it is proposed to upgrade the pedestrian infrastructure along the frontages of Brigham Creek Road and an extended Mamari Road. In principal we support this proposal, however, no details have been provided pertaining to location within the road reserve and any land-take requirements. It is noted that on the road frontage of 35 Brigham Creek Road, there is insufficient space to provide a footpath within the road reserve and therefore future connectivity should be considered. This also impacts on the site connectivity to activities to the north, including the Primary School, Café and park. In addition, as part of the plan change, consideration of the upgrade of cycle facilities on Brigham Creek Road, along the site frontage should also be undertaken to match the northern side of the road.

6. Brigham Creek Road & Mamari Road Cross Section and carriageway width

The current width of Brigham Creek Road measured on Council GIS is 22m. The proposed cross section as provided in the structure plan and provided in the ITA require a width of 32m. The proposed plan change does not allow for additional land to widen the road reserve to 32m. This is probably more a planning issue, rather than a traffic engineering issue. We would expect a designation to be place to allow this to occur.

This issue was raised by AT on 5 March 2021.

7. Policy Consideration

The ITA provides a high-level review of the policy details contained within the Chapter E27 'Transport' of the Unitary Plan. We consider that a full assessment of the policy documentation available for the area should be undertaken to ensure that the plan change is appropriate.

Request for Information

1. Please provide an assessment of the relevant traffic related policy and transport items contained within the following documents and provide comment as to any impact that the proposed plan change may have in light of this information:
 - a. the Whenuapai Structure Plan
 - b. Auckland Future Urban Land Supply Strategy, 2017
 - c. Auckland Unitary Plan Chapter H5 Residential - Mixed Housing Urban Zone
 - d. National Policy Statement on Urban development
2. The mixed housing urban zone allows for low-rise apartment buildings (up to three storeys). Please confirm the maximum number of dwellings that could be established on the site as part of the mixed housing suburban zone. A sensitivity analysis should be undertaken using the highest density of dwellings that can be established as a result of the plan change.
3. It is stated in the ITA that the key transport outcomes of the proposal include supporting the Brigham Creek Road and Mamari Road upgrades including their alignment, how does the proposal achieve this? The Whenuapai Structure Plan anticipates that Brigham Creek Road will be a four-lane arterial road. The current width of Brigham Creek Road measured on Council GIS is 22m. The proposed cross section as provided in the structure plan and provided in the ITA require a width of 32m - will this be accommodated?
4. Please provide justification for the 0.65 peak hour trip rate used within the assessment.
5. Please comment on the difference in traffic impacts of light industrial versus residential uses.
6. Please provide an indicative intersection arrangement for the two proposed access' to ensure that the proposed plan change can be accommodated and integrated into the

existing roading network and future roading network once the surrounding land becomes live zoned.

7. We note the proposal for the footpath on the southern side of Brigham Creek Road as part of the proposed development, under the proposed plan change however, there is insufficient width outside 45 Brigham Creek Road. Please provide details of how the footpath can be implemented to ensure safe pedestrian connectivity.
8. Please provide details on how the residents of the plan change will be able to cross Brigham Creek Road to access the wider development and footpath network noting that local area facilities are on the northern side, including cafes, park and Primary School.

Kind regards



JAN FRANTA
Transportation Lead

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Parnell, Auckland 1052
PO Box 5760, Victoria St West
Auckland 1142

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All our emails and attachments are subject to [conditions](#).

From: Jan Franta

Sent: Friday, 30 July 2021 5:30 pm

To: Ciaran Power <ciaran.power@aucklandcouncil.govt.nz>

Cc: Gary Black <G.Black@harrisingrierson.com>; Chloe Davison <C.Swart@harrisingrierson.com>

Subject: RE: Signed statement of works for proposed plan change 41-43 Brigham Creek Rd

Hi Ciaran

Thanks for your instructions.

We have made a good progress with the assessment; however, we find the ITA very light on the policy compliance section and need to do a more thorough assessment, which takes longer than we expected.

Please see our preliminary comments and request for further information below, and a full set of comments will follow on Monday.

The preliminary comments relate the following:

- The current zoning is Future Urban and the proposed plan change is to Mixed Housing Urban - this meets the requirements of the Whenuapai Structure Plan. Subject to due process and assessment during the application, this appears to be appropriate.
- The primary concern therefore relates to the timing of the plan change and the ability for the traffic and transportation elements to accommodate the plan change and subsequent development prior to any other infrastructure upgrades.
- The plan change and subsequent development will be prior to the implementation of improved passenger transport service and therefore there is likely to be a reliance on the private vehicles and subsequent impact on trip rates.

- Consideration for the proposed cross intersection on Brigham Creek Road/Joseph McDonald Drive intersection arrangement.
- Consideration for cycle facility upgrades on Brigham Creek Road to tie into the existing facilities on the norther side of Brigham Creek Road.
- The current width of Brigham Creek Road measured on Council GIS is 22m. The proposed cross section as provided in the structure plan and provided in the ITA require a width of 32m and there is a shortfall in road width.

Thank you for your understanding

Kind regards

Jan Franta



JAN FRANTA
Transportation Lead

Memorandum

To: Ciaran Power, Planner, Auckland Council
From: Rory Power, Principal Planner, Auckland Transport
Date: 13 August 2021
Subject: Proposed Plan Change, 41-43 Brigham Creek Road

The table below sets out Auckland Transport's preliminary comments on the Integrated Transport Assessment (ITA) dated April 2021 and prepared by Traffic Planning Consultants (TPC) to support the proposed plan change at 41-43 Brigham Creek Road, Whenuapai. These comments are provided by Auckland Transport as the Road Controlling Authority on a without prejudice basis. Auckland Transport reserves the right to lodge a submission on the proposed plan change when it is publicly notified.

Auckland Transport have previously this version of the ITA in May 2021 and meet with the applicant on 12 May 2021 to discuss improvements and changes. Minutes from the meeting were circulated to the applicant on 26 May 2021. Auckland Transport's opinion is that a precinct plan is an appropriate mechanism where specific mitigation is required to enable and support development of the plan change site.

Topic	Comments
General	The documentation submitted with the Proposed Plan Change does not include a precinct plan. The ITA should address what mechanisms are proposed to control the location and implementation of collector roads and arterials intersections as part of any subsequent subdivision and development, if no precinct plan is proposed.
Future Transport Context	<p>The ITA needs to consider the current proposals from the Supporting Growth programme in the North West. The alignment, form, and function of roads has potentially changed from the Indicative Strategic Transport Network illustrated in Figure 3 of the ITA.</p> <p>The ITA needs to be amended to clarify that the following projects are not within the scope of the Supporting Growth programme and are the responsibility of Waka Kotahi:</p> <ul style="list-style-type: none">• Direct State Highway connection between SH16-SH18, new shared paths and interchange upgrades;• Upgrades to Northside Drive east.• Upper harbour rapid transit between Westgate and Hobsonville.
Existing & Future Public Transport Accessibility	Section 2.5 of the ITA describes the future public transport services for the Whenuapai area as well as the frequency. The source of this data should be provided, along with the timeframe for when these frequencies will be achieved relative to the development of the proposed plan change site.
Brigham Creek Road and Mamari Road	As noted above, Sections 2.7 and 2.8 need to consider the current proposals from the Supporting Growth programme in the North West.

Memorandum

	<p>Future widening of Brigham Creek Road and Mamari Road to accommodate the upgraded arterials will need to be considered and provided for in the assessment of the Proposed Plan Change.</p>
Transport Outcomes	<p>Section 3.1 of the ITA notes that the key transport outcomes of the development include:</p> <ul style="list-style-type: none"> • Supporting the Brigham Creek Road and Mamari Road upgrades including their alignment, as they will provide vital links in the transport network for Whenuapai; and • Providing quality connected residential neighbourhoods to support the growth of Whenuapai. <p>The ITA needs to illustrate how these outcomes will be implemented through necessary controls, planning mechanisms and mitigation as part of any subsequent development of the site. Without a precinct plan, it is difficult envision how this will be achieved.</p>
Site Access	<p>The ITA does not adequately address how access to the site for all modes of transport will be achieved.</p> <p>Section 3.1 states that there will be up to six intersections connecting the site to Brigham Creek Road and Mamari Road. Brigham Creek Road is identified as an Arterial Road in the AUP and the site is subject to Vehicle Access Restrictions as per E27.6.4.1. Mamari Road is not identified as an Arterial Road in the AUP however, it is identified as part of the Supporting Growth network and will function as an arterial.</p> <p>The ITA does needs to demonstrate why six separate vehicle accesses are required for this site. Numerous vehicle accesses will potentially impact on pedestrians and cyclists as well as the operation and safety of Brigham Creek Road and Mamari Road.</p>
Road Design Principles	<p>Section 3.2 discusses general principles but does not demonstrate how this will be achieved through the plan change and incorporated into any subsequent development.</p> <p>The ITA states that upgraded footpaths and cycle paths have already been provided on Brigham Creek Road that would allow immediate connection to a wider network in the vicinity of the site. The current provision for walking and cycling on Brigham Creek Road (and Mamari Road) is limited to one side of the road only.</p> <p>The ITA needs to identify and assess the need for walking and cycling facilities on Brigham Creek Road and Mamari Road to support a reasonable level of access by alternative modes of transport.</p>
Trip Generation and Distribution	<p>Section 3.4 states that to minimise any associated transport effects, Mamari Road should be upgraded to a point where it would provide at least a local road connection between the site and its intersection with Brigham Creek Road to enable a more even distribution for the vehicle trips and the active modes of walking and cycling.</p> <p>The ITA needs to demonstrate how the upgrade and access from Mamari Road will be achieved prior to development to ensure this outcome. Otherwise, all vehicle trips generated by the site should be assigned to the intersection with Brigham Creek Road to demonstrate a more realistic scenario.</p>

Memorandum

<p>Transport Assessment & Mitigations</p>	<p>Section 4.1 outlines upgraded infrastructure that is required to support the development of the site. The ITA needs to demonstrate how this mitigation will be controlled and implemented as part of any subsequent development. The ITA should also outline the responsibility, cost, and timing of infrastructure required to mitigate the effects of the development.</p> <p>The level of assessment of private vehicle trips in Section 4.3 is inadequate and needs to be revised based on the comments regarding trip generation and distribution.</p> <p>The ITA does not adequately address the interim effects of the development (when the majority of the bulk transport infrastructure is not in place). ITA should identify if the current infrastructure needs to be improved to mitigate the effects of the development while not precluding the implementation of future infrastructure to cater for the long-term development of the area.</p>
<p>Road Safety</p>	<p>The ITA should identify what improvements are required to ensure a safe vehicle access to the site from both Brigham Creek Road and Mamari Road based on the existing transport environment.</p>
<p>Auckland Unitary Plan Considerations</p>	<p>If a precinct plan is not proposed, the ITA needs to demonstrate how the existing provisions of the AUP provide sufficient mechanisms to require any subsequent development to implement improvements to the transport network. This is relevant in the instance that an upgraded vehicle access on Brigham Creek Road is required to service both a distinct development of 100 units, as well as the development of the entire site as well.</p>
<p>Integration with the Future Transport Network</p>	<p>ITA should reference what projects and funding for arterial upgrades to Brigham Creek Road or Mamari Road are included in the Regional Land Transport Plan 2021-2031. This is relevant for determining the timing of the required infrastructure improvements to support the development.</p> <p>Please note that the Auckland Regional Land Transport Strategy 2010 is not longer applicable and the ITA needs to consider the updated Regional Public Transport Plan 2018.</p>

Memorandum

23 July 2021

To: Ciaran Power – Plans & Places
Cc: Nicole Miller – Team Leader: Urban Design Strategy & Projects, UDU
Subject: Private Plan Change application 41-43 Brigham Creek Road, Whenuapai
From: Vanita Ranchhod – Principal Specialist Urban Design Strategy

Updated 6 August 2021

Purpose

1. Clarify if Urban Design specialist assessment will be required for the Private Plan Change (PPC) application at 41-43 Brigham Creek Road

Recommendation

2. Urban Design assessment should be required for the PPC application at 41-43 Brigham Creek Road. Given there has been no supporting urban design information or assessment submitted from the applicant, this will need to be requested from the applicant

Summary

- Although no building development being proposed at this stage, there is a subdivision pattern with block & lot layouts and roading indicated.
- Urban design assessment should be provided for the proposal to assess matters such as lot layout regarding suitability solar orientation for future dwellings, movement permeability & connectivity that the subdivision layout would provide for future residential development.
- There should be an urban design assessment included – we would recommend you point the applicant to the Council's example of the Southern Structure Plan Area Neighbourhood Design Statement (Rev B). Whilst we would not necessarily anticipate as comprehensive a report developed as this – they should refer to Section C (Neighbourhood Design Statement: Design Considerations) and address the relevant matters that relate to their proposed residential development
- I've read the notes taken from the pre-application meeting you've provided. From an urban form & function perspective we would have significant concerns for supporting the proposed scale of this residential zoning and development that is out of sequence from Council's FULSS 2017 (Future Urban Land Supply Strategy updated in 2017).
- Whilst the location of the site is in reasonable proximity to the zoned local centre, and there is Mixed Housing Urban land nearby to where the PPC seeks to provide more MHU zoned land. There are however already significant transport impacts from the live zoned land developed in the Whenuapai area without supporting transport improvements, particularly public transport infrastructure investment serving this location and the wider Northwest area.
- There are likely to be significant impacts on the existing transport infrastructure if there is an inability to provide a viable and effective public transportation network in this area. The inclusion of this essential infrastructure is integral in promoting active transport modes and creating walkable and well-connected neighbourhoods which seek to reduce car dependency and reduce congestion issues and greenhouse gas emissions.

Link

[Southern Structure Plan Area Neighbourhood Design Statement \(Rev B\) dated August 2019](#)

Appendix 1.

Neighbourhood Design Statement: Design Considerations

The Auckland Design Office developed guidance on Neighbourhood Design Statement (NDS) content as part of developing the Southern Structure Plan Area Neighbourhood Design Statement Aug 2019. This was necessary as there had been wide variety of approaches to developing this supporting information for greenfield Structure plans and Private Plan Changes. There had also been a significant learning curve for Council staff after their first attempt at developing a NDS to support the Whenuapai Structure Plan.

Section C in the Southern Structure Plan Area Neighbourhood Design Statement Aug 2019 provides best practice guidance for developing supporting urban design information - **Neighbourhood Design Statement: Design Considerations**

The aim of the Neighbourhood Design Statement (NDS) is to provide guidance for detailed spatial planning such as master planning, as well as guidance when developing Proposed Plan Change regulatory information. Whilst it is acknowledged a high level NDS was developed across the entire Whenuapai Area, an urban design assessment should also be provided for Private Plan Change applications that seek to rezone greenfield land ahead of it being live zoned; as in the case for the Private Plan Change at 41-43 Brigham Creek Road.

Whilst the applicant is seeking re-zoning through the Plan Change process, it also requires a degree of more detailed analysis to understand how the development of the land will work under such zoning application, and the wider contextual implications to the surrounding area. To help assist in compiling this necessary information a level of detail will need to be considered by the applicant. I understand they are also having discussions with Council staff regarding a future resource consent application. This level of analysis will assist them in developing the information for a supporting Neighbourhood Design Statement assessment. It is noted the urban design analysis/ considerations signalled below overlap into other specialist areas such as transport, landscape, stormwater etc. This is purposefully intended as urban design assessment should be undertaken as an integrated analysis with other disciplines.

It is recommended the applicant provide information to respond to the following matters (contained in Section C):

- C2. Understanding the Site and Context**
Undertake a site analysis
- C3. Understanding the Site and Context**
Get the big connections in first
- C4. Open Space Framework**
- C5. The Green Network**
- C6. Fine Grain Block**
- C7. Permeable Street Network**
- C8. Density and Intensity**
- C10. Clearly defined public and private realms**
- C12. Perimeter blocks**
- C13. Block and Lot Design to reconcile solar gain, private space, and good public front**
- C14. Responding to arterials**
This relates to Brigham Creek Road
- C18. High and Medium Density Residential**
- C20. Identity, Character and Heritage**
- C21. Energy**

Note: If the applicant is undertaking consultation with mana whenua as part of supporting their PPC application they should also consider:

- C1 Te Aranga Māori Design Principles**