

18 February 2019

SFH Consultants Ltd  
PO Box 86, Orewa  
Auckland 0964  
Attn: Daniel Shaw

Dear Daniel

**Re: 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom – Private Plan Change Request from Southern Cross Hospitals Limited**

After reviewing the private plan change documents lodged on 1 February 2019, the Council requests further information under Clause 23(1) to Schedule 1 of the Resource Management Act (RMA) as follows:

**Visual and landscape**

- Clarification whether the height shown in photo simulations provided by LA4 comply with the volcanic viewshaft overlay controls, in particular Viewpoints 1-11.
- Explanation of how amenity values under section 7(c) of the RMA have been interpreted and applied to the evaluation of effects assessed by LA4.
- Explanation of how some high level of visual effects translate into lower levels of amenity effect (for example in Viewpoint 1).
- A further analysis of effects in relation to Viewpoint 2, given the limited scope of the photo and simulation prepared for that vantage point.
- Explanation of the amenity effects that would be experienced by local residents, as opposed to the more transient exposure and effects associated with the motoring public cyclists etc.
- A further analysis and/or graphic depiction (via photos etc) of the effects that would be experienced by those living at 30-38 Owens Road.
- An analysis of the degree to which the existing trees and other vegetation found at 3 Brightside Road and on the sections at 149, 151 and 153 Gillies Avenue could be expected to survive with development under the controls of Chapter H25 (Special Purpose – Healthcare Facility and Hospital Zone) provisions. While mitigation measures such as level of screening and buffering could be seen as information requirements under a resource consent application, it would be helpful that these measures are addressed by LA4 for the private plan change request.

**Special Character**

*Removal of houses at 149, 151 and 153 Gillies Avenue*

- The Special Character Assessment by Lifescapes focuses on the ways the landscape features can be retained through the proposed development of the

hospital. Council's heritage specialist is of the view that while this analysis is helpful, it is incomplete. A further analysis is required on the values of the houses. How these values, which have been identified by Lifescapes as being of architectural merit and consistent with the values of the area, can be maintained and enhanced?

The analysis should explore options including (but not limited to); retention, reuse or relocation. If the assessment concludes that the houses should be removed (even though it agrees that the houses are consistent with the values of the area), alternative options for maintaining their values should be explained.

#### *Removal of Special Character Overlay*

- The assessment by Lifescapes includes a discussion on how the identified character values of the landscape features can be maintained and enhanced through re-development. However, if the proposed plan change for rezoning is approved, the special character overlay will be removed and any requirements to consider character values will be gone.

How could the applicant ensure that protection of these values will be in place? Council's heritage specialist's view is that relying on provisions under Chapter H25, rather than character-specific provision, is an inadequate approach to protect the character values.

#### *Alternative approaches*

- Council's heritage specialist notes that alternative options for managing character places and features could be explored. These include, for example, covenanting significant features such as walls, gates and other natural landscape features through the private plan change request or concurring resource consent application.

Can you confirm if this alternative approach (covenanting significant features) has been considered as part of either the private plan change or resource consent applications.

Please provide clarification or further information on the matters specified above. If you have any questions about this letter, please feel free to contact me.

Your Sincerely



Panjama Ampanthong  
Principal Planner  
Central and South Planning