

Mitchell Daysh Limited
PO Box 1307
Waikato Mail Centre
Hamilton 3240

Digitally Delivered

ATTENTION Abbie Fowler
Dear

Resource Consent Application – Further information request

Application number: SP/0179/20
Applicant: 3MS Of Cambridge Limited Partnership
Address: 1881 Cambridge Road Cambridge 3434
Proposed activity(s): Subdivision to create 242 residential lots within the C2 Growth Cell, and associated lots for public assets

In accordance with section 92 of the Resource Management Act 1991 (RMA), the following information is requested to enable me to make an accurate and informed assessment.

Notes:

1. Council officers are available for discussions about any of the matters raised in these questions. These discussions have proceeded prior to this request following provision of RFI questions being sent to you. Council officers remain available for further discussions.
2. The Council may also have resources or information that will assist provision of responses.

The following information is requested:

Plan revisions

1. We understand revision of some aspects of the proposal is being carried out as a number of matters develop or are resolved. These may be accommodated within the assessment and determination procedures as is appropriate for each matter and the stage within these procedures the material becomes available.

Please provide advice at the time you advise of any changes of the manner you believe is appropriate for them to be included in the assessment process to be in accordance with the RMA procedures.

Stormwater matters

1. Please provide and demonstrate technical engineering assessment proving the onsite stormwater management will have sufficient capacity to protect the surrounding locality from potential for stormwater flooding.
2. Please advise, assess and demonstrate the financial effects and what resulting environmental effects will be likely to arise regarding the C2 and C1 and C3 growth cells from, as suggested in the assessment of effects on the environment, development contributions towards stormwater being described as not being applicable to this proposal due to the proposal to manage stormwater on the site.
3. 3Ms propose a SW pond/wetland that is not shown in the C1 C2 C3 Structure Plan and suggest that the costs of operating and managing this facility will be cost neutral to the Council as this will create the potential to reduce the size and scale of the stormwater swale and associated reticulation. Please provide description and demonstrate of how this will be achieved.
4. Please advise whether the development is proposed to be connected to the stormwater network within the C2 growth cell, either temporarily or permanently.

The reason for this question is the east/west swale separates the land to the south of it from the on-site stormwater reserve and this swale appears on the plans to be wider than what is expected to be required for stormwater purposes. There are also connections from outside the application site to the balance of the C2 cell indicated on the application plans.

5. Please advise how the effects of locating the stormwater drainage and swale network on the adjacent land are going to be mitigated. Please also include description of how you will be able to assist or facilitate its establishment as part of the mitigation of effects.
6. Please advise what the terms of any developer agreement with the Council concerned with mitigating effects on the stormwater network is proposed to include.
7. Please advise what effects proposed infiltration of stormwater through and below the iron pan within the infiltration basin will have on stability ground stability within the application site and outside its boundaries, and where or if it is expected to discharge and effects at that point.

Note: This should include but not be exclusive of any other matter your assessment may identify as relevant, and confirmation that the soakage pond proposal will not result in additional ground water flows to the C3 terraces and in turn cause erosion and slip and any ground stability risk and effects.

8. Please provide a description of planting and surface and structures development proposals, including surface development and plant species, for the infiltration basin and advise on Management and maintenance requirements they will present.
9. Please provide advice on the risk of instability along the side of the proposed stormwater pond and open swales within the C2 growth cell including but not limited to, lateral spread and bank erosion and how this risk will be avoided.
10. Please provide confirmation in writing from WRC that there are no issues with the stormwater discharge consent arising from the stormwater soakage pond and discharge proposals and particularly that consent for the discharges proposed has been obtained, or alternatively describe how obtaining any consent for these discharges that may be required may be provided for.
11. Please provide the technical report prepared by BECA and referenced in the application that provided the advice your assessment of the hydrological effects of the stormwater soakage pond will have.
12. Please provide the stormwater pond soakage results confirming it is a viable option.
13. Please identify the positions and details of any services connections proposed between the on-site stormwater network and the offsite network.
14. Please advise how assurance of connection to and from the application site and adjoining land that may be proposed or required for stormwater management purposes until and after the on-site facilities are constructed.
15. Please provide assessment and design of any changes to the stormwater network servicing to the C1, C2 and C3 growth cells that may result from the effects of the proposal for on-site management of stormwater and required to mitigate on-site and off-site effects of this.

Reserves

Note: The requests below are subject to the outcome of continuing discussions relating to the sports fields. There are however also a number of questions that would relate to the wider reserves matters that apply to the proposal.

16. Please advise the stage and outcome of any discussions to date and any variations to the application that have arisen from these discussions.
17. We recognise the reserves and particularly the sports fields matters are evolving and there may be further developments after any such information is provided. Please provide advice on how you see these changes being included in the assessment and determination process in a manner that satisfies the provisions of the Resource Management Act.

18. Please provide a revised subdivision scheme plan showing the location and area of the reserve/sports fields land and showing any other changes made to the subdivision proposals to accommodate them, including land use proposals adjoining proposed reserves.
19. Please provide plans showing the development proposals for the reserves proposed to be vested and those proposed to be acquired by the Council.

We understand these are still being developed and may be affected by present discussions. If there is a need to delay provision of this information to a later stage in the processing of this application, please advise how this might be provided for as part of any resource consent that may issue, or alternatively after this process.

20. Please advise the applicant's understanding of how the proposed reserve acquisition and development will be funded and the terms of the maintenance period associated with the proposed developments.
21. Please provide plans and description of how parking is proposed to be provided for reserves including sports fields and provide traffic engineering assessment of its adequacy.
22. Please provide plans and/or description of how easy, direct and safe pedestrian crossing across Road 20 between the proposed reserves areas will be created.
23. Please provide plans and/or description of how easy, direct and safe pedestrian access from the east west lineal stormwater reserve to the Cambridge Town Belt may be provided or contributed to by the development.
24. Please advise of any discussions with the Ministry of Education and the outcome of these regarding effects removal of the sports fields may have on their proposals.
25. Please provide advice of the outcome of any discussions with the Ministry of Education regarding potential for the school sports fields to be available for public use.
26. Please advise how and what services and utilities the applicant proposes to provide to the sports fields and other recreation and reserves and facilities including under an infrastructure works agreement and the locations of these relative to the reserves.
27. Please provide plans showing the details of proposed landscaping, land shaping, pathways and boardwalks, servicing and other structures and development proposed to be included in the reserves, and swale sites.
28. Please provide advice you will accept a condition requiring preparation of a landscape plan and its approval by the Council after any resource consent issues if this becomes required due to relative timing.

Transportation and Roading

29. Please provide confirmation that public transport will be provided with bus stops and suitable road carriageway width both prior to and after construction of the north/south collector road. Please provide a plan showing the shape, dimensions, and profiles of these relative to the carriageway.
30. Please provide further detail related to design layout, operation and performance of the intersection of Road 10 with Cambridge Road and Chartwell Properties intersection on the opposite side to prove it will operate safely and efficiently. This may require traffic engineering support.
31. The Council remains concerned there is a limit to the traffic that can safely and efficiently use Road 10 and Road 8 without the north/south Collector Road being constructed. Please provide an assessment of this including identification of a limit on the number of lots and development that is appropriate before the north/south collector road and intersection is required.

Urban Design

32. Swale and road relocation

Issue:

The rationale for switching the north-south swale reserve from the eastern side of the north-south collector road to the western side of the collector road for the length it extends along adjacent to the western boundary of the application site was raised in our discussions with you in February. You advised the reason for the switch is to *'ensure that the existing house can be retained.'*

Questions:

- a. Please identify the house referred to?
- b. Please provide urban design analysis of how retention of the house and the changes to the road position and alignment will provide a suitable outcome compared with the benefits of legibility, place-making, cycle/pedestrian convenience of the swale reserve continuing down the one side of the collector road for the structure planned area?

33. Road 12 pedestrian / cycle connection

Issue:

The matter of a pedestrian/cycle connection from the cul-de-sac head of Road 13 through to Cambridge Road not being shown as proposed was raised in urban design comments on the proposal in February. The applicant advised this was not proposed as the nature of the land use to the west

was not known and that any walking connectivity through Road 13 can be discussed further with Council.

A pedestrian/cycle connection from Road 13 to Cambridge Road would be supported from an urban design perspective as it is in accordance with S19.5.3.3(b) of the district plan.

Question:

- a. Please advise if the applicant would provide a pedestrian and cycle connection between Road 13 and Cambridge Road.

34. Integration of 3Ms site with adjoining land to the west

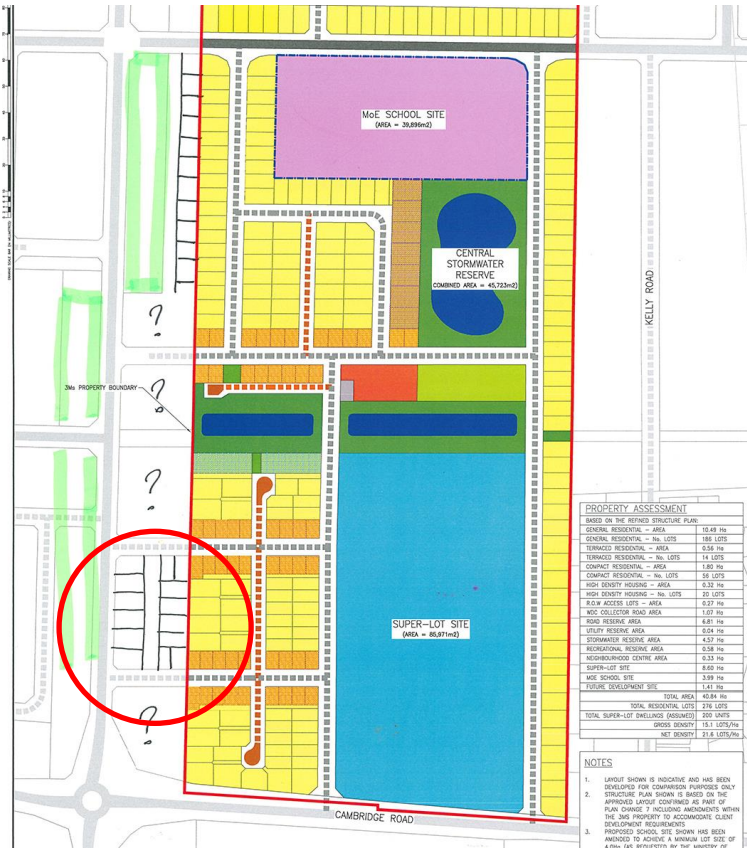
Issue:

Policy 15.3.1.1 of the district plan requires understanding of the constraints and opportunities of a site and the surrounding area to be understood by a site and area analysis. Development and subdivision are required to integrate with and acknowledge the constraints and opportunities of the site and surrounding area.'

The proposed layout within the 3Ms site on its western side, suggests that the adjoining land along the length of the western boundary of the site through to the north-south collector road (as shown to be repositioned in the 3Ms indicative Structure Plan) may not be able to be developed in a manner that would avoid significant use of rear lots, private laneways / JOALs, or single lot depth blocks with, for example, the collector road on the western side and a potential local road on the eastern side. The District Plan discourages rear lots and single lot depth blocks.

This raises the question of the suitability of this outcome on the adjacent land outside the site and what other outcomes may arise from the design approach proposed. No assessment with regard to policy 15.3.1.1 is provided.

At a Friday 19 March meeting with Abbie Fowler, Council's consultant urban designer, Matt Riley, shared his high-level thoughts as for how the land to the west might be developed by a landowner, presenting one option he has tested (see below – Red circle) that would produce undesirable urban design outcomes (eg: single lot depths) or, while potentially having vested north-south local roads, has doubtful viability. This is also an offsite effect.



Question

- a. To assist the Council to consider the suitability of the layout of the proposal in this regard, please provide urban design analysis in this regard. The expected analysis should include indicative layout options for the adjoining land to the west of the 3Ms site, showing how it could be developed in a manner that minimises and ideally avoids the use of rear lots and private laneways.

35. Local Centre

Issue:

An area of concern is the long, southern length (approximately 70m) of the Local Centre lot 301 to the swale reserve directly to the south. This could produce a poor urban design outcome if a building with a long southern elevation was constructed on the Local Centre lot. Typically, the south side of commercial buildings are hard to 'activate' and become the default location for back of house activities that be unlikely to lend themselves to positive interface with the reserve.

At the 19 March meeting with Ms Fowler, Mr Riley also noted that the Local Centre has a maximum GFA of 550m² (s19.3.3.1(b)), yet the size of Lot 301 is 3,300m². He inquired what the balance space would be used for.

Ms Fowler and her colleagues responded that it was intended to be used for outdoor seating / plaza space and that the applicant team were aware of the 'southern boundary' issue and were keen to achieve a building with a positive (and shorter) southerly interface.

Question:

Please advise how certainty can be given to avoiding an inactive frontage along the southern boundary of the Local Centre lot and give further information as to what the 'balance' area of the lot (outside the maximum 550m² GFA for a building) would be used for. It is noted that it was suggested by Ms Fowler and her colleagues that an indicative concept might be provided. Please advise how this might be provided for in any resource consent including subdivision and land use consent procedures.

36. **East-west swale**

Issue:

The east-west swale reserve outside the application site, as shown on the 3Ms Indicative Structure Plan, narrows significantly. Refer Figure below.

While appreciating that this is outside the application site, it is understood that the Indicative Structure Plan has been provided to show how the proposed development on the application site integrates with the wider C2 Growth Cell.

Question:

- a. In that context, please provide comment as to the design rationale for this narrowing of the swale reserve, and how it contributes to overall legibility and placemaking of the wider Growth Cell and is consistent with contemporary practice in terms of CPTED.

37. **Reserves and Community Centre Changes**

The Vision (S19.2.2) within Appendix S19 for the Structure Plan area focuses on sense of place, the development of strong 'gateways', and the provision of quality public open space. This is supported by a range of outcome statements, including that a range of open space for different functions, activities and users is provided.

The alternative reserves layout and removal of the reserves from the structure plan changes the manner in which this proposal compares with the structure plan and achieves the outcome described in the policy.

Associated with relocation of the community centre further to the west, this has the effect of removing it (the centre) from what will become the main collector road access to the C2 cell

and loss of the community centre and reserves facilities being easily and directly accessed as the centre of the obvious central destination and focus of the community.

This may also be expected to cause the local road network providing access to the community centre and reserves to be required to carry higher volumes of traffic with resulting impacts on the amenities of the adjacent residential areas along the routes providing access to these facilities.

Discussions relating to sports fields supply and location is continuing and to date is understood to include consideration of re-placement of them onto the site in the proximity. This will have an influence on the dynamics of the community centre and surrounding residential areas.

Questions:

- a. Please advise what the proposals are regarding the sports fields.
- b. Please provide advice of agreements regarding the sports fields.
- c. Please provide urban design assessment comparing the effects outcome of the proposal and the C2 structure plan. Particular matters any such assessment should include (not exclusive of others that may be identified as applicable) effects on the local road network, accessibility, establishment of a community centre and gateway structure, and management of effects on local roadway and adjacent property amenity and safety, and how to mitigate or the proposal mitigates effects in these regards.
- d. Please provide an urban design assessment of the outcomes from continuing discussions compared with the C2 structure plan proposals and particularly the vision statement 19.2.2.

Land Use

Issue:

The subdivision scheme plan includes reference to areas of particular land use types and development. These are identified in a generic manner. The application specifies it is only for subdivision. The nature of the Rural Zone provisions include provision for dwellings and other activities on a lot basis.

The subdivision might therefore be determined as having the effect of allowing land use of a residential nature to occur without the land use consent requirements referred to in the application.

Avoidance of these effects may require restraint on residential development until land use consent or other changes to the district plan provide for residential development on the site.

Questions:

- a. Please provide advice on how these effects and procedural implications can be mitigated.

Next Steps

Within 15 working days from the date of this request you must either:

1. Provide the information requested, or
2. Advise Council in writing of the alternative date that you will provide the information by, or
3. Advise council in writing that you refuse to provide the information requested.

A response is due on the: 13th April 2021. Please advise us if you like more time to provide the information requested.

The statutory timeframes for processing your application have been put on hold until the further information requested has been received. Despite this advice the Council is continuing to process your application as far as practicable during this time.

Please make contact if you wish to discuss any of the requests.

When all the information requested has been provided it will be reviewed to ensure it adequately addresses all of the points of this request. If the Council needs to seek clarification on matters in the further information you provide, this will be considered as information required under this letter. The application will remain on hold for this purpose. As advised above, during this time processing will however continue as practicable.

If you do not provide, or refuse to provide the information, the Council is required to notify your application under section 95(C) RMA. If this happens, you will be required to pay the notification fee before we proceed with the notification of your application. In this regard we encourage you to discuss difficulties or concerns you may have with any of these requests with the Council.

Please note that if you are dealing directly with other departments in Council regarding the further information requested, please also send further information to the writer.

If you are not sure how to respond or wish to discuss any matters relating to this request, please contact Mark Batchelor on 027 7009431 for assistance.



Yours Sincerely
Mark Batchelor
Planner
CKL