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I hereby give notice that a hearing by commissioners will be held on:

**Date:** **Monday 19 to Wednesday 21 May 2025**  
(Thursday 22 May as an overflow day if required)

**Time:** **9.30am**

**Meeting room:** **Henderson Chamber**

**Venue:** **Level 2, 1 Smythe Road, Henderson**

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## **SUBMISSIONS AND FURTHER SUBMISSIONS**

### **VOLUME 2**

## **PRIVATE PLAN CHANGE 100 - RIVERHEAD**

### **RIVERHEAD LANDOWNER GROUP**

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#### **COMMISSIONERS**

<b>Chairperson</b>	<b>Karyn Kurzeja</b>
<b>Commissioners</b>	<b>Nigel Mark-Brown</b>
	<b>Vanessa Wilkinson</b>

**Julie McKee**  
**KAIWHAKAHAERE WHAKAWĀTANGA**  
**HEARINGS MANAGER**

Telephone: 09 977 6993 or 0274 909 902  
Email: [julie.mckee@aucklandcouncil.govt.nz](mailto:julie.mckee@aucklandcouncil.govt.nz)  
Website: [www.aucklandcouncil.govt.nz](http://www.aucklandcouncil.govt.nz)

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**Note:** The reports contained within this document are for consideration and should not be construed as a decision of Council. Should commissioners require further information relating to any reports, please contact the hearings advisor.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Robyn Page  
**Date:** Wednesday, 15 May 2024 7:30:34 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Robyn Page

Organisation name:

Agent's full name:

Email address: robynjillianp@gmail.com

Contact phone number:

Postal address:

1

253 Tamaki Drive

Kohimarama

Auckland 1071

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Plan change number

Property address: 53 Queen Street, Riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Riverhead cannot sustain the huge amount of planned building that is proposed. My daughter and her family live there and the huge amount of traffic and traffic build up going into and out of Riverhead would be absolutely awful and spoil the quiet place it is and the infrastructure is not adequate.

I or we seek the following decision by council: Decline the plan change | 126.1

Submission date: 15 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Kimberley Page  
**Date:** Wednesday, 15 May 2024 8:15:41 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Kimberley Page

Organisation name:

Agent's full name:

Email address: kimlisapage@gmail.com

Contact phone number:

Postal address:

Auckland

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Property address: Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead)

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

I really don't believe this is the right area for this type of housing - not only regarding infrastructure but also Riverhead is a very special place to many and this will certainly, sadly spoil it's appeal. Please don't go ahead with the apartment plan!

I or we seek the following decision by council: Decline the plan change

127.1

Submission date: 15 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? No

#### Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Minki Lee  
**Date:** Wednesday, 15 May 2024 10:30:35 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Minki Lee

Organisation name:

Agent's full name:

Email address: [mink0214@hotmail.com](mailto:mink0214@hotmail.com)

Contact phone number: 021608063

Postal address:

11 Turpin Rd  
Riverhead  
Riverhead 0820

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:

Property address: Land identified in the Private Plan Changes by Riverhead Landowner Group, 80.5 hectares on western side of the Riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

I have four main concerns regarding the proposed land development plan:

**Traffic Congestion:** The southbound traffic from Riverhead to SH16 is already under significant pressure, particularly during peak hours (6:30-8:30 am) on weekdays and midday on weekends. Traffic frequently backs up to the golf course, and at its worst, it extends to Hallertau. Without addressing these existing traffic issues, further development will exacerbate the congestion, leading to increased chaos and delays for commuters.

**Stormwater Management:** The January 2023 floods highlighted severe stormwater issues in the northern part of Riverhead. During this event, the river level at the Riverhead-Coatsville Highway bridge was dangerously high, nearly breaching the bridge. Additional stormwater runoff from the new development could overwhelm the Rangitopuni River, potentially causing the bridge to fail, similar to what happened at Mill Rd. Effective stormwater management solutions must be

implemented to prevent such a disaster.

**School Capacity:** Riverhead School is already operating at full capacity, having grown from under 200 students to approximately 500 in recent years. The current school grounds have been extensively built up, leaving minimal space for recreational fields. Additionally, there is a shortage of secondary school options in the region, with the commute to Massey High taking over 25 minutes by car. If the traffic issues are not resolved, this commute time will only increase, placing further strain on families. The development plan must include provisions for expanding educational facilities to accommodate the influx of new students.

**Preserving Riverhead's Character:** Riverhead has historically been a rural area, reflected in our rate payments and the lack of certain urban services like council rubbish collection. The proposed high-density housing does not align with the town's rural charm, characterised by spacious single-family homes. Maintaining Riverhead's unique rural atmosphere is crucial, and any new development should respect and preserve this character rather than transforming it into a densely populated urban area akin to Massey West or Whenuapai.

In summary, the proposed development plan needs to address these critical concerns—traffic congestion, stormwater management, school capacity, and the preservation of Riverhead's rural character—before moving forward. Failure to do so will result in significant negative impacts on our community's quality of life and safety.

I or we seek the following decision by council: Decline the plan change

128.1

Submission date: 15 May 2024

### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Allan Irad MACLEAN  
**Date:** Wednesday, 15 May 2024 10:45:34 pm

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Allan Irad MACLEAN

Organisation name:

Agent's full name:

Email address: allanm@outlook.co.nz

Contact phone number: 021610020

Postal address:  
 969a Coatesville-Riverhead Hwy  
 Riverhead  
 Auckland 0793

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:

Land identified in the Private Plan Change by the Riverhead Landowner Group

Property address: 80.5 hectares adjacent to Riverhead Road, on the western side of Riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

Let me firstly make clear that I am in favour of this proposal. The land and location are well positioned for an excellent extension to Riverhead and its surrounds.

My major concerns are:

1) Traffic

a) To the best of my knowledge, we have no assurance from Govt or Council that the critical upgrade to the eastern end of the SH16 improvements programme (Motorway to Taupaki Rd roundabout) will happen anytime soon.

b) Of equal concern is the suggestion that future improvements to this section of SH16 will only address safety and not capacity!

c) There is already a daily traffic jam at the intersection of SH16 and the Coatesville-Riverhead Highway. I am aware that other submitters have provided photographic evidence of this.

d) There is also a daily traffic jam on SH16 itself – emanating from Kumeu/Huapai, past the Coatesville-Riverhead Highway intersection and reaching right down to the Bringham Creek

motorway intersection.

Any development of the Plan Change area needs to be conditional upon a firm timeline commitment from central and local governments who, to date, appear to have proved unwilling or unable to provide assurances which The Riverhead Landowner Group – or anyone else – can rely on.

## 2) Residential Zoning

Most recent development in Riverhead has been “Single House Zone”, with 600-800 sqm sections the norm and the majority containing one- or two-level dwellings. This has created a delightful suburb.

Specifications under which development of the former orchard were developed will be readily available to yourselves, and I commend them to you as a model upon which further development could be based.

It is perhaps inevitable that the developers will wish to include some three-story dwellings (including multi-tenanted), but can I add my plea that these be confined to a small area, perhaps next to the commercial development envisaged, so that the “new” part of the suburb reflects, so far as is possible, the existing character of Riverhead. I can confidently state that most residents that I speak to love living in this area.

## 3) Flooding

The Riverhead Landowner Group has stated that their proposals will make the current situation “no worse”. I guess we can assume that they are capable of designing a suitable water retention scheme, provided the Council has approved it. We must acknowledge that existing flooding is certainly not this Group’s problem, but while “out of scope” of this Plan Change, we do need the authorities to act on the existing flooding!

## 4) Ribbon Development

Riverhead already suffers to some degree from Ribbon Development. I am at a loss to understand the intent of adding a small commercial zone opposite The Hallertau. Parking in that area (including illegal parking) is already a nuisance at busy times and, I suggest, is an unnecessary additional complication that is simply not needed.

In conclusion, I do not object to the development occurring – I think it is inevitable – and I am fully in support of it proceeding under The Riverhead Landowner Group, who have both the financial strength and a long history of completing projects undertaken.

I or we seek the following decision by council: Approve the plan change with the amendments I requested

129.1

Details of amendments: 1. Delay approval until certainty of central and local government commitment to traffic issues. 2. Impose restrictions as to the type of housing to be permitted. 3. Do not allow ribbon development opposite Hallertau

129.2  
129.3  
129.4

Submission date: 15 May 2024

## Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

## Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Grant Hewison  
**Date:** Thursday, 16 May 2024 9:30:41 am  
**Attachments:** [Submission on PC 100 \(Private\) - Riverhead South \[GH\].pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Grant Hewison

Organisation name: Grant Hewison & Associates Ltd

Agent's full name: Grant Hewison

Email address: grant@granthewison.co.nz

Contact phone number: 021577869

Postal address:

PO Box 47397

Auckland

Auckland 1011

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

The entire Plan Change.

Property address: The entire Plan Change.

Map or maps: The entire Plan Change.

Other provisions:

The entire Plan Change.

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

See attached

I or we seek the following decision by council: Decline the plan change

130.1

Submission date: 16 May 2024

Supporting documents

Submission on PC 100 (Private) - Riverhead South [GH].pdf

#### Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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## Submission on Plan Change 100 (Private): Riverhead South

### Introduction

1. I welcome the opportunity to make submissions on Plan Change 100 (Private): Riverhead South.
2. By way of introduction, following the release of the third Intergovernmental Panel on Climate Change (IPCC) on 4 April 2022, the UN Secretary-General said that:<sup>1</sup>

“We are on a fast track to climate disaster. Major cities under water. Unprecedented heatwaves. Terrifying storms. Widespread water shortages. The extinction of a million species of plants and animals. This is not fiction or exaggeration. It is what science tells us will result from our current energy policies. We are on a pathway to global warming of more than double the 1.5°C limit agreed on in Paris. Some Government and business leaders are saying one thing but doing another. Simply put, they are lying. And the results will be catastrophic. This is a climate emergency.”

3. At COP27 on 8 November 2022, the UN Secretary-General followed this extraordinary statement above by then saying that: “We are on a highway to climate hell with our foot on the accelerator.”<sup>2</sup>
4. The New Zealand Parliament declared a climate change emergency in December 2020. Similar declarations have been made in many other jurisdictions. Parliament’s declaration includes recognition of: “the devastating impact that volatile and extreme weather will have on New Zealand and the wellbeing of New Zealanders, on our primary industries, water availability, and public health, through flooding, sea-level rise, and wildfire damage.” Parliament’s emergency declaration stated that “climate change is one of the greatest challenges of our time” and that “New Zealand has committed to taking urgent action on greenhouse gas mitigation and climate change adaptation.” Included in the declaration is a commitment to implement the policies required to meet the targets in the Climate Change Response (Zero Carbon) Amendment Act 2019, and to increase support for striving towards 100 percent renewable electricity generation, low carbon energy, and transport systems.<sup>3</sup>
5. In its Report *New Directions for Resource Management in New Zealand* (June 2020), the Resource Management Review Panel devoted an entire chapter to climate change and natural hazards. At the outset of Chapter 6 on climate change and natural hazards, the Review Panel observed:<sup>4</sup>

“Climate change is often described as the defining issue of our time. Limiting global warming to 1.5 degrees Celsius above pre-industrial levels will require rapid, far-reaching and unprecedented changes in all aspects of society. We are already experiencing the effects of climate change, including through

<sup>1</sup> <https://www.un.org/sg/en/content/sg/statement/2022-04-04/secretary-generals-video-message-the-launch-of-the-third-ipcc-report-scroll-down-for-languages>

<sup>2</sup> <https://www.rnz.co.nz/news/world/478257/cop27-we-re-on-a-highway-to-climate-hell-un-boss>

<sup>3</sup> [https://www.parliament.nz/en/pb/hansard-debates/rhr/combined/HansDeb\\_20201202\\_20201202\\_08](https://www.parliament.nz/en/pb/hansard-debates/rhr/combined/HansDeb_20201202_20201202_08)

<sup>4</sup> Report of the Resource Management Review Panel, *New Directions for Resource Management in New Zealand* (June 2020), page 164.

flooding and coastal erosion that threaten our essential infrastructure and the safety of whole communities. We need to respond with urgency.”

6. These Submissions are being made following the disastrous climate change induced floods and slips that have wreaked havoc across the upper North Island in early 2023. The Prime Minister at the time, Chris Hipkins, acknowledged that a cause of these floods and slips is climate change.<sup>5</sup> If ever there was a ‘wake-up call’ to turn the words of the New Zealand Parliament’s declaration of a climate change emergency into action, this has to be it.

## Submissions

Private Plan Change (100) seeks to rezone six hectares of land in Riverhead from Future Urban to Rural-Mixed Rural zone and 75.5 hectares to a mix of Residential – Mixed Housing Suburban, Residential – Terrace Housing and apartment Building, Business – Local Centre and Business – Neighbourhood Centre Zones to align with the boundary between the proposed Rural Mixed Rural zoning and urban zones.

My submission relates to the entire Plan Change.

I opposes the entire Plan Change.

The decision I seek from the Council is to decline Plan Change (100).

## Reasons for opposing the entire Plan Change

My reasons for opposing the entire Plan Change are set out below.

### Resource Management Amendment Act 2020

First, the Resource Management Amendment Act 2020 (**‘RMAA2020’**) has reintroduced specific consideration of climate change and these provisions had effect from 30 November 2022.<sup>6</sup> I believe they apply to Plan Change (100).<sup>7</sup>

In particular, the RMAA2020 provisions state that Councils must have regard to emissions reduction plans and national adaptation plans under the CCRA (as amended by the Climate Change Response (Zero Carbon) Amendment Act 2019) when making and amending regional policy statements, regional plans and district plans (sections 61, 66, 74 RMA).

### **61 Matters to be considered by regional council (policy statements)**

... when preparing or changing a regional policy statement, the regional council shall have regard to—

<sup>5</sup> <https://www.youtube.com/watch?v=NScyur2wglc>

<sup>6</sup> Resource Management Amendment Act 2020 Commencement Order 2021.

<sup>7</sup> Although it should be noted that the Review Panel did support the Resource Management Amendment Act 2020 Bill that was before Parliament and the proposal to remove the statutory barriers to RMA consideration of greenhouse gas emissions. See Report of the Resource Management Review Panel, *New Directions for Resource Management in New Zealand* (June 2020), page 178.

- (d) any emissions reduction plan made in accordance with section 5ZI of the Climate Change Response Act 2002; and
- (e) any national adaptation plan made in accordance with section 5ZS of the Climate Change Response Act 2002.

#### **66 Matters to be considered by regional council (plans)**

... when preparing or changing a regional plan, the regional council shall have regard to—

- (d) any emissions reduction plan made in accordance with section 5ZI of the Climate Change Response Act 2002; and
- (e) any national adaptation plan made in accordance with section 5ZS of the Climate Change Response Act 2002.

#### **74 Matters to be considered by territorial authority**

... when preparing or changing a district plan, a territorial authority shall have regard to—

- (d) any emissions reduction plan made in accordance with section 5ZI of the Climate Change Response Act 2002; and
- (e) any national adaptation plan made in accordance with section 5ZS of the Climate Change Response Act 2002.

I note that an emissions reduction plan has been made in accordance with section 5ZI of the Climate Change Response Act 2002 - *Te hau mārohi ki anamata: Towards a productive, sustainable and inclusive economy: Aotearoa New Zealand's First Emissions Reduction Plan* (June 2022).<sup>8</sup> In addition, a national adaptation plan has also been made in accordance with section 5ZS of the Climate Change Response Act 2002 – *Urutau, ka taurikura: Kia tū pakari a Aotearoa i ngā huringa āhuarangi Adapt and thrive: Building a climate-resilient New Zealand Aotearoa New Zealand's First National Adaptation Plan* (August 2022).<sup>9</sup>

Plan Change (100) does not appear to have regard to either *Te hau mārohi ki anamata: Towards a productive, sustainable and inclusive economy: Aotearoa New Zealand's First Emissions Reduction Plan* (June 2022) nor *Urutau, ka taurikura: Kia tū pakari a Aotearoa i ngā huringa āhuarangi Adapt and thrive: Building a climate-resilient New Zealand Aotearoa New Zealand's First National Adaptation Plan* (August 2022).

#### **Emissions Reduction and Plan Change (100)**

As noted in *Te hau mārohi ki anamata: Towards a productive, sustainable and inclusive economy: Aotearoa New Zealand's First Emissions Reduction Plan* (June 2022):<sup>10</sup>

<sup>8</sup> <https://environment.govt.nz/assets/publications/Aotearoa-New-Zealand's-first-emissions-reduction-plan.pdf>

<sup>9</sup> <https://environment.govt.nz/assets/publications/climate-change/MFE-AoG-20664-GF-National-Adaptation-Plan-2022-WEB.pdf>

<sup>10</sup> *Te hau mārohi ki anamata: Towards a productive, sustainable and inclusive economy: Aotearoa New Zealand's First Emissions Reduction Plan* (June 2022), page 127.

“Well-functioning urban environments can reduce emissions and improve wellbeing. Urban environments with a variety of mixed-use, medium- and high-density development that is connected to urban centres, as well as active and public transport routes, will help reduce greenhouse gas emissions. That is partly because they provide more options for people to travel between where we work, live, play and learn. Well-planned urban areas provide an opportunity to realise wider benefits too. They enable a greater supply and diversity of housing to be built at pace and scale, improving affordability. Good access to active and public transport routes that safely take people to workplaces and education centres can provide greater access to learning and job opportunities for households, improve public health and wellbeing and strengthen community cohesion.”

In terms of climate change, the potential adverse impacts of future development from Plan Change (100), mainly includes the use of additional private vehicles. Currently, the area is not sufficiently serviced by public transport, and the most realistic way to travel in the area is by car. Like any outer development proposed in Auckland, Plan Change (100) will result in an increase in Vehicle Kilometres Travelled (“Vkt”) and greenhouse gas emissions because:

- residents will consider themselves residents of Auckland city, as a whole, and will make use of the amenities, services, retail, education, etc in a large segment of Auckland. There is no public transport or cycling network for these trips that will be easier than driving. They will therefore drive, if they can, or be chauffeured if they can't.
- the new residences will increase the Vkt of visitors too. This will include tradespeople, friends and visitors, community service providers, people maintaining council assets, couriers, and trucks delivering to retail outlets. This is a lost opportunity for emissions reductions. Instead of making shorter trips, trips by more sustainable travel modes or trips to more places per trip - as would happen if these new dwellings were added within the built environment via intensification, each of these people will have to make longer trips to visit this development, and will drive.
- Plan Change (100) fails the ‘climate test’ because Auckland cannot provide a low car lifestyle overall without residential development being built in proximity to the amenities of the city. Development must be within the existing built environment.

I cannot see Plan Change (100) suggesting anything other than an increase in Vkt and will undermine the direction towards a Quality Compact Urban Form. Plan Change (100) will have long term, substantial and difficult-to-reverse negative impacts on Auckland's greenhouse gas emissions.

### Flooding Risks

As referenced in the Section 32 Report, significant portions of the land proposed for rezoning are prone to flooding. Last year's Cyclone Gabrielle was a harsh lesson in the reality of severe wet weather and the level of damage that can be caused, especially as the global climate continues to warm. Even during Cyclone Gabrielle, areas of Auckland that were not identified to be at risk of flooding were submerged, making it even more imperative that flood risks be seriously considered.

Intensifying housing on flood-prone areas will only saddle Aucklanders with greater concerns and costs in the future, as severe storms become more frequent. Urbanisation in this area is antithetical to Aotearoa's goals of climate resilience.

Dr Grant Hewison

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - John Olding  
**Date:** Thursday, 16 May 2024 10:31:07 am  
**Attachments:** [PPC 100 - Riverhead Community Association Submission FINAL\\_20240516101328.668.pdf](#)

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The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: John Olding

Organisation name:

Agent's full name:

Email address: jandjolding@gmail.com

Contact phone number:

Postal address:  
 15 Pitoitoe Drive  
 Riverhead  
 0820

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:

Property address: Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:  
 The best outcomes for Riverhead Community

I or we seek the following decision by council: Decline the plan change

131.1

Submission date: 16 May 2024

Supporting documents  
 PPC 100 - Riverhead Community Association Submission FINAL\_20240516101328.668.pdf

#### **Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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## **Riverhead Community Association submission to PC 100 (Private): Riverhead**

### **Introduction**

The Riverhead Community Association (RCA) is an incorporated society comprising of residents passionate about our community.

The RCA has 70 financial members and our Facebook group has 670 members, 170 of which have recently joined after the Plan Change 100 was put out for submissions.

The RCA provides a combined local voice and works collaboratively with Auckland Council and Auckland Transport on issues and projects which affect the Riverhead communities.

The RCA has a proven track record of advocating for community needs. From 2006 when Riverhead went through a plan change process for Riverhead South, RCA was at the table making a difference. We influenced the outcomes that were incorporated into the SPECIAL 30 (RIVERHEAD SOUTH) ZONE (legacy Rodney District Plan) which resulted in the spacious and attractive built form of Riverhead South.

The RCA has been active informing the community of PC100 via 2 public meetings and multiple topic Facebook updates. We have taken notice of key themes which have emerged, and these are compiled into this submission. In our view, this submission captures the major topics of concern consistently raised by the community at large.

The RCA is not anti-development.

We wish to be heard.

### **Council's Position Pre-Notification**

The RCA is cognisant of council's pre-notification reporting and the decision of the Planning, Environment and Parks Committee.

We concur in principle with council's description of the main issues, however, outline further matters of specific concern in this submission<sup>1</sup>.

*"The main issues will be the provision of infrastructure, whether the layout and provision for connections through the area are appropriate, the management of natural hazards and the intensity of development proposed. In respect of infrastructure, the applicant is proposing to provide new local transport upgrades as the land is developed. The extent to which these are sufficient can be considered through the analysis of submissions and*

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<sup>1</sup> Planning, Environment and Parks Committee, Agenda, Thursday 4 May, 2023, Paras. 72, 73



*detailed plan change review. It is noted that there are no committed or funded public transport service improvements at this time.”*

*And*

*“An important consideration is the effect of additional traffic from the potential new development enabled by the plan change on the wider transport network, and most notably the operation of SH16. NZTA Waka Kotahi are planning an upgrade to SH16 in the vicinity with the upgrade project to be completed in 2024/2025. The project extends from the end of the North Western Motorway from the Brigham Creek Road/Fred Taylor Drive/SH16 roundabout through to Waimauku - a 10km stretch. The section from Brigham Creek Road to the Taupaki roundabout will be four-laned with a new two-lane roundabout at the SH 16 /Coatesville Riverhead Highway intersection. It will also include wire rope median barriers and a 3-metre-wide shared path from Brigham Creek Road/Fred Taylor Drive/ SH 16 roundabout to Kumeu. The section from Huapai to Waimauku involves installation of wire rope median barriers and shoulder widening.”*

## **RCA – Position Overview**

The RCA opposes the plan change for the reasons set out in this submission.

The RCA welcomes the opportunity to work with the requestors and the council to resolve matters raised in this submission.

Matters of concern and remedies sought are listed below.

### **Transport:**

1. The plan change fails to adequately recognise and propose transport infrastructure upgrades required to manage adverse effects on the wider transport network. For example, SH16 is at times completely gridlocked with commuter traffic, the queue to get onto SH16 comes back to Hallertau at 6.30am! During weekends the line to Boric (the Coatesville Riverhead Highway (CRH)/SH16 intersection) is at the golf course. Another 3,000 residencies at Riverhead will exacerbate this greatly. There are very few local employment opportunities, most people will commute to work, and the single route bus is inadequate, inefficient and unreliable. The road has no capacity for walking or cycling to Westgate or Kumeu. Driving on roads is the only option.
2. Significantly, the development relies upon construction of a roundabout at the (CRH)/ Main Road (SH16) intersection to be built by Waka Kotahi NZ Transport Agency at some future time. Whilst this upgrade has been a long time coming it only addresses safety at the intersection. It will not improve capacity of the network which is already often dysfunctional. We also understand that this project is not currently programmed or funded.



3. The end of the NW motorway often backs up for a kilometre or more, and the roundabout intersection is routinely dysfunction creating huge traffic jams.
4. The plan change fails to recognise comprehensive local network transport improvements (within existing Riverhead) are warranted necessary to manage adverse effects on local transport.
5. The proposal is for limited local road 'upgrades'. But, to only deliver these in a fragmented and staged way based upon occupation of adjacent property. The upgrades do not have to be in place prior to construction when the first traffic impacts start.
6. Riverhead has under-provisioned streets, often with open drains, a lack of footpaths, unformed carriageway edges and few street trees. Some blocks are poorly connected and contain unformed paper roads. The development will increase pedestrian use over all of Riverhead, including to Riverhead School and to the two walkable pre-schools. All the realistic routes from the plan change area to destinations in Riverhead such as schools, pre-schools, shops, War Memorial Park and public walkways should be reviewed in terms of footpath provision and safety, and upgrades should be completed prior to the main development starting. This is to enable safety pedestrian movements for the existing and future people and children of Riverhead.
7. The plan change fails to recognise that local and wider transport upgrades are necessary to complete prior to development (earthworks and civil) commencement to manage the effects of construction traffic and safety.
8. The huge development area will require extensive earthworks and civil construction, including thousands of truck and vehicle movements well before any residence is occupied. Traffic upgrades, such as turning bays and pedestrian networks need to be functional and safe before the heavy traffic begins. The current plan change proposal to require limited improvements prior to occupation of a dwelling fails to recognise and mitigate the adverse construction traffic effects which will be particularly severed at main access routes and where locations where site access is feasible.
9. New subdivisions often lack on street parking. Demand for parking would spill over into the existing community where there are no formed road edges and open stormwater drains. Adequate on street parking needs to be required as we don't have the public transport options available.

### ***Transport – remedies sought***

10. Include provisions which state that development of the plan change area cannot proceed until wider network capacity and safety issues are addressed.
11. Include provisions which state that development of the plan change area cannot proceed until local road improvements have been completed, including function and safety assessments and any required upgrades to footpath routes and networks in Riverhead likely to be used by residents of the plan change area to access local destinations.
12. The enormous retirement village privatised site creates pinch points of available connectivity between the plan change area and existing Riverhead. These should be recognised and addressed by requirements for upgrades in the plan change provisions. For example, the road and pedestrian network of Te Roera Place, Duke Street, Cambridge Road, Queen Street, Alice Street and King Street will all be well used routes for people moving in and out of the plan change area, as pedestrians and in vehicles. These roads, and further routes to Riverhead School all warrant assessment and specific upgrades to ensure they are functional and safe. Similarly, the connection between the plan change area and Riverhead War Memorial Park has not been recognised as a primary route which is restricted by the CRH and the retirement village development. Specific provisions should also be applied to this area to ensure that development enables safe and logical east/west connections and road crossings.
13. Include provisions which require all required local and wider transport improvements to be in place prior to earthworks and related traffic impacts commencing.

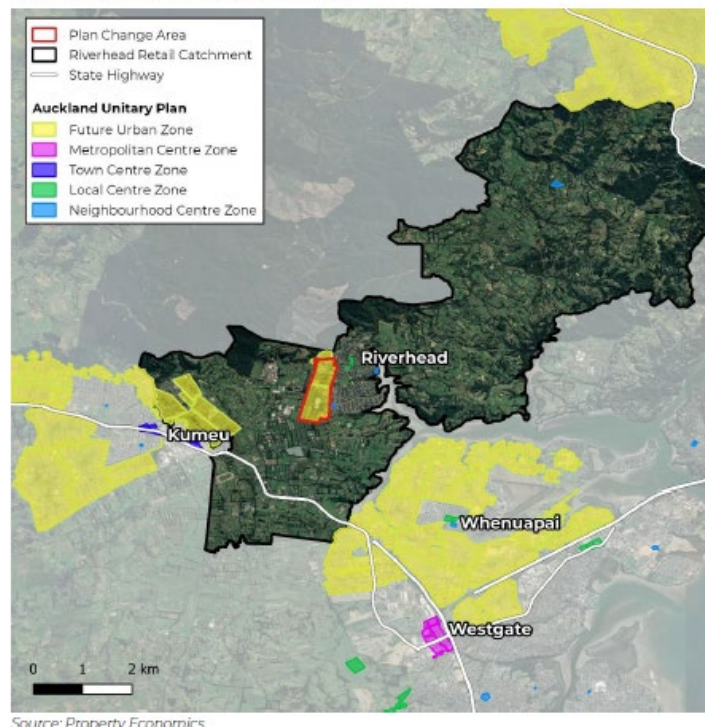
### **Commercial Zoning – Local Centre Zone and the Neighbourhood Centre Zone:**

14. A Local Centre zone is proposed at the corner of Riverhead Road and the CRH and a Neighbourhood Centre Zone is proposed opposite Riverhead Point Drive (Hallertau).
15. Riverhead already has a consolidated area of Business Mixed Use zone and Local Centre zones sites which house 2 mini-marts, a real estate office, a restaurant/bar, bottle shop and a vape shop and Heritage café/takeaways on School Road. There is also the local vet and two-preschools, Lulu's café, and other retail and commercial yard type activities. The mixed-use zoned triangle contains a development which when completed will include a series of ground level shop or business, and the final part of the triangle is also under development and also zoned Business Mixed Use, therefore, is also available for commercial use. Hallertau sits further down the CRH.

16. The basis for the proposed commercial zones is an economic report which predicts future demand (Appendix 7 – Centres Assessment). This report provides a cursory summary of the existing commercial activities and zoning. It also bases predicted demand on a ‘Riverhead Core Retail Catchment’. The report provides no basis for the extent of this catchment despite it being a formative assumption. Astonishingly, the catchment extends and wraps around Kumeu and goes all the way to the Dairy Flat Highway.

extent of Riverhead's core economic market.

FIGURE 1: RIVERHEAD CORE RETAIL CATCHMENT



17. Defining this as a catchment for Riverhead as a retail destination is ridiculous at both extents of the area shown. People in the Kumeu area have no incentive to travel to Riverhead for shopping. Kumeu is well served with a supermarket and a huge range of retail and commercial services. Council's own consultation documents for Kumeu show the extensive land at Kumeu dedicated for these activities.

See below.



24 | KUMEŪ-HUAPAI CENTRE PLAN

18. People east of Coatesville are well served by old Albany and the Albany centre and beyond. Presuming that these people would also flock to Riverhead for shopping is not realistic because Albany is more accessible and contains a much greater range of shops and services.
19. The economic report also does not appear to consider the retirement village development and the hospitality, medical and other services it will contain which would be available to the residents and to the public. Restaurants, retail and healthcare facilities are specifically enabled by the proposed Sub-Precinct A within the retirement site.
20. The proposed THAB zoned areas also allows a range of commercial and service activities (via a RC). It is not clear why the economic report does not account for the possibility that the THAB zone can also contain businesses and retail, especially the area in proximity to the proposed Neighbourhood Centre zone where this development may be likely.
21. Another concern is that the proposed isolated Neighbourhood Centre Zone (adjacent Hallertau) will exacerbate an undesirable pattern of commercial strip development down the CRH.
22. A complete and justified basis for zoning this land as a Neighbourhood Centre Zone has not been provided. The proposed zone does represent a defined area of FRL landholding which naturally raises the question as to whether this discrete proposed zone is motivated by commercial gain rather a demonstrated need or sound design principles.
23. The original structure plan for Riverhead South reinforced the community's expectation of a defined centre. The existing Riverhead centre is located in a



relatively consolidated and logical manner, and also has connection to Riverhead War memorial Park.

24. The Urban Design assessment (Appendix 6) shows that the main Local Centre Zone is within a 400m walkable catchment for all residents within the plan change area. So, the isolated Local Centre Zone it is not justified by pedestrian accessibility. As noted, the existing Riverhead centre supports two min-marts or diaries, and major supermarkets are located on all routes west (Kumeu), South (Westgate) and east (Albany).

### ***Commercial Zoning – Local Centre Zone and the Neighbourhood Centre Zone – remedies sought***

25. We want any proposed commercial zoning to be justified by economic analysis that is based on a clear outline of existing zoning and activities in Riverhead, including under-utilising of zoned land and potential capacity, and recognition of the activities and services that would be provided by the retirement village and commercial activities that can be undertaken in the THAB zone via resource consent.
26. We want any proposed commercial zoning to be justified by economic analysis that is based on a well-reasoned and justifiable customer catchment which recognises the commercial and retail centres of Kumeu, Westgate and Albany, and does not unrealistically anticipate that people who live near these centres would instead travel to Riverhead for their shopping needs.
27. We want any new business zoning to demonstrate a consolidated and legible town centre, not exacerbate strip commercial areas fronting the highway. Most importantly by removing the proposed Local Centre Zone opposite Riverhead Point Road.

### **Residential Zoning - Mixed Housing Suburban Zone:**

28. Most of the land is proposed as Mixed Housing Suburban Zone. This zone allows for two and three storey detached and attached housing in a variety of types and sizes. Up to three dwellings are permitted as of right subject to compliance with the standards.
29. In comparison, existing Riverhead is mostly Single House zone. The plan change will result in much more dense development and generally taller houses and lots of multi-unit townhouses. Existing Riverhead is characterised by many large trees on private properties.
30. In contrast, large trees would be infrequent in the proposed Mixed Housing Suburban Zone which has minimal landscaping requirements (only 20% and this can be paved if there is canopy cover over (IX6.11. Landscaped area within the

Mixed Housing Suburban Zone) and only a 2.5m front yard standard which is not adequate for large growing tree. The outcome is that buildings will dominate the neighbourhood character. Overall, due to a lack of space or a requirement to plant trees on private sites, the neighbourhood character would be markedly different compared to existing Riverhead. We expect this difference in character to be noticeable and jarring, resulting in a lower quality of amenity. We want any new development to fit into the existing urban fabric of our community.

31. We are not sure that this character represents the 'unique sense of place' described as an intension in the precinct description.
32. No requirements for road reserve tree planting are proposed either, leaving the street tree outcome uncertain or minimal. Even in the green corridor there are no measurable outcomes for vegetation cover or trees.
33. The proposal fails to mention or adopt the council Auckland's Urban Ngahere (Forest) Strategy. The strategy recognises the social, environmental, economic, and cultural benefits of our urban ngahere (forest), and sets out a strategic approach to knowing, growing, and protecting it. It seeks to achieve increased canopy cover to 30 per cent across Auckland's urban area, and at least 15 per cent in every local board area. The proposed plan change should seek to provide overall canopy cover of 30% which would provide a range of health, social and economic benefits including reducing the urban heat effect of roads, buildings and impermeable surfaces. This could go some way to integrating the old and the new.
34. The precinct description also seeks to 'enable transition from the rural to the urban environment'. It achieves this outcome abruptly, rather than a smooth transition.
35. The zoning proposed does not provide any transition at the rural edge, for example, single house zoning could be applied to the outer 100 metres. There is little attempt to provide certainty of transition of scale or density, overall. Policies which direct this outcome adopt soft non-comital language, such as 'Encourage' (policies 15 and 16). It is not clear how 'encourage' has any real influence at the resource consent stage.
36. A 5 metre rear yard setback standard is proposed at the rural zone interface. This is to landscape or plant trees in the rear yard. A 5 metre yard would have no material visual difference to the abrupt transition between residential development and the rural environment. A larger rear yard, say 15m with a requirement to plant at least one large tree and a rural fence typology are obvious designs requirements that would go some way to achieving the intended transition outcome.
37. There is also no requirement to provide adequate front yards to enable the planting of trees. This was a requirement of the Riverhead South development, which contributes to the 'treed' neighbourhood character established and respects the character of old Riverhead and the many prominent mature trees. This requirement

should at least apply to the rural fringe parts of the site and would also contribute overall to sense of transition between the rural and residential land uses.

38. Another formative design requirement of Riverhead South was a rule prohibiting tall front yard fences. This outcome can also be observed widely in Riverhead South and contributes significantly to a sense of spaciousness with buildings set back and front yard landscaping visible. The plan change seeks to removes the usual requirement for low or visually permeable front yard fences without any explanation as to why. (refer IX.6. Standards page 11). This may result in a proliferation of tall front yard fences detrimental to a desired spacious character. It also has negative effects on CPTED outcomes.
39. There is no requirement to plant regular street trees on roads. Whilst often achieved during development, the supporting AUP policy context is vague. To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, we request minimum tree quantity outcomes are required for new roads. The density for the housing will result in no tree cover of value, so the work must be done in the streets.
40. The zone also does not propose any design response to the proposed green corridor network, aside from a lonely fence height standard. There are no provisions proposed to give effect to the Urban Design recommendation for: *“a high quality and vegetated interface for higher density development along the key movement routes and adjacent to existing residential development which contributes to the current landscaped character of streets in Riverhead.”* There is also little detail on how this will be achieved, given council parks recent directive for no gardens within the streetscape we are left wondering what this ‘green corridor’ will contain.

### ***Residential Zoning - Mixed Housing Suburban Zone – Relief sought***

41. Generally, we accept that density needs to be increased compared to the predominant Single house zone of Riverhead. But this should be balanced by stronger requirements for good urban design (for example, low front yard fences) and green infrastructure (for example requirements to plant trees on sites and on roads). Graduated density should be considered at the transition to rural zoning and higher density can be placed near the neighbourhood centre and open spaces.
42. We want front yards sized to be adequate for planting large trees, for example, 6 metres. We want a requirement for each site in the zone to plant one tree capable of growing 6m plus in height.
43. We want specific yard and landscape standards to apply at the rear of all sites which adjoin a rural zone to help establish a transition between the residential and rural environments.



44. We want a front yard fence control applied which applies H5.6.15 Front, side and rear fences and walls.
45. To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, we request minimum tree quantity outcomes are required for new roads. Trees are often the last consideration and underground infrastructure dominates the road corridor.
46. Overall, we want the plan change to require sufficient private and public planted areas to give effect to the intent of Auckland's Urban Ngahere (Forest) Strategy. This will also help integrate the higher intensity development with the character of existing Riverhead and the rural interface.

## Residential Zoning - Terrace Housing and Apartment Zone (THAB):

47. The THAB zone provides for high intensity living in the form of terrace house and apartments and should be predominantly around centres and the public transport network to support the highest levels of intensification.
48. North of Riverhead Road this zone is located within the retirement village area. If that goes ahead this area of THAB zoned land would be developed with a retail/hospitality corner and privatised retirement apartments.
49. The other area of THAB zone that will be available for development and housing which is not privatised is immediately west of the Neighbourhood Centre zone at the corner of Riverhead Road and CRH. This is overlaid with Sub-Precinct B



50. There is very little reasoning provided for this discrete area of zoning proposed, and why it does not also front CRH, or warp around the south of the Local Centre zone. We do not think the proposed zoning reflects a land parcel, and this may be influencing the proposed location and extent of that zone.

### ***Residential Zoning - Terrace Housing and Apartment Zone (THAB)- remedies sought***

51. We want any THAB zone location and extent to be based on a reasoned analysis and reflect the intent of the zone which is to provide density around a transport hub and/or a town centre.
52. We want the transition edge of THAB to the Mixed House Suburban zone to contain a local road to create a natural transition space between the different densities and building scale/forms.

### **Mixed Rural Zone:**

53. A mixed rural zone is proposed at the northern part of the plan change area.
54. This is a response to the obvious flaw with the original (pre-notification but rejected by the council) proposal which proposed this flood plain area as suitable for residential development.
55. The main issue with this zoning is that the land will not be able to be further developed or subdivided.
56. The outcome is that the 'key move' of a green corridor extending to the river, and an esplanade reserve vested as public space to the council cannot be realised. The maintenance and enhancement of public access to and along rivers is a matter of national importance under the RMA. The current proposal fails to achieve this.

### ***Mixed Rural Zone – relief sought***

57. We want provision to require the 20m margin of land from the stream to be zoned as public open space and vested to the council.
58. We want the green corridor to be extended to the open space esplanade reserve and be available for public access. The river is an important taonga for our community. Previous development has turned its back to it.

## Flooding and Stormwater:

59. We are concerned that current best practice stormwater system design methodologies (as outlined within Appendix 10) would not adequately address adverse effects of the development. Council's current practice has failed Riverhead as evidenced in the Auckland Floods February 2023 where new developments designed to council's standards resulted in flooding harm.
60. We request robust peer review and an overall bottom line requirement that stormwater will not cause upstream or downstream adverse effects.
61. Objective (6) is very weak in that it that allows for the outcome of inadequate stormwater management:  
*(6) Stormwater is managed to avoid, as far as practicable, or otherwise minimise or mitigate, adverse effects on the receiving environment.*
62. In our view, if there is so much uncertainty that the requestor seeks scope for it to not be 'practicable to 'avoid, remedy or mitigate adverse stormwater effects', then this indicates a lack of confidence that stormwater issues can be appropriately addressed. We consider that the objective must be amended to remove the caveat 'as far as practicable' so the adverse stormwater effects must be avoided, remedied or mitigated.
63. Stormwater systems across the plan change area are proposed via a 'central stormwater management treatment spine' intended to be part of a 'multi-purpose green corridor' To ensure a coordinated delivery there needs to be a requirement for this to be designed and agreed prior to development.
64. Without an overarching agreed plan for the stormwater corridor, it is not clear how an overall integrated stormwater system will result from development of multiple individual lots and/or stages and what specific land parts must occur on. The risk is that fragmented and uncoordinated design and implementation would result due to a lack of design clarity and responsibilities.
65. Despite a 'designed' stormwater spine system' being proposed, zoning is not used to clarify the location and extent of the system. The extensive land required for this purpose is inappropriately zoned residential. Zoning would provide certainty of the land required for the stormwater and green corridor purposes.
66. A matter of significant concern is that the open space and stormwater functions of the corridor will be located over many separate parcels, landowners, and development stages. It is also located on parcels owned by parties not subject to the plan change.

67. There is no requirement for the overall green corridor to be designed prior to development. If this was a requirement then it would be clear what needs to occur and where. The lack of clarity will likely result in a fragmented outcome overall due to separate parties leading different parts of the development at different times.
68. It is recommended that a policy be added to require a clear overall design for the combined stormwater and open space corridor needs to be agreed by council prior to development within the precinct. We request objectives, policies and standards be included to define the corridor, its various functions, and require it to be implemented in a staged and coordinated manner.
69. Policy 17 states:  
*“(17) Require subdivision and development to be consistent with the water sensitive approach outlined in the **supporting stormwater management plan**, including: ...”*  
  
It is not appropriate for a plan change to require adherence to a document that has not been reviewed and accepted by the council. The report itself clarifies: *“This report has been prepared solely for the benefit of our client with respect to the particular brief and it may not be relied upon in other contexts for any other purpose without the express approval by CKL.”*
70. In general, it is not good practice for an enduring planning document (the AUP OP) to refer to a third party report prepared in support of a plan change.
71. The supporting stormwater report was prepared when 22 Duke Street was proposed to be zoned for residential development. This land is now largely proposed to be zoned rural, and consequently could not be subdivided. This casts doubt as to whether this land can still be used for stormwater management and conveyance to the Rangitopuni tributary. It is not clear if this affects the integrity of the stormwater report findings.

### ***Flooding and Stormwater - relief sought***

72. We want robust peer review and an overall bottom line requirement in the plan change provisions that stormwater will not cause upstream or downstream adverse effects.
73. We want the clause of ‘as far as practicable’ to be removed from Objective (6), for example: *“Stormwater is managed to avoid, or minimise or adequately mitigate, adverse effects on the receiving environment.”*
74. We want a requirement for the overall stormwater corridor system and green network design to be agreed with council prior to development and not incrementally addressed via multiple separate development proposals. This would

likely require staging of development to align with development of the stormwater/green network corridor necessary to support that development.

75. We want clarity of the intended use and function of 22 Duke Street with regard to stormwater.

## **Wastewater:**

76. Residents report that the existing system is prone to failure, often setting off alarms particularly during rain events, we understand due to groundwater and ingress of water into the council's system. The concern is that the existing poor performing system is not fit for purpose overall, and that expanding it over a large area with high groundwater will negatively impact everybody.

## **Wastewater – relief sought**

77. We want provisions which ensure that the wastewater system is appropriate and fit for purpose, and that addition of the plan change area will not negatively impact existing and future users.

## **Parks and Reserves:**

78. The 'multi-purpose green corridors' are defined by the requestor as a 'key move' from an urban design perspective. This outcome agreed and supported in principle.
79. There is no requirement that the green corridor be offered to council for vesting, but this is commonly required under existing AUPOP precinct plans to provide certainty for council and developers. In our mind, a green corridor is not a wider road with more street trees.
80. Riparian margins are to be vested, but these are minimal and go nowhere near establishing the green corridor which needs to be located on a variety of land tenures. There needs to be a requirement that land necessary for the green network, but not accepted for vesting by council, is developed and held by an entity, like the proposal for riparian margins. Otherwise, parts of the network might not get delivered.
81. The intent of a contiguous open space network comprising of stormwater and passive open space functions is supported. Unfortunately, the provisions fail to define what the corridor will comprise of in real terms and do not require it to be delivered in practice. For example, what will be located in-between the stormwater ponds?
82. Policy (13)(d) suggests *"Co-locates smaller open spaces along the multi-purpose green corridor to achieve a connected network of open space."*

83. This policy shows a lack of consideration that the separately proposed ‘neighbourhood parks’ are limited to 3 separate locations and a flawed presumption that council would accept ad-hoc vesting of a range of “smaller parks” required to join-up the green corridor network. The network may be partly on the road reserves, but if this is the intention, then that needs to be clear and also needs to be a requirement of the road design.
84. The policy fails to incorporate the depth of the description of the green corridor in the s32 report:

*“The central north-south multi-purpose green corridor is a key structuring component in both the Greenways Plan and the proposed Structure Plan. Along with the collector road, this green corridor accommodates both passive and active open spaces, footpaths and dedicated cycleways. It also incorporates an existing intermittent stream.”*
85. A clear description the intended corridor composition and the types of land it will occupy is required in the plan. As noted, it appears that parts of the green network would likely be upon road reserve. However, there are no provisions which explain this or require ‘linking roads’ to deviate from a standard design to perform this function. For example, to ensure that necessary roads are designed to be a width adequate to contain a high level of green infrastructure in a dedicated or protected zone within the road reserve.
86. Clear expectations are needed in the plan to ensure that the multiple components of the green networks are considered and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor. Without this being a clear directive it is likely that conventional design would be applied to the various parts, and overall the green network would not be cohesively designed and delivered.
87. Overall, clear objectives, policies, standards and design/outcome expectations are required in the plan to ensure the overall ‘multi-purpose green corridors’ is delivered as anticipated. Policy 13 as drafted will not achieve this outcome.
88. The precinct description seeks to realise “...the opportunity to establish green corridors through the precinct”. Policy (13) only requires the council to encourage “...the provision of a continuous and connected multi-purpose green corridor”. The word ‘encourage’ is a weak and non-committal directive. Clauses (a) to (d) provide an unclear framework without specific detail of what is ‘required’ to be achieved. A stronger word such as ‘require’ is needed to ensure the overarching urban design ‘key move’ of the green corridor is delivered.



- Auckland | A20405

Figure 10: Preliminary Master Plan - Version 10 (Source: Urban Acumen)



92. The supporting Urban Design report (Named Neighbourhood Design Statement) shows the multi-purpose green corridor extending via the land a 22 Duke Street to the Rangitopuni tributary and beyond via existing and potential future esplanade reserves alongside the stream and river.
93. We support the connection and the esplanade reserve alongside the tributary and note the extensive high quality esplanade reserve that has resulted from the Riverhead South network. A long term aspiration is to have a complete network of coastal connections. The proposed zoning of 22 Duke Street as (predominantly) Mixed Rural removes the possibility of subdivision and vesting of esplanade reserve along the tributary. The small parts which are proposed to be residentially zoned would appear to still leave the parent site over 4HA, and therefore not trigger the esplanade reserve vesting upon subdivision. We expect that this is an unintended consequence of changing the proposed zoning. We request that the 20m margin of

the tributary be zoned Open Space – Conservation, as part of the plan change, and that it's heavily weed infested margins be restored and planted, and that land be vested to the council. These are the outcomes which would have occurred if the land was able to be subdivided and are necessary to secure a necessary part of the long-term aspirational esplanade reserve network.

94. Objectives, policies and standards are also required to achieve public access links from the development to the zoned esplanade reserve. If 22 Duke Street is available for stormwater management purposes, then this outcome should be easily achieved, especially if parcels are subdivided as drainage reserves, as this may trigger the 4Ha or less lot size adjacent to the tributary to trigger esplanade reserve vesting.



95. There is no direct requirement to deliver the 3 proposed neighbourhood parks, only an indirect reference to section E38. We seek a direct requirement to deliver the parks, presuming support from council parks division.
96. One high value (notable value) Beech tree is identified which is clustered with many impressive specimen trees (including a 13m tall Kauri). The Beech sits within a cluster of magnificent trees worthy of retention and is an obvious location for a Neighbourhood Park. Policy (12) seeks that the Beech tree is incorporated into an open space, but Precinct Plan 2 does not identify this location for a Neighbourhood Park. This inconsistency needs to be corrected. This cluster of trees, planted by a family who have been in Riverhead for multiple generations could further help connect the character of existing Riverhead to that of the plan change area.
97. The Beech tree and surrounds should not be compromised by stormwater functions which also appear to be proposed within this location (refer structure plan) page 8.



98. Policy 12 does not require the retention of ‘other mature trees that are worthy of retention’ by caveating the policy with ‘*where possible*’. We seek that the option to ‘not retain worthy trees’ be removed and more directive wording applied. The site is a huge greenfield area with a lot of flexibility for development locations. Any trees of value should be required to be retained. The value of this cluster extends beyond the arboriculture assessment.
99. Large trees located near the CRH appear to not be recorded in the arboricultural report which appears to be an error.
100. The green corridor graphic, or ‘east-west connections reflecting potential original portage routes promoting awa ki awa linkage’ is shown on Precinct Plan 1 extending along and outside of the southern plan change boundary. Policy 19 contains an obtuse requirement for development to acknowledge key views and spiritual connections respond to identified on IX.10.1 Riverhead: Precinct plan 1 in the layout and/or design of development; in particular, sightlines to Te Ahu and Pukeharakeke, and connections to Papakoura Awa and Te Tōangaroa.
101. We of course cannot speak for mana whenua but note that the actual outcomes required are limited to locating and orientating streets and public open spaces to reference and respect the Māori cultural landscape values. This is unlikely to result in any material outcome in the development form. The proposed west-east roading pattern already adequately achieves the expected outcome. It is not clear how the development is required to respond to the southernmost connection, that is not even within the plan change area.

### ***Parks and Reserves – relief sought***

102. We want the requirement and composition for the green corridor to be determined and agreed in principle with council prior to any development, so that the required environmental, stormwater and connectivity outcomes are understood and delivered appropriately and fully by each discrete development parcel or stage.
103. We seek that necessary parts of the green corridor infrastructure which do not comprise of roads, neighbourhood parks or drainage reserves are offered to council for vesting or protected and maintained in perpetuity by an appropriate legal mechanism (as per IX.6.3. Riparian margin).
104. We want a clear description the intended corridor composition is required in the plan, and an explanation of how the multiple components of the green networks are to be determined and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor, and any other land that may be required.

105. We want the green corridor to extend to the Rangitopuni tributary and provide a public connection to a zoned open space esplanade reserve.
106. Overall, clear objectives, policies, standards and design/outcome expectations are required in the plan to ensure the overall 'multi-purpose green corridors' is delivered as anticipated, because Policy 13 as drafted will not achieve this outcome.
107. We want a neighbourhood park to be located to include the Beech tree and the overall grove of high value trees at this location.

### **Retirement Village (Matvin Group land):**

108. The technical approach of the plan change with respect to the Matvin retirement village land is unclear. It is noted in the s32 report but not in the plan change provisions. It is also noted in the urban design report as a consented development, containing buildings up to 5 stories tall, with 410 dwellings including 310 apartments. It is also included in the supporting stormwater report.
109. The plan change maps and provisions do not respond to the scale and poor urban design connectivity outcomes of the retirement village development. The only response is to propose zoning part of the site as THAB and the remainder as Mixed House Suburban, and Sub-Precinct B. This is of concern because the retirement village is located at the interface of the plan change area and existing Riverhead at Cambridge Road. It occupies a 500 metre long flank and only provides for a single pedestrian cross connection, available during daylight hours only.
110. The development of the retirement village is not certain to occur, however, the plan change proposal treats it as a certainty. Evidenced by the lack of local roads, pedestrian connectivity, or a considered interface with Cambridge Road, all of which would be expected on a greenfield area some 10 Hectares in area and positioned at a critical location. If the retirement village does not go ahead then the plan change should be able to provide a good practice development framework for this area consistent with the remainder of the plan change area, and adopting the key design drivers of the Urban Design report, being:
  - a connected physical environment
  - an integrated community
  - access to nature
  - vibrant and local
  - housing choice and affordability
  - proximity/convenience
111. Concerningly, despite recognising the retirement village (by way of omitting expected outcomes such as a green corridor, local roads and pedestrian connectivity, and a considered interface at Cambridge Road) the plan change also

does not propose any wider response to the retirement village form and function, should it go ahead.

112. For example, the Urban Design report recommends: *“a transition between taller buildings around the centre to lower densities and building forms in the remaining areas of the site” (pg 51)*. Requiring roads and pedestrian routes to interface with the lone public route through the retirement village should also be required in the plan change. The Sub-precincts which seek to provide some level of transition of buildings do not adjoin the retirement site but are contained within it.
113. Especially concerning is the detrimental impact that the retirement village will have on connectivity for the northern part of the plan change area and movements to and from the adjacent existing Riverhead. This matter is noted also in our transport section.

### ***Retirement Village (Matvin Group land) – remedies sought***

114. It is requested that the plan change be complete and robust in terms of dealing with the two scenarios of the retirement village being in place or not. Requiring cross-site connectivity and local roads for the scenario of the retirement village not being built.

### **Structure Plans and Consultation:**

115. Back in 2006, prior to being rezoned for development, Riverhead South also went through a plan change which was informed by a Structure Plan. This was Council led and involved the community through a series of consultation meetings including interactive design workshops. The people of Riverhead were actively involved in a meaningful way over a carefully planned process.
116. The structure plan was adopted into the then Rodney District plan ‘SPECIAL 30 (RIVERHEAD SOUTH) ZONE’. This included a comprehensive range of issues, objectives, policies, standards and assessment criteria to ensure that development reflected the needs of the community and council’s intent, whilst providing for good quality development.
117. That document delivered a planning framework informed by community participation. A range of built form outcomes are visible in Riverhead South today which were a product of this community/council collaborative process. Most significantly there was an emphasis on dwellings being set back from the street and for low or no front fences. These create a sense of spaciousness and openness at the front of houses and make for safe streets with high levels of passive surveillance.
118. These previously expressed community desires are not captured by the proposed plan change. The obvious outcome is that the character of the plan change area will be markedly different and not consistent with existing Riverhead. Density can be

provided, but it can also be balanced with adequate and open front yards and a requirement for trees. Mature trees are a defining element of existing Riverhead, including Riverhead south where significant trees were retained and sites are large enough to accommodate new large growing species.

119. In stark contrast the 'Structure Plan' (refer Appendix 4) supporting the current plan change application was not prepared with meaningful community involvement. Community consultation involved a meeting over a coffee with some members of the RCA, 2 'drop in community sessions and a summary of 'feedback'. In our view, these represent a token level of consultation designed to 'tick the box'.
120. We do not understand why the previous council led (but developer funded) process was collaborative and genuinely engaging, and the current process has been superficial, how is that democratic?
121. The Quality Planning website outlines good practice consultation for structure planning. It says:

*Consultation with key stakeholders and the community affected is an important component of the structure plan development process. The number and type of stakeholders identified and consulted with for a structure plan will depend on the scale and characteristics of the area and the issues to be managed.*

*To assist with consultation, it is good practice to develop an overall consultation plan for all groups including key stakeholders, tangata whenua and the wider community. This helps to identify all stakeholder and ensure that consultation and communications are managed in an integrated and co-ordinated way. This can also help to provide certainty to stakeholders about the opportunities to input into the structure plan process and the how the various consultation processes will be integrated into the final output. It is important that the communication or consultation plan recognises the potential for land ownership to change during the course of the structure planning exercise and any subsequent RMA plan changes.*

*Commencing consultation early in the process is important, and can help with:*

- *obtaining stakeholder buy-in to the process;*
- *gauging community and stakeholder levels of acceptance to broad concepts (such as the overall level of development) being proposed;*
- *fulfilling statutory duties under the RMA, LGA and Land Transport Management Act;*
- *incorporating and working through stakeholder concerns and aspirations while there is flexibility in the process to do so;*
- *identifying constraints and opportunities.*



122. In our view the consultation process fell well short of best practice. This is evidenced by how poorly the current plan change portrays the concerns and aspirations of the community compared to the previous process which involved meaningful involvement and consultation.
123. We are not out to stop change or development, as evidenced by involvement in the previous planning process. Rather we seek to ensure that the good things promised (such as the green corridor and infrastructure improvements) are properly designed, will be delivered as described (and when needed prior to adverse construction effects), and that due consideration is given to simple changes that could better integrate the plan change area with existing Riverhead, such as adequate front yards and tree planting. We very much would have preferred this submission to say that the process has been collaborate and effective, rather than needing to write such an involved submission and speak to these issues at a hearing and appeals if it gets to that.
124. We welcome the opportunity to conference with the requestors to resolve any matters of difference pre-hearing.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Declan Penfold  
**Date:** Thursday, 16 May 2024 11:15:45 am  
**Attachments:** [Riverhead Submission - Declan Penfold.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

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Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Parks/ Green Space and traffic and parking

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Attached in my letter

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

132.1

Details of amendments: in attachment

Submission date: 16 May 2024

Supporting documents

Riverhead Submission - Declan Penfold.pdf

#### Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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To Whom It May Concern,

I have been a resident of the Riverhead community for just shy of 3 years now. As a Brit , I have experienced drastic changes happen within the communities that I have lived in. With 10 years in London under my belt, I was very used to living in densely populated suburbs and was extremely excited to move to a country that had ample green space with easy access to the city.

I want to express my concerns regarding the proposed development project that, in its current form, does not align with the needs of our existing residents nor those who will join our community in the future. The Auckland Council's decision to halt the proposal underscores significant issues that must be addressed before any construction begins.

#### **Transportation and Infrastructure:**

The proposed project lacks substantial upgrades to our local roads and infrastructure to accommodate the increased capacity. Moreover, there are no plans for cycling lanes or additional bus routes, which are essential for sustainable mobility. Before any new homes are built, a thorough assessment of transportation needs must be conducted to ensure the seamless functioning of our community. Enhancing transportation connectivity is crucial to preserving our community's vitality.

132.2

#### **Parks & Green Space:**

Our parks and green spaces are cherished amenities that contribute to our community's quality of life. However, they are already stretched to capacity, especially during peak times. The proposed development must prioritise the preservation and expansion of green spaces to sustain our community's beauty and environmental well-being.

132.3

There are inadequate parking provisions at our parks and green spaces, posing safety risks to pedestrians and hindering community activities. Proper infrastructure, including paved sidewalks, adequate drainage, and designated parking areas, must be prioritised.

132.4

In conclusion, I know that these changes are inevitable, but I urge Fletchers to reconsider the proposed plans and prioritise the well-being of our existing residents and future families. By addressing these concerns, we can ensure a sustainable and inclusive community for generations to come.

Thank you for your attention to this matter.

Sincerely,

Declan Penfold



**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Duncan Whittaker  
**Date:** Thursday, 16 May 2024 12:45:48 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

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Postal address:  
1030 Coatesville Riverhead Highway  
Riverhead  
Auckland 0820

**Submission details**

**This is a submission to:**  
Plan change number: Plan Change 100 (Private)  
Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:  
The total lack of any future proofing of traffic management and schooling in the area  
Property address:  
Map or maps: Sate highway 27  
Other provisions:  
Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified  
Do you wish to have the provisions you have identified above amended? Yes  
The reason for my or our views are:  
The traffic flow from highway 27 to highway 16 is not capable of handling anymore cars . the local school is over flowing now and no high schools in the area  
I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested  
Details of amendments: Traffic flow and schooling to be put in place before any future development  
Submission date: 16 May 2024

133.1  
133.2  
133.3

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Mark and Joanne Robinson  
**Date:** Thursday, 16 May 2024 2:01:18 pm

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

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Riverhead

Riverhead 0820

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:

Property address: Land Identified in the Private Plan Change by Riverhead Landowners Group, 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

We oppose this proposed plan change for the following reasons:

- The character of the development itself
- The timing and integration with the infrastructure in the wider area
- The assumptions used in the different reports (appendices) to assess impact are not consistent across all of various studies

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

The development itself should:

- Have firm controls (rules) that must adhered to ensure impacts on the community are managed and appropriately mitigated, instead of 'optional or potential' controls in the submission.
- Implement more conservative design controls for managing stormwater given recent flooding events.
- Have firm controls (rules) for the provision of neighborhood parks (incorporating existing mature trees) and green corridors that can be easily accessed via footpaths. This would be consistent with controls already implemented in Riverhead for new developments.

- Have firm controls (rules) that are consistent with aligning with the character of the current Riverhead village (included in the currently approved plan). For example, sections including setbacks from the street, no high fences and outdoor living spaces.
- Ensure one commercial zone that is located near the current Riverhead village commercial zone as per the currently approved plan (avoid fragmentation of commercial activities).

The proposed plan change considered built impacts and not constructional impacts. The timing of the plan change must ensure that the increase in capacity on SH16 from Coatesville Riverhead Highway to Brigham Creek is completed before construction starts on this development. Construction traffic will add to the horrendous congestion already experienced on SH16 and the Coatesville Riverhead Highway at peak times. Traffic congestion brought about by the new development over the construction and operational phases has not been adequately quantified. The phasing of the road upgrades identified within the proposal must be ahead of the construction to not exacerbate the safety risks and congestion issues.

The proposed plan change does not sufficiently consider the integration and cumulative impacts with the wider area including infrastructure and community:

- The traffic congestion generated from the development will result in an increase in vehicle numbers by more than 70% along the CRH and there remains uncertainty on timing for the needed upgrades to ensure traffic congestion is not further exacerbated from the regularly occurring present congestion delays.
- The design and development should have assessed for a future with and without the retirement village.
- The commercial zone in the proposed land change should be consistent with the currently approved plan (which has already gone through extensive community consultation) and reflects a community desire to have one unfragmented commercial centre for the Riverhead village.
- There is very little evaluation of the impacts of traffic to the commercial zone, for example whether access is via the arterial roads or the connector roads in the proposed development.
- There needs to be stronger controls around connectivity to the existing Riverhead Village north of Riverhead Road as presently there is limited controls for vehicles, foot traffic and cycling. Given the location of the War Head Memorial Park and bus stops for school children combined with increased traffic, the pedestrian safety risks which are already severe will increase in risk.
- The residential zoning should be graduated from denser housing near the commercial area and arterial roads to less dense housing towards the existing Riverhead village and rural landscape to retain the amenity value of Riverhead.
- Evacuation of stormwater from the proposed development to the Rangitopuni stream needs to consider the wider area including the existing Riverhead village to avoid future flood risk.

We note the assumptions used in the different reports are not clear and consistent across all of the reports, for example, number of vehicles justifying commercial development and that used for transport planning. Without looking at the various studies in an integrated manner, the resultant impacts can not be credibly assessed, nor appropriate mitigations implemented.

We wish to be heard on this submission.

Mark and Joanne Robinson

I or we seek the following decision by council: Decline the plan change

Submission date: 16 May 2024

134.1

### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Paul Seymour  
**Date:** Thursday, 16 May 2024 2:30:42 pm  
**Attachments:** [Submission for Plan Change 100.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

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Contact phone number:

Postal address:

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:

Activity Table (IX.4.1)

Assessment criteria IX.8.2(4) (f)

IX5 (1)

IX.6.3

Table IX.6.9.1

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

As attached

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

135.1

Details of amendments: As attached

Submission date: 16 May 2024

Supporting documents

Submission for Plan Change 100.pdf

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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## Submission on AUP Plan Change 100

### Activity Status

The Activity Table (IX.4.1) states that subdivision and development that does not comply with Standard IX6.1 (1), will have a discretionary activity status. This is inconsistent with recent approved Plan Changes Whenuapai (PC69).

This recently approved Plan Change specified that development prior to the delivery of critical infrastructure be classified as Non-Compliant. I consider that this is an appropriate activity status given the significant lack of infrastructure in the area and is a consistent approach to that taken in the wider area.

*I request that the activity status for (A4) and (A5) be changed to Non Complying.* | 135.2

### Assessment Criteria

I note that the assessment criteria IX.8.2(4) (f) states that:

“ Whether the transport network at key intersections within Riverhead can operate safety and efficiently during the interpeak, with an overall intersection Level of Service no worse than LOS D. The key intersections to consider include Coatesville Riverhead Highway/Riverhead Road, Coatesville Riverhead Highway/Riverhead Point Drive and Riverhead Road/Lathrope Road”

I do not support this assessment criteria. The use of the interpeak period is inappropriate for the following reasons:

- Standard transport industry practice requires consideration of peak commuter periods. The morning peak commuter period is typically heavily congested. The provision of more houses, with limited other transport options and low levels of local employment will place increased pressure on these intersections in the peak morning and evening periods. The effect on these intersections in the peak periods should be a key consideration for assessment.
- Currently weekend periods are experiencing significantly poor levels of service. The weekend period should also be considered in this assessment.
- I also note that a Level of Service D in the interpeak , would represent a significant deterioration in performance of the network. I would strongly recommend that the Panel visit the area at a range of times, including the middle of a Saturday and also in a morning peak period to understand the current environment that this Plan Change will be adding pressure to.

*I request that this assessment criteria be modified to require assessment within the peak period and the weekend.* | 135.3

### Notification

I do not support the removal of public or limited notification, or written approval from affected parties for restricted discretionary activities. This is a substantial plan change that incorporates the entirety of the future urban area in Riverhead, and appropriate levels of public consultation are necessary to have the ability to address effects iteratively through the development cycle.

*I request that IX5 (1) is only applicable to permitted activities.* | 135.4

### Education Facilities



I note that the ITA has assumed that a school facility could be located within the precinct. With an area this size, I think that this is a critical piece of infrastructure and should be a key requirement of the plan change. I also note that there is limited access to secondary schools in this region, with students travelling to Massey (10km), Kaipara College (18km) Long Bay College (19km), or Westlake College (23km). I appreciate that this is the responsibility of the Ministry of Education, but I note that wider transport effects of a lack of secondary high school facilities are significant in the peak commuter periods.

135.5

#### **Other Matters**

I support IX.6.3 Riparian Margins and consider this will encourage biodiversity within the stream network.

135.6

To maintain the character and feel of the Riverhead area, I consider that the front yard set back should be increased to 3m, rather than the 2.5m proposed by Table IX.6.9.1. This is consistent with Mixed Housing Suburban zone in the Unitary Plan, and I see no reason why this should be reduced in this context.

153.7

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Paul David JAMES  
**Date:** Thursday, 16 May 2024 3:00:41 pm

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Paul David JAMES

Organisation name:

Agent's full name:

Email address: paul377a@gmail.com

Contact phone number:

Postal address:  
 37 Cambridge Road  
 RIVERHEAD  
 AUCKLAND 0820

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:  
 Roothing/infrastructure

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

The roading infrastructure and public transport networks currently available are insufficient to cope with the proposed development. There is already significant road congestion, especially where Coatesville-Riverhead Highway joins SH16. The Change Request also refers to SH16 providing connections to Kumeu to the west, and Westgate to the south, as well as providing a connection to SH18 (via Brigham Creek Road or Trig Road) which provides a connection to Albany and the North Shore. Again, all of these routes are currently heavily congested for much of the day and roading improvements planned for 2017-18 are yet to be started! the main improvements being the 4 lanes on SH16 between Brigham Creek Road and Old North Road including a roundabout at the Coatesville-Riverhead Highway/ SH16 intersection. As a result, those wanting to turn right from CRH onto SH16 now need to detour down Old Railway Rd to use the roundabout at the intersection of SH16 and Old North Rd.

A quote from the Waka Kotahi website in 2022 acknowledged these issues:

"We know that it will not solve all of the issues in this area which is why we remain focused on delivering the permanent improvements as quickly as we can,"

Local MP Chris Penk said at the time: the move was "long overdue" as a temporary fix – but not as overdue as the roundabout that had been promised.

Yet there is still no confirmation on these works. I believe the completion of these works is a necessity before any land is rezoned on the area for residential and/or commercial use.

I or we seek the following decision by council: Decline the plan change

136.1

Submission date: 16 May 2024

### **Attend a hearing**

Do you wish to be heard in support of your submission? No

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Wayne Brown  
**Date:** Thursday, 16 May 2024 3:30:39 pm

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Wayne Brown

Organisation name: nil

Agent's full name: Wayne Brown

Email address: wayne.brown@aut.ac.nz

Contact phone number:

Postal address:  
 20B Duke Street  
 Riverhead  
 Auckland  
 Auckland 0820

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:  
 Rezoning of Riverhead land to enable future development.

Property address: Riverhead

Map or maps:

Other provisions:  
 Effect on the wider Riverhead community, transport access thru Riverhead, future potential flooding caused by this development, will development issues end up being paid by ratepayers?

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:  
 Submissions

My personal opinion is that this land should remain zoned as present – the 75 ha should not be rezoned for housing as the surrounding area, infrastructure and services can not cope with this change with out considerable investment. Then maybe in 10 – 25 years it might be possible.

#### **Travel**

Traffic – existing high numbers of vehicles using UR 28 7 days per week at peak times including numbers of overweight / HT vehicles. A sensitive issue now before any changes. There are ongoing issues that need attention in the short term of 10 – 15 years before any major zoning changes should be considered.

[1] Borich intersection UR28 / SH16 intersection, this roundabout, needs to be completed before any plan change is approved.

- No roundabout at Riverhead- Coatesville Rd / Old Railway Rd intersection (beside the Golf Club) If this goes ahead before Plan approval it will only create more traffic congestion with rat runners seeking to bypass the Borich / SH intersection. This would bring a major congestion issue in the short time and in the long term and impossible situation for daily commuting.

[2] Regular maintenance for Riverhead- Coatesville Rd increased traffic flow morning & night plus weekend including all HT vehicles causes regular continuous damage - and the development[s] will increase this pressure on the roads.

Note: Most of the road / transport plans I can see - show a major flaw with Cambridge Road – Who will build this road?

[3] Riverhead Village (AT's current & ongoing inability to control safe speed in Village). The bus stop at the pedestrian crossing was removed / covered up by AT – this has not changed vehicles / trucks etc who do not slow down.

[4] Submission in the modification proposal to just 'reduce speed' thru all UR28 highway will not work – your planners should drive it every day commuting so they can see a true picture. We have only had traffic counters put out occasionally which do not get a full picture.

The transport proposal illustrates pretty roads in drawings – essential IF this were to proceed. The question of who would pay is important – will it be "RLG" as they are driving this change or will it be pushed thru as a targeted rate on local rate payers. The costs will be considerable and as we have seen with the Barrett Rd intersection upgrade - will probably take years.

Schools – only one and at peak capacity now. Older children all ready must travel out of area by school bus or parents transport to distant schools. This development will only add pressure to Riverhead school. This plan alteration is for the future as a promise possibly ?, but once houses are built parents will wait a long time for the new schools. Kumeu / Huapai is a prime example.

Riverhead – A new Town Centre is a good idea but were?

The eye sore apartment complex a prime example of why 3 level development does not work for Riverhead has been sitting stagnant for a long time now. This is noted as an important part of the proposal – a building development that never should have happened.

Parking is a key issue – since the main road is always so busy. If it gets located too close to the sports fields it will create extra congestion something not needed currently. If you add a huge number of houses into Riverhead with out establishing better and Improved roading first, you are creating a recipe for permanent disaster.

Bus Travel – One bus per hour, no safe [ covered ] bus stop zone in the middle of the old village. The drivers are as good as possible but unless it gets improved in 2024 it will never happen. There needs to be a miniature bus centre location (that can be enlarged later ) get existing residents into the habit – if you leave it till 2028 – 2030 you can never get the customer base back.

Water:

Storm water – having lived in Duke Street for over two years we have had the pleasure & pain of more than 5 separate floods of differing levels.

Yes, I did due diligence together with my lawyer searching council and other records. I also talked to 20-year veteran for this area for further research pre purchase. Records did show it was one in one hundred years risk of big floods – now records are updated !

If I had been aware, then as I am now of the continuous flood risk and potential of contaminants transference in the soils for this potential development area I would not have purchased.

The Rangitopuni Stream at the end of Duke Street has [1] has a major feed from the forest [2] drainage feeds from the flood plans where the many odd products were buried for many years & still leech into the Rangitopuni Stream / Waitemata Harbour.

I will assume that contaminants from the entire potential development area will also leech into the flood plan on a permanent basis – also polluting the Waitemata Harbour?

What is planned will not alleviate potential future regular flooding risk – from this land that will be concreted over to maximise profit per square metre.

- Will any potential development include compulsory remedial work to control contaminants leeching?

- If earth work changes are planned for this flood plan area – how will they mitigate contaminates becoming airborne.

- Will there be targeted rates on landowners in the next 10 – 20 years to pay for remedial flood prevention work – by that time developers will have long since walked away.

Dealing with the added risk of road / footpath / grass verge contamination from left over silt containing unknown and grey water colouring when our tanks are flooded - is not pleasant.

The flood plan and surrounding areas are home for wildlife– will there be any attempt to protect wildlife?

- I see that trees are mentioned in an arborist report many being of no consequence. At a time when the Council [ & AT I hope] move towards carbon reductions across the City, this blanket removal of non-essential trees seems a bit counter productive for carbon reduction aims across the City.

Grey water - We all have homeowner-maintained tanks + pumps. If it goes wrong, I pay. An assurance appears to have been given that the system will cope with the extra housing. Can I trust that? We pay City Urban rates – we should have regular standard grey water connections without any risk of user pay should equipment fail.

- Once it is necessary to suddenly improve this grey water disposal due to reaching capacity will there be targeted rates on landowners in the next 10 – 20 years.
- Is it not more acceptable for the RLG to accept this cost and plan and pay themselves for this in their developments.

Power Supply?

I didn't see anything regarding this. Does the current Vector network have sufficient capacity to cope with the demand coming up in this planned change for Riverhead.

If there is not sufficient capacity available as several subdivisions have been discovering - and those developments put on hold – maybe, it is too soon for this plan change.

.....

As they say – lets get the ducks in a row first as its too late once they commence building streets and houses.

I or we seek the following decision by council: Decline the plan change

137.1

Submission date: 16 May 2024

### **Attend a hearing**

Do you wish to be heard in support of your submission? No

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - FAYE SPOONER  
**Date:** Thursday, 16 May 2024 4:02:29 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: FAYE SPOONER

Organisation name:

Agent's full name: FAYE SPOONER

Email address: fades@xtra.co.nz

Contact phone number:

Postal address:  
 25 POHUTUKAWA PARADE RIVERHEAD  
 AUCKLAND  
 AUCKLAND 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:  
 Transportation  
 Storm water  
 Creation of impervious areas with removal of vegetation and topsoil  
 Commercial Zoning  
 Character of Riverhead  
 Land Contamination  
 Riverhead Forest

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

**OVERVIEW:** The structure planning process requires consideration as to whether the land is adequately serviced (or can be serviced) by infrastructure (including transport), and achieves appropriate environmental, social, cultural and economic planning outcomes. Further, the assessment analyses impacts on the transport network and whether urbanisation can be accommodated within the existing transport network or whether transport improvements are required.

**TRANSPORT:** Riverhead is located to the east of Kumeu/Huapai and west of Whenuapai which

have both experienced significant growth in recent years transforming from small settlements into large residential communities and thus creating more congestion in all aspects of urban life. We have all seen the effects this has on a daily commute with chokepoints which extend through to weekend traffic

In our current landscape, the public transport infrastructure leaves much to be desired. Presently, there's just one bus service traversing the Coatesville-Riverhead Highway, linking Riverhead to the Westgate and Albany Metropolitan Centres. The journey from the CBD to Westgate spans an hour, and reaching Riverhead necessitates switching to another service, (bus # 126). Coatesville-Riverhead Highway is a weak point with any potential disruption to the Riverhead bridge (eg: the floods of Jan 2024 almost wiped it out) would sever a crucial connection, highlighting the vulnerability of our existing network.

I've taken note of the "transport infrastructure staging rule" aimed at synchronizing building occupancy with the provision of necessary infrastructure. It's evident that trucks not only contribute to traffic bottlenecks and safety hazards but also accelerate the degradation of roads, which are often patched and repatched. The traffic situation extending from Kumeu to Huapai and beyond is already heavily congested, and any additional strain will exacerbate the existing issues. Until an alternative route is established, this will continue to compound an already critical situation. Hence, it's imperative that we engage in further consultation and receive a response from both Waka Kotahi NZ Transport Agency and Te Tupu Ngātahī (the Supporting Growth Alliance) to address these concerns before any houses are built

#### WASTEWATER AND STORMWATER

In relation to stormwater, it is proposed to apply the Stormwater Management Area Control – Flow 1 ('SMAF 1') across the majority of the Plan Change area to manage the increase in stormwater discharge to sensitive stream environments. Whilst we are part of the Riverhead Point Drive piped network with secondary conveyance via overland flow within Riverhead Point Drive road, we still experienced significant water flow during Cyclone Gabrielle 27/1/23. This particularly impacted all residents with Ecoflow pressure sewer system and created an untenable situation. The plan in its present form does not instil confidence that we will be resilient to the likely current and future effects of climate.

The plan indicates that wastewater will be managed through an extension of the current pressure sewer system serving Riverhead Village, with interim upgrades potentially needed as development progresses to accommodate additional capacity before the proposed separation of the Kumeu/Huapai wastewater system. However, the vagueness surrounding this aspect is indeed concerning, as it leaves significant questions unanswered regarding the adequacy and timing of necessary infrastructure enhancements. While we appreciate the Council's recently approved Network Discharge Consent includes requirements to prepare a Stormwater Management Plan ('SMP') and meet defined outcomes, this does not provide the reassurance to the people who have been flooded (some up to 3 times).

Importantly, Management of waste water failed Riverhead as evidenced in the Jan 23 floods. To ensure the integrity of planning, it's imperative to institute a rigorous peer review process, backed by guarantees and confidence-building measures. We need to establish bottom-line requirements that unequivocally prevent adverse effects from up and downstream stormwater. The inclusion of the caveat "as far as practicable" introduces unnecessary uncertainty and this caveat should be discussed in full to provide clarity and assurance.

#### CREATION OF IMPERVIOUS AREAS WITH REMOVAL OF VEGETATION AND TOPSOIL

Stormwater runoff is a significant factor. 6.2.2 New Zealand Coastal Policy Statement refers: Concerningly, sediment and contaminant runoff which "could" make its way into the coastal receiving environment. The reality is, it will eventually end up in an already choking Waitemata harbour. Loss and degradation of sensitive wetlands and streams is a concern.

It's concerning that there's no mention of the impact of Cyclone Gabrielle on the Riverhead area, particularly regarding stormwater management, in the documentation. The developer's input on this matter appears vague and lacking in detail, which is disconcerting given the severity of the event and its implications for future planning and infrastructure. Waterbodies are concentrated within the northern portion of the Plan Change area where there is a large historic wetland across the extensive flat northern terrace, which would have once been a river floodplain. Vegetation within the wetland comprises of exotic species and native pūrei.

Auckland Council Storm Recovery and Resilience Consultation document Vol 7 DOP 06/09/23  
This 925-page document – including submissions, has all the reasons why there should not be future urban in flood prone areas



## COMMERICAL ZONING

The claim that the new planning will "generate new trips, with a portion being local and internal within Riverhead, thanks to the array of activities available in the existing Riverhead township and Plan Change area" lacks substantiation. Without concrete evidence and feasibility studies, this assertion relies solely on optimistic projections. It's important to acknowledge that there are already established areas such as Albany and Westgate that cater to the public's needs.

## CHARACTER OF RIVERHEAD VILLAGE

Considering the scale and intensity of the proposed planning, I struggle to envision how it will effectively foster the development of a high-quality built environment in this locality that imbues a distinct sense of place. While I also appreciate change & progress need to happen, preserving the character of Riverhead village is paramount. However, the application of the Residential – Mixed Housing Urban ('MHU') zone around the edges of the Terrace Housing and Apartment Building ('THAB') zone, allowing for three-storey development tapering down to two storeys elsewhere in the plan change area, (purportedly to facilitate a height transition), may not align with the desired aesthetic and ambiance of Riverhead, and will further diminish the established look and feel of the area

## LAND CONTAMINATION

7.12refers: Land Contamination A Detailed Site Investigation ('DSI') has been undertaken by Soil and Rock for the Plan Change Area, and is included at Appendix 14 of this report. This DSI confirms the presence of contaminants exceeding acceptable concentrations include heavy metals (arsenic, metal, zinc) and asbestos within the Plan Change area. The regulations of the National Environmental Standard for Assessing and Managing Contaminants in the NESCS therefore apply. Any land disturbance and urban use of the land could potentially have adverse effects on the environment and human health.

## RIVERHEAD FOREST

The assertion that the Riverhead Forest "will provide a well-defined landscape and visual backdrop that is complementary to the development of the Plan Change area" contrasts starkly with the reality of recent events. The clear-fell harvesting of pine forests, particularly on steep and erosion-prone terrain, has resulted in soil, rocks, woody debris, and slash being washed into our waterways and neighbourhoods during the Auckland floods of 2023. This not only damaged the environment but also posed risk(s) to human safety. It's crucial to address these real-world consequences and incorporate them into planning considerations. The bridge providing a vital link to Coatesville – Albany came close to being wiped out by forest debris. The Mill Road bridge was not so fortunate.

## IN SUMMARY:

### 6.2.1 The National Policy Statement – Urban Development

It is my assertion that the current iteration of this plan lacks comprehensive measures to address key aspects encompassing environmental, social, cultural, and economic considerations. Notably, the plan's ambition to enhance accessibility through heightened urbanisation and a pivot towards public and active transport, (with the ancillary goal of curtailing greenhouse gas emissions), appears deficient in its present state. I'm very skeptical whether objectives in the present plan will provide solutions and points raised by all submissions require further investigation. It's essential that provisions are in place to halt earthworks and development until we have resolution of these wide-ranging issues being addressed, including functionality, and safety concerns. These are paramount before laying the foundation for any construction.

I or we seek the following decision by council: Decline the plan change

138.1

Submission date: 16 May 2024

## Attend a hearing

Do you wish to be heard in support of your submission? No

## Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Kim Spooner  
**Date:** Thursday, 16 May 2024 4:15:40 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Kim Spooner

Organisation name:

Agent's full name: FAYE SPOONER

Email address: fades@xtra.co.nz

Contact phone number:

Postal address:  
 25 POHUTUKAWA PARADE RIVERHEAD  
 AUCKLAND  
 AUCKLAND 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:  
 Transport  
 Zoning  
 Flooding and stormwater  
 Wastewater  
 Parks and reserves  
 Retirement village  
 Structure plans and consultations

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

While I'm open to embracing change and progress, I share concerns regarding several aspects of the plan. After reading the Riverhead Community Association submission PC100 (posted on FB), I find myself in agreement with every point raised. In essence, the plan overlooks significant social, local, and broader implications. I firmly believe that development should not commence until all pertinent issues have been thoroughly addressed.

I or we seek the following decision by council: Decline the plan change

139.1

Submission date: 16 May 2024

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Caroline Church  
**Date:** Thursday, 16 May 2024 4:30:45 pm  
**Attachments:** [Submission doc.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Caroline Church

Organisation name:

Agent's full name:

Email address: mail@carolinechurch.co.nz

Contact phone number:

Postal address:

0793

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

PDF attached

Property address: (Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

PDF attached

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

I wish to see Riverhead maintaining its unique and special character as one of the earliest settlements in the Auckland region, not to become another characterless treeless wasteland.

I or we seek the following decision by council: Decline the plan change

Submission date: 16 May 2024

Supporting documents

Submission doc.pdf

140.1

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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### **Transport and roading congestion**

Until extensive upgrades are done to the current roading infrastructure, this development will add the burden of more traffic to an already strained roading network. There is only one narrow transport corridor (SH16) funnelling all the traffic from Helensville, Muriwai, Waimauku, Huapai, Taupaki, Riverhead and Coatesville towards the motorway, city and West Auckland. The Coatesville-Riverhead Highway is the same – there are no short cuts to avoid it. There is no useful or reliable public transport with the area, and as the vast majority of residents in the areas named above need to commute for work, they have no option other than driving. I live on the main road, and have noticed the early commute time getting earlier and earlier. Weekday commuter traffic flow now starts at 4.30am. The roads are clogged at the weekends, with no way out, as visitors from other parts of Auckland visit the pubs, beaches and other activities.

Road surfaces are degraded and prone to flooding, the gridlocked intersections are dangerous and lead to impatience and inevitably, accidents. We don't even have footpaths so people can choose to walk safely in the area.

The roads need to be upgraded to deal with the existing capacity, and I would like this to happen BEFORE any further development takes place, not during construction - there is no space for heavy construction vehicles and thousands of additional cars on the current network.

### **Water concerns**

Riverhead and the surrounding areas are prone to flooding, which has become more extreme in recent years. Land needs to be set aside for stormwater runoff, not covered in hard surfaces, which will simply divert the water to become someone else's problem.

Part of the area in discussion has always been a flood plain and is completely unsuited to development of any kind.

Many residences to the north of Riverhead are still reliant on older septic systems, and in even the newer developments to the south, the newly installed waste systems struggle in heavy rain, as the ground becomes so saturated.

I would like to see a more realistic plan for stormwater that allows for worst case scenarios, and that leaves flood prone areas to drain naturally, as they have always done. This includes leaving existing vegetation in place.

### **Trees and green areas**

The proposed development does not provide adequate green areas with canopy trees. This development will be turning rural agricultural land into high density housing, completely changing the landscape and removing existing established trees to be replaced by grassed areas. The current specimen trees on properties along Riverhead Road need to be maintained and incorporated into any future development, not left in limbo with no guarantee they will be safe from removal.

The future depends on trees to reduce carbon emissions, keep the environment cool, mitigate erosion, provide habitat for wildlife, and for general wellbeing.

I would like to see the land at 298 Riverhead Road vested to Council as a reserve for the entire community to use, with all trees intact, and more areas left undeveloped to form genuine green corridors, not grassed 'parks' with picnic tables. I would like to see more areas left accessible for the public, and that does not include wandering through a retirement village!

Please refer to the Auckland Council Urban Ngahere Strategy when considering this point:

The nine principles of Auckland's Urban Ngahere (Forest) Strategy

- Right tree in the right place.
- Preference for native species.
- Ensure urban forest diversity.
- Protect mature, healthy trees.
- Create ecological corridors and connections.
- Access for all residents.
- Manage urban forest on public and private land.
- Deploy regulatory and non-regulatory tools.
- Manage the whole lifecycle of urban trees.

### **Excessive commercial activity**

Riverhead is already well serviced, with a petrol station, a vet, two foodmarkets, a wine shop, real estate office, two café restaurants, a takeaway, Hallertau brewery and restaurant, the Riverhead Tavern, and several child care or early education centres. There are more commercial premises scheduled in the uncompleted block on the main road - another foodmarket, a wine shop, café and possibly a hair salon. Riverhead is a short distance to Coatesville, Kumeu/Huapai, and Westgate. There really is no need for additional commercial or retail in the area, particularly on or near the already clogged main road with its lack of safe parking.

Economically, it is not viable, and environmentally it is not needed. Strip style shopping does not belong in Riverhead.

### **Loss of character**

People choose to live in Riverhead for the semi-rural lifestyle, surrounded by green space, and for the character and neighbourhood feel.

Currently the northern/older part of Riverhead consists of single unique dwellings with mature trees, and attractive streetscapes. The newly completed developments to the south were designed with the landscape in mind, but this new development makes no provision for street plantings, and will allow for multiple townhouses (and please note the two existing developments in Riverhead have failed economically, suggesting it's an unsuitable model for



the area, and for the needs of local people) To change the entire character of the township contradicts the 'unique sense of place' described in the development proposal.

The selling points of the retirement village in particular, include the 'beautiful, nature-rich environment. The very thing they are looking to change, with multi storey densely packed buildings and paving. The village complex is completely out of scale.

I would like to see lower density housing, with an obligation to provide roadside canopy trees and ensuring that layout of housing allows for green space and attractive streetscapes.

## Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 16, 135 Albert Street  
Private Bag 92300  
Auckland 1142

For office use only

Submission No:

Receipt Date:

### **Submitter details**

**Full Name or Name of Agent (if applicable)**

Mr/Mrs/Miss/Ms(Full  
Name)

Aberdeen Adventures Ltd

**Organisation Name (if submission is made on behalf of Organisation)**

**Address for service of Submitter**

Terra Nova Planning

(c/- Shane Hartley)

Telephone:

0211593240

Email:

shanehartley@tnp.co.nz

Contact Person: (Name and designation, if applicable)

### **Scope of submission**

**This is a submission on the following proposed plan change / variation to an existing plan:**

Plan Change/Variation Number

PC 100 (Private)

Plan Change/Variation Name

Riverhead

**The specific provisions that my submission relates to are:**

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Or

Property Address

All land within PC100 at 22 Duke Street, Riverhead (Lot 20 DP 499876)

Or

Map

Or

**Other (specify)**

### **Submission**

**My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)**

I **support** the specific provisions identified above ☐

I **oppose** the specific provisions identified above ☒

I wish to have the provisions identified above amended Yes ☒ No ☐

The reasons for my views are:

Refer Attachment A

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation ☐

Accept the proposed plan change / variation with amendments as outlined below ☒

Decline the proposed plan change / variation ☐

If the proposed plan change / variation is not declined, then amend it as outlined below. ☐

Refer Attachment A

I wish to be heard in support of my submission ☒

I do not wish to be heard in support of my submission ☐

If others make a similar submission, I will consider presenting a joint case with them at a hearing ☒



Signature of Submitter  
(or person authorised to sign on behalf of submitter)

15/05/24

Date

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could ☒ / could not ☐ gain an advantage in trade competition through this submission.

**If you could gain an advantage in trade competition through this submission please complete the following:**

I am ☒ / am not ☐ directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

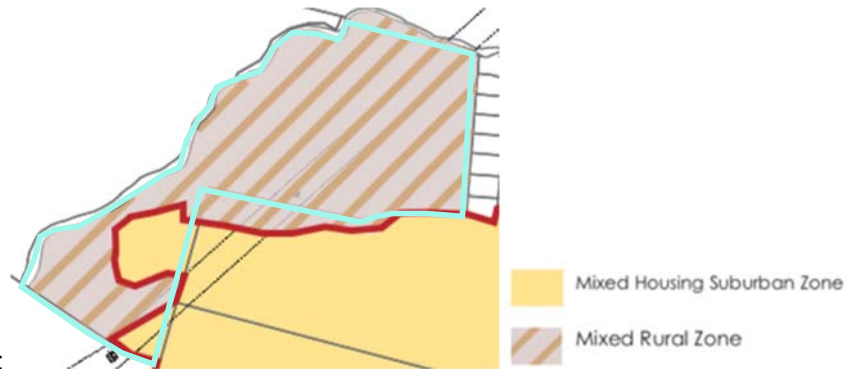
(b) does not relate to trade competition or the effects of trade competition.

## Attachment A

Submission on Auckland Unitary Plan Proposed Plan Change 100 (Private) – Riverhead

### Aberdeen Adventures Ltd

RE: 22 Duke Street, Riverhead. (Lot 20 DP 499876):



PC 100 Proposed Zone(s):

#### The reasons for my views

We consider the proposed Mixed Housing Suburban Zone applying to approximately 6,700m<sup>2</sup> of the site's land is appropriate.

Area of PC 100 proposed MHSZ within south-west part of site (Lot 2 DP 499876):





However the proposed application of Mixed Rural Zone to all of the balance of the 6.2ha site is not appropriate, as there are other areas of the site also potentially suitable for MHSZ.

The Engineering Report prepared by Riley Consultants (attached) prepared as part of the AUP Hearings, identified other potential urban areas that are or could be made free of flooding, and the possibility of further urban areas being identified with more detailed engineering assessment.

This evidence and planning evidence (for the AUP Hearings) resulted in the Future Urban Zone being applied over the whole site, along with land to the south also subject to this plan change.

The proposed plan change has taken a broad and generic approach to the site, and has unnecessarily limited additional urban development opportunities by applying the Mixed Rural Zone for flooding and ecological reasons. This is unnecessarily restrictive, preventing opportunity for appropriate further urban development when supported by more detailed engineering and ecological assessment.

In regard to the identified wetland area, much of this appears to be potentially off little significant ecological value. And, as suggested in the PC 100 application, may not even qualify as wetland if the NPS Freshwater Management criteria are amended under the current NPS review process.



Figure 5. The most northern portion of the PPC site (turquoise boundary, showing Stream 1 (dotted blue line), NPS-FM qualifying natural inlan and constructed drains (purple dotted lines). The constructed pond for horticultural water supply is indicated as a blue polygon.

We consider the Mixed Housing Suburban Zone over all, or most of the site is appropriate other than where flooding and ecological constraints are confirmed to be significant and unable to be avoided or mitigated. This should also take into account potential engineering works and changes arising from the NPS FM/wetland review process that enable appropriate urban development.

**If the proposed plan change / variation is not declined, then amend it as outlined below.**

We seek the application of Mixed Housing Suburban Zone over the whole of the site.

This recognises the need for detailed engineering and other assessments (including possible NPS FM/wetland changes) to confirm finer fabric suitability (or not) for urban development than the higher scale PC 100 assessment undertaken within for the site.

141.1



**ENGINEERING ASSESSMENT  
PROPOSED AUCKLAND  
UNITARY PLAN SUBMISSION  
22 DUKE STREET, RIVERHEAD**

Engineers and Geologists

## ENGINEERING ASSESSMENT PROPOSED AUCKLAND UNITARY PLAN SUBMISSION 22 DUKE STREET, RIVERHEAD

**Report prepared for:** Aberdeen Adventures Ltd

**Report prepared by:** Sam Reed, Civil Engineer



**Report reviewed and approved for issue by:** Steven James, Director, CPEng



**Report reference:** 15222-A

**Date:** 19 November 2015

**Copies to:** Aberdeen Adventures Ltd      Electronic copy  
Riley Consultants Ltd      1 hard copy

Issue:	Details:	Date:
0.1	Draft Engineering Assessment	9 October 2015
1.0	Engineering Assessment	19 November 2015



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## Appendices

Appendix A: Terra Nova Planning Zoning Maps

Appendix B: RILEY Dwgs: 15222-10 and -11

## ENGINEERING ASSESSMENT PROPOSED AUCKLAND UNITARY PLAN SUBMISSION 22 DUKE STREET, RIVERHEAD

### 1.0 Introduction

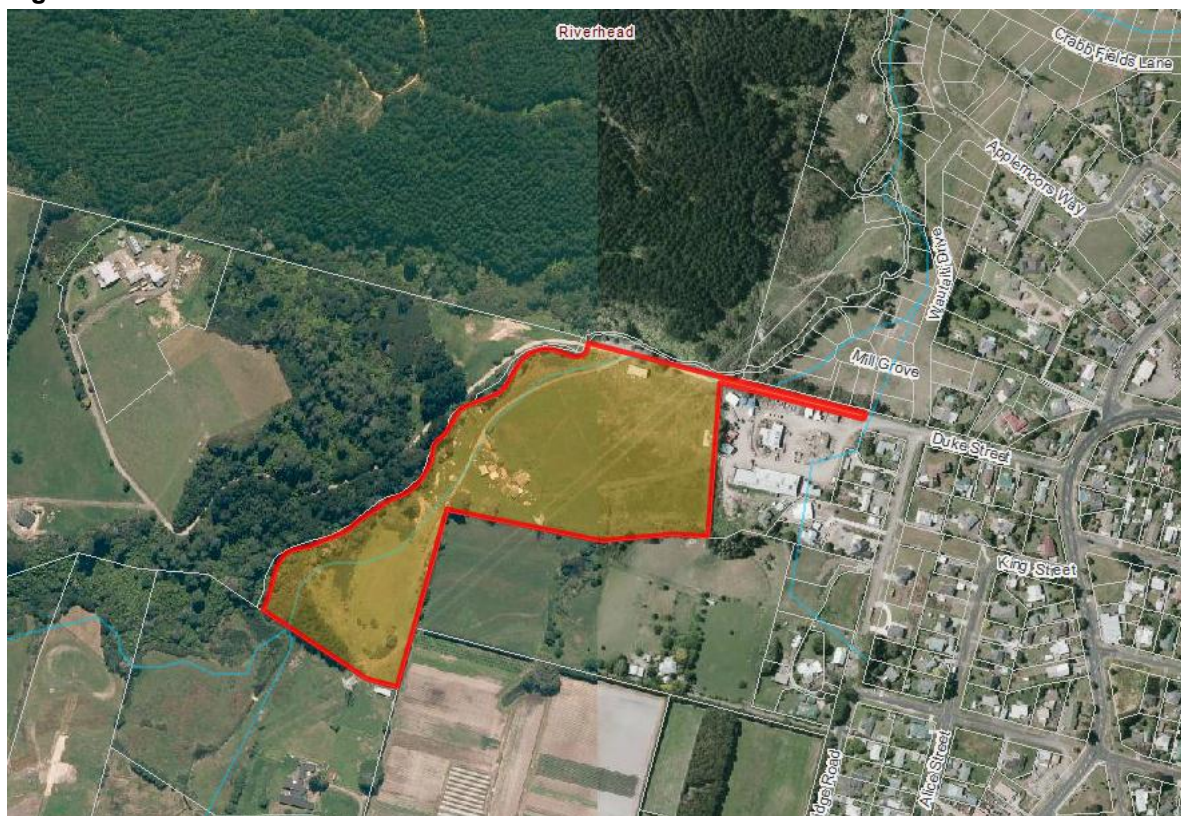
The following report has been prepared by Riley Consultants Ltd (RILEY) at the request of Aberdeen Adventures Ltd. It presents the results of a civil engineering assessment to support a submission to the Proposed Auckland Unitary Plan (PAUP). It is proposed to modify the existing Rural Urban Boundary (RUB) to include the site and re-zone the land as Future Urban. The civil engineering assessment specifically addresses earthwork aspects and the provision of stormwater, wastewater, and water supply services for future residential development.

The proposed amendments to the PAUP are shown on the zone map (Appendix A).

### 2.0 Site Description and Proposed Development

The location of the site is shown in Figure 1 below.

**Figure 1: Site Location**



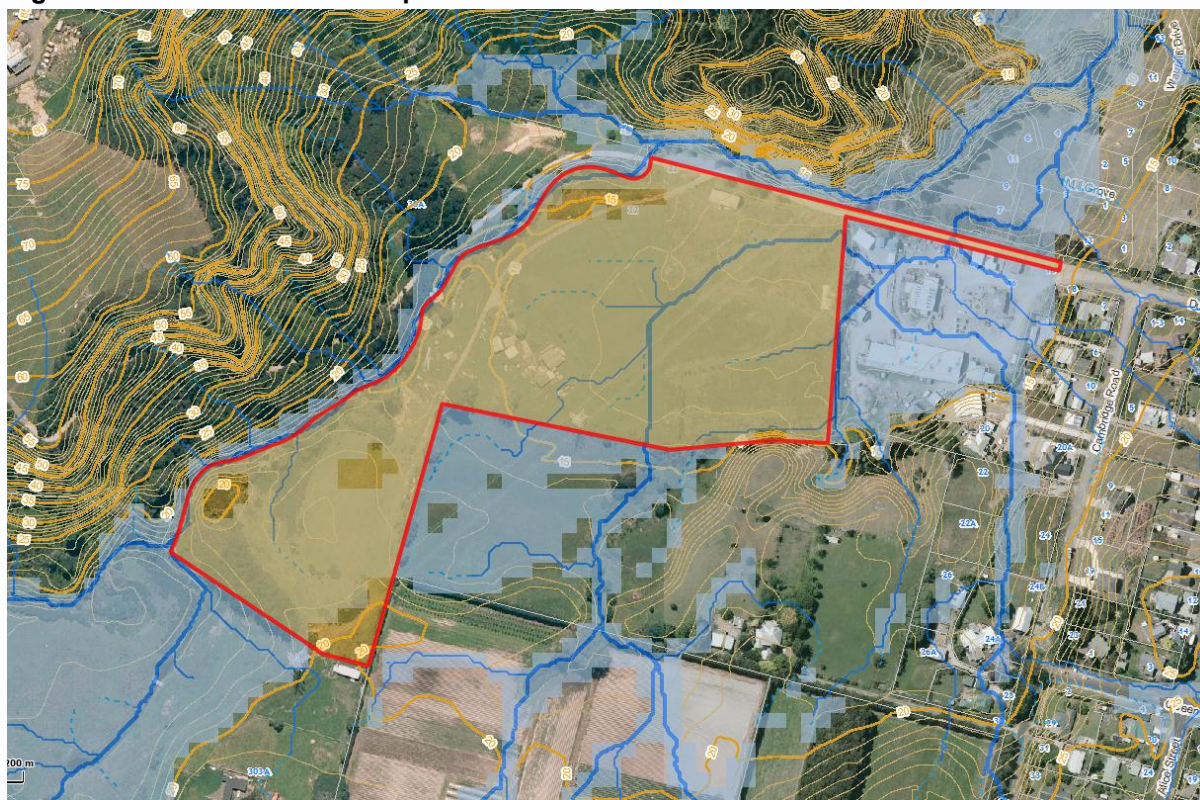
The site is 6.41ha and is known as Lot 1 DP 154985. The land is currently zoned as Rural Production in the PAUP and contains a dwelling and workshop with the remaining land in pasture. A Vector electricity transmission corridor runs south-west to north-east through the site.



The property is low-lying and the Wautaiti Stream flows north along the western boundary of the site. The stream is culverted at the north-west corner of the site beneath a shared driveway for 22 and 30 Duke Street. As the stream exits the culvert it turns right flowing east along the northern site boundary. The stream then flows north-east where it ultimately discharges at the head of the Waitemata Harbour, approximately 1km from the site.

Figure 2, reproduced from the Auckland Council (Council) GIS viewer, shows the majority of the site to be located within the 1% Annual Exceedance Probability (AEP) floodplain. An overland flowpath/channel is shown through the east of the site.

**Figure 2: Council GIS Flood Map**



Based on the aerial photography, the composition of existing impervious and pervious surfaces on the site are as follows:

**Table 1: Existing Site Coverage Composition**

Site Coverage Description	Area (m <sup>2</sup> )	%
<b>Impervious</b>	3,560	5.6
Roof Area	(703)	(1.1)
Paved Surfaces	(2,857)	(4.5)
<b>Pervious</b>	60,511	94.4
Pasture	(60,511)	(94.4)
<b>Total Area</b>	<b>64,071</b>	<b>100</b>

The total impervious area makes up a small percentage of the total site area. The site conditions, including structures, site coverage, and site contours, are shown on RILEY Dwg: 15222-10, appended.

The proposal is to change the current RUB and re-zone the site to Future Urban, which will then allow future structure planning. Provision will be made for access roading, stormwater management, and installation of wastewater and water supply infrastructure to service each lot. It is envisaged that, approximately 19 new houses could be constructed. The neighbouring sites to the east are currently zoned as either Single House or Future Urban under the PAUP.

Our preliminary assessment has been based on the layout prepared by Terra Nova Planning Limited (TNP).

## **2.1 Geology and Soil Conditions**

A preliminary geotechnical assessment has been undertaken by RILEY on the site to support the submission. The assessment investigates suitability for residential development and details the site geology and subsurface conditions. The findings from the assessment are outlined in our Geotechnical Constraints Assessment, RILEY Ref: 15222-B.

## **3.0 Proposed Engineering Works**

### **3.1 Earthwork Activities**

Earthworks will be required across the site to achieve flooding objectives as outlined in Section 3.3.2. This will primarily consist of raising development areas outside of the floodplain as well as lowering areas to increase the flow capacity of the Wautaiti Stream.

Earthworks will be required across the site to improve contours in order to satisfy the design and layout requirements for the development (i.e. access roading, stormwater management devices, building platform levels, etc.). Permanent earthworks would be carried out to an engineered standard in accordance with NZS 4404 and related documents, and with Council Standards of Engineering Design and Construction.

Due to the area and volume of earthworks, resource consent application(s) would be required for the land disturbing activities. A detailed earthworks report would be undertaken to provide a comprehensive analysis of any proposed earthworks and the measures to be implemented in order to reduce the impact on the receiving environment. Due to the proximity of the waterways and the ecological significance of the area, comprehensive erosion and sediment controls would be required.

Geotechnical and environmental aspects (i.e. watercourses, floodplains, etc.) would need to be considered during the earthwork assessments. These constraints would likely effect the extent and intensity of the development.

Sediment and erosion controls implemented to a high standard in accordance with Council engineering standards and Auckland Regional Council (ARC) Technical Publication No. 90 (TP90) guidelines would ensure the impact on the environment is less than minor.

### **3.2 Roading**

It is the envisaged that the site would be accessed via Duke Street and from Cambridge Road via an adjacent development to the east of the site.

New public roads would be required to service a housing development. Main access roads would be constructed to public standards with allowance for stormwater management, services, landscaping, pedestrian movement, etc. New public roads will likely be formed to a flexible pavement as per Council standards. Some off-street parking spaces would be envisaged along the public access roads. Based on the level nature of site, road, and driveway gradients are expected to be far less than the maximum slopes specified within Council and Auckland Transport standards.

The alignment of the roads should consider existing site gradients in order to optimise earthwork activities and to accommodate stormwater management measures. In accordance with the Council Code of Practice (CoP), roads can be used to convey flood waters provided that flood water depths do not exceed 200mm in a 1% AEP event.

A detailed traffic impact assessment will be undertaken by others as part of a structure plan process, also at this time, detailed design of the proposed access road vertical and horizontal geometry will be provided.

### **3.3 Stormwater Assessment and Management**

#### **3.3.1 Background**

We understand the Rodney District Council Riverhead Catchment Management Plan (1994) (CMP) is the latest flood report commissioned by Council within the catchment.

RILEY has previously prepared flood assessments for 11 to 17 Duke Street in 2012 and 16 Duke Street in 2014. Mr Ken Tomkins of Council has confirmed that these flood assessments represent the most recent flood information available.

#### **3.3.2 Flooding**

RILEY Dwg: 15222-10 shows the existing site with the Council GIS 1% AEP flood extents overlaid. Although most of site is shown to be located within the 1% AEP floodplain, the majority of the flooding is expected to be of a shallow nature.

The primary source of flooding for the site is the Wautaiti Stream. The shared driveway for 22 and 30 Duke Street and the existing stream culvert have been identified as key flood constraints for the site.

An indicative site layout is appended as RILEY Dwg: 15222-11 and shows how earthworks and channel widening could be used to achieve flood objectives. Earthworks will be required to raise development areas above the 1% AEP floodplain to ensure suitable building platforms, as well as lowering areas to ensure that the cross sectional area below the 1% AEP floodplain is maintained. This is likely to include widening of the eastern bank of the Wautaiti Stream as well as culvert upgrade works. Secondary overland flowpaths through the site can be maintained along roads provided that the flow depths for the 1% AEP event do not exceed 200mm.

Further analysis will be required to ensure all buildings can be safely located outside of the 1% AEP flood extents and incorporate necessary freeboard requirements. The analysis will need to demonstrate that there is no increase to flood levels upstream and downstream of the site as a result of any works.



Attenuation of site runoff to pre-development rates for up to the 1% AEP rainfall event is also likely to be required to ensure that there is no increase in flood risk to downstream properties as a result of increased river flows. Attenuation of site runoff can be provided with the provision of a wetland/pond.

Review of the proposed plan scheme indicates that adequate provision has been provided adjacent to the watercourse with ponds and reserves.

Whilst issues have been identified with flooding during the 1% AEP event, future detailed flood modelling, in conjunction with an assessment of earthworks and stormwater management measures, should show suitable development zones can be achieved without further effecting adjacent property or downstream infrastructure.

### **3.3.3 Stream Erosion**

Stormwater attenuation from developed surfaces should be incorporated into future developments. Development on the site should consider attenuation of stormwater runoff to pre-development levels, particularly for smaller storm events (i.e. two year average recurrence interval (ARI) event and 95<sup>th</sup> percentile 24 hour event in accordance with PAUP provisions).

Stormwater management measures will need to consider outlet arrangements into the stream, and ensure dispersal and erosion control measures are adopted where appropriate.

### **3.3.4 Water Quality**

The Wautaiti Stream has been classified as Type 2 in the vicinity of the site and Type 1 in its lower reaches in accordance with the ARC Technical Publication No. 232. The stream has high ecological value given the low disturbance natural channels. As a result, unmitigated development would have a negative impact on the receiving environment.

A strict sediment control methodology would be required, as discussed in the above earthwork section, to ensure any negative impact on the receiving environment is avoided. The ARC TP90 measures would be required as a minimum, with additional measures employed to ensure minimal sediment loss from the site.

The development will need to incorporate stormwater quality treatment measures to protect the receiving environment from effects of contaminants generated from roads and paved surfaces. All roof materials will need to use inert materials and be low contaminant yielding.

The development could utilise a range of measures and a Treatment Train philosophy, whereby a succession of stormwater treatment devices are utilised to ensure the development does not impact negatively on the downstream environment. The stormwater quality measures would need to be designed and constructed in accordance with the latest Council Guideline Documents, such as, GD01 Design of Stormwater Treatment Devices (an update of ARC Technical Publication No. 10) and GD04 Water Sensitive Design (an update of ARC Technical Publication No. 124). Treatment devices may incorporate vegetated drains/swales, raingardens, ponds, wetlands, and proprietary filtration devices.

Provision of wetland/pond is currently proposed to provide amenity for the area as well as stormwater quality treatment and attenuation. The wetland/pond is also likely to be able to provide attenuation and water quality for neighbouring developments.

A change of land use, from farming to residential, will have a positive impact on water quality without the concentrations of nitrogen, phosphorous, sediment and faecal contamination entering the waterways from farming production.

### **3.3.5 Proposed Auckland Unitary Plan**

In the vicinity of the site, the PAUP shows the areas to the east of the RUB to be zoned as Stormwater Management Area category of Flow 1 (SMAF 1). It is likely the site would also be zoned SMAF 1 if the RUB were to be changed to include the site. No other PAUP overlays requiring assessment for a resource consent application have been identified.

To meet the requirements of a SMAF 1 zone, stormwater mitigation is required in the form of detention (temporary storage) and retention (volume reduction). The detention volume required is equal to the runoff volume for the 95th percentile, 24 hour storm for new impervious areas and can be provided in a range of storage devices (underground tanks, above ground tanks, stormwater ponds/basins, etc.). The retention volume is equivalent to the 10mm, 24 hour storm event for new impervious area. Retention can be achieved by capturing runoff for potable or non-potable water supply and by discharging to ground soakage systems. Any soakage to ground will need geotechnical consideration to confirm that it is practical/achievable.

### **3.3.6 Overland Flow and Existing Waterways**

Consideration will need to be given to maintaining secondary overland flowpaths to cater for higher intensity rainfall events. As a greenfield development, emphasis should be placed on maintaining waterways and enhancing to provide environmental and landscaping benefits. There will be opportunity to provide secondary overland flowpaths within the roadways and proposed reserves where flows can be directed away from development areas towards stormwater management devices as appropriate.

### **3.3.7 Summary of Stormwater Management for the Site**

- Flooding of the site can be managed with earthworks to maximise the development area without effecting flood levels on neighbouring sites.
- Review of the proposed plan scheme indicates that adequate provision has been provided adjacent to the watercourse with ponds and reserves.
- Further analysis at detailed structure planning stage will be required to show that any development does not raise flood levels on neighbouring sites and consideration should be given to solutions aimed at alleviating existing flooding issues.
- Stormwater attenuation of developed surfaces to pre-development levels should be incorporated into future developments.
- Stormwater management devices should be incorporated in development of the site to avoid potential stream erosion, typically achieved by attenuation of the 95<sup>th</sup> percentile 24 hour storm.
- Stormwater management devices should be incorporated in development of the site to address issues of water quality. The details of which should be in accordance with Council Guideline Documents GD01 Stormwater Treatment Devices and GD04 Water Sensitive Design.
- Any development of the site will need to comply with the provisions of the PAUP in the form of stormwater detention and retention and stormwater quality.
- Stormwater secondary overland flow will need to be carefully managed and existing streams maintained and enhanced.

### **3.4 Wastewater**

Residential properties in the surrounding area are served by an existing Pressure Wastewater Collection (PWC) system. Likely connection points for future developments are located to the east of the site in both Duke Street and Cambridge Road. The PWC network in the area generally flows to the south along the Coatesville-Riverhead Highway to a pump station at the intersection with Old Railway Road, approximately 2km from the site. From this point, wastewater ultimately flows to the Mangere Treatment Plant.

RILEY has contacted Watercare Services Limited (WSL) with regard to capacity of the wastewater network. WSL has stated that they would not generally consider servicing anything outside of the RUB, and that water and wastewater networks were not designed with what has become the Future Urban zoned land in mind for connection. The existing network in the area has been designed for the existing development plus some additional growth to the south of Kaipara Portage Road. WSL has stated that they would be able to provide detailed comment on the proposals when or if the site was rezoned.

WSL's strategy is in line with the PAUP, which assumes growth over the next 30 years in areas with current zoning. As the site is currently outside the RUB, future servicing has not been anticipated by WSL, and subsequently the timeframe for providing wastewater servicing to the area is potentially 30 years away.

If a change to the RUB was approved, this would then signal to WSL future development was proposed and servicing the area could then be considered. With a change of the RUB the site would be zoned Future Urban, which effectively places the land in a holding pattern until such a time it can be zoned Urban. This would require a structure planning process, which would require wastewater and water supply assessments. Therefore, whilst there is current capacity and infrastructure issues, including the site in the RUB would allow long-term planning for the site.

Whilst short-term servicing for development was not available from WSL, there is the option of managing wastewater on-site from either individual lot treatment and disposal systems or a communal system with an area of land set aside for disposal and managed by a body corporate. Both options are discussed in detail below. All on-site disposal systems will need to be designed and constructed in accordance with the Council Guideline Document GD06 On-site Wastewater Systems (an update of ARC Technical Publication No. 58).

#### **3.4.1 Individual Lot Systems**

A typical lot size to cater for an on-site wastewater disposal system would be 2,500m<sup>2</sup>, based on this, the overall household yield the development could provide would be approximately seven houses. The treatment systems would provide a high quality effluent for disposal over ground via pressure compensating dripper lines over approximately 500m<sup>2</sup>.

The wastewater system would be installed under building consent when a house is built and the costs would be borne by the lot owner. If and when a connection to the public reticulation was possible, the lots could be further subdivided to provide additional housing.

#### **3.4.2 Communal System**

The alternative to individual lot systems is to have a communal treatment system with an area of land set aside for land disposal. The area of land required would depend on the amount of houses connected to the system. Typically, 500m<sup>2</sup> of land is required for every house. For example, if 6,000m<sup>2</sup> was set aside for land disposal, this would cater for an initial 12 houses.



Similar to the individual lot system, the communal system would provide a high quality effluent for distribution over land via pressure compensating dripper lines. The advantage the communal system has over many individual systems is that it would be managed by one company, with ongoing operation and maintenance responsible by a body corporate organisation, rather than relying on the many individual owners to operate and maintain the system correctly. For this reason, a communal system is deemed to be more ecologically sensitive.

A communal system has another advantage over individual systems, in that, if a connection to the public network was available at some point in the future, this could be easily achieved as all wastewater would already be reticulated to a common point. A pump station could then be installed to deliver wastewater to the new discharge location. Once connection is achieved, future development could occur within the decommissioned disposal areas.

### **3.5 Water Supply**

As discussed above, WSL is not committed to servicing the site for wastewater or water supply, as it is currently outside the RUB. WSL has not indicated whether there is capacity in their water supply system to support further development in the area and a detailed assessment of available supply would be undertaken as part of a structure planning process. In the event water supply from the public mains was not possible, then on-site supply can be provided with roof runoff storage tanks, discussed further below.

#### **3.5.1 Potable Water Supply**

Without a connection to the public water supply network, any development will need to harvest stormwater from roof runoff and store for reuse in individual dwellings. This is a common arrangement in many rural situations with two 25m<sup>3</sup> tanks being the typical volume to achieve a continuous supply throughout the year. In the event that a particular household runs out of water, there are a number of water delivery companies able to fill tanks.

To ensure the stored runoff is suitable for potable supply, each system will need to include various treatment measures. A detailed explanation of water collection and safe household water supply can be found at [www.health.govt.nz](http://www.health.govt.nz).

#### **3.5.2 Fire-Fighting Supply**

WSL has not indicated whether there is adequate supply in their water supply system for fire-fighting purposes, with adequate flow and pressure from the public reticulation to service a future development. A detailed assessment would be undertaken as part of a future structure planning process. This could include construction of the water reticulation throughout the development to provide a fire supply until public wastewater reticulation is available (i.e. no domestic water supply connection until an on-site wastewater disposal system is decommissioned). Once public wastewater is available, connection for a domestic water supply could be provided.

During a structure planning process, a detailed design of the fire-fighting requirements of the development would be undertaken by a suitable fire engineer in consultation with the New Zealand Fire Service. This will assess the minimum demands for fire-fighting purposes.

## 4.0 Summary

- Earthworks will be required to raise development areas above the 1% AEP **floodplain** to ensure suitable building platforms, as well as lowering areas to increase the flow capacity of the Wautaiti Stream. Further analysis will be required to ensure all buildings can be safely located outside of the 1% AEP flood extents and incorporate necessary freeboard requirements as well as demonstrating that there is no increase to flood levels upstream and downstream of the site.
- **Earthworks** will be required to form the new site gradients, incorporating building platforms, access roading, and stormwater management measures. Earthworks consents for earthwork activities and strict compliance of erosion and sediment control measures, designed in accordance with ARC TP90 guidelines, will be required. The staging and sequencing of earthworks activities, with the inclusion of specifically designed erosion and sediment control devices, will need to be assessed in order to reduce the volume of sediment leaving the site, thus, protecting downstream environments from excessive sedimentation and water quality degradation. Consideration of environmental, geotechnical, and stormwater management measures will need to be considered during detailed earthwork assessment. These constraints will affect the extent and intensity of the development.
- The site can be managed from a **stormwater** quality and quantity perspective to ensure there is less than minor effect on the environment. A range of stormwater quality treatment devices can be implemented to improve water quality, which would be designed and constructed in accordance with the latest design guidelines. Stormwater quantity management devices can be implemented to ensure post-development flow rates are no greater than what currently exists. The development would need to ensure that there is no effect on the 1 in 100-year flood level along the Wautaiti Stream. The provisions of a likely PAUP SMAF 1 zone, with regard to detention and retention, will likely need to be considered for the development.
- Review of the **proposed plan scheme** indicates that adequate provision has been provided adjacent to the watercourse with ponds and reserves with regards to stormwater management.
- WSL has provided limited comment on the existing public **wastewater** reticulation to service the development and indicated that there may be constraints. If the site is included in the RUB, servicing of the site could be several years away before capacity is made available in the downstream network (i.e. reticulation and treatment plant). Until this time, on-site disposal could be adopted to service a reduced development area. A communal system would be the best practical solution.
- WSL has not made comment on the ability of public **water supply** network to service development of the site for domestic supply and fire-fighting supply. WSL is not committed to servicing the site until it is within the RUB and zoned for development. Until a connection to the public wastewater reticulation becomes available, we recommend on-site collection and reuse for domestic supply is provided, however, fire-fighting supply should be extended throughout the development.

## **5.0 Limitation**

This report has been prepared solely for the benefit of Aberdeen Adventures Ltd as our client with respect to the brief and Auckland Council in processing the consent. The reliance by other parties on the information or opinions contained in the report shall, without our prior review and agreement in writing, be at such parties' sole risk.

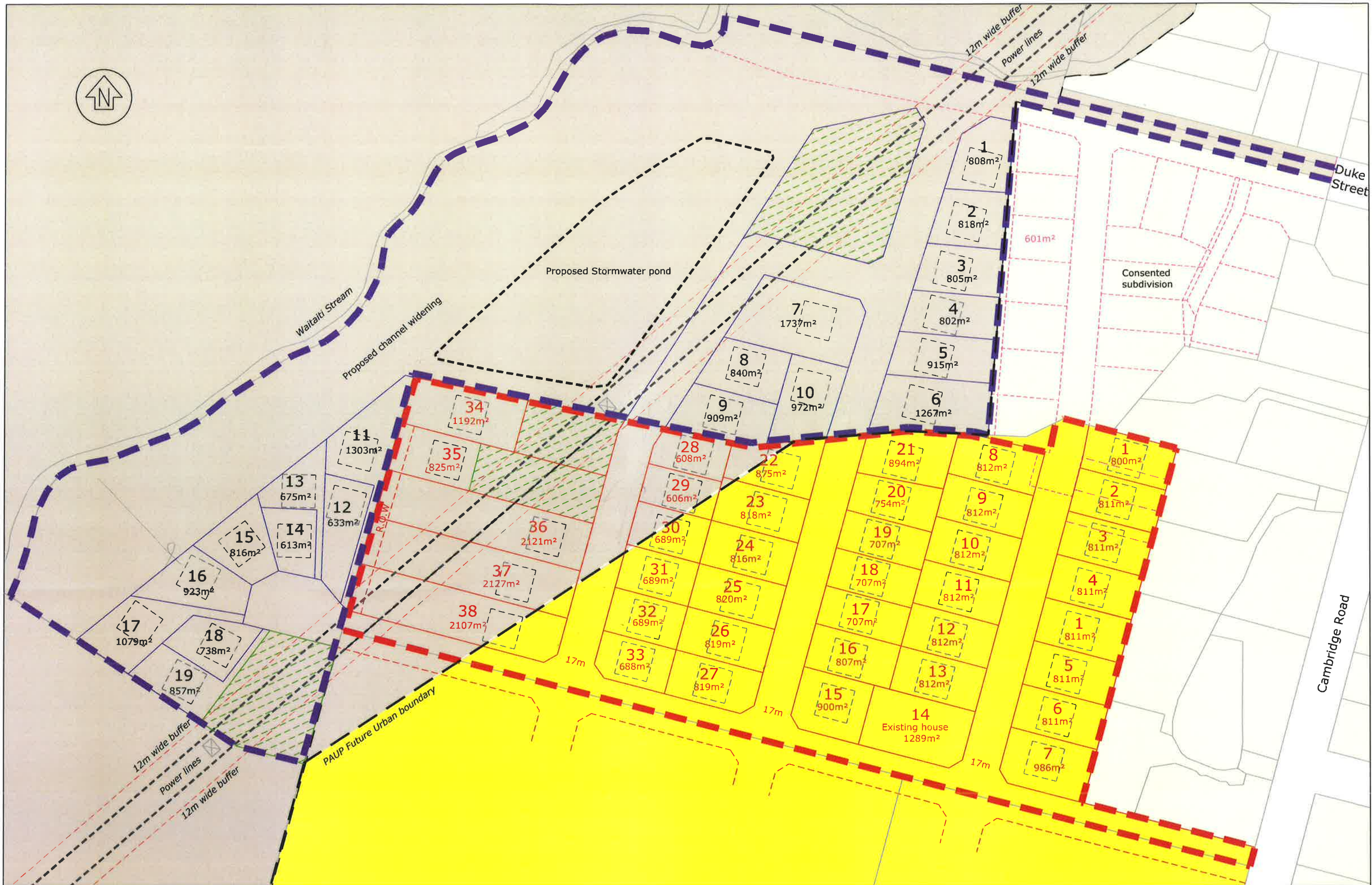
Opinions and judgements expressed herein are based on our understanding and interpretation of current regulatory standards, and should not be construed as legal or planning opinions. Where opinions or judgements are to be relied on they should be independently verified with appropriate advice.



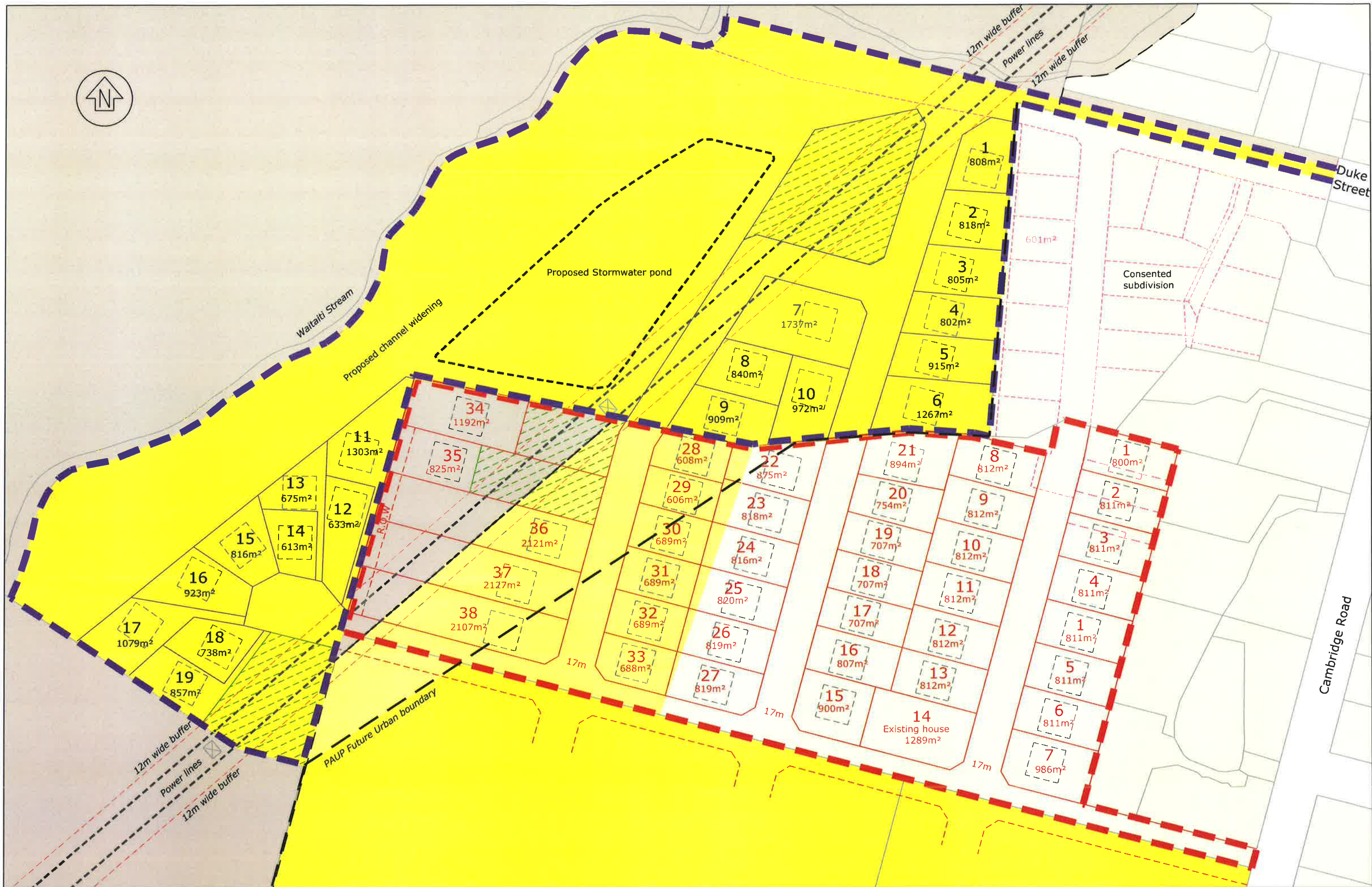
## ***APPENDIX A***

### ***Terra Nova Planning Zoning Maps***

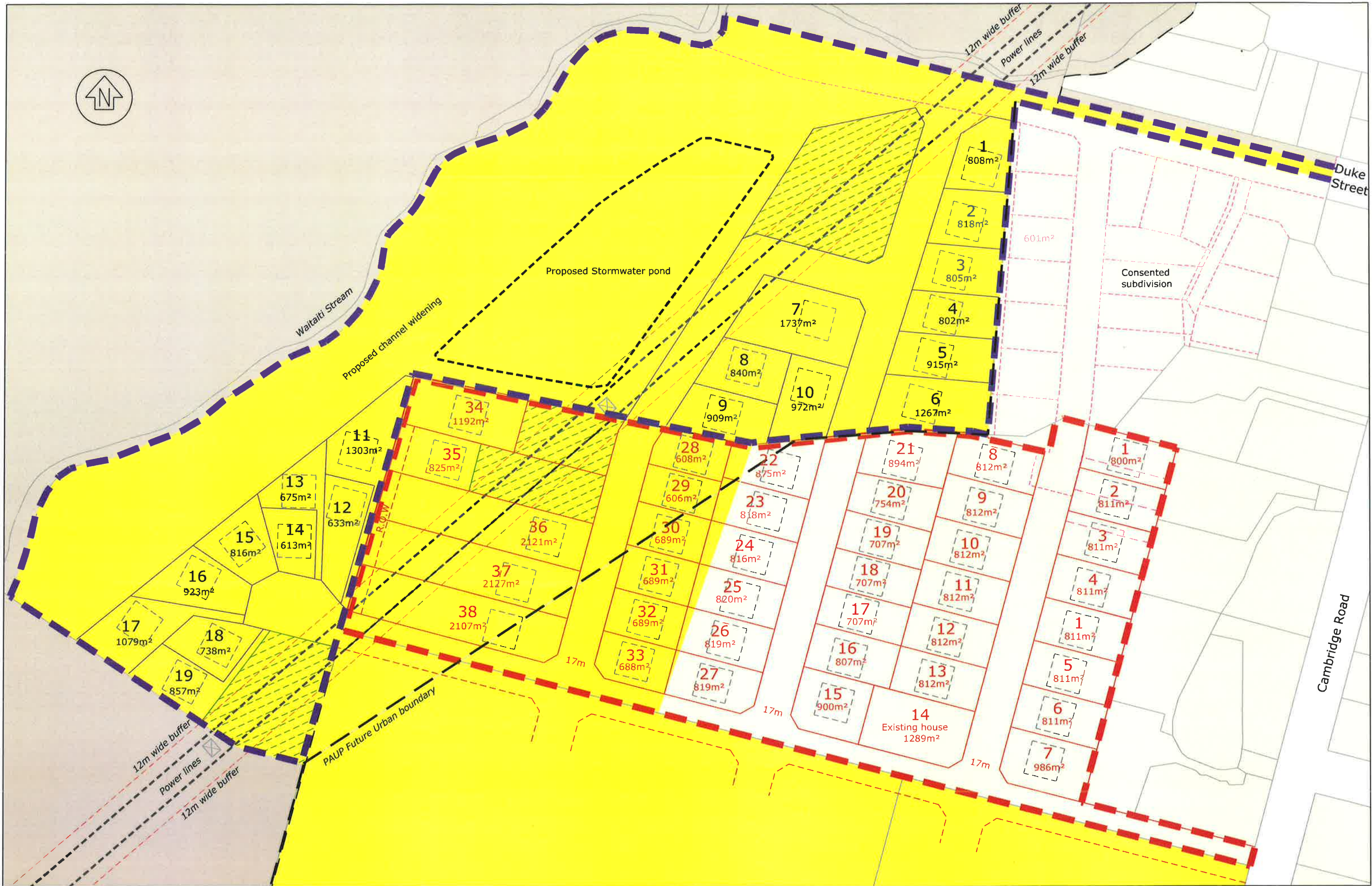










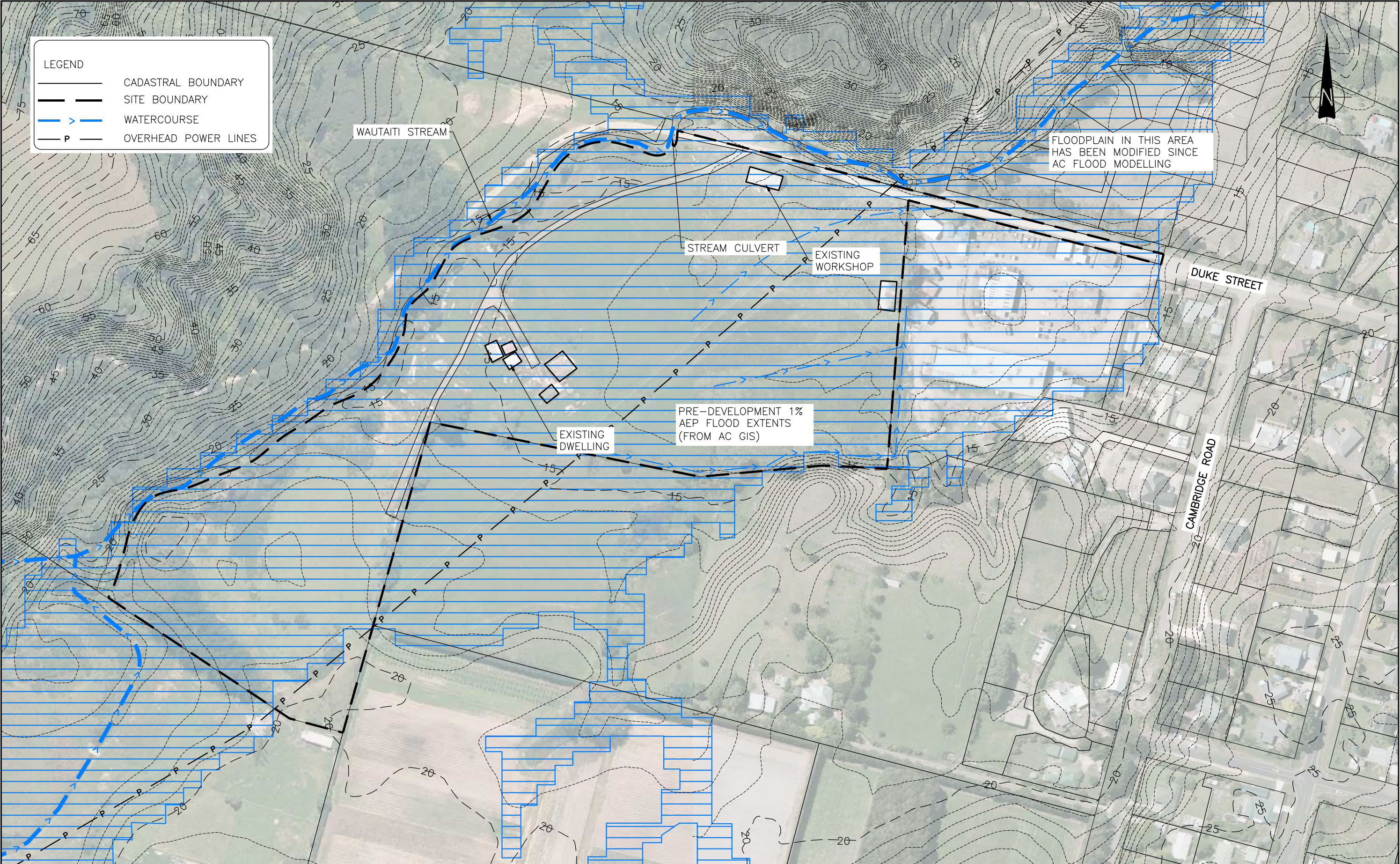




## ***APPENDIX B***

***RILEY Dwgs:  
15222-10 and -11***





LEGEND

- CADASTRAL BOUNDARY
- SITE BOUNDARY
- WATERCOURSE
- OVERHEAD POWER LINES

WAUTAITI STREAM

FLOODPLAIN IN THIS AREA  
HAS BEEN MODIFIED SINCE  
AC FLOOD MODELLING

STREAM CULVERT

EXISTING  
WORKSHOP

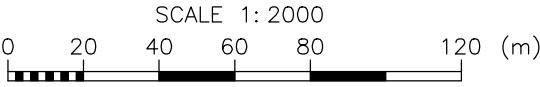
DUKE STREET

PRE-DEVELOPMENT 1%  
AEP FLOOD EXTENTS  
(FROM AC GIS)

EXISTING  
DWELLING

CAMBRIDGE ROAD

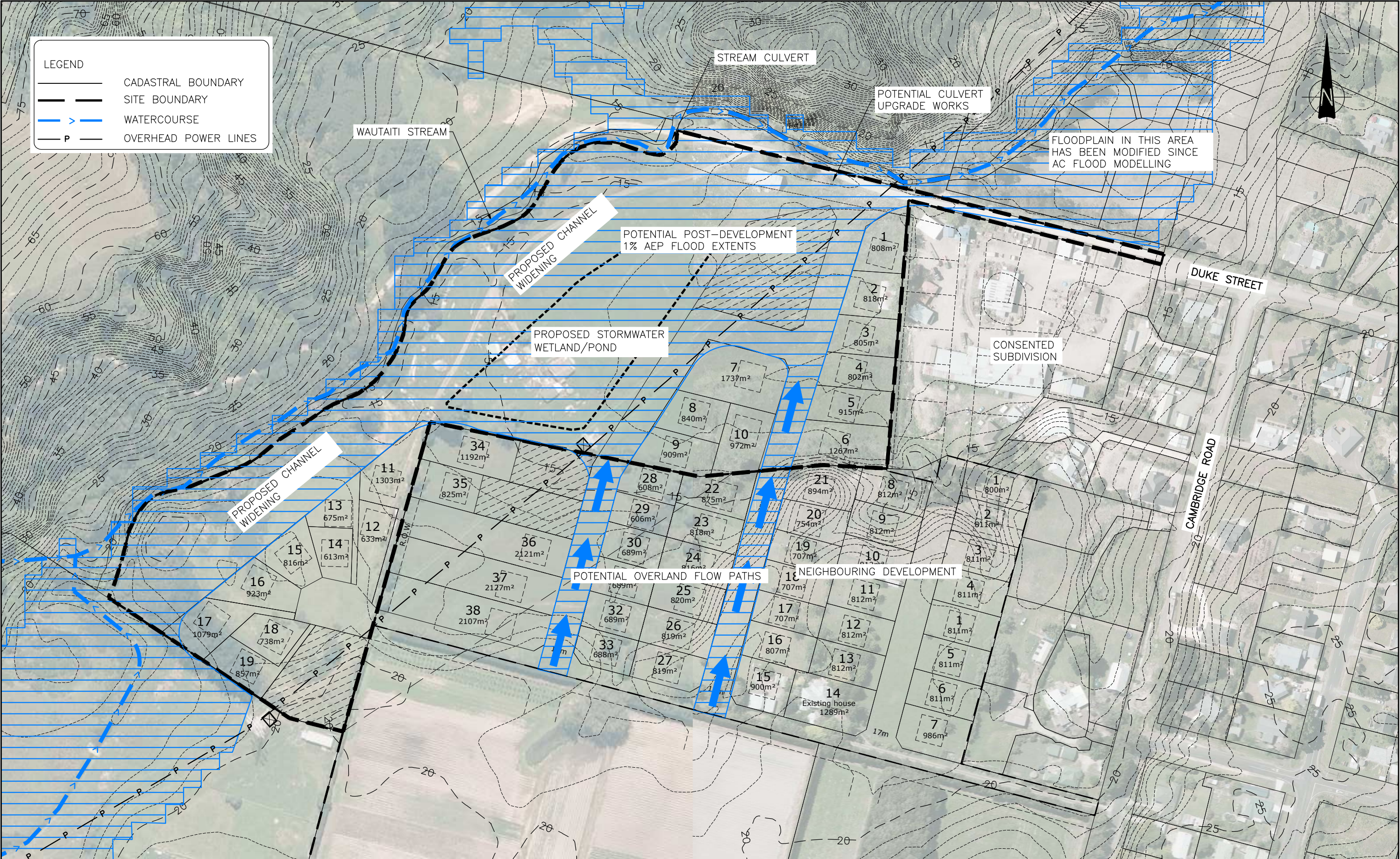
NOTES:  
1. PARCEL BOUNDARY INFORMATION, AERIAL  
PHOTOGRAPHY, FLOOD EXTENTS AND  
TOPOGRAPHY FROM AUCKLAND COUNCIL GIS.



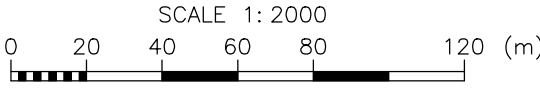
FOR INFORMATION

1 FOR INFORMATION		DESIGN SR	CHECKED SR	APPROVED FOR ISSUE:		<p>P.O. BOX 100 253 N.S.M.C. AUCKLAND TEL. 09-4897872 FAX. 09-4897873</p>	TITLE	ABERDEEN ADVENTURES LTD 22 DUKE STREET, RIVERHEAD EXISTING SITE LAYOUT	CADFILE 15222-1 SCALES (A3) 1:2000	DRAWING No. 15222-10	REV. 1
REV	DESCRIPTION	SR	DATE	DATE	DATE						
		17.11.15	OCTOBER 2015	17/11/15							





NOTES:  
1. PARCEL BOUNDARY INFORMATION, AERIAL PHOTOGRAPHY AND TOPOGRAPHY FROM AUCKLAND COUNCIL GIS.  
2. PROPOSED LAYOUTS PROVIDED BY TERRA NOVA PLANNING.



				DESIGN SR	CHECKED SR	APPROVED FOR ISSUE:  S. JAMES .....
				DRAWN SR	CHECKED MP	
1	FOR INFORMATION	SR	17.11.15	DATE DRAWN		DATE: 17/11/15
REV	DESCRIPTION	BY	DATE	OCTOBER 2015		



**RILEY**  
CONSULTANTS

P.O. BOX 100 253  
N.S.M.C.  
AUCKLAND  
TEL. 09-4897872  
FAX. 09-4897873

TITLE

**ABERDEEN ADVENTURES LTD**  
22 DUKE STREET, RIVERHEAD

INDICATIVE SITE LAYOUT

FOR INFORMATION

CADFILE  
15222-11  
SCALES (A3)  
1:2000

DRAWING No.  
15222-11

REV.  
1



**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Tim Burborough  
**Date:** Thursday, 16 May 2024 5:00:47 pm  
**Attachments:** [Submission Doc\\_20240516164930.513.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Tim Burborough  
Organisation name:  
Agent's full name: Tim Burborough  
Email address: timandkylie@outlook.com  
Contact phone number: 021987420  
Postal address:  
2 Leebank Crescent  
Riverhead  
Riverhead 0820

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)  
Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:  
Transport, roading and housing density.  
Property address:  
Map or maps:  
Other provisions:  
Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified  
Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
See attached document with my views on the affect that the development will have on local roads and the loss of character of the riverhead area with medium density housing.

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: Delay the development construction start until after the upgrades to local roads and state highway 16 are complete.

Submission date: 16 May 2024

Supporting documents  
Submission Doc\_20240516164930.513.pdf

141.1  
141.2

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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## Development Submission Notes

I am not completely opposed to the proposed development in Riverhead, but I have two major concerns with the development. The first being the traffic issues it will cause both during construction and once completed. My second concern is with the number of new homes planned and the small lot sizes spoiling the character of the Riverhead village with its current lower density residential area.

The development work should not be allowed to start until the planned upgrade of SH16 and the full length of the Riverhead Coatesville Highway from Riverhead to SH16 is upgraded with footpaths, cycleways and proper kerbs and channels. Old North Rd and Old Railway Road also need to be upgraded with footpaths, kerb and channels and cycleways as well.

From the Waka Kotahi website it appears that the SH16 upgrade from Brigham Creek to Kumeu is currently on hold due to budget blowouts. To my mind this means that there is no detail design or contract in place for this work, so it is not going to happen anytime soon. The developer's condition that no dwellings can be occupied in the development area until the SH16 upgrade should be changed to construction cannot **start** until all roads around the area are upgraded. I do not believe that government, council and the developers will let such a large development stand empty for long if the SH16 upgrade is further delayed or cancelled due to government budgets or other reasons.

We purchased our section in 2017. Before making the final decision to purchase in Riverhead for one week I left home early to be in Riverhead at the time I normally left for work each morning at around 7am. At the time there was no issue with traffic with no queue from the Riverhead Coatesville highway onto SH16 and down to the Northwestern Motorway.

Traffic was a significant consideration in our decision to move from our previous home in Te Atatu as we had endured the lengthy roadworks for the upgrade of Te Atatu Rd and the Northwestern Motorway.

By the time we moved into our house less than 18 months later if I left at the same time, I would join a queue of cars around Moontide Rd which is approximately 1km from SH16 and this added 10 to 15 minutes to my travel time. This queue very soon grew back past the Huapai Golf club and at its worst sometimes back past Riverhead Point Drive which can add 30 to 45 mins to my morning commute. I had to leave earlier and earlier to make it to work in time.

I now leave home at around 5.15am to avoid the traffic build up on the Riverhead Coatesville highway. I get home at around 5pm so this makes for a long day.

On the weekends traffic on the Riverhead Coatesville Highway is very busy with queues as long as weekday peak times through the middle of the day. If we wish to go shopping in Westgate or further afield on weekends we need to leave home before 10am to avoid a long queue to join SH16.

I quite often come across school children who have got off their buses walking along the roadside and in the ditch making their way between their home and the bus stops. This is not a safe trip for these children. They need a proper footpath.

The proposed development includes cycle ways and footpaths around the development area. These are a good idea but do not provide a safe route for anyone to commute by bike linking to SH16 and the cycleways along the NW motorway. A cycleway connecting Riverhead to existing cycleways in Westgate and Hobsonville is required.

The planned high to medium density development will spoil the character of Riverhead. The existing residential area of Riverhead is a much more appealing area compared to areas such as the new higher density developments in Westgate, Whenuapai, Hobsonville Point and Scotts Landing where lot sizes do not allow decent gardens and larger trees. Another issue with higher density areas is car parking. In my opinion each property in a development should be required to have an off-street carpark for every bedroom in the house. Think of a family with 2 parents and 2 older kids who work. All 4 would likely have their own cars.

No matter what town planners say about urging people to use public transport it is simply not practical to catch a bus from Riverhead to my office in Newmarket. For this trip the travel time is more than 1-hour 30mins and costs \$7.40 each way. So, to and from work is 3 hours of travel and \$15 per day. This means that to commute from Riverhead using a car is the most convenient method.

Higher density housing should be concentrated nearer to the CBD where there are better public transport options or along already established public transport corridors such as railway lines and busways such as on the North Shore.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Vincent Clifton Tiedt  
**Date:** Thursday, 16 May 2024 5:30:43 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Vincent Clifton Tiedt

Organisation name:

Agent's full name:

Email address: vincent.tiedt@icloud.com

Contact phone number:

Postal address:

0820

Riverhead

Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

The Entire - PC 100 ( private) Riverhead

Property address:

Map or maps:

Other provisions:

Housing development

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

1. Damaging to the Environment

2. Infrastructure: water , Electricity and specifically the Roads cannot cope with current traffic , it will never cope with proposed development.

I or we seek the following decision by council: Decline the plan change

143.1

Submission date: 16 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Karen Chambers  
**Date:** Thursday, 16 May 2024 5:45:54 pm

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Karen Chambers

Organisation name:

Agent's full name:

Email address: karen\_mikec@xtra.co.nz

Contact phone number:

Postal address:  
 66 Princes Street  
 Riverhead  
 Auckland 0820

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:

Property address: Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead)

Map or maps:

Other provisions:

We oppose this plan due to the effects this subdivision will have on transport, storm water and wastewater.

An extra 1750 properties will have a detrimental effect on the transport here in Riverhead due to the extra vehicles from this subdivision. The Coatesville-Riverhead Highway struggles most mornings and many times during the weekend already so this road will need upgrading to cope with more traffic. As there is no local high school in the area, students are required to use the school bus to go to Massey High School and there have been a few times when they struggle to get to school on time due to the traffic.

Another issues is State Highway 16 which is congested regularly from traffic coming from the local area. As this road has not been made into 4 lanes as yet, the traffic will only get worse especially due to the limited public transport in the area.

Stormwater is another issue which we feel is not adequately dealt with in the proposal. We want an overall system of stormwater management to be required and coordinated over the entire plan change area. It is unacceptable that individual parts can be developed in isolation of an overall stormwater management solution.

We want land that is clearly required for stormwater to be zoned for that purpose, not zoned residential. Residential zoning encourages developers to minimise the land used for stormwater management to maximise profits.

We want stormwater systems required to be designed to be able to cope with rain events at a higher standard than in the recent past. It is not OK for development to result in the inundation and flooding of existing or new homes just because a theoretical tolerance is exceeded as many parts of Riverhead flooded last year.

We want the overall stormwater management system to ensure that there are no upstream or downstream flooding and adverse effects.

The issue of wastewater is that the existing network often results in failures particularly for lower elevation properties and during heavy rain events. The wider existing system is not working satisfactorily. Onsite issues also arise when groundwater is high. Ecoflow alarms go off regularly during rain events. Due to this, we would like that the development be required to provide specific and measurable wastewater upgrades and outcomes to demonstrate that the wastewater needs of Riverhead and other dependent communities will be met.

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

I think it's crazy to add more properties out this way until infrastructure has been done.

I or we seek the following decision by council: Decline the plan change

144.1

Submission date: 16 May 2024

### **Attend a hearing**

Do you wish to be heard in support of your submission? No

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Kim van Zuilen  
**Date:** Thursday, 16 May 2024 6:15:37 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Kim van Zuilen

Organisation name:

Agent's full name:

Email address: vanzuilen@xtra.co.nz

Contact phone number: 0274521281

Postal address:  
 267 Riverhead Rd  
 RD 2 Kumeu  
 Auckland 0892

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Property address: Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

The reason for the submission is.

1. Riverhead, Kumeu, Taupaki, Huapai, end of the Norwestern Motorway and beyond, is already gridlocked every day and not always at peak times. Further development will only increase this and with no significant roading upgrades the traffic will be worse. Will this also impact on emergency services being able to get through.

2. Stormwater is also a concern. We have lived in our property for over 20 years and during the storm last year our paddocks flooded almost to the top of our fences, the river didn't breach its banks it came from the industrial area as this is now built up and the ground is no longer permeable. What is going to happen with the new sub division, we will either get flooding further up or down stream so causing problems for other properties.

3. Schools with increased numbers the schools will be pushed even further to their limits.
4. Foot paths and open drains, the increased number of foot traffic through Riverhead to and from the school and pre schools where there are no footpaths and open drains this is a safety concern
5. We see some of the plans include multi stories houses and much more dense development, most of the house in Riverhead are single story with large mature trees, with this we would loose the rural aspect of Riverhead.

A subdivision of this size in these area with no infrastructure will have extreme consequences to the area and surrounding towns.

I or we seek the following decision by council: Decline the plan change

145.1

Submission date: 16 May 2024

### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Tracy Anne Murray - Keith James Insley  
**Date:** Thursday, 16 May 2024 6:30:50 pm  
**Attachments:** [Princes Street Riverhead.pdf](#)  
[CRH Riverhead looking north.pdf](#)  
[CRH Riverhead looking south.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Tracy Anne Murray - Keith James Insley

Organisation name:

Agent's full name: Tracy Murray

Email address: tammybun@xtra.co.nz

Contact phone number: 0274616042

Postal address:  
 14 Princes Street  
 Riverhead  
 Riverhead 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Property address: Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on Western side of Riverhead

Map or maps:

Other provisions:

A) Traffic. Riverhead and the surrounding towns will not be able to support the increased number of vehicles on the road should this plan go ahead. SH16 is already struggling. I have been on the CRH at 6am in the morning with traffic back to the Golf Course and sometimes Hallertau waiting to get onto SH16. On some mornings and evenings we can hardly get out of our own driveway and street because of parked cars (people using the field for sports). Our concerns are this will only get worse when there are thousands more people leaving in the area using the sports field (pictures attached)

B) Stormwater and Drainage. This needs to be addressed as the system cannot cope with heavy rains as it is. Even if there is a proposed ponding system, the water still needs to drain somewhere. Our community does not wish to be flooded out (3 times in as many weeks) as it did last year.

C) Schooling. Riverhead School is already at capacity. It is landlocked. Extra classrooms have already been added or being built to enable the current children living in the village. It will not be able to add more children to its role.

D) Village Atmosphere. We choose to live in Riverhead because of its small community and rural

feel. With a Plan this size the village will most certainly lose that feeling.

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:  
see above

I or we seek the following decision by council: Decline the plan change

146.1

Submission date: 16 May 2024

Supporting documents  
Princes Street Riverhead.pdf  
CRH Riverhead looking north.pdf  
CRH Riverhead looking south.pdf

### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

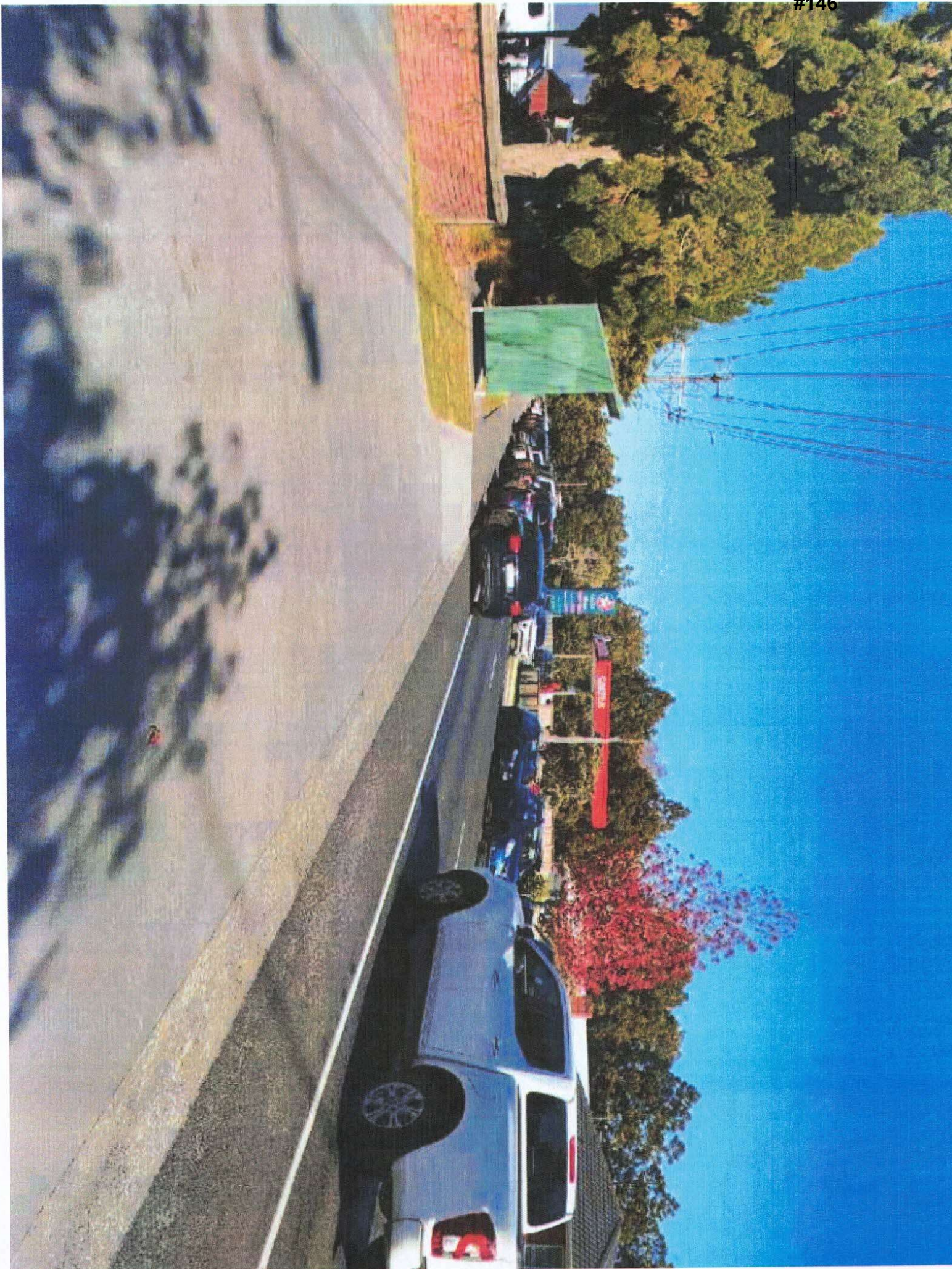














**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Mark Kimber  
**Date:** Thursday, 16 May 2024 6:30:51 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Mark Kimber

Organisation name:

Agent's full name:

Email address: mark@kimber.org.nz

Contact phone number:

Postal address:

14 Floyd Rd  
Riverhead  
Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Land identified in private plan change by Riverhead landowner group.

Property address: 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

Lack of infrastructure to cope with the traffic, already at maximum levels.

Storm water issues, Flooding on street. Not coping with current levels.

Lack of green spaces on the plan.

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

We moved to Riverhead to get away from high density housing and this plan will make it a lot worse.

I or we seek the following decision by council: Decline the plan change

147.1

Submission date: 16 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Christine Kimber  
**Date:** Thursday, 16 May 2024 6:30:52 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Christine Kimber

Organisation name:

Agent's full name:

Email address: chrissy@kimber.org.nz

Contact phone number:

Postal address:

14 Floyd Road

Riverhead

Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

land identified in private plan change by Riverhead land owners group

Property address: 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

Traffic at maximum levels currently

Storm water issues and recent flooding on Duke street . System not coping with what we have

Lack of green spaces on the plan

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

We moved to this area to have a large section and to move away from all of the mixed residential properties everywhere else. Single unitary plan is very important to us and is why we moved here.

I or we seek the following decision by council: Decline the plan change

148.1

Submission date: 16 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Ross Desmond Joyce  
**Date:** Thursday, 16 May 2024 7:30:42 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Ross Desmond Joyce

Organisation name: Rd Joyce

Agent's full name: Ross Desmond Joyce

Email address: pamandrosco@gmail.com

Contact phone number:

Postal address:  
 pamandrosco@gmail.com  
 Auckland 0820  
 Auckland 0820 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:  
 Land identified in the Private Plan Change by Riverhead Landowner Group 80.5 Hectares

Property address: western side of Riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:  
 We don't feel there has been anywhere enough consultation with the community on the effects on the Riverhead infrastructure, e.g. drainage, traffic management, future schooling, public transport.

I or we seek the following decision by council: Decline the plan change

149.1

Submission date: 16 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? No

#### Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Ruth Hirst  
**Date:** Thursday, 16 May 2024 7:30:48 pm

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Ruth Hirst

Organisation name:

Agent's full name:

Email address: hirst.murray1960s@gmail.com

Contact phone number:

Postal address:

30 Elliot Street,  
Riverhead  
Auckland 0820

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:

(Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Property address: Western side of Riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

Stormwater; The storm water infrastructure under Elliot Street, into the Rangitopuni is already inadequate to support the storm water from 30 Elliot and the adjoining streets (Maude & George St) under the road at 30 Elliot Street into the river. Essentially the pipe under the road is too small! Additionally, the open stormwater drains on Elliot Street, also feeds into this (pinchpoint ) drain. The open drains are too storm and not adequately maintained. The impact being that the under road piping becomes overwhelmed and backs up causing flooding on the road and into driveways. We would expect existing storm water issues to be addressed at key areas in Riverhead before any additional pressure on an overwhelmed system and a larger pipe under the road at 30 Elliot Street.

Transport; As an essential worker, working in central Auckland, the ability to leave Riverhead by car has reached a point that is no longer viable. I attempt to use public transport which is inadequate and which is subject to the same delays as waiting in a private car. With the number of workers



involved in the building project and with the ongoing building and population growth in Coatesville and Riverhead will mean that people will be further gridlocked. We respect the need for additional housing however we require storm water development and transport infrastructure attended to first for existing and future residents of Riverhead.

I or we seek the following decision by council: Decline the plan change

150.1

Submission date: 16 May 2024

### Attend a hearing

Do you wish to be heard in support of your submission? No

### Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Edwin van Zuilen  
**Date:** Thursday, 16 May 2024 8:15:41 pm  
**Attachments:** [Flooding.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Edwin van Zuilen

Organisation name:

Agent's full name:

Email address: vanzuilen@xtra.co.nz

Contact phone number: 0274521281

Postal address:  
267 Riverhead Rd  
RD 2 Kumeu  
Auckland 0892

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:

Property address: Land identified and the private plan change by Riverhead landowner group, 80.5 ha on Western side of Riverhead.

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

I think that a subdivision on this scale is irresponsible without any upgrades to the roading network in our area, we already have extreme congestion with traffic and it does not matter what time of day.

We have already had extreme flooding in the back of our property, which I have never seen before, this needs to be resolved before any subdivision goes added. I have attached a pdf photo of the flooding, all of this would have carried on down into Riverhead, the subdivision will only worsen this effect.

I have been told that Coatesville Riverhead highway is not going to be used to access the subdivision, if that is the case that means the only road will be Old North Road then onto Riverhead Road, so that's means that there will be numerous truck movements on a road that would not accommodate this. This would also add to our already congested roads.

I or we seek the following decision by council: Decline the plan change

151.1

Submission date: 16 May 2024

Supporting documents  
Flooding.pdf

### Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

### Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Les Whale  
**Date:** Thursday, 16 May 2024 9:00:47 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Les Whale

Organisation name:

Agent's full name:

Email address: leswhaleglobal@gmail.com

Contact phone number:

Postal address:

0810

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Please, no more new builds in Riverhead, Kumeu, Huapai between Waimaku and Northwest until the infrastructure (roading and railway and improved bus service) is completed

Property address: See above

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

As above

I or we seek the following decision by council: Decline the plan change | 152.1

Submission date: 16 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? No

#### Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Megan Lawrence  
**Date:** Thursday, 16 May 2024 9:15:57 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Megan Lawrence

Organisation name:

Agent's full name:

Email address: [megan@flair.nz](mailto:megan@flair.nz)

Contact phone number: 021462012

Postal address:  
45 George Street  
Riverhead  
Riverhead 0820

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:

Property address: Riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

We oppose the plan change due to the following concerns:

1. No committed improvement to road / transport infrastructure

CRH / SH16 Main Road Intersection

Improving the access to and from Riverhead via SH16 Main Road is a pressing concern that resonates with many residents. The issue has escalated with the morning rush now beginning as early as 6am and weekend congestion often causing significant delays, sometimes exceeding 20 minutes just to exit Riverhead onto SH16.

While assurances have been made regarding the installation of a roundabout at the CRH/SH16 intersection in the future, it's evident that this solution alone won't alleviate the growing traffic challenges, especially considering the projected increase in traffic volume. It's important to recognize that this issue extends beyond the confines of Riverhead, impacting residents of

neighbouring areas such as Kumeu, Huapai and Waimauku.

In addition, the CRH/SH16 intersection presents significant safety concerns, particularly during periods of increased traffic. The already challenging nature of this intersection will be further exacerbated by the influx of construction traffic, amplifying safety risks for commuters and residents alike.

Furthermore, evening commutes exacerbate the problem, as the roundabout at the intersection of the NW motorway experiences congestion in all directions, leading to traffic jams.

#### Local Roads and Transportation Infrastructure

The plan change has very limited upgrades to local roads and is extremely fragmented, failing to address the comprehensive needs of the community.

With just one bus route and a lack of walking or biking infrastructure in and out of the village, local residents heavily rely on motor vehicles, with the majority of family households forced to have two cars. This reliance exacerbates congestion and limits sustainable transportation choices for residents.

Additionally, the current state of the roads presents significant safety hazards for pedestrians and cyclists. CRH from Boric to the village in particular lacks essential footpaths, kerbing and channeling, and bike lanes. Road shoulders are non-existent in most places, and where they do exist, they are flanked by steep banks or deep ditches. There is no lighting along its entire length with the exception of one or two places. At one point (just south of the Zaknic farm) stormwater management is so poor that the creek running beneath the road regularly overloads its culvert, flooding the road and presenting motorists and pedestrians with a considerable risk to their safety.

The condition of the roads surrounding the development is already extremely poor and only to worsen with the expected increase in pedestrian usage as a result of the proposed development. Overall, and despite this anticipated increase in residential population, the proposed changes fall woefully short of providing a comprehensive solution to address these urgent concerns. Indeed, there appears to be no plan from Council or AT to improve this piece of road in any form whatsoever.

#### 2. Flooding and Stormwater Concerns:

The stormwater system in Riverhead has caused considerable flooding in recent years, particularly during the February 2023 floods. We're concerned that the proposed stormwater system lacks a comprehensive plan, potentially exacerbating issues for existing residents. It's imperative that a thorough investigation of the proposed stormwater plan is undertaken along with the overall stormwater management for the entire area before moving forward with any further developments.

#### 3. Insufficient Schooling Infrastructure

Riverhead School is currently unable to accommodate additional students. Despite undergoing one major expansion projects, with another currently underway, the school's capacity remains limited. The ongoing expansion is projected to only address the current student population, leaving little room for further growth.

Massey High School serves as the zoned secondary school for the area. However, with the ongoing development in the Westgate/Red Hill vicinity, it's evident that Massey High School is nearing its capacity. While discussions about establishing a secondary school in Kumeu have circulated for some time, there has been no commitment from the Ministry of Education. The anticipated development will undoubtedly strain the existing educational facilities in the region, exacerbating the pressure on schooling resources.

I or we seek the following decision by council: Decline the plan change

153.1

Submission date: 16 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Melissa Taylor  
**Date:** Thursday, 16 May 2024 9:30:42 pm

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Melissa Taylor

Organisation name:

Agent's full name:

Email address: gills.nz@outlook.com

Contact phone number:

Postal address:  
74 Pohutukawa Pde  
Riverhead  
Auckland 0820

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:

Property address: Coatesville-Riverhead Highway

Map or maps: All of Plan Change 100 (Riverhead)

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

Planned development is being considered without any planned upgrades to the surrounding infrastructure including schools, roading and storm water.

I or we seek the following decision by council: Decline the plan change

154.1

Submission date: 16 May 2024

#### **Attend a hearing**

Do you wish to be heard in support of your submission? No

#### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Susannah Marshall  
**Date:** Thursday, 16 May 2024 10:15:38 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Susannah Marshall

Organisation name:

Agent's full name:

Email address: susees@yahoo.com

Contact phone number:

Postal address:  
 20 Kent Terrace  
 Riverhead  
 Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:  
 Storm water  
 Land use  
 Special character  
 Transport

Property address: 20 Kent Terrace

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Riverhead is a historic township, originally going to be the capital of NZ and includes one of the oldest schools in the country. It's special character should have been taken into account when recent subdivisions took place in terms of having covenants to maintain the character of the township. With this new proposal it is going to even more dramatically change the face of this historic township.

The land use change will allow for prime agricultural land to be turned into housing. This land should be ring fenced and maintained in terms of our country's food security into the future. Already so much land loss has occurred across Whenuapai (translation = good land), combined with Massey and Westgate.

Existing road networks are poorly designed, including extensively long queues (up to 3km long) getting onto State Highway 16 at many different times of the working week and also weekends. By allowing this proposal to go ahead, this will only worsen. Especially in the short term with traffic from tradies and trucks as it is being built, but also in the long term with additional housing / home including a retirement village. Local road upgrades need to be completed first to cater for the extra traffic. Footpaths across Riverhead still do not line the side of every street and this combined with the extra traffic has an increased risk for our tamariki's safety.

Storm water provisions for the last development were built to standard at the time and yet houses still flooded more than once in the last couple of years (Duke St and neighbouring houses). This development will only add to the impervious surface area and with climate change 1 in 100 year events will only become more frequent.

I or we seek the following decision by council: Decline the plan change

155.1

Submission date: 16 May 2024

### **Attend a hearing**

Do you wish to be heard in support of your submission? No

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Gail Sclanders  
**Date:** Thursday, 16 May 2024 11:45:38 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Gail Sclanders  
Organisation name: Private  
Agent's full name:  
Email address: gail.sclanders@gmail.com  
Contact phone number:  
Postal address:  
14 Wautaiti Drive  
Riverhead  
Auckland 0820

**Submission details**

**This is a submission to:**  
Plan change number: Plan Change 100 (Private)  
Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:  
Infrastructure unable to handle existing traffic and surface water  
Property address:  
Map or maps: Central Riverhead  
Other provisions:  
Traffic congestion at peak hours and flooding when there is heavy rain  
Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified  
Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
The existing infrastructures cannot handle the current traffic and surface water

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: Upgrade roads and address flooding

Submission date: 16 May 2024

**Attend a hearing**

Do you wish to be heard in support of your submission? No

156.1

156.2  
156.3



**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Rob Mitchell](#)  
**To:** [Unitary Plan](#)  
**Subject:** PC 100 (Private): Riverhead - submission  
**Date:** Thursday, 16 May 2024 11:52:28 pm  
**Attachments:** [council submission on riverhead development pdf.pdf](#)  
[pc100-form-mitchell.pdf](#)

---

Please find attached two PDF documents that detail our submission on this plan change proposal. There are significant issues with the proposed development, especially regarding the already overloading roading infrastructure. Sorry, I have also submitted it online (twice), but have never received a confirmation email. So here is an email submission. Below is a cut and paste of the submission too.

Thanks

Rob

We request that our proposed amendments are added in their entirety, or the proposed plan change is declined. We have lived in the Riverhead area for the last 13 years and have witnessed the massive development of Riverhead over that time. The new housing is largely of high quality and provides a nice rural village environment for people to live in. However, the massive development of Riverhead and the surrounding areas (especially Kumeu, Huapai, Whenuapai, Westgate/Norwest) have completely crippled the local roading infrastructure and it is currently a total nightmare (we need to commute to both the Northshore and West Auckland for work etc.). The specific traffic pinch points that these new large developments have created include the following: 1) Coatesville Riverhead Highway - SH 16 intersection. I have tried leaving at all times from 6.15am to 8am and no-matter what time, traffic in the morning can regularly bank up from the intersection back to the Golf Course, and occasionally back to Riverhead itself. It is a disaster! There are no safe cycling or walking options. I had taken to driving with my bike on the car to Westgate, and biking to work from there using the awesome Northwestern cycleway - but this intersection is still a massive impediment. This intersection also banks up hundreds of metres even on weekend afternoons, making it very inefficient to go anywhere, and a real impediment to sports/community activities/shopping/connecting with others (and no other transport options). The limited bus service is also stuck in this same congestion. This has become the opposite of a livable area. 2) The Brigham Creek Roundabout at end of Northwestern Motorway. This has become a massive impediment to commuting home in the evenings. Pretty much everyone wants to go west towards Kumeu on this roundabout which is only a single lane road! Yet this roundabout is fed by the dual motorway lanes, the road from Westgate/Norwest and the new growing housing developments there, and the road from Whenuapai/Hobsonville which is also currently undergoing massive development. The status quo is absolutely crazy! 3) Traffic through Kumeu. The main road through Kumeu has become unworkable. I remember several years ago an AT representative was in Kumeu shopping centre wanting to get people's opinions on the then proposed commercial development of Kumeu (now largely done) and educate them on the changes. EVERYONE simply told him traffic through Kumeu was a nightmare already and to forget about further development until there was some sort of bypass allowing for an alternative route through Kumeu. He assured people there would be. Yet there is still only one congested route through Kumeu - we don't even think about driving through Kumeu on the weekend. Enlarging Riverhead will add to the Kumeu area congestion. To help correct these issues the following roading upgrades are required to be completed BEFORE any work further developing Riverhead: - There needs to be at least 2 lanes going each way from the Brigham Creek Roundabout to Kumeu, with an additional route through or around Kumeu. - There needs to be a roundabout at the Coatesville Riverhead Highway - SH 16 intersection. - There needs to be safe cycleways around Riverhead, with

a safe cycleway between Riverhead and Westgate, to connect to the Northwestern cycleway. This is the way of the future and would make this part of Auckland much more livable. This needs to be done alongside new developments, or it doesn't get done, now is the chance. I have recently been on a driving holiday and witnessed areas such as Cambridge, Taupo, Blenheim, Nelson make themselves cycle commuting friendly, and it has changed the lives of the people we know who live there. Auckland has fallen behind, and this is a greenfields development with plenty of space in the area. 4) Albany Village. The massive increase in the wider Riverhead area population has created a currently untenable pinch point at Albany Village, both in the morning and afternoon (worse in the afternoon). This is due to increased traffic using the Coatesville Riverhead Highway and Albany to access the Northshore. Albany village is a single lane each way that encompasses a small bridge (this bridge meant to be replaced/widened, but I understand that is no-longer happening). In the evening, the single lane of Albany village receives traffic from the double lane Albany Expressway, the Albany Highway, and Oteha Valley Road (currently Googlemaps is telling me to take a massive detour home via Lonely Track Rd to avoid this pinch point). The Albany Village pinch point needs to be resolved BEFORE further large scale development is approved. The issue of Albany Village is not addressed at all in the new proposed Riverhead development, which is a GLARING OMISSION. Over the years we have heard about proposed roading changes to these areas. Yet all proposed changes have either been cancelled or delayed or indefinitely delayed, due to various reasons including the unforeseen, such as Covid and Auckland floods. This large development will require significant road resources during construction for trucks/machinery/workers. What this means is that all these roading upgrades must be COMPLETED prior to this new proposed development going ahead, as we have seen that there are no guarantees as to when or if the upgrades are done. The roading is untenable already! The proposed development does not clearly specify provisions for green space and parks. The proposal mentions that there is access to walking/running in the nearby Riverhead Forest. However this is insufficient. While Riverhead Forest was previously publicly owned, the vast majority of it is now privately owned and there are no guarantees that public access for recreation purposes is going to be allowed into the future. This is a significant misrepresentation in the development proposal. The new development must provide for public parks. Stormwater and wastewater is a concern given the largescale development and the current infrastructure struggles to cope. Nearby Kumeu and Huapai have had significant recent flooding events. If Auckland Council is unable to fund the required upgrades, and if the new development is challenging Auckland Council's position on the development to get it approved, then the new development should fund the required infrastructure upgrades. The community needs to be consulted on the type and style of buildings in order to maintain the current pleasant community feel that has been achieved with the developments completed so far.

**Before you fill out the attached submission form, you should know:**

You need to include your full name, an email address, or an alternative postal address for your submission to be valid. Also provide a contact phone number so we can contact you for hearing schedules (where requested).

By taking part in this public submission process your submission will be made public. The information requested on this form is required by the Resource Management Act 1991 as any further submission supporting or opposing this submission is required to be forwarded to you as well as Auckland Council. Your name, address, telephone number, email address, signature (if applicable) and the content of your submission will be made publicly available in Auckland Council documents and on our website. These details are collected to better inform the public about all consents which have been issued through the Council.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious.
- It discloses no reasonable or relevant case.
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

## Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 16, 135 Albert Street  
Private Bag 92300  
Auckland 1142

For office use only

Submission No:

Receipt Date:

### Submitter details

**Full Name or Name of Agent (if applicable)**

Mr/Mrs/Miss/Ms(Full  
Name)

Dr Rob Mitchell and Ms Karina Mitchell

**Organisation Name (if submission is made on behalf of Organisation)**

**Address for service of Submitter**

robtmit@gmail.com

Telephone:

276229690

Email:

robtmit@gmail.com

Contact Person: (Name and designation, if applicable)

### Scope of submission

**This is a submission on the following proposed plan change / variation to an existing plan:**

Plan Change/Variation Number

PC 100 (Private)

Plan Change/Variation Name

Riverhead

**The specific provisions that my submission relates to are:**

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Or

Property Address

Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5Ha on Western side of Riverhead

Or

Map

Or

**Other (specify)**

### Submission

**My submission is:** (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)



I **support** the specific provisions identified above ☐

I **oppose** the specific provisions identified above ☒

I wish to have the provisions identified above amended Yes ☒ No ☐

The reasons for my views are:

I oppose the plan change/development unless significant upgrades to the region are in place before development starts.

Please see attached document called: council submission on riverhead development pdf

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation ☐

Accept the proposed plan change / variation with amendments as outlined below ☐

Decline the proposed plan change / variation ☐

If the proposed plan change / variation is not declined, then amend it as outlined below. ☒

I oppose the plan change/development unless significant upgrades to the region are in place before development starts.

Please see attached document called: council submission on riverhead development pdf

I wish to be heard in support of my submission ☒

I do not wish to be heard in support of my submission ☐

If others make a similar submission, I will consider presenting a joint case with them at a hearing ☐

Rob Mitchell

05/16/2024

Signature of Submitter

Date

(or person authorised to sign on behalf of submitter)

#### Notes to person making submission:

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could ☐ /could not ☒ gain an advantage in trade competition through this submission.

***If you could gain an advantage in trade competition through this submission please complete the following:***

I am ☐ / am not ☐ directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

We request that our proposed amendments are added in their entirety, or the proposed plan change is declined. We have lived in the Riverhead area for the last 13 years and have witnessed the massive development of Riverhead over that time. The new housing is largely of high quality and provides a nice rural village environment for people to live in. However, the massive development of Riverhead and the surrounding areas (especially Kumeu, Huapai, Whenuapai, Westgate/Norwest) have completely crippled the local roading infrastructure and it is currently a total nightmare (we need to commute to both the Northshore and West Auckland for work etc.). The specific traffic pinch points that these new large developments have created include the following:

157.1

1) Coatesville Riverhead Highway - SH 16 intersection. I have tried leaving at all times from 6.15am to 8am and no-matter what time, traffic in the morning can regularly bank up from the intersection back to the Golf Course, and occasionally back to Riverhead itself. It is a disaster! There are no safe cycling or walking options. I had taken to driving with my bike on the car to Westgate, and biking to work from there using the awesome Northwestern cycleway - but this intersection is still a massive impediment. This intersection also banks up hundreds of metres even on weekend afternoons, making it very inefficient to go anywhere, and a real impediment to sports/community activities/shopping/connecting with others (and no other transport options). The limited bus service is also stuck in this same congestion. This has become the opposite of a livable area.

2) The Brigham Creek Roundabout at end of Northwestern Motorway. This has become a massive impediment to commuting home in the evenings. Pretty much everyone wants to go west towards Kumeu on this roundabout which is only a single lane road! Yet this roundabout is fed by the dual motorway lanes, the road from Westgate/Norwest and the new growing housing developments there, and the road from Whenuapai/Hobsonville which is also currently undergoing massive development. The status quo is absolutely crazy!

3) Traffic through Kumeu. The main road through Kumeu has become unworkable. I remember several years ago an AT representative was in Kumeu shopping centre wanting to get people's opinions on the then proposed commercial development of Kumeu (now largely done) and educate them on the changes. EVERYONE simply told him traffic through Kumeu was a nightmare already and to forget about further development until there was some sort of bypass allowing for an alternative route through Kumeu. He assured people there would be. Yet there is still only one congested route through Kumeu - we don't even think about driving through Kumeu on the weekend. Enlarging Riverhead will add to the Kumeu area congestion.

To help correct these issues the following roading upgrades are required to be completed BEFORE any work further developing Riverhead:

- There needs to be at least 2 lanes going each way from the Brigham Creek Roundabout to Kumeu, with an additional route through or around Kumeu.

157.2

- There needs to be a roundabout at the Coatesville Riverhead Highway - SH 16 intersection.

157.3

- There needs to be safe cycleways around Riverhead, with a safe cycleway between Riverhead and Westgate, to connect to the Northwestern cycleway. This is the way of the future and would make this part of Auckland much more livable. This needs to be done alongside new developments, or it doesn't get done, now is the chance. I have recently been on a driving holiday and witnessed areas such as Cambridge, Taupo, Blenheim, Nelson make themselves cycle commuting friendly, and it has changed the lives of the people we know who live there. Auckland has fallen behind, and this is a greenfields development with plenty of space in the area.

157.4

4) Albany Village. The massive increase in the wider Riverhead area population has created a currently untenable pinch point at Albany Village, both in the morning and afternoon (worse in the afternoon). This is due to increased traffic using the Coatesville Riverhead Highway and Albany to access the Northshore. Albany village is a single lane each way that encompasses a small bridge (this bridge meant to be replaced/widened, but I understand that is no-longer happening). In the evening, the single lane of Albany village receives traffic from the double lane Albany Expressway, the Albany Highway, and Oteha Valley Road (currently Googlemaps is telling me to take a massive detour home via Lonely Track Rd to avoid this pinch point). The Albany Village pinch point needs to be resolved BEFORE further large scale development is approved. The issue of Albany Village is not addressed at all in the new proposed Riverhead development, which is a GLARING OMISSION.

157.5

Over the years we have heard about proposed roading changes to these areas. Yet all proposed changes have either been cancelled or delayed or indefinitely delayed, due to various reasons including the unforeseen, such as Covid and Auckland floods. This large development will require significant road resources during construction for trucks/machinery/workers. What this means is that all these roading upgrades must be COMPLETED prior to this new proposed development going ahead, as we have seen that there are no guarantees as to when or if the upgrades are done. The roading is untenable already!

The proposed development does not clearly specify provisions for green space and parks. The proposal mentions that there is access to walking/running in the nearby Riverhead Forest. However this is insufficient. While Riverhead Forest was previously publicly owned, the vast majority of it is now privately owned and there are no guarantees that public access for recreation purposes is going to be allowed into the future. This is a significant misrepresentation in the development proposal. The new development must provide for public parks.

157.6

Stormwater and wastewater is a concern given the largescale development and the current infrastructure struggles to cope. Nearby Kumeu and Huapai have had significant recent flooding events. If Auckland Council is unable to fund the required upgrades, and if the new development is challenging Auckland Council's position on the development to get it approved, then the new development should fund the required infrastructure upgrades.

157.7

The community needs to be consulted on the type and style of buildings in order to maintain the current pleasant community feel that has been achieved with the developments completed so far. 157.8

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Karen Body  
**Date:** Friday, 17 May 2024 2:30:37 am

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Karen Body

Organisation name:

Agent's full name:

Email address: karenbody50@gmail.com

Contact phone number: 0274129669

Postal address:

7 Maude Street

Riverhead

Auckland 0820

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:

Property address: Land parcels identified in the Plan Change by Riverhead Land Owner Group, 80.5 hectares on the western side of Riverhead

Map or maps:

Other provisions:

Existing (old) Riverhead still requires provisions and infrastructure.

Development Contributions and where these are spent.

Traffic issues.

Storm water/Flooding issues.

Consolidated town center amenities.

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

Existing Riverhead (old portion of town) has already suffered with the growth to Riverhead South (Special 30 Zone) whereas the existing old township has little to no new infrastructure or streetscape to help meld the new to the old. I was heavily involved at the time of this change and a robust structure plan process was undertaken with great community involvement. Unfortunately that is not the scenario with PC100. When we doubled in size last time (Riverhead South) the Development Contributions (DC's) were to be spent locally to help support the growth. This didn't happen! I had to use the Official Information Act to find where the DC's had gone to, and it was reported back that they were spent "locally" as this is Auckland Wide... not good enough! Old



Riverhead still has streets caving away at the edges into open drains, no footpaths, not lighting, and no streetscape whatsoever. This cannot continue whilst we are subjected to these huge plan proposals such as PC100!

The traffic queues at peak hour and weekends are insane. No more growth until this is all sorted which means a SET finish date for a roundabout intersection at SH16/CRHway.

The horrendous flooding that occurred in the PC100 area, ie Duke Street shows that this is not a good area for development. The existing residents here are already suffering with the growth!

No new town centers please! We have designated area for this and the developer needs to complete his buildings which include commercial below. This is well sufficient for Riverhead as we have so much more available nearby at Kumeu/Westgate/Albany.

PLEASE... no more growth as the existing growth has not helped old Riverhead already!

I or we seek the following decision by council: Decline the plan change

158.1

Submission date: 17 May 2024

### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?

No

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Peter Fredatovich  
**Date:** Friday, 17 May 2024 7:15:12 am

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Peter Fredatovich

Organisation name:

Agent's full name: Peter Fredatovich

Email address: peter@vinovum.nz

Contact phone number:

Postal address:

1 Kelly Road  
Auckland  
Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Property address: Land identified in the in the Private Plan Change by Riverhead Land Owner Group, 80.5 hectares on western side of riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

As outlined in the documentation attached, the impacts on traffic congestion, sewerage and flood plains is not currently sufficient, and this development will exasperate the situation in NorthWest Auckland.

The infrastructure needs to be sufficient for current needs, before adding more load to the system.

I or we seek the following decision by council: Decline the plan change

159.1

Submission date: 17 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Derrick Davis  
**Date:** Friday, 17 May 2024 7:30:14 am

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Derrick Davis

Organisation name:

Agent's full name:

Email address: derrickdavis111@gmail.com

Contact phone number:

Postal address:  
 40 Waikoukou Valley Road  
 Waimauku  
 Auckland 0812

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:  
 New housing in Riverhead on greenfields rural land

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:  
 Adding more housing to Riverhead prior to any significant developments to roading infrastructure will add to an already overloading roading network. As a long term resident of Waimauku and temporary resident of Riverhead in recent years I have experienced the significant increases in travel time as a direct result of overly congested roads and intersections that were never designed to handle this level of traffic. Riverhead has limited transport options and no real opportunities to work, therefore it is inevitable that a large proportion of new residents will commute. Public transport options are limited, expensive and subject to the same congestion issues as private cars, so do not present a viable alternative. Adding to an already overflowing network would be hugely detrimental to the region.

I or we seek the following decision by council: Decline the plan change

160.1

Submission date: 17 May 2024

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

[New tsunami evacuation map. Check the map today.](#)



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17 May 2024

Plans and Places  
Auckland Council  
Private Bag 92300  
Auckland 1142

Attn: Planning Technician

Email: [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

### **Proposed Private Plan Change 100 - Riverhead**

Please find attached Auckland Transport's submission on Proposed Private Plan Change 100 - Riverhead. The applicant is the Riverhead Landowner Group.

If you have any queries in relation to this submission, please contact me at [spatialplanning@at.govt.nz](mailto:spatialplanning@at.govt.nz) or on 09 930 5001 ext. 2427.

Yours sincerely



Katherine Dorofaeff  
**Principal Planner, Spatial Planning and Policy Advice**

cc:  
Karl Cook, Barker and Associates Ltd  
by email: [karlc@barker.co.nz](mailto:karlc@barker.co.nz)

## Submission by Auckland Transport on Private Plan Change 100: Riverhead

**To:** Auckland Council  
Private Bag 92300  
Auckland 1142

**Submission on:** Proposed Private Plan Change 100 from the Riverhead Landowner Group for land at Riverhead Road, Coatesville-Riverhead Highway, Cambridge Road, and Duke Street, Riverhead

**From:** Auckland Transport  
Private Bag 92250  
Auckland 1142

### 1. Introduction

- 1.1 The Riverhead Landowner Group (**the applicant**) is applying for a private plan change (**PC 100 or the plan change**) to the Auckland Unitary Plan – Operative in Part (**AUP(OP)**) to rezone 6 ha of land in Riverhead from Future Urban to Rural - Mixed Rural zone and 75.5 ha to a mix of Residential - Mixed Housing Suburban, Residential - Terrace Housing and Apartment Building, Business - Local Centre and Business - Neighbourhood Centre zones. PC 100 also applies precinct provisions and a Stormwater Management Area Control - Flow 1 overlay across 75.5 ha being given urban zonings.
- 1.2 Auckland Transport is a Council-Controlled Organisation of Auckland Council (**the Council**) and the Road Controlling Authority for the Auckland region. Auckland Transport has the legislated purpose to contribute to an 'effective, efficient and safe Auckland land transport system in the public interest'.<sup>1</sup> In fulfilling this role, Auckland Transport is responsible for the following:
- a. The planning and funding of most public transport, including bus, train and ferry services.
  - b. Promoting alternative modes of transport (i.e. alternatives to the private motor vehicle).
  - c. Operating the roading network.
  - d. Developing and enhancing the local road, public transport, walking and cycling networks.
- 1.3 Urban development on greenfield land not previously developed for urban purposes generates transport effects and the need for robust implementation and investment plans for transport infrastructure and services to support construction, land use activities and the communities that will live and work in these areas. Auckland Transport's submission seeks to ensure that the transport-related matters raised by PC 100 are appropriately considered and addressed.
- 1.4 Auckland Transport is part of the Te Tupu Ngātahi Supporting Growth Alliance (**Te Tupu Ngātahi**) which is a collaboration between Auckland Transport and New Zealand Transport Agency Waka Kotahi (**NZTA**) to plan and route protect where

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<sup>1</sup> Local Government (Auckland Council) Act 2009, section 39.

appropriate the preferred transport network in future growth areas such as the North-West, including Riverhead.

- 1.5 On behalf of Auckland Transport, Te Tupu Ngātahi has lodged Notices of Requirement (**NOR**) to route protect for local arterial projects planned to service future growth in the North-West. Particularly relevant to this plan change is the NOR for upgrading of the Coatesville-Riverhead Highway which connects Riverhead to State Highway 16. The NOR is for upgrading the southern section of the Coatesville-Riverhead Highway to a rural arterial with active mode facilities, and upgrading the northern section of the corridor to an urban arterial with active mode facilities. The NOR directly affects the frontage of the site. The Council notified its recommendations on the North-West NOR on 18 April 2024.
- 1.6 As part of its business case, Te Tupu Ngātahi also identified a future upgrade of Riverhead Road which connects Riverhead to Kumeū. The upgrade would include active mode facilities. The Riverhead Road upgrade is not included the lodged NOR but is identified as an 'other project' to be progressed by Auckland Transport. The Riverhead Road upgrade is still identified as part of the Strategic Transport Network required to support growth. The future upgrade to Riverhead Road affects the frontage of the site.
- 1.7 Also of relevance to the plan change is the NZTA SH16 Brigham Creek to Waimauku Project - Stage 2 Brigham Creek to Kumeū. Auckland Transport understands that the funding for this project is currently uncertain. As part of this project it is proposed to upgrade the Coatesville-Riverhead Highway intersection with SH16 to a two-lane roundabout.
- 1.8 Auckland Transport is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

## 2. Strategic context

- 2.1 The key overarching considerations and concerns for Auckland Transport are described below.

### Auckland Plan 2050

- 2.2 The Auckland Plan 2050 (**Auckland Plan**) is a 30-year plan outlining the long-term strategy for Auckland's growth and development, including social, economic, environmental and cultural goals<sup>2</sup>. The transport outcomes identified in the Auckland Plan include providing better connections, increasing travel choices and maximising safety. To achieve these outcomes, focus areas outlined in the Auckland Plan include targeting new transport investment to the most significant challenges; making walking, cycling and public transport preferred choices for many more Aucklanders; and better integrating land use and transport. The high-level direction contained in the Auckland Plan informs the strategic transport priorities to support growth and manage the effects associated with this plan change.

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<sup>2</sup> The Auckland Plan is a statutory spatial plan required under section 79 of the Local Government (Auckland Council) Act 2009.

## Sequencing growth and aligning with the provision of transport infrastructure and services

- 2.3 The Auckland Plan 2050 and the Future Development Strategy 2023 (**FDS**) work together to set the high-level direction for Auckland over the long-term. The FDS identifies the timing for the Riverhead Future Urban Area as being 2050+. The proposed timeframe indicates when the infrastructure required to service the full build-out of the area is likely to be implemented.
- 2.4 Appendix 6 of the FDS includes infrastructure prerequisites, linked to the development readiness of areas. The transport prerequisites identified for Kumeu-Huapai and Riverhead are:
- Brigham to Waimauku SH16 Upgrade.
  - SH16 Main Road Upgrade.
  - Alternative State Highway.
  - Access Road upgrade.
  - Coatesville-Riverhead Highway upgrades.
  - Northwest Rapid Transit extension to Huapai.
- 2.5 The growth in transport demands across Auckland comes from development in greenfield areas as well as from the smaller scale incremental intensification enabled through the AUP(OP). There is a need to support the movement of the additional people, goods and services resulting from the widespread growth. This increases pressure on the available and limited transport resources. A high level of certainty is needed about the funding, financing and delivery of transport infrastructure and services if the growth enabled by the AUP(OP) and plan changes is to be aligned with the required transport infrastructure and services. Otherwise, there will continue to be a significant deficiency in the ability of the transport network to provide and co-ordinate transport responses to dispersed growth across the region. This results in poor transport outcomes including lack of travel choice and car dependency.
- 2.6 Plan changes which propose to allow future urban land to be urbanised need to be carefully considered in the context of the wider staging and delivery of planned transport infrastructure and services. Any misalignment between the timing for providing infrastructure and services and the urbanisation of greenfield areas brings into question whether the proposed development area is 'development ready'. The matters that need to be carefully considered include:
- Whether the plan change provides mechanisms requiring applicants to mitigate the transport effects associated with their development and to provide the transport infrastructure needed to service or meet the demands from their development.
  - Whether the development means that the strategic transport infrastructure being planned to service the wider growth area identified in the FDS needs to be provided earlier.
  - Whether the development impacts the ability to provide the strategic transport infrastructure identified to service the wider growth area e.g. will it foreclose route options or hinder future upgrades of existing strategic network infrastructure.
- 2.7 The need to coordinate urban development with infrastructure planning and funding decisions is highlighted in the objectives of the National Policy Statement on Urban

Development 2020 (**NPS-UD**). Those objectives are quoted below (with emphasis in bold):

'Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:

- (a) the area is in or near a centre zone or other area with many employment opportunities
- (b) **the area is well-serviced by existing or planned public transport**
- (c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.'

'Objective 6: Local authority decisions on urban development that affect urban environments are:

- (a) **integrated with infrastructure planning and funding decisions;** and
- (b) strategic over the medium term and long term; and
- (c) responsive, particularly in relation to proposals that would supply significant development capacity.'

- 2.8 The Regional Policy Statement (**RPS**) objectives and policies in the AUP(OP) place similar clear emphasis on the efficient provision of infrastructure and on the integration of land use and development with infrastructure, including transport infrastructure. Refer, for instance, to Objectives B2.2.1(1)(c) and (5) and B3.3.1(1)(b), and Policies B2.2.2(7)(c) and B3.3.2(5)(a). For example, Policy B3.3.2(5)(a) is to: *'Improve the integration of land use and transport by... ensuring transport infrastructure is planned, funded and staged to integrate with urban growth'*). The alignment of infrastructure to support growth is essential to achieving a well-functioning urban environment.
- 2.9 The Regional Land Transport Plan (**RLTP**) sets out the 10 year programme of transport infrastructure investment required to support the transport network including planned and enabled growth in the Auckland region. The RLTP is aligned with the Council's priority areas and spend proposed within the Council's 10 Year Budget 2021-2031. Within the RLTP there is no specific funding for Auckland Transport projects in Riverhead.
- 2.10 A draft Regional Land Transport Plan 2024-2034 is being prepared for consultation between mid May and mid June. The combined proposals from Auckland Transport, NZTA and KiwiRail in the draft RLTP significantly exceed expected funding. This means the draft RLTP is very much a 'bid' document, and actual transport outcomes and what is funded will depend on decisions made by NZTA. The draft RLTP contains a prioritised ranking of projects. Northwest Growth Improvements has an activity rank of 15 within the local road improvements activity class, and an overall rank of 49.
- 2.11 As noted earlier, Te Tupu Ngātahi lodged NOR on behalf of Auckland Transport to route protect for local arterial projects planned to service future growth in the North-West. This includes the NOR for upgrading of the Coatesville-Riverhead Highway which connects Riverhead to State Highway 16. The future upgrade of Riverhead Road is included in the Detailed Business Case and forms part of the North-West Strategic Connections. However it is not being progressed to route protection at this time.
- 2.12 The plan change provisions include upgrades to Coatesville-Riverhead Highway in the vicinity of the site, and upgrades for safety reasons at the intersections of



Coatesville-Riverhead Highway with Old Railway Road, and Riverland Road. However wider improvements provided for in the NOR, including active mode connections between Riverhead and State Highway 16, are not part of the plan change works.

### 3. Specific parts of the plan change that this submission relates to

- 3.1 The specific parts of the plan change that this submission relates to are set out in **Attachment 1**. In keeping with Auckland Transport's purpose, the matters raised relate to transport and transport assets, including integration between transport and land use.
- 3.2 Auckland Transport **opposes** the plan change unless the matters raised in **Attachment 1** are satisfactorily addressed by the applicant.
- 3.3 Auckland Transport is available and willing to work through the matters raised in this submission with the applicant.

### 4. Decisions sought

- 4.1 The decisions which Auckland Transport seeks from the Council are set out in **Attachment 1**, for the reasons stated in **Attachment 1** and above.
- 4.2 In all cases where amendments to the plan change are proposed, Auckland Transport would consider alternative wording or amendments to like effect, which address the reason(s) for Auckland Transport's submission. Auckland Transport also seeks any consequential amendments required to give effect to the amendments and decisions requested.

### 5. Appearance at the hearing

- 5.1 Auckland Transport wishes to be heard in support of this submission.
- 5.2 If others make a similar submission, Auckland Transport will consider presenting a joint case with them at the hearing.

**Name:** Auckland Transport

**Signature:**



Rory Power  
Manager - Spatial Planning Policy Advice

**Date:** 17 May 2024

**Contact person:** Katherine Dorofaeff  
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## Attachment 1

Issue / Provision	Support / oppose	Reasons for submission	Decision requested	
Overall	Oppose	Auckland Transport does not support this plan change to rezone land to provide for development without providing for all the upgrades identified by Te Tupu Ngātahi as needed to Riverhead Road and Coatesville-Riverhead Highway to support growth in Riverhead. Frontage upgrades are proposed by the applicant, as well as intersection improvements, but not the full extent of upgrades identified by Te Tupu Ngātahi including the active mode provision to link with Kumeū (along Riverhead Road) and State Highway 16 (along Coatesville-Riverhead Highway) where NZTA is planning to provide a shared cycle / pedestrian path.	Decline the plan change unless the matters set out in this submission, as outlined in the main body of this submission and in this table, are addressed and resolved to Auckland Transport's satisfaction.	161.1
Overall	Oppose	<p>The Plan Change will enable development in a rural settlement which does not have frequent public transport services and where there is no Auckland Transport funding available to improve the services. For this reason the Plan Change does not give effect to some NPS-UD and RPS objectives and policies relating to public transport. In particular it will not:</p> <ul style="list-style-type: none"> <li>• have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport (NPS-UD Policy 1(c))</li> <li>• enable 'improved and more effective public transport' (AUP RPS Objective B2.2.1(1)(d))</li> <li>• achieve 'effective, efficient and safe transport that ... facilitates transport choices ... and enables accessibility and mobility for all sectors of the community.' (AUP RPS Objective B3.3.1(1)(e))</li> <li>• encourage 'land use development and patterns that reduce the rate of growth in demand for private vehicle trips, especially during peak periods' (AUP RPS Policy B3.3.2(5)(b)).</li> </ul> <p>Given the public transport deficiencies, and the lack of active mode connections beyond Riverhead, the Plan Change will be limited in the extent to which it can 'promote the health, safety and well-being of people and communities by ... 'enabling walking, cycling and public transport and minimising vehicle movements' (AUP RPS Policy B2.3.2(2)(b)).</p>	Decline the plan change unless the matters set out in this submission, as outlined in the main body of this submission and in this table, are addressed and resolved to Auckland Transport's satisfaction.	161.2

Issue / Provision	Support / oppose	Reasons for submission	Decision requested	
Overall	Oppose	<p>Amendments are needed to the plan change to address concerns raised by Auckland Transport about transport matters. These matters need to be addressed before Auckland Transport can be satisfied that appropriate provision has been made to ensure that the transport needs of the precinct can be met and that future strategic transport infrastructure is provided for and protected.</p> <p>It is essential to ensure the plan change addresses how the provision of infrastructure to support the planned growth, mitigate adverse transport effects and a well-functioning urban environment will be achieved.</p>	Decline the plan change unless the matters set out in this submission, as outlined in the main body of this submission and in this table, are addressed and resolved to Auckland Transport's satisfaction.	161.3
Acoustic mitigation	Oppose	The proposal will enable activities sensitive to noise, such as residential development, adjacent to existing arterial roads (Coatesville-Riverhead Highway and Riverhead Road). Literature relating to the health effects and amenity effects of noise indicate that there is evidence of a causal relationship between environmental noise and sleep disturbance and cardiovascular disease, and a link between environmental noise and effects on amenity more generally (e.g. annoyance effects). Development for activities sensitive to noise should be designed to protect people's health and residential amenity while they are indoors. This is not currently adequately addressed by existing AUP(OP) provisions, but has been addressed in a number of recent operative plan changes (e.g. PC49 Drury East, PC50 Waihoehoe, PC61 Waipupuke and PC76 Pukekohe East-Central). Relevant provisions should be included in this precinct, if PC 100 is approved. Such provisions will give effect to higher order provisions in the AUP(OP) (e.g. Policy B3.3.2(6)).	Amend the plan change by including precinct provisions (an objective, policy, a standard, matter(s) of discretion, and assessment criteria) to require that future developments and alterations to existing buildings mitigate potential road traffic noise effects on activities sensitive to noise from the existing arterials being Coatesville-Riverhead Highway and Riverhead Road.	161.4
IX.1 Precinct description	Oppose in part	<p>Amendments are needed so that the transport upgrades covered in precinct provisions are required to mitigate (not just 'manage') adverse effects on the local transport network, as well as the wider transport network. The precinct description should also refer to the provisions relating to the future widening of Riverhead Road.</p> <p>The words 'for development' are unnecessarily repetitive.</p>	<p>Amend third to last paragraph as follows:</p> <p>'The precinct includes provisions to ensure that the subdivision and development of land <del>for development</del> is coordinated with the <u>construction of</u> transport and infrastructure upgrades necessary to manage <u>and mitigate potential</u> adverse effects on the <u>local and wider</u> transport network. <u>Provision is also made for the future widening of Riverhead Road.</u>'</p>	161.5

Issue / Provision	Support / oppose	Reasons for submission	Decision requested	
IX.2, Objective 4	Oppose in part	Amendments are required to address access within the precinct, not just access to and from the precinct. In addition the outcome of safe, effective and efficient access needs to be linked to mitigating the adverse effects of traffic generation on the surrounding road network.	Amend Objective 4 as follows:  '(4) Access to, <del>and from and within the precinct for all modes of transport</del> occurs in a safe, effective and efficient manner <del>for all modes of transport that mitigates the adverse effects of traffic generation on the surrounding road network.</del> '	161.6
IX.2, Objective 5	Support	Support Objective 5 which seeks an outcome where subdivision and development is coordinated with supply of infrastructure, including transport infrastructure.	Retain Objective 5	161.7
IX.2, New objective	Oppose	To achieve transport land use integration, a robust objective is needed whereby subdivision and development does not occur in advance of the availability of operational transport infrastructure. This includes regional as well as local transport infrastructure as the proposal requires upgrades to some arterial roads including the Coatesville-Riverhead Highway / Main Road (SH16) intersection. Such an objective gives effect to higher order provisions (e.g. RPS Policy B3.3.2(5)(a)).	Insert a new Objective as follows:  '(x) <u>Subdivision and development does not occur in advance of the availability of operational transport infrastructure, including regional and local transport infrastructure.</u> '	161.8
IX.2, New objective	Oppose	An objective is required to support Standard IX.6.2 which requires a road widening setback along Riverhead Road.	Insert a new Objective as follows:  '(x) <u>Development provides for future road widening on Riverhead Road.</u> '	161.9
IX.3, New policy	Oppose	To achieve transport land use integration a robust policy is needed whereby subdivision and development does not occur in advance of the availability of operational transport infrastructure. This is consistent with the additional objective sought earlier in this submission. Such a policy gives effect to higher order provisions (e.g. RPS Policy B3.3.2(5)(a)).	Insert a new policy as follows:  '(x) <u>Require that subdivision and development in the Precinct does not occur in advance of the availability of operational transport infrastructure.</u> '	161.10
IX.3, New policy	Oppose	A new policy is required to support Standard IX.6.2 which requires a road widening setback along Riverhead Road. This is consistent with the additional objective sought earlier in this submission.	Insert a new policy as follows:  '(x) <u>Require development with frontage to Riverhead Road to provide for future road widening.</u> '	161.11
IX.3, Policy 4	Oppose in part	An amendment is needed to require subdivision, as well as the occupation of buildings, to be coordinated with the required infrastructure upgrades.	Amend Policy 4 as follows:  '(4) Require <u>subdivision and</u> the occupation of buildings in the precinct to be coordinated with required transport infrastructure upgrades to minimise the adverse	161.12

Issue / Provision	Support / oppose	Reasons for submission	Decision requested	
			effects of development on the safety, efficiency and effectiveness of the surrounding road network.'	
IX.3, Policy 7	Support in part	Amendments are needed to make it clear that the main collector roads are to be provided, and that the street layout needs to integrate with the existing and proposed transport network.	Amend Policy 7 as follows: '(7) Require the main collector roads to be <u>provided</u> generally in the locations shown in IX.10.2 Riverhead: Precinct plan 2, while allowing for variation where it would achieve a highly-connected street layout that integrates with the surrounding <u>existing and proposed</u> transport network.'	161.13
IX.3, Policy 8	Support in part	Amendments are needed to strengthen the existing policy to make it clear that key local road and pedestrian connections are to be provided, that a highly connected layout of streets and pedestrian connections is required, and integration is needed with the internal collector road network as well as with the existing and proposed transport network.	Amend Policy 8 as follows: '(8) Require the key local roads and pedestrian connections to be <u>provided</u> generally in the locations shown in IX.10.2 Riverhead: Precinct plan 2, while allowing for variation where it would achieve a highly connected <del>street</del> <u>layout of streets and pedestrian connections</u> that integrates with the <u>collector road network within the precinct and the surrounding existing and proposed</u> transport network.'	161.14
IX.3, Policy 9	Support in part	Amendments are needed to include subdivision, as well as development, within the policy, and to refer to the existing and proposed transport network.	Amend Policy 9 as follows: '(9) Ensure that <u>subdivision and development</u> provides a local road network that achieves a highly-connected street layout and integrates with the collector road network within the precinct and the surrounding <u>existing and proposed</u> transport network, and supports the safety and amenity of the open space network.	161.15
IX.3, Policy 10	Support in part	An amendment is needed to clarify that safe access for cyclists is separated, and that it is to be provided on arterial as well as collector roads.  Other amendments are needed to cover transport upgrades which have not been directly addressed in other policies but which are relevant to the Policy 10 focus on street design and providing for all transport modes.	Amend Policy 10 as follows: '(10) Require streets to be attractively designed and to appropriately provide for all transport modes by: (a) providing <del>for safe</del> <u>separated</u> access for cyclists on <u>arterial and collector</u> roads; (x) <u>providing upgrades to existing road frontages of the precinct to an urban standard and pedestrian connections to the existing Riverhead settlement;</u>	161.16



Issue / Provision	Support / oppose	Reasons for submission	Decision requested						
			<p>(x) <u>providing safe crossing facilities for pedestrians and cyclists;</u></p> <p>(x) <u>providing upgraded public transport facilities on Coatesville-Riverhead Highway;</u></p> <p>(b) providing a level of landscaping that is appropriate for the function of the street; and</p> <p>(c) providing for the safe and efficient movement of vehicles.'</p>						
Table IX.4.1 Activity table - Precinct-wide activities	Oppose in part	Activity table headings do not reflect the specific rule wording, i.e. 'development' is referenced in three rows ((A4), (A5) and (A6)) under the 'subdivision' heading.	<p>Amend Table IX.4.1 so that either:</p> <p>a) All development activities are listed under "Development" and all subdivision activities are listed under "Subdivision", including (without limitation) so that activities (A4) to (A6) appear in both parts of the activity table; or</p> <p>b) Alternatively, subdivision and development headings are combined and include all activities.</p> <table><tr><td>Activity</td><td>Activity Status</td></tr><tr><td colspan="2">Subdivision and Development</td></tr><tr><td>[..]</td><td></td></tr></table>	Activity	Activity Status	Subdivision and Development		[..]	
Activity	Activity Status								
Subdivision and Development									
[..]									
Table IX.4.1 Activity table - Precinct-wide activities (A4) and (A5)	Oppose	<p>Subdivision and development which does not comply with the standards requiring specified transport infrastructure to be provided should be subject to a more onerous activity status. Assessment as a non-complying activity is justified, having regard to the following considerations:</p> <p>a) A1.7.5 of the AUP(OP) concerning the circumstances when non-complying activity status is justified;</p> <p>b) It is not anticipated that any subdivision and development can or should occur without the required supporting transport infrastructure upgrades being constructed and operational;</p> <p>c) Subdivision and development occurring without the required transport infrastructure upgrades would have potentially significant adverse traffic effects on the transport network, and would not assist in achieving a well-functioning urban environment; and</p>	<p>Amend Table IX.4.1 Activity table - Precinct-wide activities, (A4) and (A5), so that non-complying activity status (rather than discretionary or restricted discretionary status) applies to 'Subdivision <b>and</b> development that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades (other than in relation to specific design requirements in Appendix 1: Road function and design elements table - Internal roads within Precinct, and / or Appendix 2: Road function and design elements table - External roads to the Precinct)'.  Make consequential amendments to the matters of discretion and assessment criteria to reflect the removal of the restricted discretionary activity.</p>						

161.17

161.18

Issue / Provision	Support / oppose	Reasons for submission	Decision requested	
		d) Non-complying activity status (supported by a robust objective and policy framework) appropriately reflects the need for greater scrutiny of any Departure Application, and the need for detailed evidence to justify any departure.		
Table IX.4.1 Activity table - Precinct-wide activities (A6)	Support	Auckland Transport supports the inclusion of a clear Restricted Discretionary consent pathway for subdivision and development which does not comply with the Road Function and Design Elements tables in Appendices 1 and 2.	Retain (A6) in Table IX.4.1 Activity table - Precinct-wide activities (subject to the submission point above concerning the location of this activity – which relates to both subdivision <b>and</b> development – in the table).	161.19
Table IX.4.2 Activity table - Sub-precinct A activities (A7)	Oppose	Listing restaurants and cafes as a permitted activity in sub-precinct A does not provide for assessment of the transport effects of the activity. In addition there is no overall limit on the number of restaurants and cafes that could establish in sub-precinct A if it is subdivided into individual sites. The activity is more permissive than applying in the underlying Terrace Housing and Apartment Buildings where an RD status applies to 'Restaurants and cafes up to 100m <sup>2</sup> per site'.	Amend Table IX.4.2 Activity table - Sub-precinct A activities by deleting (A7) as follows, together with the associated permitted activity status:  <del>'Restaurants and cafes up to 250m<sup>2</sup> gross floor area per site'</del>  Make consequential amendments to the exclusions listed under Standard IX.4 Activity table, for Sub-precinct A.	161.20
Table IX.4.2 Activity table - Sub-precinct A activities (A8)	Oppose	Listing retail as a permitted activity in sub-precinct A does not provide for assessment of the transport effects of the activity. In addition there is no overall limit on the number of retail outlets that could establish in sub-precinct A if it is subdivided into individual sites. The proposal should default to the activity status applying in the Terrace Housing and Apartment Buildings zone so that it can be appropriately controlled and assessed.	Amend Table IX.4.2 Activity table - Sub-precinct A activities by deleting (A8) as follows, together with the associated permitted activity status:  <del>'Retail up to 100m<sup>2</sup> gross floor area per site'</del>	161.21
Table IX.4.2 Activity table - Sub-precinct A activities (A9)	Oppose in part	The amendment clarifies that the restriction on size (m <sup>2</sup> ) for a healthcare facility is measured as gross floor area.	Amend Table IX.4.2 Activity table - Sub-precinct A activities by amending (A9) as follows:  <del>'Healthcare facility up to 250m<sup>2</sup> gross floor area'</del>	161.22
IX.5 Notification (1) and (2)	Oppose in part	It is not appropriate for all applications for restricted discretionary applications to be considered without public or limited notification or the need to obtain written approval from affected parties. There will be some proposals with potential effects on the transport network where Auckland Transport as road controlling authority would want to be considered as an affected party for a restricted discretionary proposal, with Council making its decision on notification on the merits of the particular proposal.	Delete Standard IX.5 Notification (1) to enable the normal RMA notification tests to apply. Make a consequential amendment to IX.5(2) to delete reference to (1).	161.23

Issue / Provision	Support / oppose	Reasons for submission	Decision requested
IX.6 Standards	Oppose	Standard E27.6.1(1) already identifies circumstances where the trip generation rule does not apply. This would include development undertaken in accordance with provisions approved on the basis of an ITA where the land use and the associated trip generation and transport effects are the same or similar in character, intensity and scale. The standard also does not apply where applicable precinct rules assess transport, traffic or trip generation effects. However there may be future proposals for the land within the precinct that are not envisaged by the ITA or addressed in precinct provisions, and which have more intensive traffic effects. It is appropriate to retain the standard for this eventuality.	Amend IX.6 Standards by deleting the listing of 'E27.6.1 - Trip Generation' as a standard that does not apply precinct-wide.
IX.6.1 Staging of development with transport upgrades	Oppose in part	As currently written the standard requires specified transport upgrades to be constructed and operational prior to the occupation of buildings within identified parts of the precinct and / or with access to identified roads. It is important that the standards are also linked to subdivision and development. Amendments are also needed to provide some certainty about how compliance with the requirements for transport upgrades will be related to resource consent or subdivision approvals (and occupation where relevant). The approach employed in the Drury East plan changes (see e.g. I451.6.2 - Drury East Precinct), which was approved by the Environment Court, provides an example of an appropriate approach.	Amend Standard IX.6.1 Staging of development with transport upgrades, so that it clearly links the requirements for transport upgrades with subdivision as well as development. This will require amendments to items (1) to (5) to require upgrades to be aligned with subdivision as well as the occupation of buildings. An example of appropriate drafting is provided in I451.6.2 of the AUP(OP).  The further amendments to Standard IX.6.1 set out later in this submission are subject to this overarching request.
IX.6.1 Staging of development with transport upgrades	Oppose in part	The amendment to the title to refer to subdivision as well as development is consistent with the wording in the purpose statement about 'ensuring subdivision and development is coordinated with transport infrastructure'.  The other amendments are required to: <ul style="list-style-type: none"> <li>• emphasise the need to mitigate rather than manage adverse effects, and to consider the 'local and wider' road network</li> <li>• include transport land use integration as part of the purpose for the rule</li> <li>• relate the purpose statement to the road function and design elements tables in Appendices 1 and 2.</li> </ul>	Amend the title and purpose statement of Standard IX.6.1 as follows:  <b>'IX.6.1. Staging of <u>subdivision and development</u> with transport upgrades</b>  Purpose: <ul style="list-style-type: none"> <li>• To <u>manage mitigate</u> the adverse effects of traffic on the safety and efficiency of the surrounding <u>local and wider</u> road network for all modes of transport by ensuring subdivision and development is coordinated with transport infrastructure.</li> <li>• <u>To achieve the integration of land use and transport.</u></li> </ul>

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Issue / Provision	Support / oppose	Reasons for submission	Decision requested	
			<ul style="list-style-type: none"> <li>To ensure that subdivision and development complies with Appendices 1 and 2 Road function and design elements tables.'</li> </ul>	
IX.6.1 Staging of development with transport upgrades (1)	Oppose in part	Subject to the overarching submission point above concerning re-drafting IX.6.1 generally, an amendment is required so that the standard applies to occupation of 'any building', rather than 'a dwelling'. This reflects the fact that the precinct provides for non-residential uses, not just dwellings. Similar amendments are needed to other clauses in IX.6.1 to refer to ' <b>any</b> building' rather than 'a building'.	<p>Subject to Auckland Transport's main submission point above about re-drafting IX.6.1 generally, amend Standard IX.6.1(1) as follows:</p> <p>'(1) Prior to occupation of <del>a dwelling</del> <b>any building</b> within the Riverhead Precinct, the following transport infrastructure must be constructed and operational:</p> <p>(a) ...'</p> <p>Similarly, amend other clauses in IX.6.1 to refer to '<b>any</b> building' rather than 'a building'.</p>	161.27
IX.6.1 Staging of development with transport upgrades (2)(a)	Oppose in part	This standard sets out road infrastructure upgrades required on Coatesville-Riverhead Highway prior to occupation of a building on a site with vehicle access to and / or from that road. The standard refers to those upgrades being in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2. However this standard does not clearly require the public transport infrastructure or all of the walking / cycling improvements identified in the ITA submitted with the application. For example the ITA includes zebra crossings for pedestrians and cyclists south of Pitoitoi Drive and north of Short Street.	Subject to Auckland Transport's main submission point above about re-drafting IX.6.1 generally, amend Standard IX.6.1(2)(a) so that it clearly includes the public transport infrastructure and walking / cycling improvements (such as pedestrian crossings) identified in the ITA.	161.28
IX.6.1 Staging of development with transport upgrades (3)(a)	Oppose in part	This standard sets out road infrastructure upgrades required on Coatesville-Riverhead Highway prior to occupation of a building on a site with vehicle access to and / or from Riverhead Road. It refers to those upgrades being in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2. However this standard does not clearly require the public transport infrastructure or all of the walking / cycling improvements identified in the ITA submitted with the application. For example the ITA includes zebra crossings for pedestrians and cyclists south of Pitoitoi Drive and north of Short Street.	Subject to Auckland Transport's main submission point above about re-drafting IX.6.1 generally, amend Standard IX.6.1(3)(a) so that it clearly includes the public transport infrastructure and walking / cycling improvements (such as pedestrian crossings) identified in the ITA.	161.29
IX.6.1 Staging of development with transport upgrades	Support in part	The term 'gateway treatment' is consistent with the terminology used in Standard IX.6.1(3)(a). Appendix 2 should be referred to	Subject to Auckland Transport's main submission point above about re-drafting IX.6.1 generally, amend Standard IX.6.1(3)(c) as follows:	161.30

Issue / Provision	Support / oppose	Reasons for submission	Decision requested	
(3)(c)		for completeness as this sets out the road function and design elements for Riverhead Road.	‘(c) Upgrade and urbanise Riverhead Road, from the eastern boundary of 307 Riverhead Road to Coatesville-Riverhead Highway, including walking/cycling infrastructure, gateway threshold treatment, and public transport infrastructure in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2.’	
IX.6.2 Road widening setback along Riverhead Road	Support in part	It is appropriate to include a road widening setback along Riverhead Road to provide for future upgrading of this arterial road.  An amendment is required to subclause (1) to match the wording used in the notation on Precinct plan 3.	Retain Standard IX.6.2, subject to a minor amendment to (1) as follows:  ‘(1) A 2m wide road widening setback must be provided along that part of the frontage of the land adjoining Riverhead Road shown as subject to the ‘ <u>Required Indicative Road Widening Required</u> ’ notation on the IX.10.3 Riverhead: Precinct plan 3.’	161.31
IX.6.3 Riparian Margin	Support	Auckland Transport supports the exception whereby the riparian planting rule does not apply to road crossings over streams. This recognises that there can be a functional need for roads to cross streams.	Retain Standard IX.6.3(1)(a).	161.32
IX.8.1 Matters of discretion (1)	Support in part	As a consequential change to the amendment to the “Healthcare facility” activity requested above, amend the heading for this matter of discretion.	Amend Matters of Discretion IX.8.1(1) to read:  ‘Healthcare facility up to 250m <sup>2</sup> <u>gross floor area per site</u> .’	161.33
IX.8.1 Matters of discretion (2)	Oppose in part	Some amendments are needed to the matters of discretion applying to ‘new buildings prior to subdivision, including subdivision establishing private roads’. Amendments are sought to address cycling and pedestrian connections (as well as networks), upgrades to public transport infrastructure, and design and sequencing of upgrades to the existing road network.  Amendments to the matters of discretion may also be needed to give effect to the general relief requested in relation to IX.6.1 above.	Amend Matters of Discretion IX.8.1(2) by amending (a) and (b), and adding two new matters as follows:  ‘(a) Location and design of the collector roads, key local roads and connections with neighbouring sites to achieve an integrated street network, and appropriately provide for all modes; (b) Provision of cycling and pedestrian networks <u>and connections</u> ; (x) <u>Upgrades to public transport infrastructure</u> ; (x) <u>Design and sequencing of upgrades to the existing road network</u> ; ....’	161.34

Issue / Provision	Support / oppose	Reasons for submission	Decision requested	
			Make any further amendments to the matters of discretion to give effect to the general relief requested in relation to IX.6.1 above. For example, without limitation, if the Drury East 'model' (I451) is followed as suggested, then include a matter of discretion relating to the imposition of appropriate conditions.	161.35
IX.8.1 Matters of discretion (4)	Oppose	<p>If an earlier submission point is accepted, these matters of discretion will not be required for noncompliance with IX.6.1.(2)-(6).</p> <p>If the matters of discretion are retained, then the reference should be to buildings, not dwellings, to be consistent with the terminology used in IX.6.1.</p> <p>This clause would also need to refer to "subdivision".</p> <p>An additional matter of discretion related to road design is warranted for non-compliance with the Road Function and Design Elements tables in Appendices 1 and 2.</p>	<p>Delete the reference to Standard IX.6.1(2) - (6) from Matters of Discretion IX.8.1(4). This is consequential from an earlier submission point seeking a non-complying status for non-compliance with this standard.</p> <p>If reference to Standard IX.6.1(2) - (6) is retained, amend as follows:</p> <p>'(4) For subdivision and occupation of <del>dwellings</del> <u>buildings</u> that <del>does</del> <u>do</u> not comply with Standard IX.6.1. Staging of development with transport upgrades. '</p> <p>Insert the following matter of discretion for non-compliance with Appendices 1 and 2:</p> <p><u>'(x) Road design and consistency with the transport related objectives and policies of the precinct'</u></p>	161.36
IX.8.2 Assessment criteria (2)(e)	Support in part	It is appropriate to amend the heading to refer to 'other transport connections', as well as roads. Other amendments include additional matters which need to be taken into account when assessing alternative alignments to those shown on Precinct Plan 2.	<p>Amend Assessment Criteria IX.8.2(2)(e) and the preceding heading as follows:</p> <p><u>'Location of roads and other transport connections</u></p> <p>(e) Whether the collector roads, key local roads and key <del>pedestrian</del> <u>active mode</u> connections are provided generally in the locations shown on IX.10.2 Riverhead: Precinct Plan 2 to achieve a highly connected street layout <u>and active mode network</u> that integrates with the surrounding transport network. <u>Whether A</u>an alternative alignment that provides an equal or better degree of connectivity and amenity within and beyond the precinct may be appropriate, having regard to the following functional matters:</p> <p>(i) <u>Landownership patterns</u>, <del>T</del>the presence of natural features, natural hazards, <del>or</del> contours <u>or other</u></p>	161.37



Issue / Provision	Support / oppose	Reasons for submission	Decision requested	
			<p><u>constraints</u> and how this impacts the placement of roads <u>and active mode connections</u>;</p> <p>(ii) ...</p> <p>(iii) The constructability of roads and the ability for <del>it</del> <u>them</u> to be delivered by a single landowner <u>and connected beyond any property boundary within the precinct.</u>'</p>	
IX.8.2 Assessment criteria (2)(f)	Support in part	The assessment criterion is generally supported, if PC 100 is approved. Amendments are sought to clarify that the reference to local roads includes collector roads, and to refer to active mode connections.	<p>Amend Assessment Criteria IX.8.2(2)(f) as follows:</p> <p>'(f) Whether a high quality and integrated network of <del>local</del> roads <u>(including collector and local roads)</u> is provided within the precinct that has a good degree of accessibility and supports a walkable street network. Whether roads <u>and active mode connections</u> are aligned to provide visual and physical connections to open spaces, including along the stream network, where the site conditions allow.'</p>	161.38
IX.8.2 Assessment criteria (2) Design of roads	Support in part	<p>An amendment is required to IX.8.2(2)(g) so that the assessment of the design of roads considers the upgrades to existing roads required to provide for the proposal.</p> <p>Additional assessment criteria are needed to address the public transport infrastructure improvements which are to be provided on the Coatesville-Riverhead Highway, and the intersection upgrades at the Old Railway Road and Riverland Road.</p>	<p>Amend Assessment Criteria IX.8.2(2) under the heading 'Design of roads' as follows:</p> <p>'(g) Whether the design of new collector and local roads <u>or upgrade of existing roads</u> accord with the road design details provided in IX.11.1 Appendix 1 <u>and 2</u>.</p> <p>(h) ...</p> <p>(x) <u>Whether the public transport infrastructure improvements provided on Coatesville-Riverhead Highway in accordance with IX.6.1 Staging of subdivision and development with transport upgrades, are of a high standard and include bus stops, bus shelters, and pedestrian crossing facilities.</u></p> <p><u>(x) Whether upgrades to the Coatesville-Riverhead Highway intersections with Old Railway Road and Riverland Road provide for safe right hand turns.'</u></p>	161.39
IX.8.2 Assessment criteria (2)(n)	Support in part	Amendments are required to address the ongoing viability and maintenance of stormwater infrastructure and devices and to include specific reference to the road corridor.	<p>Amend Assessment Criteria IX.8.2(2)(n) under the heading 'Stormwater and flooding' as follows:</p> <p>'(n) The design and efficacy of infrastructure and devices with consideration given to the likely effectiveness, ease of access, operation, <u>ongoing viability and</u></p>	161.40

Issue / Provision	Support / oppose	Reasons for submission	Decision requested
			<u>maintenance</u> , and integration with the surrounding environment <u>including the road corridor where relevant.</u> '
IX.8.2 Assessment criteria (4)	Oppose	<p>If an earlier submission point is accepted, these assessment criteria will not be required for non-compliance with IX.6.1.(2)-(6).</p> <p>More focussed assessment criteria are required to address non-compliance with the Road Function and Design Elements tables in Appendices 1 and 2.</p>	<p>Delete the reference to Standard IX.6.1(2)-(6) from Assessment Criteria IX.8.1(4). This is consequential from an earlier submission point seeking a non-complying status for non-compliance with this standard.</p> <p>If the reference to Standard IX.6.1(2)-(6) is retained, then the requirement for an Integrated Transport Assessment (in IX.8.2(4)(a)) should be specifically addressed by an addition to IX.9 Special Information Requirements.</p> <p>Insert new assessment criteria for non-compliance with the Road Function and Design Elements tables as follows:</p> <p>'(x) For subdivision and / or development that does not comply with the Road Function and Design Elements tables in Appendices 1 and 2</p> <p>(a) <u>Whether there are constraints or other factors present which make it impractical to comply with the required standards.</u></p> <p>(b) <u>Whether the design of the road and associated road reserve achieves the relevant transport-related policies of the Precinct.</u></p> <p>(c) <u>Whether the proposed design and road reserve:</u></p> <p>(i) <u>incorporates measures to achieve the required design speeds;</u></p> <p>(ii) <u>can safely accommodate required vehicle movements;</u></p> <p>(iii) <u>can appropriately accommodate all proposed infrastructure and roading elements including utilities and/or any stormwater treatment;</u></p> <p>(iv) <u>assesses the feasibility of upgrading any interim design or road reserve to the ultimate required standard.</u></p> <p>(d) <u>Whether there is an appropriate interface design treatment at property boundaries, particularly for pedestrians and cyclists.'</u></p>

161.41

Issue / Provision	Support / oppose	Reasons for submission	Decision requested
			Make consequential amendments to IX.8.2(4).
IX.9 Special information requirements	Oppose	An amendment is required to specify the information that is required to be provided with future applications which involve new or upgraded intersections for key roads. This provides for a more detailed assessment of the intersection than is appropriate at the rezoning stage.	<p>Amend IX.9 Special information requirements, by adding the following:</p> <p><u>'(5) Transport Design Report</u></p> <p><u>Any proposed new key road intersection or upgrading of existing key road intersections illustrated on Precinct Plans 2 and 3 must be supported by a Transport Design Report and Concept Plans (including forecast transport modelling and land use assumptions), prepared by a suitably qualified transport engineer confirming that the location and design of any road and its intersection(s) supports the safe and efficient function of the existing and future (ultimate) transport network and can be accommodated within the proposed or available road reserves. This may be included within a transport assessment supporting land use or subdivision consents.</u></p> <p><u>In addition, where an interim upgrade is proposed, information must be provided, detailing how the design allows for the ultimate upgrade to be efficiently delivered.'</u></p> <p>Make consequential amendments to Precinct Plans 2 and 3 to clearly identify the key road intersections.</p>
IX.10.2 Riverhead: Precinct plan 2 - Structural elements	Oppose in part	To ensure that the identification of Lathrope Road / Riverhead Road intersection upgrade in Precinct Plan 2 is consistent with Precinct Plan 3.	Amend the notation applying at the intersection of Lathrope Road / Riverhead Road to 'upgrade key intersection' instead of 'proposed roundabout'.
IX.10.3 Riverhead: Precinct plan 3 - Transport upgrades	Oppose in part	Auckland Transport supports the inclusion of Precinct plan 3 to identify transport upgrades. However the key road intersection upgrades need to be identified as such. There are two intersection upgrades identified in the ITA which may need to be identified by means of an inset to the existing diagram if required.	<p>Amend IX.10.3 Riverhead: Precinct plan 3 - Transport upgrades to identify all of the key road intersection upgrades including:</p> <ul style="list-style-type: none"> <li>• Coatesville-Riverhead Highway / Old Railway Road</li> <li>• Coatesville-Riverhead Highway / Riverland Road</li> </ul>

161.42

161.43

161.44

Issue / Provision	Support / oppose	Reasons for submission	Decision requested	
		In addition, some transport-related items are shown on Precinct plan 2 but not on Precinct plan 3. This should be reviewed with amendments made as required.	<ul style="list-style-type: none"> <li>Riverhead Road / Coatesville-Riverhead Highway / Kaipara Portage Road</li> <li>Riverhead Road / Collector Road</li> <li>Riverhead Point Drive / Coatesville-Riverhead Highway / Collector Road.</li> </ul> <p>Also amend Precinct plan 3, as required, to reflect Precinct plan 2.</p>	
IX.11.1 Appendix 1: Road function and design elements table - Internal roads within the precinct	Oppose in part	Auckland Transport supports the inclusion of a road function and design elements table. However inclusion of the terms 'Type 1' (for collector roads) and 'Type 2' (for local roads) is confusing and does not add value. These terms are not defined and are not used elsewhere in the precinct plan.	Amend the table in IX.11.1 Appendix 1 by deleting the references to '(Type 1)' and '(Type 2)' in the column headed 'Proposed role and function of road in the precinct area'	161.45
IX.11.1 Appendix 1: Road function and design elements table - Internal roads within the precinct	Oppose in part	A qualifying note is needed for 'minimum road reserve'. The additional text is consistent with the approach in other recent precincts and acknowledges the circumstances under which the minimum width may need to be varied.	Amend the table in IX.11.1 Appendix 1 by adding the following footnote to the column headed 'Minimum road reserve':  <u>'Typical minimum width which may need to be varied in specific locations where required to accommodate network utilities, batters, structures, stormwater treatment, intersection design, significant constraints or other localised design requirements'</u>	161.46
IX.11.1 Appendix 1: Road function and design elements table - Internal roads within the precinct	Oppose in part	A qualifying note is needed for 'bus provision'. This is consistent with the approach in other recent precincts and clarifies what is required to provide for buses.	Amend the table in IX.11.1 Appendix 1 by adding the following footnote to the column headed 'Bus provision':  <u>'Carriageway and intersection geometry capable of accommodating buses. Bus stop form and locations and bus routes shall be determined with Auckland Transport at resource consent and engineering plan approval stage'</u>	161.47
IX.11.1 Appendix 2: Road function and design elements table - External roads to the precinct	Oppose in part	A qualifying note is needed for 'minimum road reserve'. The additional text is consistent with the approach in other recent precincts and acknowledges the circumstances under which the minimum width may need to be varied.	Amend the table in IX.11.2 Appendix 2 by adding the following footnote to the column headed 'Minimum road reserve':  <u>'Typical minimum width which may need to be varied in specific locations where required to accommodate network utilities, batters, structures, stormwater treatment, intersection design, significant constraints or other localised design requirements'</u>	161.48

Issue / Provision	Support / oppose	Reasons for submission	Decision requested	
IX.11.1 Appendix 2: Road function and design elements table - External roads to the precinct	Oppose in part	A qualifying note is needed for 'bus provision', This is consistent with the approach in other recent precincts and clarifies what is required to provide for buses.	Amend the table in IX.11.2 Appendix 2 by adding the following footnote to the column headed 'Bus provision':  <u>'Carriageway and intersection geometry capable of accommodating buses. Bus stop form and locations and bus routes shall be determined with Auckland Transport at resource consent and engineering plan approval stage.'</u>	161.49
IX.11.1 Appendix 2: Road function and design elements table - External roads to the precinct	Oppose in part	It is important to retain flexibility for a future bus route between Riverhead and Kumeū-Huapai. This will need to use Riverhead Road. The Road Function and Design Elements table should therefore identify 'bus provision' for Riverhead Road.  Like Coatesville-Riverhead Highway, Riverhead Road is identified as an arterial road in the controls layer of the AUP maps. Access restrictions therefore apply under E27 and the table should be amended accordingly.	Amend the table in IX.11.2 Appendix 2 by: <ul style="list-style-type: none"> <li>changing the entry about bus provision (final column) for Riverhead Road from 'no' to 'yes'.</li> <li>changing the entry about access restrictions (column 7) for Riverhead Road from 'no' to 'yes'.</li> </ul>	161.50
IX.11.1 Appendix 2: Road function and design elements table - External roads to the precinct	Oppose in part	Cambridge Road should be included in the Road function and design elements table applying to external roads to the precinct, given the upgrades required in IX.6.1 Staging of development with transport upgrades.	Amend the table in IX.11.2 Appendix 2 to include a row for Cambridge Road.	161.51

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Ryan Sclanders  
**Date:** Friday, 17 May 2024 8:30:24 am  
**Attachments:** [Flooding\\_20240517081931.465.pdf](#)  
[Traffic.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Ryan Sclanders

Organisation name:

Agent's full name:

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Contact phone number: 0212264142

Postal address:

4 Mill Grove

Riverhead

Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Property address:

Map or maps: All Map sections in 04-pc100-app-2-pc-zoning-map

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

I am making my submission to highlight not necessarily the proposed subdivision but rather the lack of infrastructure upgrades needed to support the subdivision and the influx of people, schools, vehicles, and water drainage issues.

The plan proposes anywhere between 1450 to 1750 mixed residential dwellings without any Safety and capacity upgrades to State HW 16, Coatesville Riverhead highway, or residential roads other than around the development. Traffic is already horrendous in the mornings, taking an hour to an hour and a half to get into the city. Some (if not most) mornings the traffic is backed up from Hallertau to Borich. The traffic from Kumeu to Borich is even worse. This also happens on weekends when an event is hosted at the Kumeu showgrounds or temples in the area.

Furthermore, Coatesville Riverhead Highway looks at capacity by how poorly the roads are maintained (the Riverhead bridge is an example) and the vehicle size. The subdivision would add a lot more "heavy vehicle traffic" during construction and residential traffic (2900 - 3500 Vehicles if we



assume each dwelling has two vehicles) once complete.

The documents also state that "Kumeu, Huapai, and Riverhead are collectively designated 'development-ready' from 2028-2032, with the potential to accommodate 6,600 new dwellings!" Where will all the traffic go? Where are the plans to upgrade the Coatesville Riverhead highway and SHW 16 to accommodate all this development?

The developers' belief that the new subdivision will not contribute to the existing stormwater issues in Riverhead is a cause for concern. The stormwater drainage in our area is ineffective, and there are no visible plans to address this problem. The subdivision plans to direct most of the water into the northern river, which is already at capacity at times. Additionally, the western end of the subdivision will send water south, where we have witnessed the catchment area and drains overflowing in light to medium rain. This situation leaves our community vulnerable and in need of immediate solutions.

I disagree with the developer's assessment, considering my neighbours' houses and mine were flooded twice just over a year ago. Not just because the stormwater drains were inadequate but also because of the subdivision at the bottom of Duke Street (Which you, the council, approved!). They also said that their subdivision wouldn't affect our houses. Instead, the subdivision caused all the water to channel through the bottom of Mill Grove.

Schooling: Riverhead Primary School has more than doubled in size over the last five or so years. The school is constantly undergoing upgrades to handle capacity. There is no high school in the immediate area, and Riverhead is only zoned for Massey High School. I know the subdivision provides an area for a new primary school, but there are no plans from the MOE to build a new school. Where will all the kids go to school? How would they get there with all the traffic?

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

162.1

Details of amendments: Upgrade road infrastructure for increased capacity and safety. Review and fix the Storm water issues in Riverhead so that we don't have to worry about our houses each time it rains. Work with the MOE to build new schools in the area.

162.2

162.3

162.4

Submission date: 17 May 2024

Supporting documents

Flooding\_20240517081931.465.pdf

Traffic.pdf

### Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

### Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.



























**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Heather Hernandez  
**Date:** Friday, 17 May 2024 8:45:14 am

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Heather Hernandez

Organisation name:

Agent's full name: Heather Hernandez

Email address: heather4evernz@gmail.com

Contact phone number:

Postal address:

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Property address: Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

I am concerned about the increase in traffic in the local area, which will feed onto SH 16 which already is at a standstill on many occasions. SH 16 has not been upgraded to handle the increase in use nor are there good public transport options to the city or North Shore, rapid transport/park n rides or bike lanes. SH 16 is already at a standstill on many occasions, with the increase in noise & fumes affecting residents. With the large amount of land earmarked for development in the area, these improvements need to be made, along with drainage and flood mitigation plans, prior to further intensification.

I or we seek the following decision by council: Decline the plan change

163.1

Submission date: 17 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Jennifer Caitlin Watson  
**Date:** Friday, 17 May 2024 9:15:20 am  
**Attachments:** [Plan Change.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Jennifer Caitlin Watson

Organisation name:

Agent's full name:

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 Riverhead  
 Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:  
 All of it

Property address: 4 Princes Street, Riverhead

Map or maps: n/a

Other provisions:  
 all of this is totally ridiculous

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
 Please see attached document

I or we seek the following decision by council: Decline the plan change

164.1

Submission date: 17 May 2024

Supporting documents  
 Plan Change.pdf

#### Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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## Infrastructure Concerns

### Travel

Auckland Transport and Waka Kotahi as well as the residents of Riverhead do not believe the roading infrastructure is sufficient to handle the increased use caused by the planned development. An Auckland Transport document regarding Riverhead holds that “There is no funding in place to improve public transport services to support any urbanisation to align with the project’s delivery timeframe, with the development being car-oriented,” Further AT wrote, “There is no funding in place to improve public transport services to support any urbanisation to align with the project’s delivery timeframe, with the development being car-oriented.”

Indeed, the roading infrastructure currently does not handle the number of cars on the road well: Coatesville Riverhead Highway entrance onto 16 heading into Auckland has significant delays no matter the time of day and, of course, exacerbated by rush hour. At times, it takes more than ½ hour to go from Princes Street to the roundabout that feeds the highway into Auckland and Fred Taylor Drive. In several documents, the Council mentions road infrastructure “improvements,” and in one place it mentions being “fully funded “and finished in 2025, but no evidence of that work can be seen.

The Plan Change request and the development in Riverhead should be halted until roading development can handle the current and future increased numbers.

Improvement of mass transit (buses in this case) remains insufficient as well. Auckland Transport journey planner cites that the trip from Riverhead to Auckland CBD often takes 1 hour and 40 minutes (if buses are running perfectly) and can require using three different buses.

Consider me a single mother of two living on Princes Street with one child in daycare in Huapai and one at Riverhead School. Both the school and daycare will take children from 7:00 a.m. (if she pays for the before school programme) Assuming I transport my children by car as quickly as possible, I could (with no hiccups) catch the 7:26 bus, transfer twice and enter my office well after 9:00. A park and ride facility will not change that reality. A fast train, or dedicated bus lanes with express buses from Riverhead might.

The Plan Change request and the development in Riverhead should be halted until mass transit can efficiently handle the current and future increased numbers.

### Flooding

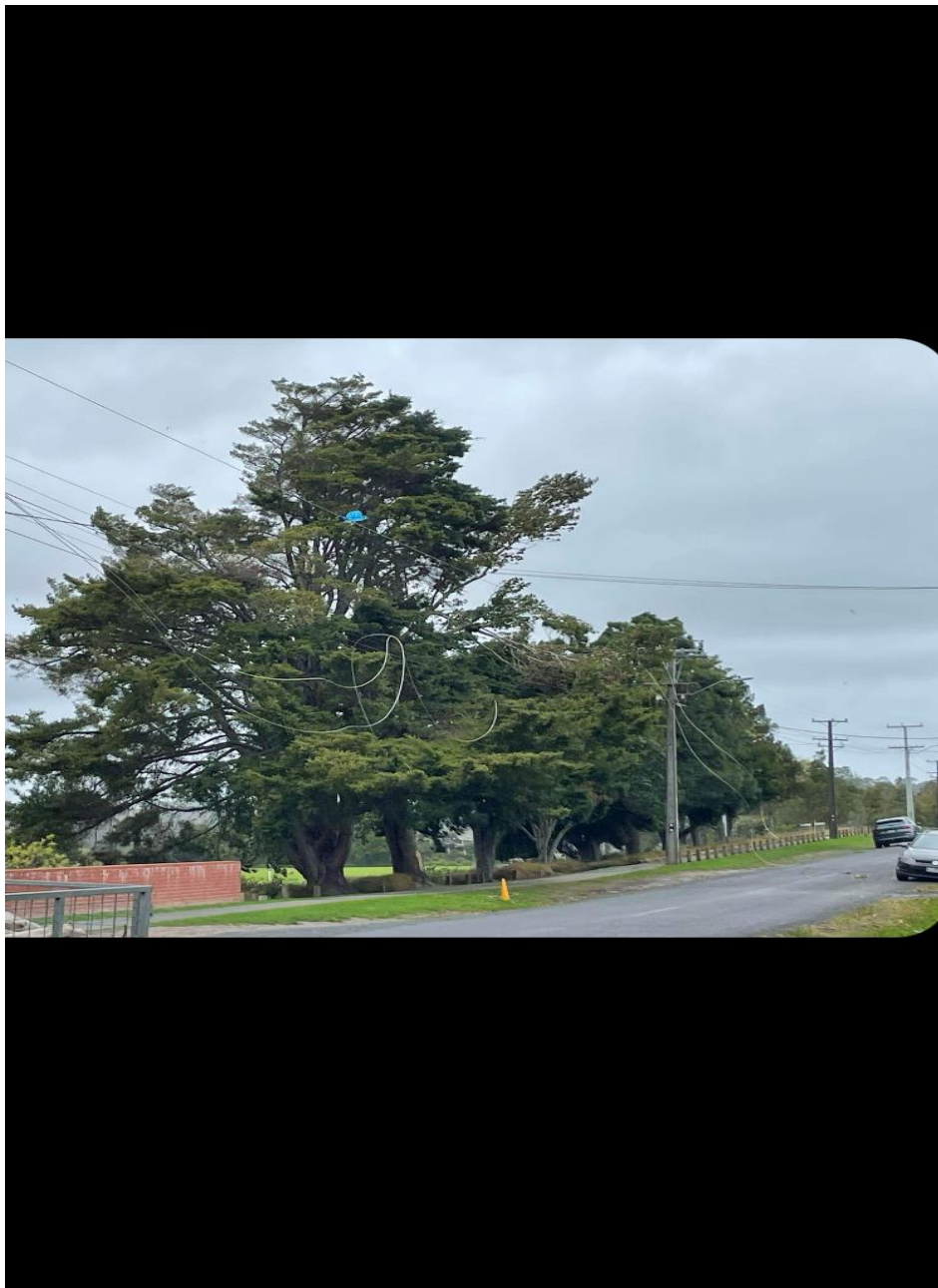
The Plan Change group indicates its flood control for the area within the development. However, the Council has not addressed the flooding that occurs on Princess Street. Having good infrastructure in a small portion of the town and not available within ½ block of the proposed development may create unnecessary friction between residents. Kia Ora Tāmaki Makaurau indicates the need for “holistic wellbeing for Tāmaki Makaurau,” which should mean resilient flood control for all residents.

The Plan Change Request and its development in Riverhead should be halted until all areas of Riverhead have good water management infrastructure.

## Electricity

Over the past several years, Princess Street has had power outages due to a transformer blowing and weather causing power lines to be ripped apart by trees. Might these outages affect the grid that the development is on, including the hospital? Electrical lines and the trees that down them should be addressed completely before developing further. (Please see a photo of the April tree involvement)

The Plan Change Request and its development in Riverhead should be halted until all areas of Riverhead have good, safe, robust electrical management infrastructure.



## Housing

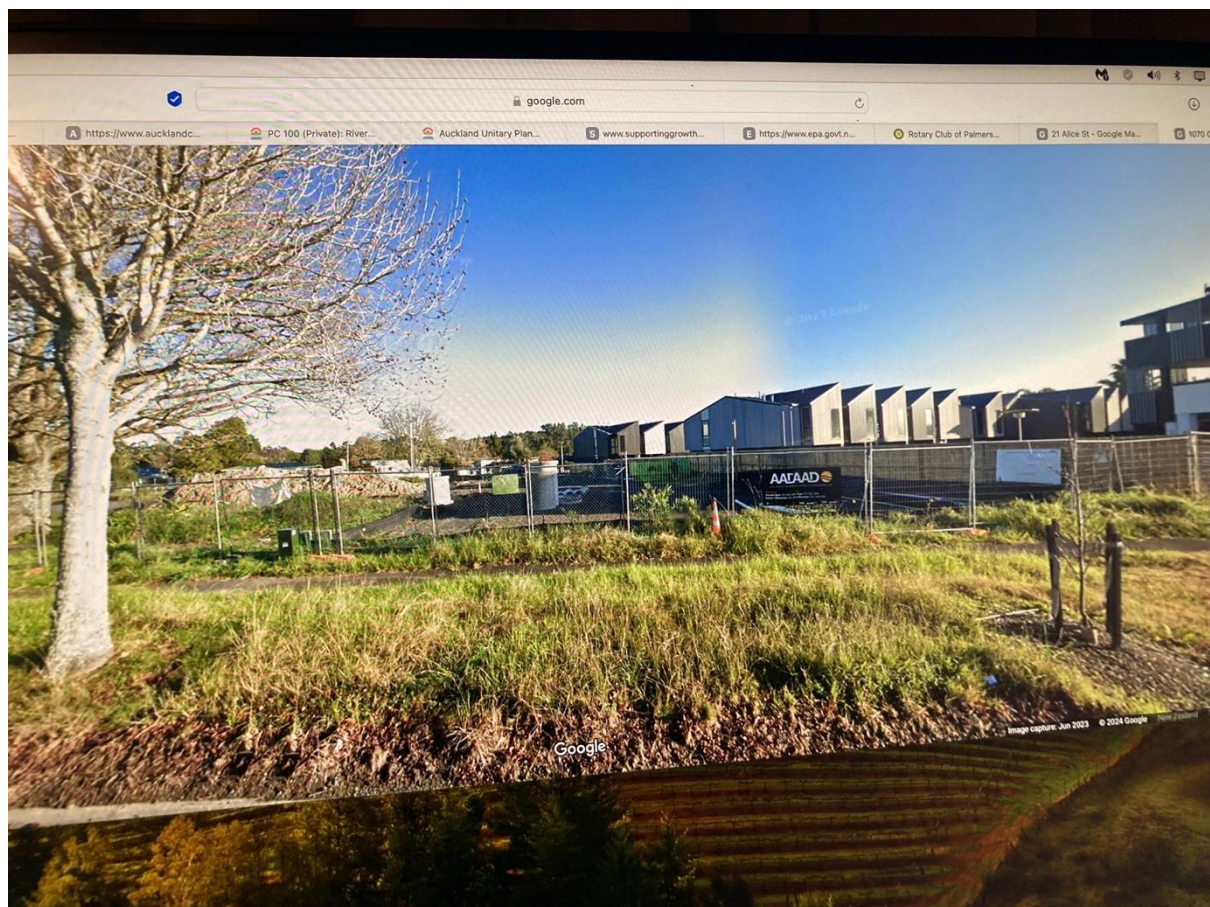
The proposed Plan Change touts adding terraced housing and apartments with a 4-storey structure.

The tall buildings will detract from the character of Riverhead. In addition, taller buildings may cut light from the houses nearby. A possible solution would be to move any 4-storey building to the corners furthest away from Coatesville Riverhead Highway where there are fewer houses affected. Move the orange Terrace Housing in Figure 4 to the left along Riverhead Road. Here, it will only affect rural land.

If the Plan Change is approved, no buildings taller than a main and 1<sup>st</sup> level should sit on Coatesville Riverhead Highway.

The Plan Change also hopes to “increase the amount of available housing.”

Currently Riverhead has several developments that have failed to progress: the area at 1066-1070 Coatesville Riverhead Highway has a partially developed lot with pipes unburied and no progress being made. This area (between Alice and Coatesville Riverhead Highway also has terraced housing --- mostly finished, but completely unoccupied. Construction for those terraced houses and the amenities they would bring began about 5 years ago and has sat in its current state for 3 or 4 years. Both sites are blights on the community. (Photo from Google maps) The area is the small purple area to the right of the RLG holdings shown in Figure 1.



The Plan Change Request and its development in Riverhead should be halted until the current developments that sit idle are finished and occupied. Perhaps the Plan Change proponents should first purchase and finish and rent/sell those units to ensure the demand exists before continuing with the Plan.

## Education

Riverhead School (primary school) stands near capacity. Adding more housing (and therefore families) directly affects the schools and their children. Riverhead, Kumeu, and Huapai do not have a secondary school. Students must travel up to an hour to get a high school education. That problem does not disappear with this plan.

The Plan Change Request and its development in Riverhead should be halted until educational resources coincide with the numbers of children of all ages in the area.



**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Sara Wheeler  
**Date:** Friday, 17 May 2024 10:00:51 am

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Sara Wheeler

Organisation name:

Agent's full name:

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Contact phone number:

Postal address:  
 948 Old North Road  
 Waimauku  
 Auckland 0882

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:

Property address:

Map or maps:

Other provisions:

The number of homes proposed

The impact on the surrounding area

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

This plan change constitutes a significant plan change that, if approved, would result in a departure from Auckland Council's own Future Development Strategy.

Riverhead and its surrounding areas have been subject to considerable residential development over the last ten years – however infrastructure has not kept up with demand. The proposed infrastructure contribution is meaningless in the context of the infrastructure deficit in the area. This is the sort of development that might be contemplated once the motorway extension to Waimauku has been completed. The congestion on SH16 caused by traffic entering from the Coatesville Riverhead Highway is already unacceptable.

Riverhead and surrounding area are not equipped to deal with the scale of development that this plan change would result in.

PC100 would result in an inappropriate development, that will ultimately result in higher vehicle and pressure on infrastructure that is already under resourced. There is insufficient public transport in

the area to support the development.

PC10's residential development occurring in land that is subject to natural hazards, which completely contradicts Auckland Council's own Future Development Strategy.

In the past three years, the Kumeu-Huapai and Riverhead areas have experienced three significant flood events that have resulted in extensive damage to homes and businesses. Avoiding further residential development in these areas in the future is vital, in light of more frequent and impactful weather events occurring as a result of climate change and the lack of stormwater infrastructure (that will not be addressed by simply providing for stormwater within the development).

I/we oppose PC100 and ask that Auckland Council declines the application.

I or we seek the following decision by council: Decline the plan change

165.1

Submission date: 17 May 2024

### **Attend a hearing**

Do you wish to be heard in support of your submission? No

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Mary Midgley  
**Date:** Friday, 17 May 2024 10:15:28 am

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Mary Midgley

Organisation name:

Agent's full name:

Email address: mmidgley@xtra.co.nz

Contact phone number:

Postal address:

84 and 86 Riverland road,

Kumeu

Auckland 0892

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Rezoning of 75.5ha of future urban /rural zone to residential/suburban/terrace and apartment housing.

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Locals are seeking to live in Riverhead for its semi rural small town, village atmosphere. Already the riverhead new developments strain the infrastructure esp congested roads, poor maintenance of local roads. As pleasant as the area currently is there is minimal infrastructure to support the population living in the area. Homes have been built on flood plain which as weather events prove, has been drastically under considered with dire outcomes for many.

Public transport is minimal, a car is a must for households. Further development would force people to leave area or face impossible commute times to work etc. We have developers failing to complete homes and commercial areas already. Such failures create eyesores and take the rural community feel away. Nothing should be developed or planned without robust plans for strong infrastructure across the board. Then a considered and well laid out area can be planned with a restriction on jamming apartments and terrace housing. As hindsight has proved people wanting to move to this area want a lifestyle not box living.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested | 166.1

Details of amendments: Infrastructure first to provide for what is already in place | 166.2

Submission date: 17 May 2024

### Attend a hearing

Do you wish to be heard in support of your submission? No

### Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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NZ Transport Agency Waka Kotahi Reference: 2024-0473

17 May 2024

Auckland Council  
C/- Sarah El Karamany – Planning Technician  
Private Bag 92300  
Auckland 1142

Via Auckland Council submission portal

Dear Sarah,

**Submission on Plan Change 100 (Private) Riverhead**

Attached is the NZ Transport Agency Waka Kotahi (NZTA) submission on the proposed Plan Change 100 (Private) Riverhead.

We welcome the opportunity to discuss the contents of our submission with the applicant as required.

If you have any questions, please contact me.

Yours sincerely



Rosalind Cowen  
Senior Planner – Poutiaki Taiao / Environmental Planning  
System Design, Transport Services

Phone: 099565710

Email: [rosalind.cowen@nzta.govt.nz](mailto:rosalind.cowen@nzta.govt.nz)



**FORM 5, CLAUSE 6 OF SCHEDULE 1, RESOURCE MANAGEMENT ACT 1991****Submission on Plan Change 100 (Private) Riverhead**

**To:** Auckland Council  
C/- Sarah El Karamany  
Private Bag 92300  
Auckland 1142

Via Auckland Council submission portal

**From:** NZ Transport Agency Waka Kotahi  
Private Bag 106602  
Auckland City  
Auckland 1143

**1. This is a submission on the following:**

Proposed Plan Change 100 (Private) Riverhead ("PC100").

**2. NZ Transport Agency Waka Kotahi (NZTA) could not gain an advantage in trade competition through this submission.****3. Role of NZTA**

NZTA is a Crown entity with its functions, powers and responsibilities set out in the Land Transport Management Act 2003 (LTMA) and the Government Rounding Powers Act 1989. The primary objective of NZTA under Section 94 of the LTMA is to contribute to an effective, efficient, and safe land transport system in the public interest.

An integrated approach to transport planning, funding and delivery is taken by NZTA. This includes investment in public transport, walking and cycling, local roads and the construction and operation of state highways.

**4. State highway environment and context**

The Proposed Plan Change is approximately 2km south of the State Highway 16 (SH16) and Coatesville Riverhead Road intersection.

As a note, NZTA's Stage 2 of the Bringham Creek to Waimauku Safety Improvements project, which includes the upgrade of the SH16/ Coatesville Riverhead Highway intersection, is currently on hold due to significant increases in forecasted costs. NZTA are currently working through internal processes to seek direction on funding and scope in light of the new draft Government Policy Statement on Land Transport (2024) and the development of the next National Land Transport Programme.

There are no assurances on funding for the project however if this is approved in the coming months the current programme is for construction to be completed mid-2029.

**5. The specific provisions of the proposal that this submission relates to are:**

The specific provisions of the proposal that this submission relates are associated with the proposed infrastructure upgrade provisions, notification provisions and consultation requirements with NZTA.

**6. The submission of NZTA is:**

NZTA oppose the Proposed Plan Change 100 (Private) Riverhead ("PC100") until the relief as detailed below is addressed.

Plan Section	Plan Provision	Support / Oppose	Reasons	Relief Sought
Policies – Transport, Infrastructure and staging	IX.3.(4) <i>Require the occupation of buildings in the precinct to be coordinated with required transport infrastructure upgrades to minimise the adverse effects of development on the safety, efficiency and effectiveness of the surrounding road network.</i>	Support	NZTA support this policy as it will direct that any development within this plan change area will not be occupied until appropriate roading infrastructure has been constructed.	No relief sought.  167.1
Table IX.4.1 Activity table – Precinct- wide activities	(A4) Subdivision and development that does not comply with Standard IX.6.1(1) Staging of Development with Transport Upgrades  - Discretionary Activity	Oppose	NZTA consider that any subdivision and development that does not comply with Standard IX.6.1(1) should be a Non-Complying Activity. This is to ensure that the appropriate RMA gateway tests are applied to development that is out of sequence with the SH16/Coatesville Riverhead Road intersection upgrade.	To amend (A4) to a Non-Complying Activity. 167.2
IX.5. Notification	(1) Any application for a restricted discretionary activity listed in Table IX.4.1 Activity table above, will be considered without public or limited notification or the need to obtain written approval from affected	Oppose	The applicant's consultant has advised NZTA that "the precinct wording is consistent with the approach applied to all precincts under the AUP and adopts standard notification clauses (and does not preclude notification to NZTA)."	In order to remain consistent with the RMA, this provision should be amended from enabling applications to be considered without public or limited notification from a restricted discretionary activity to a controlled activity.  167.3

	<p>parties unless the Council decides that special circumstances exist under sections 95A(9) or 95B(10) of the Resource Management Act 1991.</p>		<p>NZTA do not agree that precincts typically enable a restricted discretionary activity to be considered without public or limited notification unless Council that special circumstances exist.</p> <p>The RMA precludes controlled activities from public and limited notification and only precludes a restricted discretionary activity if the activity is a boundary activity (s95A(5)(b)) which is not consistent with this proposed precinct provision.</p>	
IX.6.1. Standards	<p><i>IX.6.1. Staging of development with transport upgrades</i></p> <p><i>(1) Prior to occupation of a dwelling within the Riverhead Precinct, the following transport infrastructure must be constructed and operational:</i></p> <p><i>(a) Upgrade of the Coatesville-Riverhead Highway / Main Road (SH16) intersection to a roundabout, as part of the SH16 Brigham Creek to Waimauku project, led by Waka Kotahi NZ Transport Agency</i></p>	Support	<p>NZTA support this provision as it will manage future development in the plan change area in an efficient and safe manner with appropriate roading infrastructure being in place prior to occupation of any development.</p> <p>The proposed SH16 Coatesville-Riverhead Highway intersection upgrade <u>should</u> provide sufficient capacity to service the additional traffic generated from this plan change. Although, the applicant should be aware that if this intersection upgrade is to occur, it would be no earlier than mid-2029. This would be consistent with the Future Urban Land Supply Strategy 2017 (FULSS).</p> <p>The FULSS sets out the anticipated timeframes for 'development ready' areas over a 30-year period. It</p>	<p>No relief sought. 167.4</p>

			<p>helps to inform infrastructure asset planning and funding priorities, and to support development capacity to be provided in a coordinated and cost-efficient way via the release of 'development ready' land.</p> <p>Therefore, this plan change and intersection upgrade should enable development no earlier than 2028/9.</p>	
IX.9 Special Information Requirements	<p>(2) <i>Consultation with Waka Kotahi NZ Transport Agency</i></p> <p><i>An application for development, excluding construction activities, which occurs prior to the upgrade of the Coatesville-Riverhead Highway / Main Road (SH16) intersection must be accompanied by a description of consultation undertaken with Waka Kotahi NZ Transport Agency and the outcomes of this consultation.</i></p>	Support	<p>NZTA support consultation for any subdivision or development occurring prior to the SH16/ Coatesville Riverhead Highway intersection upgrade.</p>	<p>No relief sought. 167.5</p>

**7. NZTA seeks the following decision from the local authority:**

- (i) NZTA seeks that Auckland Council decline this proposed plan change until all requested relief is sought as outlined in the above table.
- (ii) Any other relief that would provide for the adequate consideration of potential effects on the state highway network.

**8. NZTA does wish to be heard in support of this submission.**

**9. If others make a similar submission, NZTA will consider presenting a joint case with them at the hearing.**

**10. NZTA is willing to work with the applicant in advance of a hearing.**

Signature:



Rosalind Cowen  
Senior Planner – Poutiaki Taiao / Environmental Planning  
System Design, Transport Services  
Pursuant to an authority delegated by NZ Transport Agency Waka Kotahi

Date: 17 May 2024

Address for service: NZ Transport Agency Waka Kotahi  
Private Bag 106602  
Auckland City  
Auckland 1143

Contact Person: Rosalind Cowen  
Telephone Number: 099565710  
Alternate Email: [EnvironmentalPlanning@nzta.govt.nz](mailto:EnvironmentalPlanning@nzta.govt.nz)

**Before you fill out the attached submission form, you should know:**

You need to include your full name, an email address, or an alternative postal address for your submission to be valid. Also provide a contact phone number so we can contact you for hearing schedules (where requested).

By taking part in this public submission process your submission will be made public. The information requested on this form is required by the Resource Management Act 1991 as any further submission supporting or opposing this submission is required to be forwarded to you as well as Auckland Council. Your name, address, telephone number, email address, signature (if applicable) and the content of your submission will be made publicly available in Auckland Council documents and on our website. These details are collected to better inform the public about all consents which have been issued through the Council.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious.
- It discloses no reasonable or relevant case.
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.



## Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 16, 135 Albert Street  
Private Bag 92300  
Auckland 1142

For office use only

Submission No:

Receipt Date:

### Submitter details

**Full Name or Name of Agent (if applicable)**

Mr/Mrs/Miss/Ms(Full  
Name)

Ms Angela Yelavich

**Organisation Name (if submission is made on behalf of Organisation)**

**Address for service of Submitter**

51 Kent Terrace, Riverhead, Auckland 0820

Telephone:

211922212

Email:

angela.m.yelavich@gmail.com

Contact Person: (Name and designation, if applicable)

### Scope of submission

**This is a submission on the following proposed plan change / variation to an existing plan:**

Plan Change/Variation Number

PC 100 (Private)

Plan Change/Variation Name

Riverhead

**The specific provisions that my submission relates to are:**

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Stormwater/Flooding, Traffic, Special Character

Or

Property Address

Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on the western side of Riverhead.

Or

Map

Or

**Other (specify)**

### Submission

**My submission is:** (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I **support** the specific provisions identified above ☒

I **oppose** the specific provisions identified above ☐

I wish to have the provisions identified above amended Yes ☐ No ☒

The reasons for my views are:

---



---



---

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

☐

Accept the proposed plan change / variation with amendments as outlined below

☐

Decline the proposed plan change / variation

☒

168.1

If the proposed plan change / variation is not declined, then amend it as outlined below.

☐

I wish to be heard in support of my submission


☐

I do not wish to be heard in support of my submission

☐

If others make a similar submission, I will consider presenting a joint case with them at a hearing

☒

  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

05/16/2024

Date

#### Notes to person making submission:

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could ☒ / could not ☐ gain an advantage in trade competition through this submission.

**If you could gain an advantage in trade competition through this submission please complete the following:**

I am ☒ / am not ☐ directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

## Stormwater/Flooding

There are many reasons for my views, but briefly they are:

Twice in the last two years, the area adjacent to the proposed development i.e. Duke Street, Cambridge Terrace, Waititi Lane, Crabfields, has experienced significant major flooding. This was due to the already poor development planning. Given global warming and weather situations we are experiencing, it is unrealistic to plan for a “one in a hundred year” flood. More development of this area can only lead to further problems.

## Traffic

The traffic conditions experienced daily is of concern - you can hear for yourselves that the only road mentioned besides motorways, on multiple daily radio traffic reports, is for SH16. Proposed plans for something to be done at the Riverhead Coatesville road/SH16 turnoff were meant to be implemented years ago... and this is when the traffic was only a fraction of what it is now. Nothing has been done. How can a major housing/retirement village/commercial building development not increase current problems significantly?

## Special Character

Riverhead is a picturesque village with an important cultural and historic past. Surrounded by pine forests, the charming Rangitopuni River, and located so close to Auckland Central, it should be developed with its special character at the forefront. With market gardens, eating places, forest walks, river activities, and wineries nearby, it has a wonderful community vibe. In a city rapidly losing sight of what makes a place appealing to visitors, it would be shame if Riverhead's uniqueness was lost.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Adrian Low  
**Date:** Friday, 17 May 2024 10:30:21 am  
**Attachments:** [20240516 Riverhead Plan Change Submission - Adrian Low.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Adrian Low

Organisation name:

Agent's full name:

Email address: [adrian@smlo.nz](mailto:adrian@smlo.nz)

Contact phone number: 021 999 449

Postal address:

Box 96177

Balmoral

Auckland 1342

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

See Report Attached

Property address: All of Area

Map or maps: All of Area

Other provisions:

See attached Reports

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Support in principal to plan change however Opposition to Approval Timeframe. Plan Change requires widen of scope and area concerned to take into the full character and impacts of Riverhead for future.

I or we seek the following decision by council: Approve the plan change with the amendments I requested

169.1

Details of amendments: See Report Attached

Submission date: 17 May 2024

Supporting documents

20240516 Riverhead Plan Change Submission - Adrian Low.pdf

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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# Submission on Proposed Plan Change PC100: Riverhead

16/5/2024

**From: Adrian Low, Jelas Drive, Riverhead**

Dear Council Members,

I am writing to express my concerns regarding the proposed plan change PC100 for Riverhead. While I support the principle of growth, I strongly advocate delaying immediate implementation until 2028-2032. This delay is crucial to resolving significant infrastructure, environmental, and community impact concerns, ensuring sustainable and well-planned development. The current plan appears to benefit specific properties rather than providing long-term benefits to the broader community and surrounding rural areas. I urge the Council to consider a comprehensive approach that integrates critical infrastructure, community needs, and sustainable growth for the entire Riverhead area.

## Key Concerns and Recommendations

### Opposition to Immediate Implementation

- **Support for Delay:** A delay until 2028-2032 will allow adequate planning, funding, and implementation of critical infrastructure, aligning with sustainable development principles.
- **Recommendations:** I urge you to delay the plan change, prioritize infrastructure planning, maintain Riverhead's rural character, and develop a single, integrated town centre.

#### 1. Undertake full review of the Master Plan Design and widen the scope to include the whole Riverhead area and surrounds

The master plan should be designed based on all overlapping issues, including existing trees, archaeological sites, stormwater protection, community impacts, commercial areas, and other environmental considerations. It is essential to create an integrated plan that:

- **Integrates well into the existing village and community** rather than being an independent development.
- **Preserves Existing Trees:** Protect and incorporate large trees and vegetation into the urban landscape.
- **Protects Archaeological Sites:** Identify and preserve significant archaeological sites, integrating them into public open spaces and ensuring ongoing monitoring.
- **Manages Stormwater:** Implement robust stormwater protection measures, considering maximum and peak flow events and integrating them with green infrastructure.
- **Supports Sustainability:** Ensure that all elements of the plan work together to promote long-term sustainability and resilience.
- **Has a staged approach** that will be in conjunction with other infrastructure programmes.

**By addressing these interconnected issues, the master plan will support a cohesive and sustainable approach to Riverhead's development, preserving its unique character while accommodating future growth.**

#### 2. Scope of Plan change is limited in relation to waiting for and solving area wide Infrastructure Concerns

- **Incomplete Infrastructure Development:** Current infrastructure, especially transport, education, wastewater, and water supply systems, is insufficient for the proposed urbanization.
  - **Transport:** Upgrades to SH16 and Coatesville-Riverhead Highway are needed.



- Water and Wastewater: A second water main and upgrades to the wastewater system, with specific projects outlined for completion are essential.
- Electricity: Updated supply assessments and underground installations are necessary.
- Education: Adequate planning and funding for educational facilities are critical before any development.

### **3. Environmental and Ecological Concerns**

- Insufficient Environmental Impact Assessments: Current assessments do not fully address potential impacts on local ecosystems.
  - Recommendations: I recommend conducting comprehensive ecological surveys, updating stormwater management plans, and integrating green spaces into urban design.

### **4. Consultation and Community Engagement**

- Inadequate Consultation: The consultation process has been insufficient, failing to engage all community stakeholders effectively.
  - Recommendations: Extend consultation periods, engage broader community groups, and incorporate community feedback into planning.

### **5. Urban Design and Character Preservation**

- Maintaining Rural Character: Immediate urbanization could compromise Riverhead's rural character.
  - Recommendations: Redesign the structure plan for low to medium-density housing, preserve significant natural features, and establish clear growth boundaries.

### **6. Commercial Development**

- Opposition to Large Retail Centres: A large retail centre is inappropriate and disregards existing infrastructure.
  - Recommendations: Develop a smaller, integrated retail centre in close proximity to the existing shops and conduct comprehensive community consultation.

### **7. Archaeological and Historical Preservation**

- Inadequate Review: The current report lacks detailed analysis and preservation plans for significant archaeological sites.
  - Recommendations: Conduct comprehensive archaeological surveys and implement continuous monitoring and preservation efforts.

### **8. Contamination Risks**

- Identified Contaminants: Presence of heavy metals, pesticides, TPH, PAHs, and asbestos poses significant health risks.
  - Recommendations: Conduct thorough testing and remediation before development and implement strict health and safety measures.

### **9. Geotechnical Issues**

- Soil Stability Concerns: Predominantly clay soil requires significant stabilization efforts for high-density development.
  - Recommendations: Adopt phased development, use on-site soil treatment methods, and utilize geotextiles.

### **10. Landscape and Visual Effects**

- Lower Density Development: To preserve rural character, lower density residential development is recommended.
  - Recommendations: Relocate commercial areas closer to the town centre and expand public open spaces.

11. Arboricultural Assets

- Tree Protection and Maintenance: The report lacks detailed plans for maintaining and protecting existing large trees and vegetation these should be retained and utilised within proposed open space areas as much as possible.
  - Recommendations: Develop comprehensive maintenance plans and establish tree protection zones during construction.

12. Bias toward specific properties

The proposed plan change appears limited to specific properties and does not encompass the wider community or surrounding rural areas. This specificity suggests that the plan change functions more as a resource or development consent application put forward by a developer, rather than a comprehensive plan designed to provide long-term benefits to the entire community.

- Concerns:
  - The plan change does not sufficiently address broader community needs and future growth.
  - It focuses on specific developments rather than integrating a vision for Riverhead's overall development.
- Recommendations:
  - Develop a more inclusive plan that considers the wider community and surrounding rural areas.
  - Ensure the plan change benefits current residents and future generations by providing a holistic approach to development.

Recommendations to Auckland Council

- Delay Implementation: Postpone the plan change until 2028-2032 to allow for comprehensive infrastructure upgrades and planning. | 169.2
- Widen the scope of the plan change to include all of the existing village and surrounding rural areas. | 169.3
- Prioritize Infrastructure: Ensure critical infrastructure, particularly transport, water, wastewater, and educational facilities, is fully planned and funded before development. | 169.4
- Enhance Consultation: Extend and deepen community engagement to ensure the plan reflects current needs and concerns. | 169.5
- Sustainability and Preservation: Redesign plans to emphasize low to medium-density development, maintain rural character, and protect ecological and historical assets. | 169.6
- Broaden Scope: Expand the plan change to include broader community benefits and integrate surrounding rural areas into the development vision. | 169.7

By addressing these issues and recommendations, we can ensure a sustainable, well-planned future for Riverhead that meets community needs and preserves its unique rural character. For benefit of the reader I have included below my review of all application material for Council to consider as part of this plan change process.

Thank you for considering my submission.

Sincerely,

Adrian Low  
Jelas Drive, Riverhead

## Consultation Document Review

Contents of Reviews undertaken below:

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## Review of Plan change and S32 Assessment

The S32 assessment has a clear focus on the development as opposed to the outcomes required under the District Plan. Therefore under this circumstance opposition to Immediate Implementation of Riverhead Plan Change is the best method forward allowing for detailed analysis and planning.

Future Consideration of the plan change should be made after Critical Infrastructure is completed.

### Introduction

Immediate implementation of the proposed plan change for Riverhead is not supported, while expressing support for revisiting the plan change between 2028 and 2032. The opposition is grounded in current uncertainties surrounding critical infrastructure, regional planning consistency, and community impact. These concerns must be resolved before the plan change proceeds to ensure sustainable development that aligns with the existing Auckland Unitary Plan (AUP) policies and community expectations.

### Summary

The proposed plan change for Riverhead aims to rezone 80.5 hectares for urban activities, which involves significant development and infrastructural commitments. While the plan has potential benefits, current uncertainties regarding region-wide transport, education, wastewater, and water supply infrastructure pose substantial risks. A delay in the plan change until 2028-2032 would allow for these critical infrastructure components to be adequately planned, funded, and implemented, ensuring a cohesive and sustainable approach to Riverhead's development. Additionally, a phased approach would maintain the rural character and village nature of the area, integrate a single town centre, and align with broader regional planning objectives.

### Reasons for Delay

#### 1. Infrastructure Certainty

**Transport:** The current transport network is insufficient to support the proposed scale of development. Confirmed implementation dates and budgets for necessary transport upgrades are essential.

**Education:** Adequate educational facilities must be planned and funded to meet the needs of a growing population.

**Wastewater and Water Supply:** Reliable and sustainable wastewater and water supply systems are critical. These systems require confirmed implementation plans and budgets before development can proceed.

#### 2. Alignment with Council Policies and Plans:

The AUP emphasizes the need for integrated infrastructure planning and sustainable urban development. Delaying the plan change until infrastructure plans are finalized ensures alignment with these policies.

Maintaining the rural character and village nature of Riverhead is a key objective. Immediate urbanization could compromise these values, whereas a phased approach allows for thoughtful, community-centred development.

#### 3. Integrated Town Centre:

The current proposal includes multiple local centres, which could fragment the community and dilute the economic and social vitality of Riverhead. Developing a single, integrated town centre would better serve the community and support sustainable growth.

### Recommendations

1. Postpone the Plan Change: Delay the Riverhead plan change until 2028-2032 to ensure critical infrastructure is in place. Use this period to finalize and secure funding and implementation dates for transport, education, wastewater, and water supply infrastructure.
2. Infrastructure Planning: Prioritize infrastructure planning and integration to support the future growth of Riverhead. Establish clear timelines and budgets for all necessary infrastructure upgrades.
3. Maintain Rural Character: Develop guidelines to ensure that any future development maintains the rural character and village nature of Riverhead. Focus on sustainable, community-centred design principles.
4. Single Integrated Town Centre: Plan for a single, cohesive town centre that serves as the social and economic hub of Riverhead. This will foster a stronger sense of community and support sustainable growth.

### Conclusion

While the proposed plan change for Riverhead presents potential benefits, current uncertainties around critical infrastructure necessitate a delay. Postponing the plan change until 2028-2032 will allow for the necessary planning, funding, and implementation of essential infrastructure, ensuring sustainable and community-centred development. This approach aligns with existing council policies and plans, maintaining the rural character and village nature of Riverhead while preparing for future growth in a controlled and integrated manner.

By addressing these concerns and recommendations, Auckland Council can ensure a sustainable, well-planned future for Riverhead that meets the needs of its residents and aligns with broader regional planning objectives.

# Support in Principle but Opposition to Immediate Implementation of Riverhead Structure Plan

## Introduction

The Riverhead Structure Plan proposes significant urban development within the existing rural village of Riverhead. While there is necessity of growth, this memo outlines opposition to the immediate implementation of the plan. We strongly advocate for delaying the plan change until critical infrastructure upgrades, comprehensive planning, and detailed consultation are undertaken. This delay is crucial to ensure the plan aligns with the community's needs and preserves the unique character of Riverhead.

## Points of Opposition and Requests for Delay

### 1. Incomplete Infrastructure Development

- **Opposition:** The current infrastructure in Riverhead, particularly transportation, wastewater, and water supply systems, is inadequate to support the proposed urbanization.
- **Request:** Delay the plan change until all necessary infrastructure upgrades are completed and verified to ensure they can handle the increased demand. This includes the detailed planning and funding of these upgrades.

### 2. Pending Transport Network Upgrades

- **Opposition:** Planned upgrades to key roads and transportation networks are not yet fully funded or specified. There is significant concern about increased traffic congestion and safety issues.
- **Request:** Postpone the plan change until all transport network upgrades are fully planned, funded, and detailed with clear completion timelines. This includes ensuring that the transport network improvements are in place before any significant development begins.

### 3. Inadequate Consultation and Engagement

- **Opposition:** The consultation process has been insufficient, failing to fully engage with all community stakeholders and address their concerns effectively.
- **Request:** Extend the consultation period to ensure thorough engagement with residents, local businesses, and other stakeholders, allowing ample opportunity for their input and concerns to be addressed comprehensively.

### 4. Premature Urban Form and Design Principles

- **Opposition:** The proposed urban form, including higher density housing, threatens the existing village character and may lead to future expansion beyond the current plan change area.
- **Request:** Redesign the structure plan to include strict controls that limit urbanization to the proposed boundaries and ensure no future expansion into rural zones.

### 5. Protection of Rural Zoning and Village Character

- **Opposition:** The proposed plan change risks future re-zoning of adjacent rural lands, further eroding the village's character.
- **Request:** Implement policies that permanently protect surrounding rural areas from future urban development to maintain the village character indefinitely.

### 6. Insufficient Environmental and Ecological Impact Assessment

- **Opposition:** The environmental assessments provided do not fully address the potential impacts on local ecosystems, particularly wetlands and indigenous vegetation.
- **Request:** Conduct comprehensive environmental impact assessments and implement robust protection and enhancement measures before proceeding with the plan change.

## 7. Lack of Detailed Sustainability Measures

- Opposition: The current plan does not adequately address long-term sustainability, including measures to reduce carbon emissions and enhance local biodiversity.
- Request: Develop a detailed sustainability plan that includes clear targets for carbon reduction, increased green spaces, and comprehensive measures to protect and promote local biodiversity.

## Conclusion

While we support the idea of planned growth, the immediate implementation of the Riverhead Structure Plan presents significant challenges and potential adverse impacts on the community. It is essential to delay the plan change until key infrastructure work is completed, more detailed planning is undertaken, and broader, more inclusive consultation is conducted. This delay will ensure that the plan truly reflects and respects the aspirations of the Riverhead community and preserves its unique character.

## Recommendations

1. Delay the plan change until comprehensive infrastructure upgrades are fully planned, funded, and detailed.
2. Extend the consultation period to ensure thorough engagement with all community stakeholders.
3. Redesign the structure plan to limit urbanization to the proposed boundaries with no future expansion.
4. Implement policies to permanently protect surrounding rural zones and maintain the village character.
5. Conduct comprehensive environmental impact assessments and include robust protection measures.
6. Develop a detailed sustainability plan addressing carbon reduction, increased green spaces, and biodiversity protection.

By addressing these concerns and delaying the plan change, the Riverhead Structure Plan can better align with the community's needs and preserve the unique character of the Riverhead village.

Thank you for considering these points of opposition. We look forward to a revised plan that truly reflects and respects the aspirations of the Riverhead community, ensuring a sustainable and well-integrated development for the future.



## Review of AUP Review by Barkers:

This memo outlines the reasons for opposing the proposed Riverhead Plan Change and delaying the plan change from being implemented. Upon review, several issues within the Auckland Unitary Plan (AUP) indicate that proceeding with this development now is premature and potentially harmful. Specific planning rules and policies highlight significant concerns that warrant delaying the project until they are adequately addressed.

### Planning Rules and Policies Justifying Delay:

- **Urban Growth and Form (B2.2):**
  - Policy B2.2.2(1): The proposal does not clearly demonstrate that there is sufficient land within the Rural Urban Boundary to accommodate seven years of projected growth. This could lead to unsustainable urban sprawl.
  - Policy B2.2.2(2): The development may not support efficient land use and transport integration, risking misaligned infrastructure and increased reliance on private vehicles.
- **Quality Built Environment (B2.3):**
  - Policy B2.3.2(1)(a-f): The current plan lacks detailed strategies to ensure pedestrian and cyclist safety and amenity, essential for a quality built environment.
- **Residential Growth (B2.4):**
  - Policy B2.4.2(6): Infrastructure assessments indicate the existing systems (water supply, wastewater) are inadequate for the proposed development, necessitating significant upgrades.
- **Infrastructure (B3.2):**
  - Policy B3.2.2(4): The current infrastructure cannot support the proposed development without causing adverse effects, indicating a need for pre-emptive upgrades.
  - Policy B3.2.2(5): Potential constraints on infrastructure development and maintenance highlight the need for more thorough planning.
- **Transport (B3.3):**
  - Policy B3.3.2(5)(b): The proposal may increase private vehicle reliance, as it does not sufficiently integrate with existing public transport networks, exacerbating traffic congestion.
- **Freshwater Systems (B7.3):**
  - Policy B7.3.2(1)(a-d): Stormwater management plans may not adequately address potential adverse effects on local freshwater systems, necessitating stronger mitigation strategies.
- **Natural Hazards and Climate Change (B10.2):**
  - Policy B10.2.2(5): The northern portion of the Plan Change area faces significant flood risk, requiring comprehensive mitigation before development can proceed.

### Conclusion and Recommendation:

Based on the outlined concerns, it is recommended to delay the Riverhead Plan Change proposal. This will allow time for addressing critical infrastructure needs, integrating public transport, enhancing Mana Whenua engagement, and developing robust strategies for managing natural hazards and protecting freshwater systems.

### Recommendation:

Delay the approval and implementation of the Riverhead Plan Change until the following issues are resolved:

- Comprehensive infrastructure assessments and necessary upgrades.
- Better integration with public transport networks.
- Thorough and meaningful engagement with Mana Whenua, including documented agreements.
- Detailed mitigation strategies for natural hazards and freshwater systems.

Addressing these concerns will ensure the development aligns with the AUP's objectives, leading to a sustainable and well-planned urban expansion.

## Review of Urban Design Report

The Urban Design Statement prepared by Urban Acumen Ltd lacks sufficient detail in several critical areas, including community outcomes, infrastructure planning, and ways to maintain the unique character of Riverhead. It also fails to establish a clear growth boundary, which is essential for sustainable development.

### Evaluation of Current Document

#### **Lack of Content Around Community Outcomes:**

**Shortcoming:** The report does not adequately address the outcomes required by the community, leaving out vital community needs and priorities.

**Impact:** Without addressing community outcomes, the plan risks alienating residents and failing to meet their needs, leading to potential opposition and dissatisfaction.

#### **Insufficient Infrastructure Planning:**

**Shortcoming:** The report lacks detailed planning for key infrastructure components, including stormwater, wastewater, archaeology, and the protection of existing vegetation and open space.

**Impact:** Inadequate infrastructure planning can lead to environmental degradation, increased flooding risks, insufficient wastewater management, and loss of historical and natural resources.

#### **Failure to Emphasize Unique Character and Establish Growth Limits:**

**Shortcoming:** The report does not sufficiently emphasize Riverhead's unique character or recommend this plan change as the definitive limit of growth.

**Impact:** Without preserving Riverhead's unique character and setting clear growth limits, there is a risk of overdevelopment, loss of community identity, and degradation of the surrounding rural landscape.

### Recommendations

#### **Address Community Outcomes:**

**Recommendation:** Enhance community consultation processes to gather and integrate detailed input on community needs into the Urban Design Statement.

**Implementation:**

- Conduct comprehensive surveys, town hall meetings, and online forums to gather diverse community input.
- Synthesize the feedback to identify community priorities and concerns, and update the Urban Design Statement to explicitly address these outcomes.

#### **Develop Comprehensive Infrastructure Plans:**

**Recommendation:** Create detailed plans for all critical infrastructure components, ensuring sustainable practices and protection of heritage and natural resources.

**Implementation:**

- Develop strategies for stormwater and wastewater management, incorporating sustainable practices.
- Conduct archaeological surveys and establish a comprehensive vegetation and open space management plan.
- Form a task force including engineers, environmental scientists, and heritage experts to oversee planning and implementation.

**Emphasize Unique Character and Establish Growth Limits:**

Recommendation: Highlight Riverhead's historical, cultural, and natural aspects in the Urban Design Statement. Establish a permanent growth boundary and ensure surrounding rural areas remain zoned as rural.

**Implementation:**

- Ensure design guidelines reflect and enhance Riverhead's existing aesthetic and cultural heritage.
- Clearly define and enforce a growth boundary, securing commitments from planning authorities to maintain these limits.
- Update zoning maps and local planning documents to reflect the established growth boundary and maintain the rural zoning of surrounding areas.

**Conclusion and Recommendation**

The current Urban Design Statement for the Riverhead Plan Change is inadequate as it fails to address crucial areas such as community outcomes, infrastructure planning, and maintaining Riverhead's unique character. It is essential to revise the document to include comprehensive community consultation, detailed infrastructure planning, and clear growth boundaries.

**Recommendation:**

The Riverhead Landowner Group should commission a revision of the Urban Design Statement to incorporate the recommendations outlined above. This will ensure the plan aligns with community needs, supports sustainable development, and preserves the unique character of Riverhead for future generations.

# Review of Proposed Retail Area in Riverhead

## Introduction

We oppose the conclusions and recommendations of the Riverhead Retail Assessment Report, which advocates for the development of a large retail centre in Riverhead. The proposed retail development disregards the existing community infrastructure and amenities, and lacks sufficient community consultation.

This opposition provides clear reasons why a large retail area is inappropriate and offers recommendations for a more community-centred approach.

## Key Reasons for Opposition

### Existing Infrastructure and Amenities:

- Riverhead already has significant community infrastructure, including public sports fields, open spaces, the RSA, a bowling club, petrol stations, tennis courts, existing shops, and other public amenities.
- A large retail centre separate from the existing assets and centre would disrupt the current balance and create an imbalance with existing facilities, leading to loss of the small-town charm that Riverhead residents value.

### Community Consultation:

- The original report lacks comprehensive community consultation. The voices and preferences of Riverhead residents should be central to any development plans.
- It is crucial to engage with the entire community to determine the appropriate size and types of retail shops needed and to decide on their optimal locations.

### Economic and Social Impact:

- A large retail centre could have adverse economic impacts on existing small businesses by diverting foot traffic and sales to larger stores.
- The social fabric of Riverhead could be negatively affected by increased traffic, noise, and potential environmental impacts associated with a larger development.

## Recommendations

### Smaller, Integrated Retail Centre:

- Develop a smaller retail centre next to the existing public sports fields, open spaces, RSA, bowling club, petrol stations, tennis courts, and other amenities.
- This approach would enhance the existing community infrastructure and provide convenience without overwhelming the local environment.

### Comprehensive Community Consultation:

- Initiate a thorough consultation process with all Riverhead residents to gather input on the desired scale and type of retail development.
- Use surveys, public meetings, and focus groups to ensure a wide range of opinions are considered.

### Full Review of the Existing Report:

- Conduct a full review of the current retail assessment report to address its shortcomings and biases.
- Ensure that the revised report incorporates community feedback and aligns with the long-term vision for Riverhead's development.

## Conclusion

The proposed large retail centre in Riverhead, as recommended in the Property Economics report, is inappropriate for the community's needs and disregards existing amenities and infrastructure. A smaller, community-integrated retail centre, developed through comprehensive consultation with Riverhead residents, is a more suitable approach. We call for a full review of the existing report to ensure future developments are truly reflective of the community's desires and sustainable growth.

## Review of Transportation Assessment

There is a significant lack of current roading infrastructure in Riverhead, which results in major capacity issues and congestion. The purpose is to summarize the findings from the road network assessment, outline proposed improvements and their timeline, and provide clear recommendations. Emphasis is placed on ensuring that no plan change or development should commence without first upgrading the major and minor arterial roads to guarantee network capacity and safety for locals and users.

### Existing Road Network Issues

#### Current Capacity and Safety Concerns:

- Congestion: State Highway 16 (SH16) and Coatesville-Riverhead Highway experience severe congestion during peak hours.
- Safety Issues: Several intersections, including SH16/Coatesville-Riverhead Highway, are prone to accidents due to high traffic volumes and inadequate road design.
- Insufficient Infrastructure: The existing road network lacks the capacity to support current traffic demands, let alone future growth from potential developments.

### Summary of proposed Improvements and Timeline

#### SH16 Brigham Creek to Waimauku Upgrade:

- Components: Four-lane expansion, new roundabout at Coatesville-Riverhead Highway/SH16 intersection, and a shared path from Brigham Creek Road to Kumeu.
- Status: Detailed design completed; resource consent and Notice of Requirement lodged.
- Timeline: Prioritized funding for 2021-2025, with completion expected by 2025.

#### SH16 Northwest Bus Improvements:

- Components: Introduction of a Northwest Express bus service, interim bus interchange facilities at key locations, and enhanced bus shoulder lanes.
- Long-term Vision: Development of a rapid transit solution for the Northwest corridor to Kumeu.
- Timeline: Initial improvements scheduled under the Regional Land Transport Plan (RLTP) 2021-2031.

#### Supporting Growth Programme:

- Components: Road and safety improvements on Coatesville-Riverhead Highway, focusing on route protection and future urban transition.
- Timeline: Designation process underway, but no immediate funding for construction; potential involvement of developers in early stages.

#### Internal Road Network and Design Philosophy:

- Guidelines: Adherence to Auckland Transport's Roads and Streets Framework (RASf) and Vision Zero principles.
- Speed Limit Reductions: Proposed reductions on key roads to improve safety.
- Road Typologies: Design of collector and local roads to ensure low-speed, safe environments for all users.

### Implementation Plan

- Phased Upgrades: Key infrastructure upgrades to be completed before the occupation of new developments.
- Developer Involvement: Opportunity for developers to take into account all proposed road infrastructure upgrades this will contribute to early-stage roading upgrades to mitigate impacts and ensure safety.

### Recommendations

#### Prioritize Safety and Capacity Upgrades:

- Major upgrades to SH16/Coatesville-Riverhead Highway intersection and surrounding road network must be completed before any new development begins.
- Implement road widening, new roundabouts at all major intersections in the surrounding area, enhance pedestrian and cycling facilities to alleviate congestion and improve safety.

**Conditional Development Approval:**

- No plan change or development should proceed without ensuring the completion of critical road network upgrades.
- Establish stringent criteria in the Precinct Plan provisions to enforce these requirements.

**Monitor and Adapt:**

- Continuously monitor traffic conditions and safety outcomes.
- Adjust the implementation plan as needed to address emerging issues and ensure alignment with long-term transport strategies.

**Conclusion**

The existing road network in Riverhead is currently inadequate, leading to significant congestion and safety issues. The proposed improvements are essential to support future growth and enhance the transport network's capacity and safety.

Therefore, it is crucial that these upgrades are prioritized and completed before any new developments commence. This approach will ensure a safe and efficient transport system for current and future residents.



## Review of Ecological Values Assessment

### Intensify and Specify Investigations

The report needs a more detailed and specific investigation. Conduct thorough mapping and high-resolution surveys of all ecological features, identifying significant areas for retention and protection. Seasonal assessments should be included to capture comprehensive biodiversity data.

### Enhance and Protect Ecological Areas

#### Streams and Wetlands:

- Establish buffer zones to protect water quality and habitats.
- Restore degraded areas with native vegetation and invasive species control.

#### Vegetation:

- Retain mature trees and indigenous vegetation.
- Protect these areas during construction and integrate them into the landscape.

#### Wildlife Habitats:

- Create wildlife corridors and natural features to support native fauna.
- Focus on habitats for copper skinks and bats.

### Incorporate Protection into Open Spaces

#### Open Spaces:

- Design parks around key ecological features for passive recreation and education.

#### Walkways and Cycleways:

- Develop paths that integrate with and protect ecological areas.
- Use interpretive signage to educate the public.

#### Biodiversity Retention:

- Preserve existing biodiversity, including stands of trees and significant flora.
- Implement management plans with regular monitoring and maintenance.

### Recommendations for Improvement

1. Conduct Detailed Surveys: Perform comprehensive, high-resolution ecological surveys.
2. Develop Protection Plans: Create detailed plans for streams, wetlands, and significant vegetation.
3. Integrate with Urban Design: Collaborate with urban planners to incorporate green spaces and ecological features.
4. Engage Community: Involve the local community in conservation efforts.
5. Monitor and Adapt: Establish a monitoring program to track and adjust conservation practices.

By following these recommendations, the Riverhead Private Plan Change can improve ecological outcomes, enhance biodiversity, and create a sustainable environment.

## Review of Stormwater Reporting

The current stormwater management plan for the Riverhead Future Urban Zone has major shortcomings in light of the overall plan change proposed. Given recent extreme weather events and ongoing infrastructure developments, the plan requires significant updates to address several shortcomings.

### Key Issues Identified

#### 1. Inadequate Consideration of Maximum and Peak Flow Events

The stormwater report does not adequately account for maximum and peak flow events, which have become more frequent and severe due to intensification and increased impervious surfaces. Recent events in Kumeu and surrounding areas have demonstrated the devastating impact of such flows, highlighting the need for more robust flood management strategies.

#### 2. Outdated Report

The report, dated March 2022, needs updating to reflect current data and conditions. The rapid pace of urban development and climate change necessitates more frequent reviews to ensure stormwater management strategies remain effective and relevant.

#### 3. Proposed Road Widening by NZTA

The report fails to account for the proposed road widening by the New Zealand Transport Agency (NZTA). This significant infrastructure change will alter surface runoff patterns and volumes, necessitating a reassessment of stormwater management strategies to mitigate potential impacts.

#### 4. Misalignment with Tree Protection, Archaeological Plans, and Open Spaces

The current plan does not align properly with tree protection and archaeological plans, nor does it integrate adequately with open space areas. Effective stormwater management must consider and incorporate these elements to ensure a holistic and sustainable approach.

#### 5. Downstream Consequences of Peak Flow Protection

The report does not sufficiently outline the downstream consequences of peak flow protection measures. Without a comprehensive understanding of these impacts, downstream areas may face increased flood risks, undermining the overall effectiveness of the stormwater management plan.

#### 6. Recent Flooding in Riverhead

Significant flooding in Riverhead from recent storm events has not been taken into account. This oversight suggests that the current stormwater management strategies are inadequate for dealing with such extreme weather conditions, necessitating a thorough review and update.

### Required Actions

1. **Comprehensive Update:** The stormwater management plan must be revised to incorporate data from recent peak flow events, reflecting the latest understanding of stormwater dynamics in the region.
2. **Integration with NZTA Plans:** Incorporate the proposed road widening by NZTA into the stormwater management strategy, assessing and mitigating any potential impacts.
3. **Alignment with Environmental and Heritage Plans:** Ensure the plan aligns with tree protection measures, archaeological considerations, and the integration of open spaces.
4. **Downstream Impact Assessment:** Conduct a detailed assessment of the downstream impacts of proposed peak flow protection measures, ensuring they do not exacerbate flood risks.
5. **Reflect Recent Flood Events:** Incorporate lessons learned from recent flooding in Riverhead to enhance the resilience and effectiveness of the stormwater management strategy.

### Conclusion

The current stormwater management plan for the Riverhead Future Urban Zone requires a significant review and update to address critical shortcomings. Incorporating recent data, aligning with infrastructure developments, and considering environmental and heritage plans are essential steps in developing a robust and sustainable stormwater management strategy.

# Review of Water and Wastewater supply issues

## 1. Water Supply: Existing Capacity and Required Infrastructure

### Existing Capacity

The current water supply network in Riverhead is inadequate for the proposed development, relying on a single pipeline that lacks the necessary capacity and resilience.

### Required Infrastructure

A second water main is required from the Reservoir at 403 Old North Road, Huapai, into Riverhead. This duplicate pipeline, recommended to run along Deacon Road and Riverhead Road, will provide the additional capacity and resilience needed. Local water reticulation must adhere to the Watercare Code of Practice, with detailed designs submitted for approval.

### Recommendations:

1. Construct a second water main from the Reservoir at 403 Old North Road, Huapai, into Riverhead, along Deacon Road and Riverhead Road. This watermain must be constructed prior to the commencement of any additional development in the area.
2. Ensure local water reticulation designs adhere to the Watercare Code of Practice and obtain necessary approvals.

## 2. Wastewater Supply: Existing Capacity and Required Infrastructure

### Existing Capacity

The existing Riverhead Wastewater Pump Station (WWPS) and rising main can service an additional 1,000 DUE after the abandonment of Tamiro WWPS (scheduled for October 2025). Prior to this, the network can only service up to 500 DUE.

### Required Infrastructure

To accommodate the proposed development, the following upgrades are essential:

- Installation of larger pumps to increase the pump duty point to 75 L/s at 69m pump head.
- Construction of an additional 150m<sup>3</sup> of operational storage.
- Implementation of a smart pressure sewer system for the retirement village, programmed to avoid peak periods, allowing for servicing an additional 1,000 DUE post-abandonment of Tamiro WWPS.

### Recommendations:

1. Install larger pumps at the Riverhead WWPS to increase the pump duty point to 75 L/s at 69m pump head.
2. Construct an additional 150m<sup>3</sup> of operational storage.
3. Implement a smart pressure sewer system for the retirement village, ensuring it operates outside peak periods.

## Conclusion

The current water and wastewater networks in Riverhead are inadequate for the proposed development of 1,861 DUE. Significant infrastructure upgrades are required:

- A second water main to ensure sufficient capacity and resilience.
- Upgrades to the wastewater system, including larger pumps, additional storage, and a smart pressure sewer system.

No residential development should proceed until these critical infrastructure upgrades are completed.

## Review of Electricity provision from Vector (and Transpower)

### Key Points:

#### Outdated Report:

- The current supply availability report from Vector Limited, dated 5 April 2022, is over two years old.
- An updated assessment is required to reflect any changes in the network capacity and to confirm the feasibility of the proposed electrical supply for our project.

#### Underground Installation Requirement:

- For safety, landscape, and aesthetic reasons, all new high voltage (HV) and low voltage (LV) lines must be installed underground.
- This measure is essential to enhance the overall appeal and safety of the development.

#### Cost Estimate:

- An updated cost estimate for the installation of underground HV and LV cables and equipment is needed.
- The estimate should cover the entire project, including the anticipated 1,000-1,500 residential dwellings, a 500-unit retirement village, a supermarket, other small retail units, and a school.

#### Safe Distances from National Grid Corridor:

- The development must comply with international standards for safe distances from high voltage transmission lines.
- Residential homes should be located at least 90 meters away from 240kV lines to ensure safety.
- No homes should be built within this 90-meter safety zone from the Transpower national grid corridor.
- The proposed plan change should ensure zoning reflects this safety element and zoning under or near these lines should be prioritised as part of the plan change process.

### Action Required:

- Vector Limited is requested to provide an updated supply availability report and a detailed cost estimate for the required underground installations.
- Contact and communication with Transpower. Confirmation of compliance with safe distance requirements from the Transpower national grid corridor.
- Please prioritize this issue to ensure the timely progression of the Riverhead development project.

# Review of Archaeological Sites Preservation during Development

## Introduction

The current archaeological report for the proposed Riverhead Structure Plan and Plan Change area lacks comprehensive content and detailed analysis, particularly regarding the identification and preservation of significant archaeological sites. To address these deficiencies and ensure thorough protection of the area's heritage, we propose the following actions.

## Intensive Archaeological Review and Search

### Comprehensive Archaeological Surveys:

- Conduct detailed subsurface testing and geophysical surveys across the entire development area before any construction begins to identify buried archaeological features that may not be visible on the surface.

### Ongoing Monitoring:

- Implement continuous archaeological monitoring during all ground-disturbing activities, ensuring any new finds are promptly identified and recorded.

### Focus on both Māori and European Settlement Sites:

- Prioritize the identification and preservation of sites related to both early Māori and European settlement. Significant sites already identified include:
  - Riverhead Mill Water Race (R10/721): Part of the mid-19th-century milling operations, crucial to understanding the industrial history of the area.
  - Former 19th-Century Ellis House Site (R10/1537): Provides insights into the residential patterns and lifestyle of early European settlers.
  - Te Taonga Waka Portage Route: A traditional Māori canoe portage of great cultural significance, traversing the northern half of the Plan Change area.
  - Other potential unrecorded Māori and European sites: Given the historical use of the area by both communities, efforts should be made to identify and preserve any additional sites that may be discovered during development.

## Incorporation into Open Space Areas

### Preservation of Identified Sites:

- Preserve any discovered archaeological sites in situ where feasible, incorporating them into open space areas within the development plan.

### Creation of Heritage Reserves:

- Designate specific areas as heritage reserves, especially around significant sites like the Riverhead Mill water race and the Ellis house, to protect these areas and enhance their cultural value.

## Information Signage and Historical Interpretation

### Informational Signage:

- Install signs and panels at key archaeological sites detailing their historical significance, focusing on the role of both Māori and European settlers.

### Educational Programs:

- Develop educational programs and guided tours to enhance public awareness and appreciation of the area's archaeological heritage.

## Key Actions and Implementation

### Detailed Archaeological Assessment:

- Conduct detailed assessments, including geophysical surveys and targeted excavations, before any development begins.

### Archaeological Management Plan:

- Develop an Archaeological Management Plan (AMP) outlining procedures for site monitoring, recording, and preservation during construction.

### Heritage Consultation:

- Engage with Heritage New Zealand Pouhere Taonga and local iwi to ensure compliance with national standards and respect for cultural values.

**Integration into Development Plans:**

- Modify development plans to incorporate identified archaeological sites into public open spaces and heritage reserves.

**Community Involvement:**

- Involve the local community in preservation efforts through public meetings, volunteer opportunities, and collaboration with local historical societies.

By implementing these recommendations, we can ensure the thorough protection and appreciation of Riverhead's rich archaeological heritage, particularly the significant sites related to both Māori and European settlement. This approach will protect valuable historical resources and enrich the cultural fabric of the community.



## Review of Contamination Investigation

The preliminary and detailed site investigation for the Riverhead development reveals several contaminants of concern: heavy metals, organochlorine pesticides, total petroleum hydrocarbons (TPH), polycyclic aromatic hydrocarbons (PAHs), and asbestos. These contaminants pose significant risks to residents, including severe health issues such as developmental problems, cancer, organ damage, and respiratory diseases.

### Risks of Contaminants to Residents

- **Heavy Metals:** Exposure can lead to serious health problems, including developmental issues in children, kidney damage, and neurological disorders.
- **Organochlorine Pesticides:** These chemicals pose high risks of cancer, reproductive disorders, and endocrine disruption, significantly impacting human health.
- **Total Petroleum Hydrocarbons (TPH):** Long-term exposure can cause liver and kidney damage, and several compounds within TPH are known to be carcinogenic.
- **Polycyclic Aromatic Hydrocarbons (PAHs):** These are potent carcinogens that can cause skin, lung, and bladder cancer, posing a severe risk to residents.
- **Asbestos:** Inhalation of asbestos fibers can result in deadly diseases such as lung cancer, mesothelioma, and asbestosis, making it highly dangerous for residential areas.

### Mitigation and Disposal Methods

- **Heavy Metals:** Mitigation methods include soil washing and stabilization, with contaminated soil requiring disposal at hazardous waste landfills.
- **Organochlorine Pesticides:** These can be managed through bioremediation and incineration to reduce their hazardous impact.
- **Total Petroleum Hydrocarbons (TPH):** Contamination can be addressed via bioremediation and soil vapor extraction, with disposal at designated facilities.
- **Polycyclic Aromatic Hydrocarbons (PAHs):** Bioremediation and thermal treatment are necessary, typically requiring incineration due to their carcinogenic nature.
- **Asbestos:** Effective mitigation involves encapsulation, controlled removal, and disposal at licensed sites to prevent exposure.

### Additional Testing Required

- **Soil Testing:** Comprehensive testing across the site to identify contamination hotspots, with periodic re-testing to ensure ongoing safety.
- **Groundwater Testing:** Regular monitoring to assess and prevent contamination of groundwater sources.
- **Air Quality Testing:** Monitoring for asbestos fibers and volatile organic compounds (VOCs) to protect air quality.
- **Surface Water Testing:** Ensuring that runoff water from the site does not carry harmful contaminants.

### Recommendations for Residential Use

1. **Land Use Planning:** Avoid residential development on highly contaminated areas unless thoroughly remediated.
2. **Health and Safety Measures:** Implement strict guidelines for construction workers and provide safety information to residents.
3. **Remediation Before Development:** Complete all necessary remediation activities before residential construction, verified by an independent environmental consultant.
4. **Post-Development Monitoring:** Establish a long-term environmental monitoring plan to ensure ongoing safety, with regular reviews and updates based on new data.
5. **Community Engagement:** Involve the community in the planning and remediation process, maintaining transparency about findings and actions taken.

## Review of Geotechnical Report by Byron Smith & Dave Ouwejan

### 1. Current Ground and Soil Condition

The current soil condition on the proposed 81-hectare land is predominantly clay with some sandy patches. The topsoil is relatively shallow, with a mix of organic material and clay, leading to moderate drainage issues.

### 2. Suitability and Impact of Residential Development

The intensity of residential development will require significant soil stabilization efforts due to the clay content, which can lead to foundation issues if not managed properly. High-density development will exacerbate these issues, requiring enhanced engineering solutions such as deep foundations or soil replacement. Low to medium density development is more suitable, minimizing soil disturbance and the need for extensive soil modification.

### 3. Estimation of Soil Removal

To make the 81 hectares suitable for residential housing, an estimated 400,000 cubic meters of soil may need to be excavated. This figure considers the removal of unsuitable clay layers and the replacement with more stable soil to ensure proper foundation support.

### 4. Disturbance from Truck Movements

The removal of 400,000 cubic meters of soil will result in approximately 25,000 truck trips, assuming each truck can carry 16 cubic meters of soil. This will cause significant disturbance, including noise, dust, and traffic congestion, particularly if the site is near residential or commercial areas.

### 5. Soil Retention Method

To retain soil volumes within the area and utilize them for open spaces:

- **Create Terraced Landscaping:** Use the excavated soil to create terraced parks and recreational areas within the development.
- **Fill for Green Spaces:** Use the soil for raising the level of parks, playgrounds, and other open spaces, reducing the need to transport soil off-site.
- **Construct Berms and Sound Barriers:** Utilize excess soil to build berms around the development, which can also serve as sound barriers against nearby traffic.

### Additional Recommendations

1. **Phased Development:** Implementing a phased development approach can minimize immediate soil disturbance and allow for gradual soil stabilization.
2. **On-site Soil Treatment:** Consider on-site soil treatment methods, such as lime stabilization, to improve the soil's load-bearing capacity without extensive removal.
3. **Use of Geotextiles:** Employ geotextiles and other modern engineering techniques to enhance soil stability and reduce the need for soil replacement.
4. **Community Engagement:** Engage with the community to inform them about the development process and mitigate concerns related to noise, dust, and traffic.
5. **Avoid any soil excavation or modifications around archaeological and vegetation areas or sites**

By adopting these measures, the development could proceed with reduced costs, minimized environmental impact, and lower disturbance to the surrounding area.

## Review of Landscape and Visual Effects report from Boffa Miskell

### Lower Density Development and Preservation of Rural Character

To align the proposed plan change with community aspirations and maintain the rural village character of Riverhead, we recommend the following key adjustments:

#### Lower Density Residential Development:

- **Adjust Zoning:** Remove the extent of Terraced Housing and Apartment Building Zone (THAB) and emphasize Mixed Housing Suburban (MHS) and Single House Zone (SHZ) to maintain lower density.
- **Transition Zones:** Implement a gradient of density, with higher-density housing close to the existing town centre, transitioning to lower-density housing at the rural periphery.

#### Relocate Commercial Areas:

- **Closer to Town Centre:** Move the proposed Business – Neighbourhood Centre Zone (BNC) and Business – Local Centre Zone (BLC) closer to the existing Riverhead Town Centre to consolidate commercial activities and strengthen the community hub.
- **Enhance Accessibility:** Ensure relocated commercial areas are accessible by pedestrians, cyclists, and public transport to reduce traffic congestion and enhance connectivity.

#### Maintain Rural Village Character:

- **Landscape Integration:** Preserve significant natural features and integrate them as green corridors and open spaces to provide ecological buffers.
- **Design and Form:** Encourage architectural styles and materials that reflect the rural character, using natural materials and designs sympathetic to the village scale.
- **Expand Open Spaces:** Increase public open spaces, parks, community gardens, and walking trails to maintain the rural atmosphere.

#### Retain Rural Character:

- **Vegetation and Planting:** Retain existing mature trees and incorporate new native planting, shelterbelts, and hedgerows to enhance biodiversity.
- **Building Setbacks:** Implement greater building setbacks from roads and property boundaries to maintain a sense of space and openness.
- **Preserve Agricultural Heritage:** Incorporate historical features and promote local history to preserve elements of the area's agricultural heritage.

#### Maintain Rural Buffer Zone:

- **Widen Plan Change:** Include a provision to maintain a significant area within a 5-10km radius as rural to preserve the village's rural form and character.
- **Rural Buffer:** Ensure that surrounding areas remain designated as rural to provide a clear boundary and transition from urban to rural landscapes, maintaining the village's identity and rural ambiance.

### Conclusion

By adopting these recommendations, the proposed development can better align with the existing rural village character of Riverhead, ensuring a cohesive, sustainable, and attractive community that respects its rural roots while accommodating future growth. Maintaining a significant rural buffer zone will further preserve the village's rural form and character.

## Response to the Arboricultural Assessment Report

The Report “Arboricultural Assessment for the Riverhead Plan Change” is comprehensive however excludes key advice about how to retain and protect key features of the Riverhead rural village character. I appreciate the detailed inventory of trees and vegetation and analysis provided.

However, there are several key issues that need further consideration to ensure the sustainable integration of the existing arboricultural assets into the development. Below are specific areas that require attention:

### 1. Maintenance of Large Trees, Stands of Trees, and Shelter Belts

Issue: The report lacks a detailed plan for the ongoing maintenance of large trees, stands of trees, and shelter belts.

Recommendations:

- **Maintenance Plans:** Develop comprehensive maintenance plans for large trees, stands of trees, and shelter belts to ensure their health and longevity. This should include regular pruning, pest control, soil management, and watering schedules.
- **Monitoring:** Implement a long-term monitoring program to regularly assess tree health and respond promptly to any signs of decline or disease.

### 2. Protection of Trees During Construction

Issue: While the report mentions the importance of tree protection, it does not detail the specific measures to be taken during the construction phase.

Recommendations:

- **Tree Protection Zones (TPZ):** Establish and enforce Tree Protection Zones around all significant trees and stands. These zones should be marked clearly on-site and in construction plans.
- **Physical Barriers:** Install physical barriers (e.g., fencing) around TPZs to prevent machinery and workers from entering these areas.
- **Construction Guidelines:** Provide specific guidelines to contractors regarding activities near TPZs, such as restricting excavation, avoiding heavy machinery traffic, and prohibiting storage of materials within these zones.
- **Arborist Supervision:** Require on-site supervision by a qualified arborist during critical construction phases to ensure compliance with tree protection measures.

### 3. Designing Transport Routes, Infrastructure, and Housing to Accommodate Trees

Issue: The report does not address how the design of transport routes, infrastructure, and housing will accommodate existing trees.

Recommendations:

- **Tree-Friendly Design:** Integrate existing trees into the design of transport routes and infrastructure. For example, roads and paths can be curved around significant trees rather than removing them.
- **Root Protection:** Use construction techniques that protect tree roots, such as bridging over root zones or using permeable materials to allow water and air to reach the roots.
- **Setbacks:** Ensure adequate setbacks of buildings from large trees to allow for root expansion and canopy growth without future conflicts.

### 4. Inclusion of Large Existing Trees in Public Open Spaces

Issue: The report does not provide a clear strategy for incorporating large existing trees into public open spaces.

Recommendations:

- **Public Space Design:** Design public open spaces to incorporate large existing trees as focal points, providing natural shade and enhancing the aesthetic and ecological value of the spaces.
- **Community Engagement:** Involve the community in planning public spaces to ensure that the preservation of large trees aligns with public preferences and recreational needs.
- **Interpretive Signage:** Install signage to educate the public about the importance and history of the existing trees, fostering a sense of stewardship and appreciation.

## Conclusion

Integrating these recommendations into the development plan will help ensure that the Riverhead Plan Change not only accommodates the existing arboricultural assets but also enhances the overall sustainability and livability of the area. We look forward to further collaboration and to seeing these considerations reflected in the final development plans.

## Concerns Regarding Consultation Process and Feedback

I have concerns regarding the consultation process detailed in the "Riverhead Structure Plan and Plan Change Consultation Summary Report" dated 5 December 2022. While the effort to engage with various stakeholders is appreciated, several critical issues need to be addressed to ensure comprehensive and inclusive community planning.

### 1. Issues Highlighted in the Feedback

#### 1. Lack of Schools in the area:

- Issue: The majority of the feedback expressed significant concerns about lack of education facilities to accommodate additional children and students.
- Recommendation: A detailed education capacity report in conjunction with Ministry of Education should be conducted, with clear plans and timelines for educational improvements

#### 2. Traffic and Infrastructure Concerns:

- Issue: The majority of the feedback expressed significant concerns about traffic congestion and the need for infrastructure upgrades to accommodate additional traffic volumes. Public transport provision and facilities for active modes such as cycling and walking were highlighted as critical priorities.
- Recommendation: A detailed traffic impact assessment should be conducted, with clear plans and timelines for infrastructure improvements. Additionally, increased collaboration with Auckland Transport and Waka Kotahi NZ Transport Agency is necessary to address these concerns effectively.

#### 3. High-Density Housing:

- Issue: There is strong opposition to high-density housing developments, with many residents expressing a desire to avoid becoming similar to areas like Hobsonville Point, Whenuapai, and Kumeu.
- Recommendation: The plan should include clear zoning regulations that limit high-density housing and prioritize low to medium-density developments that align with the existing character of Riverhead. Community workshops could be held to co-design housing plans with residents.

#### 4. Commercial Development:

- Issue: The community expressed strong opposition to 'strip mall' developments along Coatesville-Riverhead Highway, preferring commercial areas set back from the main highway.
- Recommendation: The commercial development plan should be revised to reflect community preferences, with input from urban design experts to ensure aesthetically pleasing and functional commercial spaces that blend with the village character.

### 2. Length of Time Since Consultation

Issue: The consultation process, as detailed, includes meetings dating back to early 2021. The significant time lapse between initial consultations and the finalization of the report could mean that some community concerns or priorities may have evolved.

Recommendation: A follow-up round of consultations should be conducted to ensure that the feedback is current and reflective of the community's present needs and concerns. This should include updates on how previous feedback has been incorporated into the planning process.

### 3. Lack of Wider Consultation with Different Community Groups

Issue: The report indicates limited engagement with broader community groups such as sports clubs, RSA (Returned Services Association), Bowling Club, and varying age demographics, particularly the elderly and youth.

Recommendation: A targeted outreach strategy should be implemented to engage these groups. This can include:

- Sports Clubs: Engage with local sports clubs to understand their needs for recreational spaces and facilities.
- RSA and Bowling Club: Consult with these organizations to incorporate their needs and preferences into the community planning.
- Youth and Elderly: Hold specific focus groups with youth organizations and elderly residents to gather their unique perspectives and requirements.

## Conclusion

Addressing these issues requires a more inclusive, updated, and comprehensive consultation approach. By actively involving all community segments and updating the plan based on current feedback, we can ensure that the Riverhead Structure Plan and Plan Change truly reflect the needs and aspirations of all its residents. Thank you for considering these concerns. I look forward to your response and a revised approach that includes wider community engagement and addresses the highlighted issues.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Roderick Bruce Simpson  
**Date:** Friday, 17 May 2024 10:45:19 am

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Roderick Bruce Simpson

Organisation name:

Agent's full name:

Email address: rodo.simpson@gmail.com

Contact phone number: 021664090

Postal address:  
 2 Crabb Fields Lane  
 Riverhead  
 Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:  
 The land identified in private land change by Riverhead Land Owner Group

Property address: 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:  
 The negative effects on transport, roading, character of Riverhead, sewerage reticulation and storm water reticulation.

I or we seek the following decision by council: Decline the plan change

170.1

Submission date: 17 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
 No



**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - John Armstrong  
**Date:** Friday, 17 May 2024 10:45:20 am

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: John Armstrong

Organisation name:

Agent's full name:

Email address: johnarmstrongconstruction2012@gmail.com

Contact phone number: 0272742717

Postal address:  
 32 Crabbfields lane  
 Riverhead  
 Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:  
 Water control around the Wautaiti stream

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
 I there is no remedy to clearing the stream there should be no further development None

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

171.1

Details of amendments: Water control

171.2

Submission date: 17 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Bernard Tye](#)  
**To:** [Unitary Plan](#)  
**Subject:** Make Submission  
**Date:** Friday, 17 May 2024 10:51:27 am

---

Hello I wish to support the submission by the Riverhead Community Association to the proposed Riverhead North development .

I endorse all the requests asked by the RCA be seriously considered and the Auckland council a dear to the legal requirements to have a through assessment of the concerns of the aesthetic effects of the development and the mitigation of flooding from poor designed rain water management .

Regards Mr Bernard Tye

7 Kent Street Riverhead

Sent from my iPad

172.1

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Nathan Brown  
**Date:** Friday, 17 May 2024 11:00:32 am  
**Attachments:** [Riverhead Submission.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Nathan Brown

Organisation name:

Agent's full name: Nathan Brown

Email address: nathanbrown.nz@gmail.com

Contact phone number:

Postal address:

13 Floyd Road

Riverhead 0820

Riverhead 0820

Riverhead

Riverhead 0820

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:

Optional

Property address: OPTIONAL

Map or maps: OPTIONAL

Other provisions:

OPTIONAL

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

Concern for the current residents and environment

I or we seek the following decision by council: Decline the plan change

173.1

Submission date: 17 May 2024

Supporting documents

Riverhead Submission.pdf

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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While I am not inherently opposed to development of land, this needs to be met with caution particularly in Riverhead.

The developers intent is profit, not building a better Riverhead or surrounding NorthWest Auckland. Profit flies in the face of doing what is right for the community, as what is needed will cost money. This is obvious in their plans that do not have explicit and clearly defined intentions but vague wording that can later be scaled back.

We are already plagued with many infrastructure problems that will only be exasperated by rapid development.

### **Stormwater/Flooding**

The recent flooding events (3 in 2 years!) significantly impacted Riverhead residents of which we are one. Auckland Council representatives have told us in meetings that we need to expect more of these 1 in a 100 year events. The plan from the development group does nothing to address this increasing issue and will only exasperate the problem, turning permeable agriculture land into housing. All stormwater needs to be planned to be self contained within the development in the event of **more than 1 in 100 year event** as the current infrastructure and environment does not support these events without further development. Auckland Council has already used this as part of the initial rejection of this development plan, and little has been done to address this in this resubmission.

### **Wastewater**

Riverheads semi-self contained wastewater 'feature' often fails during moderate rain events. The entire network cannot cope due to poor design and limited scope of expansion. The plans need extensive provisions to improve this without additional burden to the current failing system. note, it costs residents \$150 every time the alarm goes off, unlike most other suburbs that use this system it is not managed by Watercare but is the resident/homeowners responsibility.

### **Transport**

The entire roading network in the north west has not been developed at the same pace as population growth. The main arterial route into Riverhead (Riverhead-Coatesville Highway) is the same design as it was 60 years ago. This arterial route has significant standstill blockages already (typically from 630 am – 930am!), not to mention SH16 which it feeds into is often at a standstill during peak times.

This development will require significant heavy vehicle movements for a long period of time. The areas congestion is already significant, and the condition of the roads deteriorates rapidly – as experienced when significant logging operations happening. We will experience years of development with this plan, of which the heavy vehicle movements and timings need to be planned and specifically designated, so that further impact on the already poor roading conditions and congestion is mitigated as part of the consent.

All of this is said before a single new occupant becomes part of our community.

Auckland Transport, along with Waka Kotahi NZTA need to ensure that the roading infrastructure in the local and surrounding area is PRIORITISE and EXPEDITED to accommodate, BEFORE any redesignation of land use is achieved. Proposals for improvement, particularly for the intersection of SH16 an CRH, need to be addressed with urgency (regardless of this proposed plan change)

The developers need significantly more detail in their proposals. From the previous rejection of this application, I believe the Council largely agrees with the sentiment of the combined response from the Riverhead Community Association (RCA) submission that there is significant mitigation to serious implications if this proposal is approved without modification.

Further community consultation and mitigation of concerns, with the likes of the RCA and other organised community groups (of with the developers are not) will go a long way to making this opportunity for development a success for all of Riverhead and the wider North West community.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Claire Walker  
**Date:** Friday, 17 May 2024 11:00:33 am  
**Attachments:** [PPC 100 - Riverhead\\_CW.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Claire Walker

Organisation name: N/A

Agent's full name: Claire Walker

Email address: [claire@wla.net.nz](mailto:claire@wla.net.nz)

Contact phone number: 021555158

Postal address:  
 41 Great North Road  
 Riverhead  
 Auckland 0821

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Many aspects of the development. Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead. See attached PDF submission.

Property address: Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Map or maps: N/A

Other provisions:  
 See attached PDF

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
 As outlined in my submission.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

174.1

Details of amendments: As outlined in my attached submission.

Submission date: 17 May 2024

Supporting documents

PPC 100 - Riverhead\_CW.pdf

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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## Submission to PC 100 (Private): Riverhead

Claire Walker

41 Great North Road,

Riverhead

I have lived in Riverhead for 20 years. During this time, I have been very active in the community, a member of the Riverhead Residents and Ratepayers (now RCA), the founding member of the Riverhead Beautification Society and an advocate for many other improvement projects within our community. I have worked closely and respectfully with council and the Rodney Local Board during this time to achieve good outcomes for the community. I was actively involved in the 2006 Structure Plan Process and the resulting Plan Change for the area. I am a NZILA Registered Landscape Architect and have undertaken a lot of work within the wider Rodney area as a consultant for council. As a direct result of all of the above I have a good understanding of the many challenges that development brings to our region.

I am not anti-development. I am passionate about ensuring development is undertaken in a sustainable way that responds to the local cultural and environmental context. Development done well can enhance and strengthen existing communities.

I personally oppose the plan change for the reasons set out in this submission.

I wish to be heard.

## General Context

I understand council do not support the development proposal, mostly due to the infrastructure deficit and the lack of approved/allocated funding to deliver this. Even without the potential for Plan change 100 development we have an infrastructure deficit in existing Riverhead and surrounding communities. We have not yet caught up from the historic under provision from Rodney District Council days. Our community now pay urban rates. We still don't have footpaths on all our local streets, we have open drains on our roads that do not function properly, some of which are health and safety issues with high drop offs and narrow or no road shoulder. We have not been on council's radar for years, the only footpath upgrades have come from the targeted rate from the Rodney Local Board (whom we thank for putting this in place), our only bus route came about because the RLB funded a trial route. It quickly became evident how well used and finally AT woke up and started funding the route! Our community have asked for buses and footpaths for the entire 20 years I have lived here. We don't have a single bus shelter (our kids stand in the rain) and we have a single bus route which runs on the hour. I could provide many more examples about lack of basic provision, fundamentally we lack infrastructure. What is tiring is that for every small improvement we do get, we the community have had to lobby, sometimes for years to even get heard. Until we have 'caught up', I don't feel we are ready for more development. It is not equitable for current residents.

The wider Kumeu/Huapai/Riverhead community have witnessed two 'Special Housing Areas' obtain approval and subsequent development occur. This has resulted in significant issues for

the wider community around stormwater management, lack of pedestrian footpaths, lack of roading infrastructure. The community were told the Access Road intersection would be upgraded to manage growth for the Huapai Triangle development. It finally did, but not before the development traffic pressure occurred and the area came to a grinding halt. Budgets were found, cost estimates increased, funding was argued and debated, cost increased, all delaying what was promised at 'time of development'. A perfect example of a private development coming BEFORE infrastructure was developed, a perfect example of how we are affected when it is not delivered. I fear (and for good reason) that the same will happen here if Plan Change 100 is approved.

In a similar vein, when the Riverhead South Plan Change was approved our community was promised (by Rodney District Council) that old Riverhead would have the infrastructure upgrades forthcoming (footpaths, kerb and channel, underground drainage, street lights etc), it never came. We have no confidence that it will come this time.

Waka Kotahi does their own thing, MOE does their own thing, AT barely knows Riverhead exists. None of these silo's talk to one another. There is no integrated planning. The Plan Change 100 supporting documents do not paint a convincing picture that the local issues are well understood and appropriately responded to. Council is so under resourced they can't facilitate a public plan change process with effective and through consultation. We have no faith in any of the above because no body has any budgets, none of the required upgrades are in anyone's long term plan and budgets. We also appreciate the enormous pressure all of the above players have dealing with the scale and pace of growth in south Auckland. All of the problems above already being well played out there.

## Transport:

1. PC100 does not adequately recognise or propose the transport infrastructure upgrades required to manage adverse effects on the wider transport network. Many local roads are poorly constructed, narrow with no formed shoulder, there is little provision for walking and cycling. This is the road network which Riverhead and new development will rely on. The PC100 does not go anywhere near recognising the widespread under specification of the existing local roads, nor adequately proposes to resolve them, despite the significantly increased demand that would result from the development. It is reductionist to focus on the main vehicle routes to and from the development area. People live in the whole community, makes friends, go to school and enjoy the open spaces. People need to be able to walk safely around the whole neighbourhood.
2. PC100 does not recognise comprehensive local network transport improvements (within existing Riverhead) are warranted and necessary to manage adverse effects on local transport. If trucks start using our local roads which has lack of footpath and open drains, how do we safely navigate these during construction? Our kids walk on the roads! PC100 states the upgrades do not have to be in place prior to construction when the first traffic impacts start.



3. Riverhead has under-provisioned streets, often with open drains, a lack of footpaths, unformed carriageway edges and few street trees. Some blocks are poorly connected and contain unformed paper roads – a key one being in Cambridge Terrace, which the applicant has ignored. The development will increase pedestrian use over all of Riverhead, including to Riverhead School and to the two walkable pre-schools. All the realistic routes from the plan change area to destinations in Riverhead such as schools, pre-schools, shops, War Memorial Park and public walkways should be reviewed in terms of footpath provision and safety, and upgrades should be completed prior to the main development starting. This is to enable safe pedestrian movements for the existing and future people and children of Riverhead. This should not have to come from Rodney Local Board funding! It should also be done to the Auckland-wide standards, and not some woeful alternative for long forgotten Riverhead – which is what we have seen approved for many years. My question is ‘Would this happen in St Heliers?’ If not, then why is it ok for Riverhead? We all pay urban rates.
4. The huge development area will require extensive earthworks and civil construction, including thousands of truck and vehicle movements well before any residence is occupied. Traffic upgrades, such as turning bays and pedestrian networks need to be functional and safe before the heavy traffic begins. The current plan change proposal to require limited improvements prior to occupation of a dwelling fails to recognise and mitigate the adverse construction traffic effects which will be particularly severe at main access routes and where locations where site access is feasible.
5. New subdivisions often lack on street parking. Demand for parking would spill over into the existing community where there are no formed road edges and open stormwater drains. Adequate on street parking needs to be required. We need to acknowledge that Riverhead is a very long way off being serviced by adequate public transport options. We have no logical nearby train line, Swanson is a very long and non-direct commute to town. We are limited by a single route bus service making driving the only viable option for many. Two or 3 car families are the norm in Riverhead because of the isolation from significant transport and employment nodes. Driving everywhere is normal. If higher density is developed the lack of on-street carparking will become problematic.
6. It is unclear how the proposed retirement site fits into this PC100. Some consultants reference it, others ignore it. What is clear, is that if in place as per the previous scheme we have seen it will sever the existing and new communities of Riverhead. It is shown as 500m long block, without any east/west roading connections, and only one pedestrian connection that is privatised and only open during daylight hours. This does not result in a well interconnected community. The retirement village is a huge private gated community located between existing and proposed residential areas. It is not clear why such a negatively impactful private development with negative overall urban design outcomes can be acceptable. The result is that the plan change precinct sits uncomfortably around the retirement village. The result is a lack of cross site permeability and an island of private gated residences.

7. Waka Kotahi have plans for the roundabout at the (CRH)/ Main Road (SH16) intersection, but the delivery timing is uncertain. Waka Kotahi tells us that this project only deals with safety, and not capacity. Long dysfunctional queueing at CRH and SH16 will continue and only get worse with many hundreds more commuters on CRH. Wider network capacity issues need to be addressed before the development so that people can realistically commute to employment.
8. Overall, wider network projects need to be responsibly planned and timed in accordance with the strategic growth programme and designations, ad hoc upgrades would be an inefficient use of resources. These wider programmes are many years from being funded or delivered.

### ***Transport – remedies sought***

- |     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |       |
|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| 9.  | Include provisions which state that development of the plan change area cannot proceed until wider network capacity and safety issues are addressed. SH16 is already dysfunctional at high demand times.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 174.2 |
| 10. | Include provisions which state that development of the plan change area cannot proceed until comprehensive local road improvements have been completed, including function and safety assessments and any required upgrades to footpath routes and networks in Riverhead likely to be used by residents of the plan change area to access local destinations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 174.3 |
| 11. | The enormous retirement village privatised site creates pinch points of available connectivity between the plan change area and existing Riverhead. East/west road connections through this area are key – providing choice to residents, whether on foot, bike or car. These should be recognised and addressed by requirements for upgrades.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 174.4 |
| 12. | Other routes within the community need addressing. For example, the road and pedestrian network of Te Roera Place and Duke Street do not show any proposed connectivity improvements or in fact any connection to the new Plan Change 100 area. This will be the route of choice for anyone going to Riverhead School and for those going north to Albany for work or shopping. Cambridge Road, Queen Street, Alice Street and King Street will all be well used routes for people moving in and out of the plan change area, as pedestrians and in vehicles. Cambridge Terrace paper road should be completed as a connecting road giving people choice and allowing traffic to disperse through our community. The development is putting the pressure on this road connection, so surely the developer should pay for this upgrade. | 174.5 |
| 13. | These roads, and further routes to Riverhead School all warrant assessment and specific upgrades to ensure they are functional and safe. Similarly, the connection between the plan change area and Riverhead War Memorial Park has not been recognised as a primary route which is restricted by the CRH and horribly by the retirement village development. The supporting urban design report accurately                                                                                                                                                                                                                                                                                                                                                                                                                            | 175.6 |

describes War Memorial Park as the 'heart of Riverhead' but this recognition has not resulted in any meaningful response in PPC100. Specific provisions should also be applied to this area to ensure that development enables safe and logical east/west connections and road crossings over CRH. The tension is that the CRH is a significant commuter route, and every move which benefits pedestrians puts more strain on the function of this route for people moving west and east between Albany Highway and SH16.

14. Include provisions which require all required local and wider transport improvements to be in place prior to earthworks and related traffic impacts commencing. Leaving upgrades to be required until residential occupation does not mitigate the adverse effects of heavy vehicles and construction traffic required for the formative and civil works which will adversely impact our local roads.

174.7

## Commercial Zoning:

15. Back in the 2006 Structure Planning process the residents of Riverhead undertook a series of design workshops so that the council could understand what was important. At recent RCA meetings we discussed these key themes. Most agreed the key ideas remained consistent with today's residents. Key to this was a village centre. No one ever said they wanted a rerun of the disaster of Kumeu, or Lincoln Road with a strip commercial development running the length of the community. Riverhead wants to retain a strong heart to our community. The War Memorial Park has been our civic heart for many years and the small grouping of shops near Maude Street has been our centre. We acknowledge the need for growth and the proposal for a new town centre around the roundabout is sound with a Local Centre zone proposed at the corner of Riverhead Road.
16. What is not sound urban planning is the proposed Neighbourhood Centre Zone proposed opposite Riverhead Point Drive (Hallertau). This encourages the 'strip' development our community so clearly does not support. The proposed zone does represent a defined area of FRL landholding which naturally raises the question as to whether this discrete proposed zone is motivated by commercial gain rather a demonstrated need or sound design principles. The Urban Design assessment (Appendix 6) shows that the main Local Centre Zone is within a 400m walkable catchment for all residents within the plan change area. So, the isolated Local Centre Zone it is not justified by pedestrian accessibility. AAs noted, the existing Riverhead centre supports two mini-marts or diaries, and major supermarkets are located on all routes west (Kumeu), South (Westgate) and east (Albany). We don't need another supermarket or shops at a disconnected location along the highway!

## Commercial Zoning – remedies sought

17. I want any proposed commercial zoning to be justified by economic analysis that is based on a clear outline of existing zoning and activities in Riverhead, including under-utilising of zoned land and potential capacity, and recognition of the activities and services that would be provided by the retirement village (if it happens) and

174.8

commercial activities that can be undertaken in the THAB zone via resource consent.

- |     |                                                                                                                                                                                                                                                                                                                                                                              |        |
|-----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| 18. | I want any proposed commercial zoning to be justified by economic analysis that is based on a well-reasoned and justifiable customer catchment which recognises the commercial and retail centres of Kumeu, Westgate and Albany, and does not unrealistically anticipate that people who live near these centres would instead travel to Riverhead for their shopping needs. | 174.9  |
| 19. | I want any new business zoning to demonstrate a consolidated and legible town centre, not exacerbate strip commercial areas fronting the highway. Most importantly by removing the proposed Local Centre Zone opposite Riverhead Point Road.                                                                                                                                 | 174.10 |

## Residential Zoning - Mixed Housing Suburban Zone:

20. Most of the land is proposed as Mixed Housing Suburban Zone. This zone allows for two and three storey detached and attached housing in a variety of types and sizes. Up to three dwellings are permitted as of right subject to compliance with the standards. I support this density if undertaken well but balanced with requirements for onsite and street landscaping to mitigate the extent of built form and reflect Riverheads unique character.
21. In comparison, existing Riverhead is mostly Single House zone. The plan change will result in much more dense development and generally taller houses and lots of multi-unit townhouses. Existing Riverhead is characterised by many large trees on private properties. It is this character that people love and recognise. Any new development needs to work hard to incorporate this character whilst providing for density. PC100 proposes nothing to achieve an integrated or sympathetic 'treed' character.
22. Large trees would be infrequent in the proposed Mixed Housing Suburban Zone because it has minimal landscaping requirements (only 20% and this can be paved if there is canopy cover over (IX6.11. Landscaped area within the Mixed Housing Suburban Zone) and only a 2.5m front yard standard which is not adequate for a large growing tree. The outcome is that buildings will dominate the neighbourhood character. Overall, due to a lack of space or a requirement to plant trees on private sites, the neighbourhood character would be markedly different compared to existing Riverhead. We expect this difference in character to be noticeable and jarring, resulting in lower amenity. The green corridor cannot be relied upon to balance the built form outcome due to the provisions which support it being very vague non-specific and uncertain in terms of outcomes. We want any new development to be sympathetic to the existing urban fabric of our community which is characterized by a heavily treed appearance.
23. The current zoning and provisions will not result in the 'unique sense of place' described as an intension in the precinct description. Th development will have no distinct or unique character.

24. There is no requirement to provide adequate front yards to enable the planting of trees. This was a requirement of the Riverhead South development, which contributes to the 'treed' neighbourhood character established and respects the character of old Riverhead and the many prominent mature trees. This requirement should at least apply to the rural fringe parts of the site (for example 100m from a rural zone) and would also contribute overall to sense of transition between the rural and residential land uses.
25. There is no requirement to plant regular street trees on roads. Whilst often achieved during development, the supporting AUP policy context is vague. To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, we request minimum tree quantity outcomes are required for new roads. The density for the housing will result in no tree cover of value, so the work must be done in the streets.
26. Whilst being an opportunity to improve the 'treed character' there are no requirements for road reserve tree planting, leaving the street tree outcome uncertain or minimal. Even in the green corridor there are no measurable outcomes for ecology, vegetation cover or trees. Despite these being lofty policy outcomes of the green corridor, the teeth of the provisions fall short.
27. In my professional life I have witnessed the disconnect between the glossy green landscape plan at RC lodgement and the reality of the EPA approvals and outcomes. A combination of narrow streets, maximising of developable land, underground infrastructure, use of roads for swales/ stormwater function (trees and swales sometimes cannot be together) and the safety setbacks often result in a very limited number of street trees being physically able to be accommodated. Trees always come last – always!
28. The proposal fails to mention or adopt the council Auckland's Urban Ngahere (Forest) Strategy. The strategy recognises the social, environmental, economic, and cultural benefits of our urban ngahere (forest), and sets out a strategic approach to knowing, growing, and protecting it. It seeks to achieve increased canopy cover to 30 per cent across Auckland's urban area, and at least 15 per cent in every local board area. The proposed plan change should seek to provide overall canopy cover of 30% which would provide a range of health, social and economic benefits including reducing the urban heat effect of roads, buildings and impermeable surfaces. If adopted precinct wide it would provide for flexibility in implementation and also help integrate the old and the new.
29. Another formative design requirement of Riverhead South was a rule prohibiting tall front yard fences with developers also recognising this and largely placing covenants for no front yard fencing. This outcome can also be observed widely in Riverhead South and contributes significantly to a sense of spaciousness with buildings set back and front yard landscaping visible. The plan change seeks to removes the usual requirement for low or visually permeable front yard fences without any explanation as to why. (refer IX.6. Standards page 11). This may result in

a proliferation of tall front yard fences detrimental to a desired spacious character. Front yard fences also have negative effects on CPTED outcomes.

30. The zone also does not propose any design response to the proposed green corridor network, aside from a lonely fence height standard. There are no provisions proposed to give effect to the Urban Design recommendation for: *“a high quality and vegetated interface for higher density development along the key movement routes and adjacent to existing residential development which contributes to the current landscaped character of streets in Riverhead.”* There is also little detail on how this will be achieved, given council parks recent directive for no gardens within the streetscape we are left wondering what this ‘green corridor’ will contain.

### **Residential Zoning - Mixed Housing Suburban Zone – Relief sought**

- |     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |        |
|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| 31. | Generally, we accept that density needs to be increased compared to the predominant Single house zone of Riverhead. But this should be balanced by stronger requirements for good urban design (for example, low front yard fences) and green infrastructure (for example requirements to plant trees on sites and on roads). Graduated density should be considered at the transition to rural zoning and higher density can be placed near the neighbourhood centre and open spaces. | 174.11 |
| 32. | I want front yards sized to be adequate for planting large trees. We want a requirement for each site in the zone to plant one tree capable of growing 6m plus in height.                                                                                                                                                                                                                                                                                                              | 174.12 |
| 33. | I want specific yard and landscape standards to apply at the rear of all sites which adjoin a rural zone to help establish a transition between the residential and rural environments.                                                                                                                                                                                                                                                                                                | 174.13 |
| 34. | I want a front yard fence control applied which applies H5.6.15 Front, side and rear fences and walls.                                                                                                                                                                                                                                                                                                                                                                                 | 174.14 |
| 35. | To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, I request minimum tree quantity outcomes are required for new roads. Trees are often the last consideration and underground infrastructure dominates the road corridor.                                                                                                                                      | 174.15 |
| 36. | Overall, our community wants the plan change to require sufficient private and public planted areas to give effect to the intent of Auckland's Urban Ngahere (Forest) Strategy. This will also help integrate the higher intensity development with the character of existing Riverhead and the rural interface.                                                                                                                                                                       | 174.16 |

### **Mixed Rural Zone:**



37. A mixed rural zone is proposed at the northern part of the plan change area. This is a response to the obvious flaw with the original (pre-notification but rejected by the council) proposal which proposed this flood plain area as suitable for residential development.
38. The main issue with this zoning is that the land will not be able to be further developed or subdivided. Due to flooding but also being poor-quality land for agriculture or horticulture it will most likely be left to deteriorate and form no meaningful part of the Riverhead village. This land has pretty much been abandoned, which unfortunately is partly the result of FUZ zoning, which simply facilitates land-banking and neglect of peri-urban land. The riparian area and beyond is rank with huge woody weeds and an environmental embarrassment, despite it being on the fringe of a stream which feeds the might but sensitive Waitemata.
39. Riverhead community have for many years sought to have better connection to the river. The outcome of the rural zoning is that the 'key move' of a green corridor extending to the river, and an esplanade reserve vested as public space to the council cannot be realised. The maintenance and enhancement of public access to and along rivers is a matter of national importance under the RMA. The current proposal fails to achieve this or recognise the shortcoming of not providing it. The site directly abuts a tributary stream to the Rangitopunui, and along with simply treating this area as a route for stormwater, the plan change must realise the opportunity for environmental restoration and public access connections.

### ***Mixed Rural Zone – relief sought***

40. I want provision to require the 20m margin of land from the stream to be zoned as public open space and vested to the council. Development should be required to deliver environmental restoration and improvements to the stream corridor. 174.17
41. I want the green corridor to be extended to establish an open space esplanade reserve and be available for public access. The river is an important taonga for our community. 174.18

### **Flooding and Stormwater:**

42. I am concerned that current best practice stormwater system design methodologies (as outlined within Appendix 10) would not adequately address adverse effects of the development. Council's current practice has failed Riverhead (and other recently developed areas in Kumeu) as evidenced in the Auckland Floods February 2023 where new developments designed to council's standards resulted in flooding harm.
43. I request robust peer review and an overall bottom-line requirement that stormwater will not cause upstream or downstream adverse effects.

44. Stormwater systems across the plan change area are proposed via a 'central stormwater management treatment spine' intended to be part of a 'multi-purpose green corridor'. To ensure a coordinated delivery there needs to be a requirement for this to be designed and agreed prior to development commencing. A comprehensive development approach is required but the mixed landholdings risk a fragmented approach.
45. Without an overarching agreed plan for the stormwater corridor, it is not clear how an overall integrated stormwater system will result from development of multiple individual lots and/or staging would be decided. The risk is that fragmented and uncoordinated design and implementation would result due to a lack of overall clarity and responsibilities.
46. Despite a 'designed' stormwater spine system' being proposed, zoning is not used to clarify the location and extent of the system. The extensive land required for this purpose is inappropriately zoned residential. Zoning would provide certainty of the land required for the stormwater and green corridor purposes. The community want certainty that this will be delivered, that it will be vested and looked after and that our existing (and future) housing will not flood. In general, it is not good practice for an enduring planning document (the AUP OP) to refer to a third-party report prepared in support of a plan change.
47. The supporting stormwater report was prepared when 22 Duke Street was proposed to be zoned for residential development. This land is now largely proposed to be zoned rural, and consequently could not be subdivided. This casts doubt as to whether this land can still be used for stormwater management and conveyance to the Rangitopuni tributary. It is not clear if this affects the integrity of the stormwater report findings. The report also relies upon specific stormwater outcomes at the Matvin site which may or may not actually occur.

### ***Flooding and Stormwater - relief sought***

48. I want robust peer review and an overall bottom-line requirement in the plan change provisions that stormwater will not cause upstream or downstream adverse effects. 174.19
49. I want the clause of 'as far as practicable' to be removed from Objective (6), for example: *"Stormwater is managed to avoid, or minimise or adequately mitigate, adverse effects on the receiving environment."* Stormwater and flooding is a serious matter and the objective should not include wording which makes achieving expected outcomes optional. 174.20
50. I want a requirement for the overall stormwater corridor system and green network design to be agreed with council prior to development and not incrementally addressed via multiple separate development proposals. This would likely require staging of development to align with development of the stormwater/green network corridor necessary to support that development. 174.21

51. I want clarity of the intended use and function of 22 Duke Street with regard to stormwater, public access and environmental improvements. | 174.22

## Wastewater:

52. When it rains hard in Riverhead, we all hear the Ecoflow alarms going off. The current pressurised system does not cope. If you are unlucky enough to be at the end of the line, your property is the most impacted. So much so that Watercare don't charge these residents anymore to come and pump out the backflow, because it is the fault of the system failing during rain events and ingress of water into the council's system. The concern is that the existing poor performing system is not fit for purpose overall, and that expanding it over a large area with high groundwater will negatively impact current residents further.

## Wastewater – relief sought

53. I want provisions which ensure that the wastewater system is appropriate and fit for purpose, and that addition of the plan change area will not negatively impact existing and future users. | 174.23

## Parks and Reserves:

54. The 'multi-purpose green corridors' are defined in PC100 as a 'key move' from an urban design perspective. This outcome is agreed and supported in principle. However, there is no requirement that the green corridor be offered to council for vesting which is commonly required under existing AUPOP precinct plans to provide certainty for council and developers. In our mind, a green corridor is not a wider road with more street trees which the current proposal could result in.
55. Riparian margins are to be vested, but these are minimal and go nowhere near establishing the green corridor which needs to be located on a variety of land tenures. There needs to be a requirement that land necessary for the green network, but not accepted for vesting by council, is developed and held by an entity, like the proposal for riparian margins. Otherwise, parts of the network might not get delivered. There is a strong desire to protect and enhance our waterways in Riverhead, as is evidenced in the community involvement of the Riverhead Beautification Society which has to date planted over 7000 trees along a stream corridor. Given our location at the head of the harbour there are strong environmental reasons for this.
56. The intent of a contiguous open space network comprising of stormwater and passive open space functions is supported. Unfortunately, the provisions fail to define what the corridor will comprise of in real terms and do not require it to be delivered in practice. For example, what will be located in-between the stormwater ponds? How can we work on getting a contiguous canopy cover?

57. Policy (13)(d) suggests *“Co-locates smaller open spaces along the multi-purpose green corridor to achieve a connected network of open space.”*
58. This policy shows a lack of consideration that the separately proposed ‘neighbourhood parks’ are limited to 3 separate locations and a flawed presumption that council would accept ad-hoc vesting of a range of “smaller parks” required to join-up the green corridor network. The network may be partly on the road reserves, but if this is the intention, then that needs to be clear and also needs to be a requirement of the road design with specific, measurable outcomes and standards.
59. The policy fails to incorporate the depth of the description of the green corridor in the s32 report:
- “The central north-south multi-purpose green corridor is a key structuring component in both the Greenways Plan and the proposed Structure Plan. Along with the collector road, this green corridor accommodates both passive and active open spaces, footpaths and dedicated cycleways. It also incorporates an existing intermittent stream.”*
60. A clear description the intended corridor composition and the types of land it will occupy is required in the plan. As noted, it appears that parts of the green network would likely be upon road reserve. However, there are no provisions which explain this or require ‘linking roads’ to deviate from a standard design to perform this function. For example, to ensure that necessary roads are designed to be a width adequate to contain a high level of green infrastructure in a dedicated or protected zone within the road reserve.
61. Clear expectations are needed in the plan to ensure that the multiple components of the green networks are considered and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor. Without this being a clear directive it is likely that conventional design would be applied to the various parts, and overall, the green network would not be cohesively designed and delivered.
62. Overall, clear objectives, policies, standards and design/outcome expectations are required in the plan to ensure the overall ‘multi-purpose green corridors’ is delivered as anticipated. Policy 13 as drafted will not achieve this outcome.
63. The precinct description seeks to realise *“...the opportunity to establish green corridors through the precinct”*. Policy (13) only requires the council to encourage *“...the provision of a continuous and connected multi-purpose green corridor”*. The word ‘encourage’ is a weak and non-committal directive. Clauses (a) to (d) provide an unclear framework without specific detail of what is ‘required’ to be achieved. A stronger word such as ‘require’ is needed to ensure the overarching urban design ‘key move’ of the green corridor is delivered.
64. Policy 17 requires development and subdivision to provide *“... a central stormwater management treatment spine through the precinct in general accordance with the*

*multi-purpose green corridor in the locations indicatively shown on IX.10.2*

*Riverhead: Precinct plan 2;*” This cannot be achieved in isolation of an overall agreed plan which spans the plan change area.

65. The supporting Stormwater and Flooding assessment contains a ‘Preliminary Masterplan’ which shows significant areas of land to be occupied by stormwater devices and green infrastructure, extending in area at some locations much further than shown on Precinct Plan 2.
66. If this drawing represents the modelled stormwater requirements, then the precinct plan should also include the same information so that developers and the community can understand what is required.

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Figure 10: Preliminary Master Plan - Version 10 (Source: Urban Acumen)



67. The supporting Urban Design report (Named Neighbourhood Design Statement) shows the multi-purpose green corridor extending via the land a 22 Duke Street to the Rangitopuni tributary and beyond via existing and potential future esplanade reserves alongside the stream and river.
68. We support the connection and an esplanade reserve alongside the tributary and note the extensive high quality esplanade reserve that has resulted from the Riverhead South network. A long-term aspiration is to have a complete network of coastal connections. The proposed zoning of 22 Duke Street as (predominantly) Mixed Rural removes the possibility of subdivision and vesting of esplanade reserve along the tributary. The small parts which are proposed to be residentially zoned would appear to still leave the parent site over 4HA, and therefore not trigger the esplanade reserve vesting upon subdivision. We expect that this is an unintended consequence of changing the proposed zoning. We request that the 20m margin of the tributary be zoned Open Space – Conservation, as part of the plan change, and that it's heavily weed infested margins be restored and planted, and that land be vested to the council. These are the outcomes which would have occurred if the

land was able to be subdivided and are necessary to secure a necessary part of the long-term aspirational esplanade reserve network.

69. Objectives, policies and standards are also required to achieve public access links from the development to the zoned esplanade reserve. If 22 Duke Street is available for stormwater management purposes, then this outcome should be easily achieved, especially if parcels are subdivided as drainage reserves, as this may trigger the 4Ha or less lot size adjacent to the tributary to trigger esplanade reserve vesting.



70. There is no direct requirement to deliver the 3 proposed neighbourhood parks, only an indirect reference to section E38. We seek a direct requirement to deliver the parks, presuming support from council parks division.
71. One high value (notable value) Beech tree is identified which is clustered with many impressive specimen trees (including a 13m tall Kauri). The Beech sits within a cluster of magnificent trees worthy of retention and is an obvious location for a Neighbourhood Park. Policy (12) seeks that the Beech tree is incorporated into an open space, but Precinct Plan 2 does not identify this location for a Neighbourhood Park. This inconsistency needs to be corrected. This cluster of trees, planted by a family who have been in Riverhead for multiple generations could further help connect the character of existing Riverhead to that of the plan change area.
72. The Beech tree and surrounds should not be compromised by stormwater functions which also appear to be proposed within this location (refer structure plan) page 8.
73. Policy 12 does not require the retention of 'other mature trees that are worthy of retention' by caveating the policy with '*where possible*'. I strongly suggest that the option to 'not retain worthy trees' be removed and more directive wording applied. The site is a huge greenfield area with a lot of flexibility for development locations.



Any trees of value should be required to be retained. The value of this cluster extends beyond the arboriculture assessment.

74. Large trees located near the CRH appear to not be recorded in the arboricultural report which appears to be an error.
75. The green corridor graphic, or 'east-west connections reflecting potential original portage routes promoting awa ki awa linkage' is shown on Precinct Plan 1 extending along and outside of the southern plan change boundary. Policy 19 contains an obtuse requirement for development to acknowledge key views and spiritual connections respond to identified on IX.10.1 Riverhead: Precinct plan 1 in the layout and/or design of development; in particular, sightlines to Te Ahu and Pukeharakeke, and connections to Papakoura Awa and Te Tōangaroa.
76. While I cannot speak for mana whenua I note there is very little reference to tangible outcomes relating to streets and public open spaces which reference and respect the Māori cultural landscape values. In reality, the proposed provisions will not achieve anything apparent in terms of recognising mana whenua values.

## Parks and Reserves – relief sought

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|-----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| 77. | I want the requirement and composition for the green corridor to be determined and agreed in principle with council prior to any development, so that the required environmental, stormwater and connectivity outcomes are understood and delivered appropriately and fully by each discrete development parcel or stage.                         | 174.24 |
| 78. | I seek that necessary parts of the green corridor infrastructure which do not comprise of roads, neighbourhood parks or drainage reserves are offered to council for vesting or protected and maintained in perpetuity by an appropriate legal mechanism (as per IX.6.3. Riparian margin).                                                        | 174.25 |
| 79. | I want a clear description the intended composition corridor to be set out in the plan, including an explanation of how the multiple components of the green networks are to be determined and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor, and any other land that may be required. | 174.26 |
| 80. | I want the green corridor to extend to the Rangitopuni tributary and provide a public connection to a zoned open space esplanade reserve, and require environmental improvements to the degraded margins.                                                                                                                                         | 174.27 |
| 81. | Overall, clear objectives, policies, standards and design/outcome expectations are required in the plan to ensure the overall 'multi-purpose green corridors' is delivered as anticipated, because Policy 13 as drafted, will not achieve this outcome.                                                                                           | 174.28 |

82. I want a neighbourhood park to be located to include the Beech tree and the adjacent grove of high value trees at this location. These trees represent remnant heritage features and are important to the Riverhead Community. They can provide a unique opportunity to establish some old Riverhead character in the new Riverhead development, along with established ecology and habitat.

174.29

## Retirement Village (Matvin Group land):

83. It is unclear what is going on with this land and proposal. It is noted in the s32 report but not in the plan change provisions. It is also noted in the urban design report as a consented development, containing buildings up to 5 stories tall, with 410 dwellings including 310 apartments. It is also included in the supporting stormwater report, which curiously does not provide a scenario for the retirement village not eventuating.
84. The plan change maps and provisions do not respond to the scale and poor urban design connectivity outcomes of the retirement village development. The only response is to propose zoning part of the site as THAB and the remainder as Mixed House Suburban, and Sub-Precinct B. This is of concern because the retirement village is located at the interface of the plan change area and existing Riverhead at Cambridge Road. It occupies a 500-metre-long flank and only provides for a single pedestrian cross connection, available during daylight hours only. It is effectively a gated community which turns it back on our village. The lack of expected connectivity appears to be a result of just accepting that the retirement village will occur.
85. PC100 should instead be prepared to stand alone from the retirement village proposal, and incorporate the key design drivers of the Urban Design applied over the entire plan change area, being:
- a connected physical environment
  - an integrated community
  - access to nature
  - vibrant and local
  - housing choice and affordability
  - proximity/convenience.
86. Concerningly, despite recognising the retirement village (by way of omitting expected outcomes such as a green corridor, local roads and pedestrian connectivity, and a considered interface at Cambridge Road) the plan change also does not propose any specific response to the retirement village form and function, should it go ahead.
87. For example, the Urban Design report recommends: *“a transition between taller buildings around the centre to lower densities and building forms in the remaining areas of the site” (pg 51)*. Requiring roads and pedestrian routes to interface with the lone public route through the retirement village should also be required in the plan

change. The Sub-precincts which seek to provide some level of transition of buildings do not adjoin the retirement site but are contained within it.

88. Especially concerning is the detrimental impact that the retirement village will have on connectivity for the northern part of the plan change area and movements to and from the adjacent existing Riverhead. This matter is noted also in our transport section.

### ***Retirement Village (Matvin Group land) – remedies sought***

89. It is requested that the plan change be complete and robust in terms of dealing with the two scenarios of the retirement village being in place, or not. Requiring cross-site connectivity and local roads for the scenario of the retirement village not being built. The interface with the residential community at Cambridge Road should be addressed in terms of appropriate built form and interface outcomes.

174.30

### **Structure Plans and Consultation:**

90. Back in 2006, prior to being rezoned for development, Riverhead South also went through a plan change which was informed by a Structure Plan. This was Council led and involved the community through a series of consultation meetings including interactive design workshops.
91. The people of Riverhead were actively involved in a meaningful way over a carefully planned process. I was involved in the RRRA at this time. The outcomes from this highly engaged process were in the most part very positive. The design controls adopted recognised our community as being special, having a distinct character worthy of protection, retention/enhancement (new areas) and celebration.
92. The structure plan was adopted into the then Rodney District plan 'SPECIAL 30 (RIVERHEAD SOUTH) ZONE'. This included a comprehensive range of issues, objectives, policies, standards and assessment criteria to ensure that development reflected the needs of the community and council's intent, whilst providing for good quality development.
93. That document delivered a planning framework informed by community participation. A range of built form outcomes are visible in Riverhead South today which were a product of this community/council collaborative process. Most significantly there was an emphasis on dwellings being set back from the street and for low or no front fences. These create a sense of spaciousness and openness at the front of houses and make for safe streets with high levels of passive surveillance. A perimeter esplanade reserve open space network, along with a prominent coastal park at a heritage location, were also achieved.
94. In the recent meetings undertaken by the RCA the community were asked if they thought those basic desires for our community 'look and feel' still stood. Overwhelmingly the answer was yes.

95. These previously expressed community desires are not captured by the proposed plan change 'consultation', even though the RCA outlined these to the development consortium. The obvious outcome is that the character of the plan change area will be markedly different and not consistent with existing Riverhead. Density can be provided, but it should also be balanced with adequate and open front yards and a requirement for trees. Mature trees are a defining element of existing Riverhead, including Riverhead south where significant trees were retained and sites are large enough to accommodate new large growing species.
96. In stark contrast to the 2006 process the proposed 'Structure Plan' (refer Appendix 4) supporting the current plan change application was not prepared with meaningful community involvement. We were not involved in any meaningful way. We were not taken along on the journey. We were not listened to.
97. Community consultation involved a meeting over a coffee with some members of the RCA, 2 'drop-in community sessions and a summary of 'feedback'. In our view, these represent a token level of 'consultation' designed to 'tick the box'.
98. I do not understand how any part of what PC100 team claim as consultation can be called best practice or genuinely engaging. It has been superficial at best. Hurried and disingenuous. But it did not have to be like that. We are not against development; we just want the opportunity to be involved so that our concerns are recognised.
99. In closing, our community is special. People who live here have long known that which is why so many people stay for life. The fabric of our very tight community is built around a tight centre (commercial, civic and recreational) which keeps people together. We want any development to not only respect this but build on these principles. PC100 is prepared in isolation from meaningful community involvement, and this is obvious by the generic provisions proposed which do not recognise what is here and how development should appropriately respond.

174.31

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Tatiana Brown  
**Date:** Friday, 17 May 2024 11:00:56 am  
**Attachments:** [Riverhead Submission\\_20240517105719.417.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Tatiana Brown

Organisation name:

Agent's full name: Nathan Brown

Email address: [tatianabrown.nz@gmail.com](mailto:tatianabrown.nz@gmail.com)

Contact phone number:

Postal address:

13 Floyd Road  
 Riverhead 0820  
 Riverhead 0820  
 Riverhead  
 Riverhead 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:  
 OPTIONAL

Property address: OPTIONAL

Map or maps: OPTIONAL

Other provisions:  
 OPTIONAL

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Severe impacts on community and environment before, during and after development with current proposal

I or we seek the following decision by council: Decline the plan change | 175.1

Submission date: 17 May 2024

Supporting documents

[Riverhead Submission\\_20240517105719.417.pdf](#)

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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While I am not inherently opposed to development of land, this needs to be met with caution particularly in Riverhead.

The developers intent is profit, not building a better Riverhead or surrounding NorthWest Auckland. Profit flies in the face of doing what is right for the community, as what is needed will cost money. This is obvious in their plans that do not have explicit and clearly defined intentions but vague wording that can later be scaled back.

We are already plagued with many infrastructure problems that will only be exasperated by rapid development.

### **Stormwater/Flooding**

The recent flooding events (3 in 2 years!) significantly impacted Riverhead residents of which we are one. Auckland Council representatives have told us in meetings that we need to expect more of these 1 in a 100 year events. The plan from the development group does nothing to address this increasing issue and will only exasperate the problem, turning permeable agriculture land into housing. All stormwater needs to be planned to be self contained within the development in the event of **more than 1 in 100 year event** as the current infrastructure and environment does not support these events without further development. Auckland Council has already used this as part of the initial rejection of this development plan, and little has been done to address this in this resubmission.

### **Wastewater**

Riverheads semi-self contained wastewater 'feature' often fails during moderate rain events. The entire network cannot cope due to poor design and limited scope of expansion. The plans need extensive provisions to improve this without additional burden to the current failing system. note, it costs residents \$150 every time the alarm goes off, unlike most other suburbs that use this system it is not managed by Watercare but is the resident/homeowners responsibility.

### **Transport**

The entire roading network in the north west has not been developed at the same pace as population growth. The main arterial route into Riverhead (Riverhead-Coatesville Highway) is the same design as it was 60 years ago. This arterial route has significant standstill blockages already (typically from 630 am – 930am!), not to mention SH16 which it feeds into is often at a standstill during peak times.

This development will require significant heavy vehicle movements for a long period of time. The areas congestion is already significant, and the condition of the roads deteriorates rapidly – as experienced when significant logging operations happening. We will experience years of development with this plan, of which the heavy vehicle movements and timings need to be planned and specifically designated, so that further impact on the already poor roading conditions and congestion is mitigated as part of the consent.

All of this is said before a single new occupant becomes part of our community.

Auckland Transport, along with Waka Kotahi NZTA need to ensure that the roading infrastructure in the local and surrounding area is PRIORITISE and EXPEDITED to accommodate, BEFORE any redesignation of land use is achieved. Proposals for improvement, particularly for the intersection of SH16 an CRH, need to be addressed with urgency (regardless of this proposed plan change)

The developers need significantly more detail in their proposals. From the previous rejection of this application, I believe the Council largely agrees with the sentiment of the combined response from the Riverhead Community Association (RCA) submission that there is significant mitigation to serious implications if this proposal is approved without modification.

Further community consultation and mitigation of concerns, with the likes of the RCA and other organised community groups (of with the developers are not) will go a long way to making this opportunity for development a success for all of Riverhead and the wider North West community.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Jade Lacey  
**Date:** Friday, 17 May 2024 11:15:27 am  
**Attachments:** [PPC 100 - Riverhead Community Association Submission FINAL\\_20240517110239.434.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

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Organisation name:

Agent's full name:

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Contact phone number:

Postal address:

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Land identified in the Private Plan Change by Riverhead Landowner Group

Property address: 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

As per attached.

I or we seek the following decision by council: Decline the plan change

176.1

Submission date: 17 May 2024

Supporting documents

PPC 100 - Riverhead Community Association Submission FINAL\_20240517110239.434.pdf

#### Attend a hearing

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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## **Riverhead Community Association submission to PC 100 (Private): Riverhead**

### **Introduction**

The Riverhead Community Association (RCA) is an incorporated society comprising of residents passionate about our community.

The RCA has 70 financial members and our Facebook group has 670 members, 170 of which have recently joined after the Plan Change 100 was put out for submissions.

The RCA provides a combined local voice and works collaboratively with Auckland Council and Auckland Transport on issues and projects which affect the Riverhead communities.

The RCA has a proven track record of advocating for community needs. From 2006 when Riverhead went through a plan change process for Riverhead South, RCA was at the table making a difference. We influenced the outcomes that were incorporated into the SPECIAL 30 (RIVERHEAD SOUTH) ZONE (legacy Rodney District Plan) which resulted in the spacious and attractive built form of Riverhead South.

The RCA has been active informing the community of PC100 via 2 public meetings and multiple topic Facebook updates. We have taken notice of key themes which have emerged, and these are compiled into this submission. In our view, this submission captures the major topics of concern consistently raised by the community at large.

The RCA is not anti-development.

We wish to be heard.

### **Council's Position Pre-Notification**

The RCA is cognisant of council's pre-notification reporting and the decision of the Planning, Environment and Parks Committee.

We concur in principle with council's description of the main issues, however, outline further matters of specific concern in this submission<sup>1</sup>.

*"The main issues will be the provision of infrastructure, whether the layout and provision for connections through the area are appropriate, the management of natural hazards and the intensity of development proposed. In respect of infrastructure, the applicant is proposing to provide new local transport upgrades as the land is developed. The extent to which these are sufficient can be considered through the analysis of submissions and*

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<sup>1</sup> Planning, Environment and Parks Committee, Agenda, Thursday 4 May, 2023, Paras. 72, 73

*detailed plan change review. It is noted that there are no committed or funded public transport service improvements at this time.”*

And

*“An important consideration is the effect of additional traffic from the potential new development enabled by the plan change on the wider transport network, and most notably the operation of SH16. NZTA Waka Kotahi are planning an upgrade to SH16 in the vicinity with the upgrade project to be completed in 2024/2025. The project extends from the end of the North Western Motorway from the Brigham Creek Road/Fred Taylor Drive/SH16 roundabout through to Waimauku - a 10km stretch. The section from Brigham Creek Road to the Taupaki roundabout will be four-laned with a new two-lane roundabout at the SH 16 /Coatesville Riverhead Highway intersection. It will also include wire rope median barriers and a 3-metre-wide shared path from Brigham Creek Road/Fred Taylor Drive/ SH 16 roundabout to Kumeu. The section from Huapai to Waimauku involves installation of wire rope median barriers and shoulder widening.”*

## **RCA – Position Overview**

The RCA opposes the plan change for the reasons set out in this submission.

The RCA welcomes the opportunity to work with the requestors and the council to resolve matters raised in this submission.

Matters of concern and remedies sought are listed below.

### **Transport:**

1. The plan change fails to adequately recognise and propose transport infrastructure upgrades required to manage adverse effects on the wider transport network. For example, SH16 is at times completely gridlocked with commuter traffic, the queue to get onto SH16 comes back to Hallertau at 6.30am! During weekends the line to Boric (the Coatesville Riverhead Highway (CRH)/SH16 intersection) is at the golf course. Another 3,000 residencies at Riverhead will exacerbate this greatly. There are very few local employment opportunities, most people will commute to work, and the single route bus is inadequate, inefficient and unreliable. The road has no capacity for walking or cycling to Westgate or Kumeu. Driving on roads is the only option.
2. Significantly, the development relies upon construction of a roundabout at the (CRH)/ Main Road (SH16) intersection to be built by Waka Kotahi NZ Transport Agency at some future time. Whilst this upgrade has been a long time coming it only addresses safety at the intersection. It will not improve capacity of the network which is already often dysfunctional. We also understand that this project is not currently programmed or funded.



3. The end of the NW motorway often backs up for a kilometre or more, and the roundabout intersection is routinely dysfunction creating huge traffic jams.
4. The plan change fails to recognise comprehensive local network transport improvements (within existing Riverhead) are warranted necessary to manage adverse effects on local transport.
5. The proposal is for limited local road 'upgrades'. But, to only deliver these in a fragmented and staged way based upon occupation of adjacent property. The upgrades do not have to be in place prior to construction when the first traffic impacts start.
6. Riverhead has under-provisioned streets, often with open drains, a lack of footpaths, unformed carriageway edges and few street trees. Some blocks are poorly connected and contain unformed paper roads. The development will increase pedestrian use over all of Riverhead, including to Riverhead School and to the two walkable pre-schools. All the realistic routes from the plan change area to destinations in Riverhead such as schools, pre-schools, shops, War Memorial Park and public walkways should be reviewed in terms of footpath provision and safety, and upgrades should be completed prior to the main development starting. This is to enable safety pedestrian movements for the existing and future people and children of Riverhead.
7. The plan change fails to recognise that local and wider transport upgrades are necessary to complete prior to development (earthworks and civil) commencement to manage the effects of construction traffic and safety.
8. The huge development area will require extensive earthworks and civil construction, including thousands of truck and vehicle movements well before any residence is occupied. Traffic upgrades, such as turning bays and pedestrian networks need to be functional and safe before the heavy traffic begins. The current plan change proposal to require limited improvements prior to occupation of a dwelling fails to recognise and mitigate the adverse construction traffic effects which will be particularly severed at main access routes and where locations where site access is feasible.
9. New subdivisions often lack on street parking. Demand for parking would spill over into the existing community where there are no formed road edges and open stormwater drains. Adequate on street parking needs to be required as we don't have the public transport options available.

### ***Transport – remedies sought***

10. Include provisions which state that development of the plan change area cannot proceed until wider network capacity and safety issues are addressed.
11. Include provisions which state that development of the plan change area cannot proceed until local road improvements have been completed, including function and safety assessments and any required upgrades to footpath routes and networks in Riverhead likely to be used by residents of the plan change area to access local destinations.
12. The enormous retirement village privatised site creates pinch points of available connectivity between the plan change area and existing Riverhead. These should be recognised and addressed by requirements for upgrades in the plan change provisions. For example, the road and pedestrian network of Te Roera Place, Duke Street, Cambridge Road, Queen Street, Alice Street and King Street will all be well used routes for people moving in and out of the plan change area, as pedestrians and in vehicles. These roads, and further routes to Riverhead School all warrant assessment and specific upgrades to ensure they are functional and safe. Similarly, the connection between the plan change area and Riverhead War Memorial Park has not been recognised as a primary route which is restricted by the CRH and the retirement village development. Specific provisions should also be applied to this area to ensure that development enables safe and logical east/west connections and road crossings.
13. Include provisions which require all required local and wider transport improvements to be in place prior to earthworks and related traffic impacts commencing.

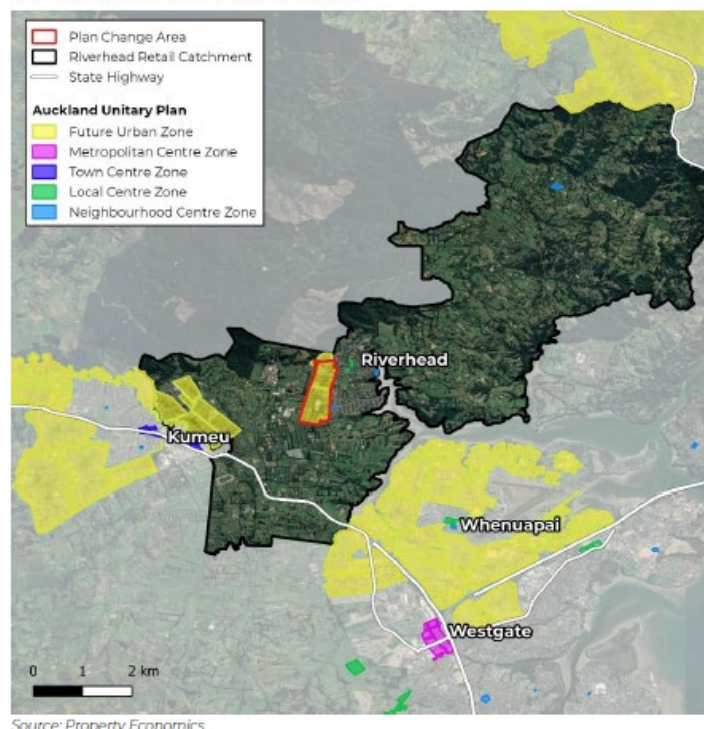
### **Commercial Zoning – Local Centre Zone and the Neighbourhood Centre Zone:**

14. A Local Centre zone is proposed at the corner of Riverhead Road and the CRH and a Neighbourhood Centre Zone is proposed opposite Riverhead Point Drive (Hallertau).
15. Riverhead already has a consolidated area of Business Mixed Use zone and Local Centre zones sites which house 2 mini-marts, a real estate office, a restaurant/bar, bottle shop and a vape shop and Heritage café/takeaways on School Road. There is also the local vet and two-preschools, Lulu's café, and other retail and commercial yard type activities. The mixed-use zoned triangle contains a development which when completed will include a series of ground level shop or business, and the final part of the triangle is also under development and also zoned Business Mixed Use, therefore, is also available for commercial use. Hallertau sits further down the CRH.

16. The basis for the proposed commercial zones is an economic report which predicts future demand (Appendix 7 – Centres Assessment). This report provides a cursory summary of the existing commercial activities and zoning. It also bases predicted demand on a 'Riverhead Core Retail Catchment'. The report provides no basis for the extent of this catchment despite it being a formative assumption. Astonishingly, the catchment extends and wraps around Kumeu and goes all the way to the Dairy Flat Highway.

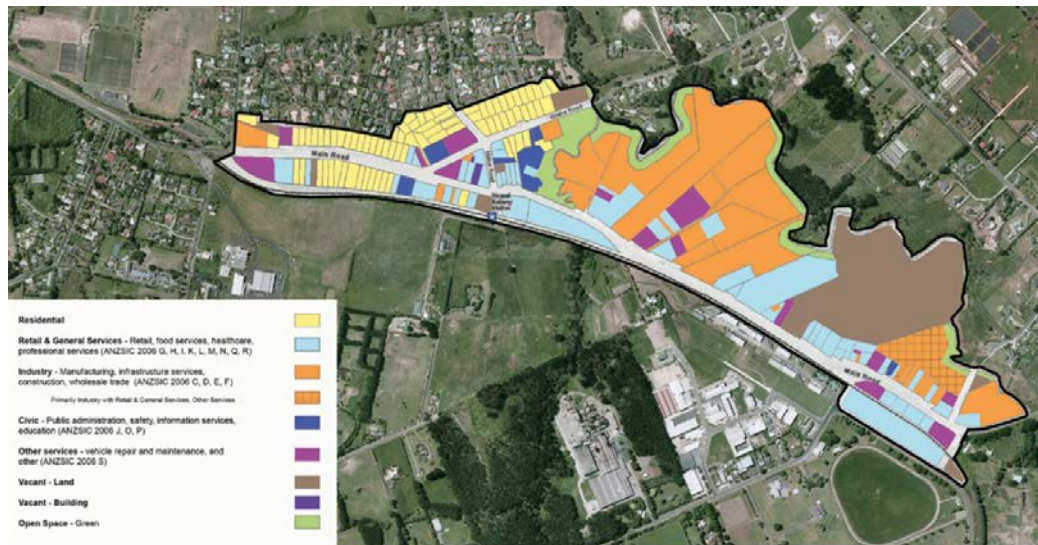
extent of Riverhead's core economic market.

FIGURE 1: RIVERHEAD CORE RETAIL CATCHMENT



17. Defining this as a catchment for Riverhead as a retail destination is ridiculous at both extents of the area shown. People in the Kumeu area have no incentive to travel to Riverhead for shopping. Kumeu is well served with a supermarket and a huge range of retail and commercial services. Council's own consultation documents for Kumeu show the extensive land at Kumeu dedicated for these activities.

See below.



24 | KUMEŪ-HUAPAI CENTRE PLAN

18. People east of Coatesville are well served by old Albany and the Albany centre and beyond. Presuming that these people would also flock to Riverhead for shopping is not realistic because Albany is more accessible and contains a much greater range of shops and services.
19. The economic report also does not appear to consider the retirement village development and the hospitality, medical and other services it will contain which would be available to the residents and to the public. Restaurants, retail and healthcare facilities are specifically enabled by the proposed Sub-Precinct A within the retirement site.
20. The proposed THAB zoned areas also allows a range of commercial and service activities (via a RC). It is not clear why the economic report does not account for the possibility that the THAB zone can also contain businesses and retail, especially the area in proximity to the proposed Neighbourhood Centre zone where this development may be likely.
21. Another concern is that the proposed isolated Neighbourhood Centre Zone (adjacent Hallertau) will exacerbate an undesirable pattern of commercial strip development down the CRH.
22. A complete and justified basis for zoning this land as a Neighbourhood Centre Zone has not been provided. The proposed zone does represent a defined area of FRL landholding which naturally raises the question as to whether this discrete proposed zone is motivated by commercial gain rather a demonstrated need or sound design principles.
23. The original structure plan for Riverhead South reinforced the community's expectation of a defined centre. The existing Riverhead centre is located in a

relatively consolidated and logical manner, and also has connection to Riverhead War memorial Park.

24. The Urban Design assessment (Appendix 6) shows that the main Local Centre Zone is within a 400m walkable catchment for all residents within the plan change area. So, the isolated Local Centre Zone it is not justified by pedestrian accessibility. As noted, the existing Riverhead centre supports two min-marts or diaries, and major supermarkets are located on all routes west (Kumeu), South (Westgate) and east (Albany).

### ***Commercial Zoning – Local Centre Zone and the Neighbourhood Centre Zone – remedies sought***

25. We want any proposed commercial zoning to be justified by economic analysis that is based on a clear outline of existing zoning and activities in Riverhead, including under-utilising of zoned land and potential capacity, and recognition of the activities and services that would be provided by the retirement village and commercial activities that can be undertaken in the THAB zone via resource consent.
26. We want any proposed commercial zoning to be justified by economic analysis that is based on a well-reasoned and justifiable customer catchment which recognises the commercial and retail centres of Kumeu, Westgate and Albany, and does not unrealistically anticipate that people who live near these centres would instead travel to Riverhead for their shopping needs.
27. We want any new business zoning to demonstrate a consolidated and legible town centre, not exacerbate strip commercial areas fronting the highway. Most importantly by removing the proposed Local Centre Zone opposite Riverhead Point Road.

### **Residential Zoning - Mixed Housing Suburban Zone:**

28. Most of the land is proposed as Mixed Housing Suburban Zone. This zone allows for two and three storey detached and attached housing in a variety of types and sizes. Up to three dwellings are permitted as of right subject to compliance with the standards.
29. In comparison, existing Riverhead is mostly Single House zone. The plan change will result in much more dense development and generally taller houses and lots of multi-unit townhouses. Existing Riverhead is characterised by many large trees on private properties.
30. In contrast, large trees would be infrequent in the proposed Mixed Housing Suburban Zone which has minimal landscaping requirements (only 20% and this can be paved if there is canopy cover over (IX6.11. Landscaped area within the



Mixed Housing Suburban Zone) and only a 2.5m front yard standard which is not adequate for large growing tree. The outcome is that buildings will dominate the neighbourhood character. Overall, due to a lack of space or a requirement to plant trees on private sites, the neighbourhood character would be markedly different compared to existing Riverhead. We expect this difference in character to be noticeable and jarring, resulting in a lower quality of amenity. We want any new development to fit into the existing urban fabric of our community.

31. We are not sure that this character represents the 'unique sense of place' described as an intension in the precinct description.
32. No requirements for road reserve tree planting are proposed either, leaving the street tree outcome uncertain or minimal. Even in the green corridor there are no measurable outcomes for vegetation cover or trees.
33. The proposal fails to mention or adopt the council Auckland's Urban Ngahere (Forest) Strategy. The strategy recognises the social, environmental, economic, and cultural benefits of our urban ngahere (forest), and sets out a strategic approach to knowing, growing, and protecting it. It seeks to achieve increased canopy cover to 30 per cent across Auckland's urban area, and at least 15 per cent in every local board area. The proposed plan change should seek to provide overall canopy cover of 30% which would provide a range of health, social and economic benefits including reducing the urban heat effect of roads, buildings and impermeable surfaces. This could go some way to integrating the old and the new.
34. The precinct description also seeks to 'enable transition from the rural to the urban environment'. It achieves this outcome abruptly, rather than a smooth transition.
35. The zoning proposed does not provide any transition at the rural edge, for example, single house zoning could be applied to the outer 100 metres. There is little attempt to provide certainty of transition of scale or density, overall. Policies which direct this outcome adopt soft non-comital language, such as 'Encourage' (policies 15 and 16). It is not clear how 'encourage' has any real influence at the resource consent stage.
36. A 5 metre rear yard setback standard is proposed at the rural zone interface. This is to landscape or plant trees in the rear yard. A 5 metre yard would have no material visual difference to the abrupt transition between residential development and the rural environment. A larger rear yard, say 15m with a requirement to plant at least one large tree and a rural fence typology are obvious designs requirements that would go some way to achieving the intended transition outcome.
37. There is also no requirement to provide adequate front yards to enable the planting of trees. This was a requirement of the Riverhead South development, which contributes to the 'treed' neighbourhood character established and respects the character of old Riverhead and the many prominent mature trees. This requirement



should at least apply to the rural fringe parts of the site and would also contribute overall to sense of transition between the rural and residential land uses.

38. Another formative design requirement of Riverhead South was a rule prohibiting tall front yard fences. This outcome can also be observed widely in Riverhead South and contributes significantly to a sense of spaciousness with buildings set back and front yard landscaping visible. The plan change seeks to removes the usual requirement for low or visually permeable front yard fences without any explanation as to why. (refer IX.6. Standards page 11). This may result in a proliferation of tall front yard fences detrimental to a desired spacious character. It also has negative effects on CPTED outcomes.
39. There is no requirement to plant regular street trees on roads. Whilst often achieved during development, the supporting AUP policy context is vague. To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, we request minimum tree quantity outcomes are required for new roads. The density for the housing will result in no tree cover of value, so the work must be done in the streets.
40. The zone also does not propose any design response to the proposed green corridor network, aside from a lonely fence height standard. There are no provisions proposed to give effect to the Urban Design recommendation for: *“a high quality and vegetated interface for higher density development along the key movement routes and adjacent to existing residential development which contributes to the current landscaped character of streets in Riverhead.”* There is also little detail on how this will be achieved, given council parks recent directive for no gardens within the streetscape we are left wondering what this ‘green corridor’ will contain.

### ***Residential Zoning - Mixed Housing Suburban Zone – Relief sought***

41. Generally, we accept that density needs to be increased compared to the predominant Single house zone of Riverhead. But this should be balanced by stronger requirements for good urban design (for example, low front yard fences) and green infrastructure (for example requirements to plant trees on sites and on roads). Graduated density should be considered at the transition to rural zoning and higher density can be placed near the neighbourhood centre and open spaces.
42. We want front yards sized to be adequate for planting large trees, for example, 6 metres. We want a requirement for each site in the zone to plant one tree capable of growing 6m plus in height.
43. We want specific yard and landscape standards to apply at the rear of all sites which adjoin a rural zone to help establish a transition between the residential and rural environments.

44. We want a front yard fence control applied which applies H5.6.15 Front, side and rear fences and walls.
45. To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, we request minimum tree quantity outcomes are required for new roads. Trees are often the last consideration and underground infrastructure dominates the road corridor.
46. Overall, we want the plan change to require sufficient private and public planted areas to give effect to the intent of Auckland's Urban Ngahere (Forest) Strategy. This will also help integrate the higher intensity development with the character of existing Riverhead and the rural interface.

## Residential Zoning - Terrace Housing and Apartment Zone (THAB):

47. The THAB zone provides for high intensity living in the form of terrace house and apartments and should be predominantly around centres and the public transport network to support the highest levels of intensification.
48. North of Riverhead Road this zone is located within the retirement village area. If that goes ahead this area of THAB zoned land would be developed with a retail/hospitality corner and privatised retirement apartments.
49. The other area of THAB zone that will be available for development and housing which is not privatised is immediately west of the Neighbourhood Centre zone at the corner of Riverhead Road and CRH. This is overlaid with Sub-Precinct B



50. There is very little reasoning provided for this discrete area of zoning proposed, and why it does not also front CRH, or warp around the south of the Local Centre zone. We do not think the proposed zoning reflects a land parcel, and this may be influencing the proposed location and extent of that zone.

### ***Residential Zoning - Terrace Housing and Apartment Zone (THAB)- remedies sought***

51. We want any THAB zone location and extent to be based on a reasoned analysis and reflect the intent of the zone which is to provide density around a transport hub and/or a town centre.
52. We want the transition edge of THAB to the Mixed House Suburban zone to contain a local road to create a natural transition space between the different densities and building scale/forms.

### **Mixed Rural Zone:**

53. A mixed rural zone is proposed at the northern part of the plan change area.
54. This is a response to the obvious flaw with the original (pre-notification but rejected by the council) proposal which proposed this flood plain area as suitable for residential development.
55. The main issue with this zoning is that the land will not be able to be further developed or subdivided.
56. The outcome is that the 'key move' of a green corridor extending to the river, and an esplanade reserve vested as public space to the council cannot be realised. The maintenance and enhancement of public access to and along rivers is a matter of national importance under the RMA. The current proposal fails to achieve this.

### ***Mixed Rural Zone – relief sought***

57. We want provision to require the 20m margin of land from the stream to be zoned as public open space and vested to the council.
58. We want the green corridor to be extended to the open space esplanade reserve and be available for public access. The river is an important taonga for our community. Previous development has turned its back to it.

## Flooding and Stormwater:

59. We are concerned that current best practice stormwater system design methodologies (as outlined within Appendix 10) would not adequately address adverse effects of the development. Council's current practice has failed Riverhead as evidenced in the Auckland Floods February 2023 where new developments designed to council's standards resulted in flooding harm.
60. We request robust peer review and an overall bottom line requirement that stormwater will not cause upstream or downstream adverse effects.
61. Objective (6) is very weak in that it that allows for the outcome of inadequate stormwater management:  
*(6) Stormwater is managed to avoid, as far as practicable, or otherwise minimise or mitigate, adverse effects on the receiving environment.*
62. In our view, if there is so much uncertainty that the requestor seeks scope for it to not be 'practicable to 'avoid, remedy or mitigate adverse stormwater effects', then this indicates a lack of confidence that stormwater issues can be appropriately addressed. We consider that the objective must be amended to remove the caveat 'as far as practicable' so the adverse stormwater effects must be avoided, remedied or mitigated.
63. Stormwater systems across the plan change area are proposed via a 'central stormwater management treatment spine' intended to be part of a 'multi-purpose green corridor' To ensure a coordinated delivery there needs to be a requirement for this to be designed and agreed prior to development.
64. Without an overarching agreed plan for the stormwater corridor, it is not clear how an overall integrated stormwater system will result from development of multiple individual lots and/or stages and what specific land parts must occur on. The risk is that fragmented and uncoordinated design and implementation would result due to a lack of design clarity and responsibilities.
65. Despite a 'designed' stormwater spine system' being proposed, zoning is not used to clarify the location and extent of the system. The extensive land required for this purpose is inappropriately zoned residential. Zoning would provide certainty of the land required for the stormwater and green corridor purposes.
66. A matter of significant concern is that the open space and stormwater functions of the corridor will be located over many separate parcels, landowners, and development stages. It is also located on parcels owned by parties not subject to the plan change.

67. There is no requirement for the overall green corridor to be designed prior to development. If this was a requirement then it would be clear what needs to occur and where. The lack of clarity will likely result in a fragmented outcome overall due to separate parties leading different parts of the development at different times.
68. It is recommended that a policy be added to require a clear overall design for the combined stormwater and open space corridor needs to be agreed by council prior to development within the precinct. We request objectives, policies and standards be included to define the corridor, its various functions, and require it to be implemented in a staged and coordinated manner.
69. Policy 17 states:  
*“(17) Require subdivision and development to be consistent with the water sensitive approach outlined in the **supporting stormwater management plan**, including: ...”*  
  
It is not appropriate for a plan change to require adherence to a document that has not been reviewed and accepted by the council. The report itself clarifies: *“This report has been prepared solely for the benefit of our client with respect to the particular brief and it may not be relied upon in other contexts for any other purpose without the express approval by CKL.”*
70. In general, it is not good practice for an enduring planning document (the AUP OP) to refer to a third party report prepared in support of a plan change.
71. The supporting stormwater report was prepared when 22 Duke Street was proposed to be zoned for residential development. This land is now largely proposed to be zoned rural, and consequently could not be subdivided. This casts doubt as to whether this land can still be used for stormwater management and conveyance to the Rangitopuni tributary. It is not clear if this affects the integrity of the stormwater report findings.

### ***Flooding and Stormwater - relief sought***

72. We want robust peer review and an overall bottom line requirement in the plan change provisions that stormwater will not cause upstream or downstream adverse effects.
73. We want the clause of ‘as far as practicable’ to be removed from Objective (6), for example: *“Stormwater is managed to avoid, or minimise or adequately mitigate, adverse effects on the receiving environment.”*
74. We want a requirement for the overall stormwater corridor system and green network design to be agreed with council prior to development and not incrementally addressed via multiple separate development proposals. This would

likely require staging of development to align with development of the stormwater/green network corridor necessary to support that development.

75. We want clarity of the intended use and function of 22 Duke Street with regard to stormwater.

## Wastewater:

76. Residents report that the existing system is prone to failure, often setting off alarms particularly during rain events, we understand due to groundwater and ingress of water into the council's system. The concern is that the existing poor performing system is not fit for purpose overall, and that expanding it over a large area with high groundwater will negatively impact everybody.

## Wastewater – relief sought

77. We want provisions which ensure that the wastewater system is appropriate and fit for purpose, and that addition of the plan change area will not negatively impact existing and future users.

## Parks and Reserves:

78. The 'multi-purpose green corridors' are defined by the requestor as a 'key move' from an urban design perspective. This outcome agreed and supported in principle.
79. There is no requirement that the green corridor be offered to council for vesting, but this is commonly required under existing AUPOP precinct plans to provide certainty for council and developers. In our mind, a green corridor is not a wider road with more street trees.
80. Riparian margins are to be vested, but these are minimal and go nowhere near establishing the green corridor which needs to be located on a variety of land tenures. There needs to be a requirement that land necessary for the green network, but not accepted for vesting by council, is developed and held by an entity, like the proposal for riparian margins. Otherwise, parts of the network might not get delivered.
81. The intent of a contiguous open space network comprising of stormwater and passive open space functions is supported. Unfortunately, the provisions fail to define what the corridor will comprise of in real terms and do not require it to be delivered in practice. For example, what will be located in-between the stormwater ponds?
82. Policy (13)(d) suggests *"Co-locates smaller open spaces along the multi-purpose green corridor to achieve a connected network of open space."*



83. This policy shows a lack of consideration that the separately proposed ‘neighbourhood parks’ are limited to 3 separate locations and a flawed presumption that council would accept ad-hoc vesting of a range of “smaller parks” required to join-up the green corridor network. The network may be partly on the road reserves, but if this is the intention, then that needs to be clear and also needs to be a requirement of the road design.

84. The policy fails to incorporate the depth of the description of the green corridor in the s32 report:

*“The central north-south multi-purpose green corridor is a key structuring component in both the Greenways Plan and the proposed Structure Plan. Along with the collector road, this green corridor accommodates both passive and active open spaces, footpaths and dedicated cycleways. It also incorporates an existing intermittent stream.”*

85. A clear description the intended corridor composition and the types of land it will occupy is required in the plan. As noted, it appears that parts of the green network would likely be upon road reserve. However, there are no provisions which explain this or require ‘linking roads’ to deviate from a standard design to perform this function. For example, to ensure that necessary roads are designed to be a width adequate to contain a high level of green infrastructure in a dedicated or protected zone within the road reserve.

86. Clear expectations are needed in the plan to ensure that the multiple components of the green networks are considered and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor. Without this being a clear directive it is likely that conventional design would be applied to the various parts, and overall the green network would not be cohesively designed and delivered.

87. Overall, clear objectives, policies, standards and design/outcome expectations are required in the plan to ensure the overall ‘multi-purpose green corridors’ is delivered as anticipated. Policy 13 as drafted will not achieve this outcome.

88. The precinct description seeks to realise “...the opportunity to establish green corridors through the precinct”. Policy (13) only requires the council to encourage “...the provision of a continuous and connected multi-purpose green corridor”. The word ‘encourage’ is a weak and non-committal directive. Clauses (a) to (d) provide an unclear framework without specific detail of what is ‘required’ to be achieved. A stronger word such as ‘require’ is needed to ensure the overarching urban design ‘key move’ of the green corridor is delivered.

89. Policy 17 requires development and subdivision to provide “... a central stormwater management treatment spine through the precinct in general accordance with the multi-purpose green corridor in the locations indicatively shown on IX.10.2 Riverhead: Precinct plan 2;” This cannot be achieved in isolation of an overall agreed plan which spans the plan change area.
90. The supporting Stormwater and Flooding assessment contains a ‘Preliminary Masterplan’ which shows significant areas of land to be occupied by stormwater devices and green infrastructure, extending in area at some locations much further than shown on Precinct Plan 2.
91. If this drawing represents the modelled stormwater requirements, then the precinct plan should also include the same information so that developers and the community can understand what is required.

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Figure 10: Preliminary Master Plan - Version 10 (Source: Urban Acumen)



92. The supporting Urban Design report (Named Neighbourhood Design Statement) shows the multi-purpose green corridor extending via the land a 22 Duke Street to the Rangitopuni tributary and beyond via existing and potential future esplanade reserves alongside the stream and river.
93. We support the connection and the esplanade reserve alongside the tributary and note the extensive high quality esplanade reserve that has resulted from the Riverhead South network. A long term aspiration is to have a complete network of coastal connections. The proposed zoning of 22 Duke Street as (predominantly) Mixed Rural removes the possibility of subdivision and vesting of esplanade reserve along the tributary. The small parts which are proposed to be residentially zoned would appear to still leave the parent site over 4HA, and therefore not trigger the esplanade reserve vesting upon subdivision. We expect that this is an unintended consequence of changing the proposed zoning. We request that the 20m margin of

the tributary be zoned Open Space – Conservation, as part of the plan change, and that it's heavily weed infested margins be restored and planted, and that land be vested to the council. These are the outcomes which would have occurred if the land was able to be subdivided and are necessary to secure a necessary part of the long-term aspirational esplanade reserve network.

94. Objectives, policies and standards are also required to achieve public access links from the development to the zoned esplanade reserve. If 22 Duke Street is available for stormwater management purposes, then this outcome should be easily achieved, especially if parcels are subdivided as drainage reserves, as this may trigger the 4Ha or less lot size adjacent to the tributary to trigger esplanade reserve vesting.



95. There is no direct requirement to deliver the 3 proposed neighbourhood parks, only an indirect reference to section E38. We seek a direct requirement to deliver the parks, presuming support from council parks division.
96. One high value (notable value) Beech tree is identified which is clustered with many impressive specimen trees (including a 13m tall Kauri). The Beech sits within a cluster of magnificent trees worthy of retention and is an obvious location for a Neighbourhood Park. Policy (12) seeks that the Beech tree is incorporated into an open space, but Precinct Plan 2 does not identify this location for a Neighbourhood Park. This inconsistency needs to be corrected. This cluster of trees, planted by a family who have been in Riverhead for multiple generations could further help connect the character of existing Riverhead to that of the plan change area.
97. The Beech tree and surrounds should not be compromised by stormwater functions which also appear to be proposed within this location (refer structure plan) page 8.

98. Policy 12 does not require the retention of ‘other mature trees that are worthy of retention’ by caveating the policy with ‘*where possible*’. We seek that the option to ‘not retain worthy trees’ be removed and more directive wording applied. The site is a huge greenfield area with a lot of flexibility for development locations. Any trees of value should be required to be retained. The value of this cluster extends beyond the arboriculture assessment.
99. Large trees located near the CRH appear to not be recorded in the arboricultural report which appears to be an error.
100. The green corridor graphic, or ‘east-west connections reflecting potential original portage routes promoting awa ki awa linkage’ is shown on Precinct Plan 1 extending along and outside of the southern plan change boundary. Policy 19 contains an obtuse requirement for development to acknowledge key views and spiritual connections respond to identified on IX.10.1 Riverhead: Precinct plan 1 in the layout and/or design of development; in particular, sightlines to Te Ahu and Pukeharakeke, and connections to Papakoura Awa and Te Tōangaroa.
101. We of course cannot speak for mana whenua but note that the actual outcomes required are limited to locating and orientating streets and public open spaces to reference and respect the Māori cultural landscape values. This is unlikely to result in any material outcome in the development form. The proposed west-east roading pattern already adequately achieves the expected outcome. It is not clear how the development is required to respond to the southernmost connection, that is not even within the plan change area.

### ***Parks and Reserves – relief sought***

102. We want the requirement and composition for the green corridor to be determined and agreed in principle with council prior to any development, so that the required environmental, stormwater and connectivity outcomes are understood and delivered appropriately and fully by each discrete development parcel or stage.
103. We seek that necessary parts of the green corridor infrastructure which do not comprise of roads, neighbourhood parks or drainage reserves are offered to council for vesting or protected and maintained in perpetuity by an appropriate legal mechanism (as per IX.6.3. Riparian margin).
104. We want a clear description the intended corridor composition is required in the plan, and an explanation of how the multiple components of the green networks are to be determined and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor, and any other land that may be required.



105. We want the green corridor to extend to the Rangitopuni tributary and provide a public connection to a zoned open space esplanade reserve.
106. Overall, clear objectives, policies, standards and design/outcome expectations are required in the plan to ensure the overall 'multi-purpose green corridors' is delivered as anticipated, because Policy 13 as drafted will not achieve this outcome.
107. We want a neighbourhood park to be located to include the Beech tree and the overall grove of high value trees at this location.

### **Retirement Village (Matvin Group land):**

108. The technical approach of the plan change with respect to the Matvin retirement village land is unclear. It is noted in the s32 report but not in the plan change provisions. It is also noted in the urban design report as a consented development, containing buildings up to 5 stories tall, with 410 dwellings including 310 apartments. It is also included in the supporting stormwater report.
109. The plan change maps and provisions do not respond to the scale and poor urban design connectivity outcomes of the retirement village development. The only response is to propose zoning part of the site as THAB and the remainder as Mixed House Suburban, and Sub-Precinct B. This is of concern because the retirement village is located at the interface of the plan change area and existing Riverhead at Cambridge Road. It occupies a 500 metre long flank and only provides for a single pedestrian cross connection, available during daylight hours only.
110. The development of the retirement village is not certain to occur, however, the plan change proposal treats it as a certainty. Evidenced by the lack of local roads, pedestrian connectivity, or a considered interface with Cambridge Road, all of which would be expected on a greenfield area some 10 Hectares in area and positioned at a critical location. If the retirement village does not go ahead then the plan change should be able to provide a good practice development framework for this area consistent with the remainder of the plan change area, and adopting the key design drivers of the Urban Design report, being:
  - a connected physical environment
  - an integrated community
  - access to nature
  - vibrant and local
  - housing choice and affordability
  - proximity/convenience
111. Concerningly, despite recognising the retirement village (by way of omitting expected outcomes such as a green corridor, local roads and pedestrian connectivity, and a considered interface at Cambridge Road) the plan change also

does not propose any wider response to the retirement village form and function, should it go ahead.

112. For example, the Urban Design report recommends: *“a transition between taller buildings around the centre to lower densities and building forms in the remaining areas of the site” (pg 51)*. Requiring roads and pedestrian routes to interface with the lone public route through the retirement village should also be required in the plan change. The Sub-precincts which seek to provide some level of transition of buildings do not adjoin the retirement site but are contained within it.
113. Especially concerning is the detrimental impact that the retirement village will have on connectivity for the northern part of the plan change area and movements to and from the adjacent existing Riverhead. This matter is noted also in our transport section.

### ***Retirement Village (Matvin Group land) – remedies sought***

114. It is requested that the plan change be complete and robust in terms of dealing with the two scenarios of the retirement village being in place or not. Requiring cross-site connectivity and local roads for the scenario of the retirement village not being built.

### **Structure Plans and Consultation:**

115. Back in 2006, prior to being rezoned for development, Riverhead South also went through a plan change which was informed by a Structure Plan. This was Council led and involved the community through a series of consultation meetings including interactive design workshops. The people of Riverhead were actively involved in a meaningful way over a carefully planned process.
116. The structure plan was adopted into the then Rodney District plan ‘SPECIAL 30 (RIVERHEAD SOUTH) ZONE’. This included a comprehensive range of issues, objectives, policies, standards and assessment criteria to ensure that development reflected the needs of the community and council’s intent, whilst providing for good quality development.
117. That document delivered a planning framework informed by community participation. A range of built form outcomes are visible in Riverhead South today which were a product of this community/council collaborative process. Most significantly there was an emphasis on dwellings being set back from the street and for low or no front fences. These create a sense of spaciousness and openness at the front of houses and make for safe streets with high levels of passive surveillance.
118. These previously expressed community desires are not captured by the proposed plan change. The obvious outcome is that the character of the plan change area will be markedly different and not consistent with existing Riverhead. Density can be



provided, but it can also be balanced with adequate and open front yards and a requirement for trees. Mature trees are a defining element of existing Riverhead, including Riverhead south where significant trees were retained and sites are large enough to accommodate new large growing species.

119. In stark contrast the 'Structure Plan' (refer Appendix 4) supporting the current plan change application was not prepared with meaningful community involvement. Community consultation involved a meeting over a coffee with some members of the RCA, 2 'drop in community sessions and a summary of 'feedback'. In our view, these represent a token level of consultation designed to 'tick the box'.
120. We do not understand why the previous council led (but developer funded) process was collaborative and genuinely engaging, and the current process has been superficial, how is that democratic?
121. The Quality Planning website outlines good practice consultation for structure planning. It says:

*Consultation with key stakeholders and the community affected is an important component of the structure plan development process. The number and type of stakeholders identified and consulted with for a structure plan will depend on the scale and characteristics of the area and the issues to be managed.*

*To assist with consultation, it is good practice to develop an overall consultation plan for all groups including key stakeholders, tangata whenua and the wider community. This helps to identify all stakeholder and ensure that consultation and communications are managed in an integrated and co-ordinated way. This can also help to provide certainty to stakeholders about the opportunities to input into the structure plan process and the how the various consultation processes will be integrated into the final output. It is important that the communication or consultation plan recognises the potential for land ownership to change during the course of the structure planning exercise and any subsequent RMA plan changes.*

*Commencing consultation early in the process is important, and can help with:*

- *obtaining stakeholder buy-in to the process;*
- *gauging community and stakeholder levels of acceptance to broad concepts (such as the overall level of development) being proposed;*
- *fulfilling statutory duties under the RMA, LGA and Land Transport Management Act;*
- *incorporating and working through stakeholder concerns and aspirations while there is flexibility in the process to do so;*
- *identifying constraints and opportunities.*



122. In our view the consultation process fell well short of best practice. This is evidenced by how poorly the current plan change portrays the concerns and aspirations of the community compared to the previous process which involved meaningful involvement and consultation.
123. We are not out to stop change or development, as evidenced by involvement in the previous planning process. Rather we seek to ensure that the good things promised (such as the green corridor and infrastructure improvements) are properly designed, will be delivered as described (and when needed prior to adverse construction effects), and that due consideration is given to simple changes that could better integrate the plan change area with existing Riverhead, such as adequate front yards and tree planting. We very much would have preferred this submission to say that the process has been collaborate and effective, rather than needing to write such an involved submission and speak to these issues at a hearing and appeals if it gets to that.
124. We welcome the opportunity to conference with the requestors to resolve any matters of difference pre-hearing.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Chris Ridley  
**Date:** Friday, 17 May 2024 11:15:43 am

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Chris Ridley  
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 Agent's full name:  
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 Contact phone number: 021488274  
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 Whenuapai  
 Auckland 0618

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)  
 Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:  
 PC100

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
 Will create massive overpopulation without sufficient infrastructure. How can this even be thought of at this stage?

I or we seek the following decision by council: Decline the plan change

177.1

Submission date: 17 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
 Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Linda Margaret McFadyen  
**Date:** Friday, 17 May 2024 11:30:20 am

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Linda Margaret McFadyen

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Postal address:

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Auckland

Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Land identified in the Private Plan Change by Riverhead Landowner Group -

Property address: 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

My submission relates to the proposed development on 80.5 hectares on the western side of Riverhead Village.

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

Lack of a plan to address the impact on the infrastructure, wastewater and stormwater in Riverhead which would be adversely affected and could not cope with the increase in housing proposed in the development.

Traffic flow is already impacted and long traffic queues are presently being experienced by Riverhead residents.

There is already a proposed Retirement Village consented for building which will also greatly affect Riverhead Village, its infrastructure and its residents.

I or we seek the following decision by council: Decline the plan change

178.1

Submission date: 17 May 2024

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Francesca Johnson  
**Date:** Friday, 17 May 2024 11:45:26 am  
**Attachments:** [PPC 100 - Riverhead Community Association Submission FINAL\\_20240517113715.609.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

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 Agent's full name:  
 Email address: francesca\_kumeu@hotmail.com  
 Contact phone number:  
 Postal address:

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)  
 Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:  
 Land identified in the Private Plan Change by Riverhead Landowner Group

Property address: 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:  
 As per attached

I or we seek the following decision by council: Decline the plan change

179.1

Submission date: 17 May 2024

Supporting documents  
 PPC 100 - Riverhead Community Association Submission FINAL\_20240517113715.609.pdf

#### Attend a hearing

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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## **Riverhead Community Association submission to PC 100 (Private): Riverhead**

### **Introduction**

The Riverhead Community Association (RCA) is an incorporated society comprising of residents passionate about our community.

The RCA has 70 financial members and our Facebook group has 670 members, 170 of which have recently joined after the Plan Change 100 was put out for submissions.

The RCA provides a combined local voice and works collaboratively with Auckland Council and Auckland Transport on issues and projects which affect the Riverhead communities.

The RCA has a proven track record of advocating for community needs. From 2006 when Riverhead went through a plan change process for Riverhead South, RCA was at the table making a difference. We influenced the outcomes that were incorporated into the SPECIAL 30 (RIVERHEAD SOUTH) ZONE (legacy Rodney District Plan) which resulted in the spacious and attractive built form of Riverhead South.

The RCA has been active informing the community of PC100 via 2 public meetings and multiple topic Facebook updates. We have taken notice of key themes which have emerged, and these are compiled into this submission. In our view, this submission captures the major topics of concern consistently raised by the community at large.

The RCA is not anti-development.

We wish to be heard.

### **Council's Position Pre-Notification**

The RCA is cognisant of council's pre-notification reporting and the decision of the Planning, Environment and Parks Committee.

We concur in principle with council's description of the main issues, however, outline further matters of specific concern in this submission<sup>1</sup>.

*"The main issues will be the provision of infrastructure, whether the layout and provision for connections through the area are appropriate, the management of natural hazards and the intensity of development proposed. In respect of infrastructure, the applicant is proposing to provide new local transport upgrades as the land is developed. The extent to which these are sufficient can be considered through the analysis of submissions and*

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<sup>1</sup> Planning, Environment and Parks Committee, Agenda, Thursday 4 May, 2023, Paras. 72, 73

*detailed plan change review. It is noted that there are no committed or funded public transport service improvements at this time.”*

And

*“An important consideration is the effect of additional traffic from the potential new development enabled by the plan change on the wider transport network, and most notably the operation of SH16. NZTA Waka Kotahi are planning an upgrade to SH16 in the vicinity with the upgrade project to be completed in 2024/2025. The project extends from the end of the North Western Motorway from the Brigham Creek Road/Fred Taylor Drive/SH16 roundabout through to Waimauku - a 10km stretch. The section from Brigham Creek Road to the Taupaki roundabout will be four-laned with a new two-lane roundabout at the SH 16 /Coatesville Riverhead Highway intersection. It will also include wire rope median barriers and a 3-metre-wide shared path from Brigham Creek Road/Fred Taylor Drive/ SH 16 roundabout to Kumeu. The section from Huapai to Waimauku involves installation of wire rope median barriers and shoulder widening.”*

## **RCA – Position Overview**

The RCA opposes the plan change for the reasons set out in this submission.

The RCA welcomes the opportunity to work with the requestors and the council to resolve matters raised in this submission.

Matters of concern and remedies sought are listed below.

### **Transport:**

1. The plan change fails to adequately recognise and propose transport infrastructure upgrades required to manage adverse effects on the wider transport network. For example, SH16 is at times completely gridlocked with commuter traffic, the queue to get onto SH16 comes back to Hallertau at 6.30am! During weekends the line to Boric (the Coatesville Riverhead Highway (CRH)/SH16 intersection) is at the golf course. Another 3,000 residencies at Riverhead will exacerbate this greatly. There are very few local employment opportunities, most people will commute to work, and the single route bus is inadequate, inefficient and unreliable. The road has no capacity for walking or cycling to Westgate or Kumeu. Driving on roads is the only option.
2. Significantly, the development relies upon construction of a roundabout at the (CRH)/ Main Road (SH16) intersection to be built by Waka Kotahi NZ Transport Agency at some future time. Whilst this upgrade has been a long time coming it only addresses safety at the intersection. It will not improve capacity of the network which is already often dysfunctional. We also understand that this project is not currently programmed or funded.

3. The end of the NW motorway often backs up for a kilometre or more, and the roundabout intersection is routinely dysfunction creating huge traffic jams.
4. The plan change fails to recognise comprehensive local network transport improvements (within existing Riverhead) are warranted necessary to manage adverse effects on local transport.
5. The proposal is for limited local road 'upgrades'. But, to only deliver these in a fragmented and staged way based upon occupation of adjacent property. The upgrades do not have to be in place prior to construction when the first traffic impacts start.
6. Riverhead has under-provisioned streets, often with open drains, a lack of footpaths, unformed carriageway edges and few street trees. Some blocks are poorly connected and contain unformed paper roads. The development will increase pedestrian use over all of Riverhead, including to Riverhead School and to the two walkable pre-schools. All the realistic routes from the plan change area to destinations in Riverhead such as schools, pre-schools, shops, War Memorial Park and public walkways should be reviewed in terms of footpath provision and safety, and upgrades should be completed prior to the main development starting. This is to enable safety pedestrian movements for the existing and future people and children of Riverhead.
7. The plan change fails to recognise that local and wider transport upgrades are necessary to complete prior to development (earthworks and civil) commencement to manage the effects of construction traffic and safety.
8. The huge development area will require extensive earthworks and civil construction, including thousands of truck and vehicle movements well before any residence is occupied. Traffic upgrades, such as turning bays and pedestrian networks need to be functional and safe before the heavy traffic begins. The current plan change proposal to require limited improvements prior to occupation of a dwelling fails to recognise and mitigate the adverse construction traffic effects which will be particularly severed at main access routes and where locations where site access is feasible.
9. New subdivisions often lack on street parking. Demand for parking would spill over into the existing community where there are no formed road edges and open stormwater drains. Adequate on street parking needs to be required as we don't have the public transport options available.

### ***Transport – remedies sought***

10. Include provisions which state that development of the plan change area cannot proceed until wider network capacity and safety issues are addressed.
11. Include provisions which state that development of the plan change area cannot proceed until local road improvements have been completed, including function and safety assessments and any required upgrades to footpath routes and networks in Riverhead likely to be used by residents of the plan change area to access local destinations.
12. The enormous retirement village privatised site creates pinch points of available connectivity between the plan change area and existing Riverhead. These should be recognised and addressed by requirements for upgrades in the plan change provisions. For example, the road and pedestrian network of Te Roera Place, Duke Street, Cambridge Road, Queen Street, Alice Street and King Street will all be well used routes for people moving in and out of the plan change area, as pedestrians and in vehicles. These roads, and further routes to Riverhead School all warrant assessment and specific upgrades to ensure they are functional and safe. Similarly, the connection between the plan change area and Riverhead War Memorial Park has not been recognised as a primary route which is restricted by the CRH and the retirement village development. Specific provisions should also be applied to this area to ensure that development enables safe and logical east/west connections and road crossings.
13. Include provisions which require all required local and wider transport improvements to be in place prior to earthworks and related traffic impacts commencing.

### **Commercial Zoning – Local Centre Zone and the Neighbourhood Centre Zone:**

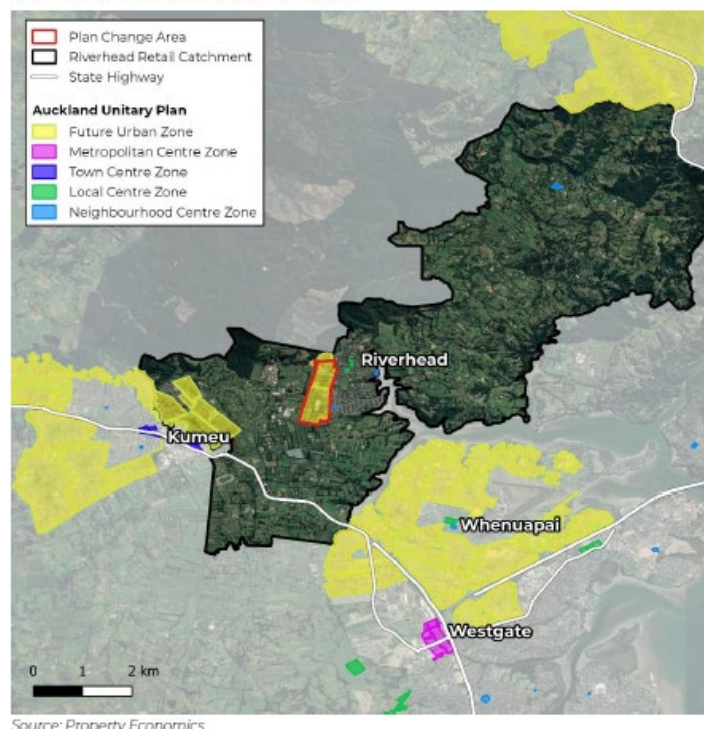
14. A Local Centre zone is proposed at the corner of Riverhead Road and the CRH and a Neighbourhood Centre Zone is proposed opposite Riverhead Point Drive (Hallertau).
15. Riverhead already has a consolidated area of Business Mixed Use zone and Local Centre zones sites which house 2 mini-marts, a real estate office, a restaurant/bar, bottle shop and a vape shop and Heritage café/takeaways on School Road. There is also the local vet and two-preschools, Lulu's café, and other retail and commercial yard type activities. The mixed-use zoned triangle contains a development which when completed will include a series of ground level shop or business, and the final part of the triangle is also under development and also zoned Business Mixed Use, therefore, is also available for commercial use. Hallertau sits further down the CRH.



16. The basis for the proposed commercial zones is an economic report which predicts future demand (Appendix 7 – Centres Assessment). This report provides a cursory summary of the existing commercial activities and zoning. It also bases predicted demand on a ‘Riverhead Core Retail Catchment’. The report provides no basis for the extent of this catchment despite it being a formative assumption. Astonishingly, the catchment extends and wraps around Kumeu and goes all the way to the Dairy Flat Highway.

extent of Riverhead's core economic market.

FIGURE 1: RIVERHEAD CORE RETAIL CATCHMENT



17. Defining this as a catchment for Riverhead as a retail destination is ridiculous at both extents of the area shown. People in the Kumeu area have no incentive to travel to Riverhead for shopping. Kumeu is well served with a supermarket and a huge range of retail and commercial services. Council's own consultation documents for Kumeu show the extensive land at Kumeu dedicated for these activities.

See below.



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18. People east of Coatesville are well served by old Albany and the Albany centre and beyond. Presuming that these people would also flock to Riverhead for shopping is not realistic because Albany is more accessible and contains a much greater range of shops and services.
19. The economic report also does not appear to consider the retirement village development and the hospitality, medical and other services it will contain which would be available to the residents and to the public. Restaurants, retail and healthcare facilities are specifically enabled by the proposed Sub-Precinct A within the retirement site.
20. The proposed THAB zoned areas also allows a range of commercial and service activities (via a RC). It is not clear why the economic report does not account for the possibility that the THAB zone can also contain businesses and retail, especially the area in proximity to the proposed Neighbourhood Centre zone where this development may be likely.
21. Another concern is that the proposed isolated Neighbourhood Centre Zone (adjacent Hallertau) will exacerbate an undesirable pattern of commercial strip development down the CRH.
22. A complete and justified basis for zoning this land as a Neighbourhood Centre Zone has not been provided. The proposed zone does represent a defined area of FRL landholding which naturally raises the question as to whether this discrete proposed zone is motivated by commercial gain rather a demonstrated need or sound design principles.
23. The original structure plan for Riverhead South reinforced the community's expectation of a defined centre. The existing Riverhead centre is located in a

relatively consolidated and logical manner, and also has connection to Riverhead War memorial Park.

24. The Urban Design assessment (Appendix 6) shows that the main Local Centre Zone is within a 400m walkable catchment for all residents within the plan change area. So, the isolated Local Centre Zone it is not justified by pedestrian accessibility. As noted, the existing Riverhead centre supports two min-marts or diaries, and major supermarkets are located on all routes west (Kumeu), South (Westgate) and east (Albany).

### ***Commercial Zoning – Local Centre Zone and the Neighbourhood Centre Zone – remedies sought***

25. We want any proposed commercial zoning to be justified by economic analysis that is based on a clear outline of existing zoning and activities in Riverhead, including under-utilising of zoned land and potential capacity, and recognition of the activities and services that would be provided by the retirement village and commercial activities that can be undertaken in the THAB zone via resource consent.
26. We want any proposed commercial zoning to be justified by economic analysis that is based on a well-reasoned and justifiable customer catchment which recognises the commercial and retail centres of Kumeu, Westgate and Albany, and does not unrealistically anticipate that people who live near these centres would instead travel to Riverhead for their shopping needs.
27. We want any new business zoning to demonstrate a consolidated and legible town centre, not exacerbate strip commercial areas fronting the highway. Most importantly by removing the proposed Local Centre Zone opposite Riverhead Point Road.

### **Residential Zoning - Mixed Housing Suburban Zone:**

28. Most of the land is proposed as Mixed Housing Suburban Zone. This zone allows for two and three storey detached and attached housing in a variety of types and sizes. Up to three dwellings are permitted as of right subject to compliance with the standards.
29. In comparison, existing Riverhead is mostly Single House zone. The plan change will result in much more dense development and generally taller houses and lots of multi-unit townhouses. Existing Riverhead is characterised by many large trees on private properties.
30. In contrast, large trees would be infrequent in the proposed Mixed Housing Suburban Zone which has minimal landscaping requirements (only 20% and this can be paved if there is canopy cover over (IX6.11. Landscaped area within the

Mixed Housing Suburban Zone) and only a 2.5m front yard standard which is not adequate for large growing tree. The outcome is that buildings will dominate the neighbourhood character. Overall, due to a lack of space or a requirement to plant trees on private sites, the neighbourhood character would be markedly different compared to existing Riverhead. We expect this difference in character to be noticeable and jarring, resulting in a lower quality of amenity. We want any new development to fit into the existing urban fabric of our community.

31. We are not sure that this character represents the 'unique sense of place' described as an intension in the precinct description.
32. No requirements for road reserve tree planting are proposed either, leaving the street tree outcome uncertain or minimal. Even in the green corridor there are no measurable outcomes for vegetation cover or trees.
33. The proposal fails to mention or adopt the council Auckland's Urban Ngahere (Forest) Strategy. The strategy recognises the social, environmental, economic, and cultural benefits of our urban ngahere (forest), and sets out a strategic approach to knowing, growing, and protecting it. It seeks to achieve increased canopy cover to 30 per cent across Auckland's urban area, and at least 15 per cent in every local board area. The proposed plan change should seek to provide overall canopy cover of 30% which would provide a range of health, social and economic benefits including reducing the urban heat effect of roads, buildings and impermeable surfaces. This could go some way to integrating the old and the new.
34. The precinct description also seeks to 'enable transition from the rural to the urban environment'. It achieves this outcome abruptly, rather than a smooth transition.
35. The zoning proposed does not provide any transition at the rural edge, for example, single house zoning could be applied to the outer 100 metres. There is little attempt to provide certainty of transition of scale or density, overall. Policies which direct this outcome adopt soft non-comital language, such as 'Encourage' (policies 15 and 16). It is not clear how 'encourage' has any real influence at the resource consent stage.
36. A 5 metre rear yard setback standard is proposed at the rural zone interface. This is to landscape or plant trees in the rear yard. A 5 metre yard would have no material visual difference to the abrupt transition between residential development and the rural environment. A larger rear yard, say 15m with a requirement to plant at least one large tree and a rural fence typology are obvious designs requirements that would go some way to achieving the intended transition outcome.
37. There is also no requirement to provide adequate front yards to enable the planting of trees. This was a requirement of the Riverhead South development, which contributes to the 'treed' neighbourhood character established and respects the character of old Riverhead and the many prominent mature trees. This requirement

should at least apply to the rural fringe parts of the site and would also contribute overall to sense of transition between the rural and residential land uses.

38. Another formative design requirement of Riverhead South was a rule prohibiting tall front yard fences. This outcome can also be observed widely in Riverhead South and contributes significantly to a sense of spaciousness with buildings set back and front yard landscaping visible. The plan change seeks to removes the usual requirement for low or visually permeable front yard fences without any explanation as to why. (refer IX.6. Standards page 11). This may result in a proliferation of tall front yard fences detrimental to a desired spacious character. It also has negative effects on CPTED outcomes.
39. There is no requirement to plant regular street trees on roads. Whilst often achieved during development, the supporting AUP policy context is vague. To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, we request minimum tree quantity outcomes are required for new roads. The density for the housing will result in no tree cover of value, so the work must be done in the streets.
40. The zone also does not propose any design response to the proposed green corridor network, aside from a lonely fence height standard. There are no provisions proposed to give effect to the Urban Design recommendation for: *“a high quality and vegetated interface for higher density development along the key movement routes and adjacent to existing residential development which contributes to the current landscaped character of streets in Riverhead.”* There is also little detail on how this will be achieved, given council parks recent directive for no gardens within the streetscape we are left wondering what this ‘green corridor’ will contain.

### ***Residential Zoning - Mixed Housing Suburban Zone – Relief sought***

41. Generally, we accept that density needs to be increased compared to the predominant Single house zone of Riverhead. But this should be balanced by stronger requirements for good urban design (for example, low front yard fences) and green infrastructure (for example requirements to plant trees on sites and on roads). Graduated density should be considered at the transition to rural zoning and higher density can be placed near the neighbourhood centre and open spaces.
42. We want front yards sized to be adequate for planting large trees, for example, 6 metres. We want a requirement for each site in the zone to plant one tree capable of growing 6m plus in height.
43. We want specific yard and landscape standards to apply at the rear of all sites which adjoin a rural zone to help establish a transition between the residential and rural environments.



44. We want a front yard fence control applied which applies H5.6.15 Front, side and rear fences and walls.
45. To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, we request minimum tree quantity outcomes are required for new roads. Trees are often the last consideration and underground infrastructure dominates the road corridor.
46. Overall, we want the plan change to require sufficient private and public planted areas to give effect to the intent of Auckland's Urban Ngahere (Forest) Strategy. This will also help integrate the higher intensity development with the character of existing Riverhead and the rural interface.

## Residential Zoning - Terrace Housing and Apartment Zone (THAB):

47. The THAB zone provides for high intensity living in the form of terrace house and apartments and should be predominantly around centres and the public transport network to support the highest levels of intensification.
48. North of Riverhead Road this zone is located within the retirement village area. If that goes ahead this area of THAB zoned land would be developed with a retail/hospitality corner and privatised retirement apartments.
49. The other area of THAB zone that will be available for development and housing which is not privatised is immediately west of the Neighbourhood Centre zone at the corner of Riverhead Road and CRH. This is overlaid with Sub-Precinct B





50. There is very little reasoning provided for this discrete area of zoning proposed, and why it does not also front CRH, or warp around the south of the Local Centre zone. We do not think the proposed zoning reflects a land parcel, and this may be influencing the proposed location and extent of that zone.

### ***Residential Zoning - Terrace Housing and Apartment Zone (THAB)- remedies sought***

51. We want any THAB zone location and extent to be based on a reasoned analysis and reflect the intent of the zone which is to provide density around a transport hub and/or a town centre.
52. We want the transition edge of THAB to the Mixed House Suburban zone to contain a local road to create a natural transition space between the different densities and building scale/forms.

### **Mixed Rural Zone:**

53. A mixed rural zone is proposed at the northern part of the plan change area.
54. This is a response to the obvious flaw with the original (pre-notification but rejected by the council) proposal which proposed this flood plain area as suitable for residential development.
55. The main issue with this zoning is that the land will not be able to be further developed or subdivided.
56. The outcome is that the 'key move' of a green corridor extending to the river, and an esplanade reserve vested as public space to the council cannot be realised. The maintenance and enhancement of public access to and along rivers is a matter of national importance under the RMA. The current proposal fails to achieve this.

### ***Mixed Rural Zone – relief sought***

57. We want provision to require the 20m margin of land from the stream to be zoned as public open space and vested to the council.
58. We want the green corridor to be extended to the open space esplanade reserve and be available for public access. The river is an important taonga for our community. Previous development has turned its back to it.

## Flooding and Stormwater:

59. We are concerned that current best practice stormwater system design methodologies (as outlined within Appendix 10) would not adequately address adverse effects of the development. Council's current practice has failed Riverhead as evidenced in the Auckland Floods February 2023 where new developments designed to council's standards resulted in flooding harm.
60. We request robust peer review and an overall bottom line requirement that stormwater will not cause upstream or downstream adverse effects.
61. Objective (6) is very weak in that it that allows for the outcome of inadequate stormwater management:  
*(6) Stormwater is managed to avoid, as far as practicable, or otherwise minimise or mitigate, adverse effects on the receiving environment.*
62. In our view, if there is so much uncertainty that the requestor seeks scope for it to not be 'practicable to 'avoid, remedy or mitigate adverse stormwater effects', then this indicates a lack of confidence that stormwater issues can be appropriately addressed. We consider that the objective must be amended to remove the caveat 'as far as practicable' so the adverse stormwater effects must be avoided, remedied or mitigated.
63. Stormwater systems across the plan change area are proposed via a 'central stormwater management treatment spine' intended to be part of a 'multi-purpose green corridor' To ensure a coordinated delivery there needs to be a requirement for this to be designed and agreed prior to development.
64. Without an overarching agreed plan for the stormwater corridor, it is not clear how an overall integrated stormwater system will result from development of multiple individual lots and/or stages and what specific land parts must occur on. The risk is that fragmented and uncoordinated design and implementation would result due to a lack of design clarity and responsibilities.
65. Despite a 'designed' stormwater spine system' being proposed, zoning is not used to clarify the location and extent of the system. The extensive land required for this purpose is inappropriately zoned residential. Zoning would provide certainty of the land required for the stormwater and green corridor purposes.
66. A matter of significant concern is that the open space and stormwater functions of the corridor will be located over many separate parcels, landowners, and development stages. It is also located on parcels owned by parties not subject to the plan change.

67. There is no requirement for the overall green corridor to be designed prior to development. If this was a requirement then it would be clear what needs to occur and where. The lack of clarity will likely result in a fragmented outcome overall due to separate parties leading different parts of the development at different times.
68. It is recommended that a policy be added to require a clear overall design for the combined stormwater and open space corridor needs to be agreed by council prior to development within the precinct. We request objectives, policies and standards be included to define the corridor, its various functions, and require it to be implemented in a staged and coordinated manner.
69. Policy 17 states:  
*“(17) Require subdivision and development to be consistent with the water sensitive approach outlined in the **supporting stormwater management plan**, including: ...”*  
  
It is not appropriate for a plan change to require adherence to a document that has not been reviewed and accepted by the council. The report itself clarifies: *“This report has been prepared solely for the benefit of our client with respect to the particular brief and it may not be relied upon in other contexts for any other purpose without the express approval by CKL.”*
70. In general, it is not good practice for an enduring planning document (the AUP OP) to refer to a third party report prepared in support of a plan change.
71. The supporting stormwater report was prepared when 22 Duke Street was proposed to be zoned for residential development. This land is now largely proposed to be zoned rural, and consequently could not be subdivided. This casts doubt as to whether this land can still be used for stormwater management and conveyance to the Rangitopuni tributary. It is not clear if this affects the integrity of the stormwater report findings.

### ***Flooding and Stormwater - relief sought***

72. We want robust peer review and an overall bottom line requirement in the plan change provisions that stormwater will not cause upstream or downstream adverse effects.
73. We want the clause of ‘as far as practicable’ to be removed from Objective (6), for example: *“Stormwater is managed to avoid, or minimise or adequately mitigate, adverse effects on the receiving environment.”*
74. We want a requirement for the overall stormwater corridor system and green network design to be agreed with council prior to development and not incrementally addressed via multiple separate development proposals. This would

likely require staging of development to align with development of the stormwater/green network corridor necessary to support that development.

75. We want clarity of the intended use and function of 22 Duke Street with regard to stormwater.

## Wastewater:

76. Residents report that the existing system is prone to failure, often setting off alarms particularly during rain events, we understand due to groundwater and ingress of water into the council's system. The concern is that the existing poor performing system is not fit for purpose overall, and that expanding it over a large area with high groundwater will negatively impact everybody.

## Wastewater – relief sought

77. We want provisions which ensure that the wastewater system is appropriate and fit for purpose, and that addition of the plan change area will not negatively impact existing and future users.

## Parks and Reserves:

78. The 'multi-purpose green corridors' are defined by the requestor as a 'key move' from an urban design perspective. This outcome agreed and supported in principle.
79. There is no requirement that the green corridor be offered to council for vesting, but this is commonly required under existing AUPOP precinct plans to provide certainty for council and developers. In our mind, a green corridor is not a wider road with more street trees.
80. Riparian margins are to be vested, but these are minimal and go nowhere near establishing the green corridor which needs to be located on a variety of land tenures. There needs to be a requirement that land necessary for the green network, but not accepted for vesting by council, is developed and held by an entity, like the proposal for riparian margins. Otherwise, parts of the network might not get delivered.
81. The intent of a contiguous open space network comprising of stormwater and passive open space functions is supported. Unfortunately, the provisions fail to define what the corridor will comprise of in real terms and do not require it to be delivered in practice. For example, what will be located in-between the stormwater ponds?
82. Policy (13)(d) suggests *"Co-locates smaller open spaces along the multi-purpose green corridor to achieve a connected network of open space."*

83. This policy shows a lack of consideration that the separately proposed ‘neighbourhood parks’ are limited to 3 separate locations and a flawed presumption that council would accept ad-hoc vesting of a range of “smaller parks” required to join-up the green corridor network. The network may be partly on the road reserves, but if this is the intention, then that needs to be clear and also needs to be a requirement of the road design.

84. The policy fails to incorporate the depth of the description of the green corridor in the s32 report:

*“The central north-south multi-purpose green corridor is a key structuring component in both the Greenways Plan and the proposed Structure Plan. Along with the collector road, this green corridor accommodates both passive and active open spaces, footpaths and dedicated cycleways. It also incorporates an existing intermittent stream.”*

85. A clear description the intended corridor composition and the types of land it will occupy is required in the plan. As noted, it appears that parts of the green network would likely be upon road reserve. However, there are no provisions which explain this or require ‘linking roads’ to deviate from a standard design to perform this function. For example, to ensure that necessary roads are designed to be a width adequate to contain a high level of green infrastructure in a dedicated or protected zone within the road reserve.

86. Clear expectations are needed in the plan to ensure that the multiple components of the green networks are considered and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor. Without this being a clear directive it is likely that conventional design would be applied to the various parts, and overall the green network would not be cohesively designed and delivered.

87. Overall, clear objectives, policies, standards and design/outcome expectations are required in the plan to ensure the overall ‘multi-purpose green corridors’ is delivered as anticipated. Policy 13 as drafted will not achieve this outcome.

88. The precinct description seeks to realise “...the opportunity to establish green corridors through the precinct”. Policy (13) only requires the council to encourage “...the provision of a continuous and connected multi-purpose green corridor”. The word ‘encourage’ is a weak and non-committal directive. Clauses (a) to (d) provide an unclear framework without specific detail of what is ‘required’ to be achieved. A stronger word such as ‘require’ is needed to ensure the overarching urban design ‘key move’ of the green corridor is delivered.

89. Policy 17 requires development and subdivision to provide “... a central stormwater management treatment spine through the precinct in general accordance with the multi-purpose green corridor in the locations indicatively shown on IX.10.2 Riverhead: Precinct plan 2;” This cannot be achieved in isolation of an overall agreed plan which spans the plan change area.
90. The supporting Stormwater and Flooding assessment contains a ‘Preliminary Masterplan’ which shows significant areas of land to be occupied by stormwater devices and green infrastructure, extending in area at some locations much further than shown on Precinct Plan 2.
91. If this drawing represents the modelled stormwater requirements, then the precinct plan should also include the same information so that developers and the community can understand what is required.

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Figure 10: Preliminary Master Plan - Version 10 (Source: Urban Acumen)



92. The supporting Urban Design report (Named Neighbourhood Design Statement) shows the multi-purpose green corridor extending via the land a 22 Duke Street to the Rangitopuni tributary and beyond via existing and potential future esplanade reserves alongside the stream and river.
93. We support the connection and the esplanade reserve alongside the tributary and note the extensive high quality esplanade reserve that has resulted from the Riverhead South network. A long term aspiration is to have a complete network of coastal connections. The proposed zoning of 22 Duke Street as (predominantly) Mixed Rural removes the possibility of subdivision and vesting of esplanade reserve along the tributary. The small parts which are proposed to be residentially zoned would appear to still leave the parent site over 4HA, and therefore not trigger the esplanade reserve vesting upon subdivision. We expect that this is an unintended consequence of changing the proposed zoning. We request that the 20m margin of



the tributary be zoned Open Space – Conservation, as part of the plan change, and that it's heavily weed infested margins be restored and planted, and that land be vested to the council. These are the outcomes which would have occurred if the land was able to be subdivided and are necessary to secure a necessary part of the long-term aspirational esplanade reserve network.

94. Objectives, policies and standards are also required to achieve public access links from the development to the zoned esplanade reserve. If 22 Duke Street is available for stormwater management purposes, then this outcome should be easily achieved, especially if parcels are subdivided as drainage reserves, as this may trigger the 4Ha or less lot size adjacent to the tributary to trigger esplanade reserve vesting.



95. There is no direct requirement to deliver the 3 proposed neighbourhood parks, only an indirect reference to section E38. We seek a direct requirement to deliver the parks, presuming support from council parks division.
96. One high value (notable value) Beech tree is identified which is clustered with many impressive specimen trees (including a 13m tall Kauri). The Beech sits within a cluster of magnificent trees worthy of retention and is an obvious location for a Neighbourhood Park. Policy (12) seeks that the Beech tree is incorporated into an open space, but Precinct Plan 2 does not identify this location for a Neighbourhood Park. This inconsistency needs to be corrected. This cluster of trees, planted by a family who have been in Riverhead for multiple generations could further help connect the character of existing Riverhead to that of the plan change area.
97. The Beech tree and surrounds should not be compromised by stormwater functions which also appear to be proposed within this location (refer structure plan) page 8.

98. Policy 12 does not require the retention of ‘other mature trees that are worthy of retention’ by caveating the policy with ‘*where possible*’. We seek that the option to ‘not retain worthy trees’ be removed and more directive wording applied. The site is a huge greenfield area with a lot of flexibility for development locations. Any trees of value should be required to be retained. The value of this cluster extends beyond the arboriculture assessment.
99. Large trees located near the CRH appear to not be recorded in the arboricultural report which appears to be an error.
100. The green corridor graphic, or ‘east-west connections reflecting potential original portage routes promoting awa ki awa linkage’ is shown on Precinct Plan 1 extending along and outside of the southern plan change boundary. Policy 19 contains an obtuse requirement for development to acknowledge key views and spiritual connections respond to identified on IX.10.1 Riverhead: Precinct plan 1 in the layout and/or design of development; in particular, sightlines to Te Ahu and Pukeharakeke, and connections to Papakoura Awa and Te Tōangaroa.
101. We of course cannot speak for mana whenua but note that the actual outcomes required are limited to locating and orientating streets and public open spaces to reference and respect the Māori cultural landscape values. This is unlikely to result in any material outcome in the development form. The proposed west-east roading pattern already adequately achieves the expected outcome. It is not clear how the development is required to respond to the southernmost connection, that is not even within the plan change area.

### ***Parks and Reserves – relief sought***

102. We want the requirement and composition for the green corridor to be determined and agreed in principle with council prior to any development, so that the required environmental, stormwater and connectivity outcomes are understood and delivered appropriately and fully by each discrete development parcel or stage.
103. We seek that necessary parts of the green corridor infrastructure which do not comprise of roads, neighbourhood parks or drainage reserves are offered to council for vesting or protected and maintained in perpetuity by an appropriate legal mechanism (as per IX.6.3. Riparian margin).
104. We want a clear description the intended corridor composition is required in the plan, and an explanation of how the multiple components of the green networks are to be determined and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor, and any other land that may be required.

105. We want the green corridor to extend to the Rangitopuni tributary and provide a public connection to a zoned open space esplanade reserve.
106. Overall, clear objectives, policies, standards and design/outcome expectations are required in the plan to ensure the overall 'multi-purpose green corridors' is delivered as anticipated, because Policy 13 as drafted will not achieve this outcome.
107. We want a neighbourhood park to be located to include the Beech tree and the overall grove of high value trees at this location.

### **Retirement Village (Matvin Group land):**

108. The technical approach of the plan change with respect to the Matvin retirement village land is unclear. It is noted in the s32 report but not in the plan change provisions. It is also noted in the urban design report as a consented development, containing buildings up to 5 stories tall, with 410 dwellings including 310 apartments. It is also included in the supporting stormwater report.
109. The plan change maps and provisions do not respond to the scale and poor urban design connectivity outcomes of the retirement village development. The only response is to propose zoning part of the site as THAB and the remainder as Mixed House Suburban, and Sub-Precinct B. This is of concern because the retirement village is located at the interface of the plan change area and existing Riverhead at Cambridge Road. It occupies a 500 metre long flank and only provides for a single pedestrian cross connection, available during daylight hours only.
110. The development of the retirement village is not certain to occur, however, the plan change proposal treats it as a certainty. Evidenced by the lack of local roads, pedestrian connectivity, or a considered interface with Cambridge Road, all of which would be expected on a greenfield area some 10 Hectares in area and positioned at a critical location. If the retirement village does not go ahead then the plan change should be able to provide a good practice development framework for this area consistent with the remainder of the plan change area, and adopting the key design drivers of the Urban Design report, being:
  - a connected physical environment
  - an integrated community
  - access to nature
  - vibrant and local
  - housing choice and affordability
  - proximity/convenience
111. Concerningly, despite recognising the retirement village (by way of omitting expected outcomes such as a green corridor, local roads and pedestrian connectivity, and a considered interface at Cambridge Road) the plan change also

does not propose any wider response to the retirement village form and function, should it go ahead.

112. For example, the Urban Design report recommends: *“a transition between taller buildings around the centre to lower densities and building forms in the remaining areas of the site” (pg 51)*. Requiring roads and pedestrian routes to interface with the lone public route through the retirement village should also be required in the plan change. The Sub-precincts which seek to provide some level of transition of buildings do not adjoin the retirement site but are contained within it.
113. Especially concerning is the detrimental impact that the retirement village will have on connectivity for the northern part of the plan change area and movements to and from the adjacent existing Riverhead. This matter is noted also in our transport section.

### ***Retirement Village (Matvin Group land) – remedies sought***

114. It is requested that the plan change be complete and robust in terms of dealing with the two scenarios of the retirement village being in place or not. Requiring cross-site connectivity and local roads for the scenario of the retirement village not being built.

### **Structure Plans and Consultation:**

115. Back in 2006, prior to being rezoned for development, Riverhead South also went through a plan change which was informed by a Structure Plan. This was Council led and involved the community through a series of consultation meetings including interactive design workshops. The people of Riverhead were actively involved in a meaningful way over a carefully planned process.
116. The structure plan was adopted into the then Rodney District plan ‘SPECIAL 30 (RIVERHEAD SOUTH) ZONE’. This included a comprehensive range of issues, objectives, policies, standards and assessment criteria to ensure that development reflected the needs of the community and council’s intent, whilst providing for good quality development.
117. That document delivered a planning framework informed by community participation. A range of built form outcomes are visible in Riverhead South today which were a product of this community/council collaborative process. Most significantly there was an emphasis on dwellings being set back from the street and for low or no front fences. These create a sense of spaciousness and openness at the front of houses and make for safe streets with high levels of passive surveillance.
118. These previously expressed community desires are not captured by the proposed plan change. The obvious outcome is that the character of the plan change area will be markedly different and not consistent with existing Riverhead. Density can be

provided, but it can also be balanced with adequate and open front yards and a requirement for trees. Mature trees are a defining element of existing Riverhead, including Riverhead south where significant trees were retained and sites are large enough to accommodate new large growing species.

119. In stark contrast the 'Structure Plan' (refer Appendix 4) supporting the current plan change application was not prepared with meaningful community involvement. Community consultation involved a meeting over a coffee with some members of the RCA, 2 'drop in community sessions and a summary of 'feedback'. In our view, these represent a token level of consultation designed to 'tick the box'.
120. We do not understand why the previous council led (but developer funded) process was collaborative and genuinely engaging, and the current process has been superficial, how is that democratic?
121. The Quality Planning website outlines good practice consultation for structure planning. It says:

*Consultation with key stakeholders and the community affected is an important component of the structure plan development process. The number and type of stakeholders identified and consulted with for a structure plan will depend on the scale and characteristics of the area and the issues to be managed.*

*To assist with consultation, it is good practice to develop an overall consultation plan for all groups including key stakeholders, tangata whenua and the wider community. This helps to identify all stakeholder and ensure that consultation and communications are managed in an integrated and co-ordinated way. This can also help to provide certainty to stakeholders about the opportunities to input into the structure plan process and the how the various consultation processes will be integrated into the final output. It is important that the communication or consultation plan recognises the potential for land ownership to change during the course of the structure planning exercise and any subsequent RMA plan changes.*

*Commencing consultation early in the process is important, and can help with:*

- *obtaining stakeholder buy-in to the process;*
- *gauging community and stakeholder levels of acceptance to broad concepts (such as the overall level of development) being proposed;*
- *fulfilling statutory duties under the RMA, LGA and Land Transport Management Act;*
- *incorporating and working through stakeholder concerns and aspirations while there is flexibility in the process to do so;*
- *identifying constraints and opportunities.*



122. In our view the consultation process fell well short of best practice. This is evidenced by how poorly the current plan change portrays the concerns and aspirations of the community compared to the previous process which involved meaningful involvement and consultation.
123. We are not out to stop change or development, as evidenced by involvement in the previous planning process. Rather we seek to ensure that the good things promised (such as the green corridor and infrastructure improvements) are properly designed, will be delivered as described (and when needed prior to adverse construction effects), and that due consideration is given to simple changes that could better integrate the plan change area with existing Riverhead, such as adequate front yards and tree planting. We very much would have preferred this submission to say that the process has been collaborate and effective, rather than needing to write such an involved submission and speak to these issues at a hearing and appeals if it gets to that.
124. We welcome the opportunity to conference with the requestors to resolve any matters of difference pre-hearing.



**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Marc Garratt  
**Date:** Friday, 17 May 2024 11:45:30 am

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Marc Garratt

Organisation name:

Agent's full name:

Email address: marcg70@hotmail.com

Contact phone number: 0211592548

Postal address:  
 37 Great North Road  
 Riverhead  
 Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Property address: Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

I do not believe the proposal has sufficient grounding or information in a number of issues including,  
 1) Storm water 2) Traffic management and infrastructure 3) Child/resident safety 4) Schooling 5)  
 Housing density (graduated density better)

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

I am a Riverhead resident and care about my community and don't want to see some quick fix  
 management in place of a suitable and quality project.

I or we seek the following decision by council: Decline the plan change

180.1

Submission date: 17 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Priya Khatri  
**Date:** Friday, 17 May 2024 12:00:54 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Priya Khatri

Organisation name:

Agent's full name:

Email address:

Contact phone number:

Postal address:

1 Wautaiti Drive

Riverhead

Auckland 0820

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:

1 Wautaiti Driver Riverhead

Property address:

Map or maps:

Other provisions:

Riverhead

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Before considering the commercial development Council needs to make infrastructure available such as 2 lanes from Coatesville Riverhead road to connect to the motorway, round about in the motorway as there are issues and people from the motor sometimes does not give way and we have to wait minimum of 30 mins to get on to the motorway during peak hours versus 5 mins at night quiet time.

There is also no proper and frequent and connected transportation available. Instead of spending millions on the Hamilton route train tracks, a must needed train tracks and train in Riverhead and Huapai would have reduce the congestion we face on daily basis.

Last year there was flooding in our streets, till date council has not taken any actions or made any changes to prevent this happening in the future.

These are the wider issues council needs to fix in first instance before looking into other things.

There is already few commercial activity like Golf and Strawberry picking and this adds to the existing congestion on the small road.

The streets are so small that once people park on street there is not enough space sometimes to go through.

You are always increasing the rates but in return we do not get anything. Simple thing like Courier also charges us extra for rural delivery which is unbelievable as our city rates are as much as the other urban rates. Plus the courier delivery take extra 2 days as we are RURAL. we do not get discounts for staying in rural area but rather a reap off from council rates and other services.

There is no high school for kids in riverhead. Why can't council first think of investing into these type of things rather than otherwise. Make the basic things available first!

I or we seek the following decision by council: Decline the plan change

181.1

Submission date: 17 May 2024

### **Attend a hearing**

Do you wish to be heard in support of your submission? No

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Shannon Malcolm  
**Date:** Friday, 17 May 2024 12:15:23 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Shannon Malcolm

Organisation name:

Agent's full name:

Email address: mailthemailcolms@gmail.com

Contact phone number: 021335988

Postal address:

28 Elliot Street

Riverhead

Auckland 0820

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:

Property address: Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

My main concerns relate to the failure to provide for adequate infrastructure, connections, management of natural hazards, together with the overall size of the proposed development.

In relation to infrastructure, there is no commitment to arrange or fund adequate public transport service improvements to deal with the influx of people, and the effect of the additional traffic from the proposed new development on the roads (namely SH16 and the Coatesville-Riverhead Highway). The roads in the affected area are already completely gridlocked with commuter traffic and there is a complete lack of public transport options. The roading itself is in a terrible state, full of potholes and in parts completely unsafe for its current usage - let alone the proposed increase in use. Any proposed or current upgrades by Waka Kotahi NZ Transport Agency do not begin to account for this. The proposal fails to adequately account for the infrastructure that would be required to even in part deal with the proposed increase in traffic and people.

The current plan change proposal only seeks to make limited improvements prior to occupation of the new dwellings. The proposal completely fails to recognise and mitigate the adverse construction traffic effects on main access routes for the current Riverhead community, and does not make adequate provision for the safety of current residents (particularly the huge number of children in the area).

There is a complete lack of parking. There is already limited street parking which is insufficient to deal with the current residents.

The next issue is the proposed Local Centre Zone and Neighbourhood Centre Zone. There are already existing areas of such. Between the current Riverhead shops and businesses, Kumeu/Huapai, Westgate and Albany retail areas, there are already many options for residents. This proposal would only increase traffic, and put even more pressure on the area with no benefit to the residents.

Majority of the land is proposed as Mixed Housing Suburban Zone. Currently Riverhead is mostly Single House zone. The proposed plan change will result in a very dense development with lots of multi-unit townhouses. A complete disregard for the current character of the neighbourhood, and would lead to a huge increase in people and pressure on the existing neighbourhood resources, services and facilities.

My main concern is the current best practice stormwater system design methodologies (as outlined within Appendix 10). These completely fail to adequately address the negative effects of the development. There is already a very real failure by Council to provide and maintain sufficient services to Riverhead as evidenced in the Auckland Floods February 2023. I hold my breath every time there is rainfall now, as there are continuing stormwater runoff, drainage and water flow issues throughout the Riverhead neighbourhood affecting private residents, and the general public using public areas, that have not be dealt with. The proposed development will completely overwhelm what is already a failing system.

The current proposal fails to ensure that adequate stormwater management be required as part of the development. I refer to Objective (6) which must be revised to remove the caveat 'as far as practicable' so the adverse stormwater effects must be avoided, remedied or mitigated. I submit that the proposed stormwater systems across the plan change area via the 'central stormwater management treatment spine' which is part of a 'multi-purpose green corridor' must be designed and agreed with Council prior to commencement of the development.

I submit that the stormwater and wastewater systems must be appropriate and fit for purpose, and agreed upon in full with Council, prior to commencement of the development; and that the plan change area will not negatively impact existing and future users.

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

I am a current resident of Riverhead. We have a young family, and are engaged members of the neighbourhood. We, along with many of our neighbours and friends, will be adversely affected by the plan change and this proposed development in its current form. This plan change fails miserably to account for what is required, at a bare minimum, to create a functioning and positive development. I am not against development or progress - but this plan change currently would only negatively affect the Riverhead community.

I or we seek the following decision by council: Decline the plan change

182.1

Submission date: 17 May 2024

### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Danielle Davies  
**Date:** Friday, 17 May 2024 12:15:37 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Danielle Davies

Organisation name:

Agent's full name:

Email address: danielle.davies@hotmail.co.nz

Contact phone number:

Postal address:

Kumeu  
Auckland 0891

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:

Property address: 95 Station Road

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

I am a resident in Huapai and currently experience congestion issues coming in and out. The intersection of SH16 and CRH is one of the main sources of congestion for vehicles leaving and entering Kumeu; vehicles stop on SH16 to let people out of CRH. Adding more housing and businesses to Riverhead will exacerbate the problem further by adding more vehicle movements. I do not agree with the traffic assessment that people will stay local. Many well paying jobs are outside of this area and many travel into the CDB and beyond.

The intersection should be upgraded to allow for free flow of traffic through this intersection to and from Kumeu, for example merging lanes for vehicles coming out of CRH and 2 lanes all the way along SH16 from the Brigham creek round about to the Taupaki Road round about. The lane to turn right into CRH from SH16 should be removed completely and road users directed to the roundabout at Taupaki.

The Kumeu bypass has been delayed, this project should be brought forward before more development takes place in riverhead.

I or we seek the following decision by council: Decline the plan change

183.1

Submission date: 17 May 2024

### Attend a hearing

Do you wish to be heard in support of your submission? No

### Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**Before you fill out the attached submission form, you should know:**

You need to include your full name, an email address, or an alternative postal address for your submission to be valid. Also provide a contact phone number so we can contact you for hearing schedules (where requested).

By taking part in this public submission process your submission will be made public. The information requested on this form is required by the Resource Management Act 1991 as any further submission supporting or opposing this submission is required to be forwarded to you as well as Auckland Council. Your name, address, telephone number, email address, signature (if applicable) and the content of your submission will be made publicly available in Auckland Council documents and on our website. These details are collected to better inform the public about all consents which have been issued through the Council.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious.
- It discloses no reasonable or relevant case.
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

## Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 16, 135 Albert Street  
Private Bag 92300  
Auckland 1142

For office use only

Submission No:

Receipt Date:

### Submitter details

**Full Name or Name of Agent (if applicable)**

Mr/Mrs/Miss/Ms(Full  
Name)

Graham & Sunita Ramsey

**Organisation Name (if submission is made on behalf of Organisation)**

**Address for service of Submitter**

75 Riverhead Point Drive, Riverhead

Telephone:

21888994

Email:

graham.ramsey.nz@gmail.com

Contact Person: (Name and designation, if applicable)

### Scope of submission

**This is a submission on the following proposed plan change / variation to an existing plan:**

Plan Change/Variation Number

PC 100 (Private)

Plan Change/Variation Name

Riverhead

**The specific provisions that my submission relates to are:**

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

PC 100 (Private)

Or

Property Address

Or

Map

Or

**Other (specify)**

### Submission

**My submission is:** (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I **support** the specific provisions identified above ☐

I **oppose** the specific provisions identified above ☒

I wish to have the provisions identified above amended Yes ☒ No ☐

The reasons for my views are:

See accompanying information

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

☐

Accept the proposed plan change / variation with amendments as outlined below

☐

Decline the proposed plan change / variation

☒

184.1

If the proposed plan change / variation is not declined, then amend it as outlined below.

☐

See accompanying information

I wish to be heard in support of my submission

☒

I do not wish to be heard in support of my submission

☐

If others make a similar submission, I will consider presenting a joint case with them at a hearing

☒

05/17/2024

Signature of Submitter  
(or person authorised to sign on behalf of submitter)

Date

#### Notes to person making submission:

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could ☐ /could not ☒ gain an advantage in trade competition through this submission.

**If you could gain an advantage in trade competition through this submission please complete the following:**

I am ☐ / am not ☐ directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

**From:** [graham.ramsey.nz@gmail.com](mailto:graham.ramsey.nz@gmail.com)  
**To:** [Unitary Plan](#)  
**Subject:** Submission on PC 100 (Private): Riverhead  
**Date:** Friday, 17 May 2024 1:04:37 pm  
**Attachments:** [pc100-form-5-signed.pdf](#)

---

Hi There

We oppose the Proposed Private Plan Change 100 in its current form.  
Our objections are based around concerns about the proposed intensity of the development in an urban fringe location that is already underserved with inadequate infrastructure. We propose instead that:

- Any development should be primarily H3 Residential – Single House Zone in keeping the existing character of Riverhead. | 184.2
- Any request to rezone to H6 Residential - Terrace Housing and Apartment Buildings Zone should be rejected | 184.3
- No development should commence before the transport improvements needed to address safety and capacity issues on State Highway 16, and the completion of the Northern Interceptor have been complete. | 184.4
- The proposal lacks consideration about the long term suitability of the Coatesville-Riverhead Highway as an east-west link | 184.5
- Any further development to Riverhead should address the lack of capacity for schools | 184.6
- Any further development to Riverhead must fully address community concerns regarding flooding | 184.7

**Planning**

There is insufficient progressiveness between the low density, single dwelling, large lot housing on the eastern side of the Coatesville-Riverhead Highway and the proposed apartment buildings on the western side of the Highway. That such a “cliff-like” transition would be jarring and unpleasant should be self-apparent. In our opinion, density should favour inner city suburbs and not the urban fringe.

We note that the “recent” Stone Mill development is held up as an example of a mixed use, medium density housing development located along Coatesville-Riverhead Highway. However (as an outside observer, and for all extents and purposes), this development has stalled and has been sitting disused for years. This development continues to harm the community, not help it.

In our opinion, the property bounded by Alice St and Coatesville-Riverhead Highway should be designated as the local centre to respect the existing town centre. This proximity to the Memorial Park would promote pedestrian activity between the two, noting that Memorial Park is a busy and active sports venue. This area is the existing “heart” of Riverhead, the plan change seeks to transplant it by relocating to the corner of Riverhead Rd and the Coatesville-Riverhead Highway. | 184.8

We generally support the proposed multi-purpose green corridor links. Furthermore, and in our

opinion, we believe the proposal would benefit from the multi-purpose green corridor linking the proposed network directly to the Memorial Park. This would allow residents to enjoy the amenity of the park without being forced to walk along a busy roadway. We also noting the lack of safe (or any) footpaths for some existing residents to access the Memorial Park which we discuss further below.

### **Transport**

We generally support the provision objectives for active mode transport. The area is popular with cyclists and any changes should support their safety along Coatesville-Riverhead Highway (along its entirety) and Riverhead Road.

We consider the development of safe walking and cycling space between the roundabout of Coatesville-Riverhead Highway and Kaipara Portage Road on the eastern side of the road and alongside the Memorial Park as essential, noting that the footpath pushes pedestrians unacceptably close to a busy roadway. The lack of a complete footpath on the eastern end of Princes St requires residents and children to walk on the road if they wish to use the park. We also draw attention to the lack of safe walking spaces throughout Riverhead generally making it unsafe for children to walk to and from school – some of this is identified in the Plan Change documents.

We note that there have been several significant traffic incidents outside the assessment window of the Integrated Transport Assessment. This includes a child being struck by a car on the pedestrian crossing outside the Beekeepers while on their way to school.

We note that traffic along Coatesville-Riverhead Highway continues to get heavier with this road being used as a key east-west link. The plan change documents support this view. We argue that there is need to plan for a new east-west link between Kumeu/Huapai and Albany North. It seems unlikely that the Coatesville-Riverhead Highway will offer sufficient capacity in the future as a single lane roadway given development plans for North and North-West Auckland. We respectfully propose that any development should plan for a future integrated transport link/dual carriageway running to the west of the development before such a corridor is obstructed by further development. In the near term, we wish to emphasise the safety of residents and children having to cross the existing Coatesville-Riverhead Highway, in particular to access the school.

We consider public transport to and from Riverhead is substantially insufficient to support terraced housing and apartments. There is no ferry, no rail, and bus services are infrequent and require a significant journey before arriving to an interchange. Any development must recognise that the primary means of transportation will be by personal car simply because residents lack choice. We note that the limited bus transport that exists only does so because existing residents were willing to pay a levy on top of their rates for this service.

The Integrated Transport Assessment acknowledges (and understates) the 1.8km queues along Coatesville-Riverhead Highway. These queues can occur on weekends as well as weekdays. All references to use of the Westgate Town Centre must be considered in this context – if it is too difficult to get to Westgate, we shop elsewhere (i.e. Kumeu or Albany). Addressing this issue is critical to any future development.



We also note that the plan change reports do not identify parts of Coatesville-Riverhead Highway that are prone to flooding and can become impassible during heavy rain. We draw attention to the culverts nearer to the interchange between Coatesville-Riverhead Highway and State Highway 16.

### **Schools**

The Riverhead area is underserved in terms of schooling. There is a single primary/intermediate school which is already overwhelmed from the influx of students following prior developments. There is no secondary school. In our opinion, further development would require development of a new intermediate school (to free up capacity at Riverhead School) and a new secondary school.

### **Flooding**

We acknowledge that there are a significant number of properties within Riverhead that are affected by flooding (for instance, Riverhead Forest Stream downstream of Duke St). Our understanding of the planning documentation is that we are not personally directly affected by flooding; however, we support any concerns that the community has expressed in this regard. We oppose development on any land prone to flooding. We oppose any development that creates or exacerbates any flood hazards within the community. We reject the argument per 9.4.3 of the storm water report that the increase in flood depth should be considered "minor".

Thank you for your consideration. Please do not hesitate to contact me if you require further information.

-----  
 Regards,  
 Graham Ramsey  
 Mob. 021 888 994

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Marcus Cook  
**Date:** Friday, 17 May 2024 1:15:28 pm  
**Attachments:** [PC100Submission.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Marcus Cook

Organisation name:

Agent's full name: Marcus Cook

Email address: marcusdavidcook@gmail.com

Contact phone number: 0211753205

Postal address:  
 5 Te Roera Place  
 Riverhead  
 Riverhead 0820

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:

Property address:

Map or maps:

Other provisions:  
 PC100 Riverhead

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:  
 Please see attached

I or we seek the following decision by council: Decline the plan change

185.1

Submission date: 17 May 2024

Supporting documents  
 PC100Submission.pdf

#### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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## INTRODUCTION

While we understand the requirement for additional housing stock (albeit the wisdom of further expansion “out” rather than “up” is debatable), Riverhead’s infrastructure is woefully underprepared for yet another development – particularly of this size. In my opinion, PC100 is therefore wildly premature, and should be declined or significantly delayed. The reasons include:

### 1 – FLOODING RISK

We have only recently had residents able to move back into their homes following the 2023 flooding events – albeit those houses are in some cases still undergoing remediation.

Other residents have undertaken “temporary” repairs (to fences, etc.) as they recognize the futility of a permanent fix until flooding issues are resolved. Building adjacent to a floodplain, as opposed to directly on it, will do little to ease the concerns of residents due to the dramatic increase in impermeable area proposed. Indeed, some residents speak of children still anxious during even moderate and commonplace rainfall events. It would not be unreasonable to assume that serious rainfall events will continue and likely increase in both frequency and severity because of climate change.

I note the Flooding Assessment report attached to PC100 is dated March 2022, which predates the worst flooding at the beginning of 2023. It also states the additional flooding effect to the (Riverhead Stream discharging) Northern part of the PC100 site (specifically to the Duke St, Mill Grove, Te Roera Place area) will be “less than minor”, stated as 30mm – small comfort when your house is underwater.

We were fortunate to not have severe injury or loss of life in the area (to my knowledge) during the February 2023 flooding. We should not gamble on being this fortunate in the future.

Unless and until the flooding risk is adequately mitigated, I would urge this application to be declined. I’m given to understand that Healthy Waters are “working on this” currently.

### 2 – TRANSPORT AND TRAFFIC

Riverhead is intolerably congested currently. It’s not unusual for there to be a 2km queue from 6am weekdays for traffic turning left from Coatesville Riverhead Highway (CRH) into SH16 (also into SH16 from Old North Road, Old Railway Road, and Riverhead Road). This causes congestion North on SH16 back into Kumeu, Huapai, and beyond. I note the PC application refers to SH16 being upgraded by Waka Kotahi “by 2025”. This seems optimistic at best and should not be given any significant weight in considering this application in my opinion.

Additionally, CRH (which also floods in moderately heavy rain) needs upgrading entirely between SH16 and Riverhead Road. PC100 provides for upgrading adjacent to the Plan Change area, but nowhere else. My understanding is that there is no timeline for this project currently.

Riverhead has minimal public transport capacity (and no mass transport options) so private car trips are largely unavoidable. The limited bus services we have (which only exist because of a special levy on local ratepayers) are often caught up in the traffic. I note the Proposal states capacity for 1450-1750 additional dwellings. The proposal further submits this would result in an additional 4270 trips generated per weekday, with the associated Greenhouse Gas Emission increases, particularly by idling vehicles.

We have an incomplete and fragmented footpath network currently. RLG proposes to establish footpaths on CRH and Riverhead Road where its precinct is only. This leaves us with the absurdity that adjacent to the precinct we will have delightful paths which will end abruptly, presumably leaving pedestrians and cyclists to brave the roadway proper. We have the same situation on Duke Street (and, in fact, the opposite side of CRH from the PC100 area), where the developer laid footpath to the edge of their development only and there is no continued footpath, as well as unformed road edges and open drains. In addition to being an absurdity and a significant safety concern, this is another barrier to our disabled and less mobile community.

Congestion on CRH and SH16 is not merely a “rush hour” issue. A visit to the area during the weekend, for example, would almost certainly see a long queue on CRH, and heavy congestion Southbound on SH16 all the way down Brigham Creek Hill to the motorway.

The Proposal refers to several specific roading upgrades proposed which will reportedly mitigate the effects of the development. Unless and until these stated upgrades (as a minimum) have been completed (or at least physically started), I would again urge this application to be declined.

### 3 – SCHOOL CAPACITY

Riverhead School is near capacity already. We have lost approximately half of the school field for temporary Portacom classrooms to be placed.

We have no intermediate or secondary schools locally (MOE are part way through ongoing negotiations for a local secondary school site, which will likely still be many years away).

Our secondary students therefore need to be transported in and out of Riverhead (our zoned High School is approximately 15km away). This contributes to our minimal bus services (referred to in Point 2) often being at capacity and indeed students (and non-students) have been unable to be collected at times.

I understand empirically the Riverhead Landowners Group (RLG) propose to set aside land for a school within the Plan Change area, albeit I can’t find reference to it in the Section 32 report. I’m led to believe that this is an additional Primary School whereas a secondary school is a more pressing need at this time. It would not appear that RLG are proposing to build this school, the cost of which would presumably fall to the MOE to fund from their budget.

It would be reasonable to assume the additional dwellings resulting from the proposed rezoning would result in additional students – and those students requiring secondary schooling would also have to be transported into and out of the area.

## 4 – STORMWATER AND WASTEWATER

Despite the reports contained within the PC100 documents, the current stormwater infrastructure is unable to cope with the current load (let alone with the forecast increased flow). All houses are required to have a sewage pump, and these will often error and trip in even a moderate rain event. Empirically, this is because the stormwater system overflows and creates back pressure in the wastewater system.

Residents have been advised by the pump service agents, in the case of sewage pump failure, that this is caused by back pressure in the system burning out the pumps. The (not insignificant) cost of replacement or repair is of course borne by the property owner.

Logically, if the stormwater is mixing into the wastewater system, it would follow that untreated wastewater would also be ending up in our stormwater system to be discharged into the environment.

These concerns are in addition to the flooding concerns referred to above.

### SUMMARY

In summary, Riverhead's infrastructure (both Council and Central Government responsibilities) is the victim of approximately 30 years of underinvestment, and simply unable to acceptably cope even with the current population. This raises serious safety and environmental concerns were PC100 to proceed at this time. Documents lodged in support of PC100 refer to proposed or future required upgrades to the inadequate infrastructure and services. This would suggest that PC100 is premature and should be declined at this time.

Note is taken (at IX.6.1.) that RLG intends not to "occupy" dwellings or buildings until certain stated upgrades are in place. This does not address any other required upgrades (i.e. Coatesville-Riverhead Highway itself for the entire distance back to SH16). This too suggests the Plan Change is premature and, perhaps cynically, raises suspicions in the community that this requirement may be lobbied to be changed in the future if the proposed site is rezoned at this time. It also fails to account for the (no doubt) thousands of cubic meters of topsoil which will need to be removed (raising additional concerns for flooding, as any stormwater controls proposed would not be operational during this time) as well as building materials brought in, with the associated vehicle movements, noise, and pollution. Most (if not all) of our roads are unsuitable for the repeated and concentrated heavy vehicle use which will no doubt be required for the building works. As mentioned, Coatesville Riverhead Highway (south of the PC100 Precinct) is sub-par, has no planned works and dozens of heavy vehicle movements would inevitably hasten the wear to the road and further endanger safety.

Many of these upgrades should have been completed before previous developments were permitted by previous Councils. I would strongly urge Council not to repeat the same mistakes, and to decline PC100 entirely until at least the stated improvements have been made to all relevant parts of the infrastructure.

It is worth noting that Riverhead infrastructure is underprepared in far more areas than PC100 indicates would require to be upgraded before “occupying” the area. The very real fear within the community is that these “extra” upgrades would again be overlooked or deferred.

The Riverhead community as a whole is not vehemently opposed to development in general and understands that this site will be developed at some point in the future. We’re simply asking for common sense to prevail and for our beleaguered infrastructure (both local and central government responsibilities) to be upgraded to an acceptable level before PC100 is accepted.

If PC 100 is not declined outright, I submit it should only be approved with the explicit condition that no development work of any kind is permitted to commence at all in the rezoned area until all the required infrastructure upgrades (not just those referred to in the proposal) are completed, unless that work is directly required for those upgrades. In this case, we would urge Council to work with RLG to ensure the upgrades are completed in the most efficient way possible to minimize disruption to the community.

185.2



**IN THE MATTER** of the Resource  
Management Act (**RMA**)

**A N D**

**IN THE MATTER** of a submission under  
clause 6 of the First  
Schedule to the RMA on  
Private Plan Change 100:  
Riverhead

**SUBMISSION ON NOTIFIED PROPOSAL FOR PRIVATE PLAN CHANGE 100  
TO THE AUCKLAND UNITARY PLAN (OPERATIVE IN PART)**

**To:** Auckland Council

**Name of submitter:** Auckland Council  
(contact: Craig Cairncross)

**Address for service:** 35 Albert Street  
Private Bag 92300  
Auckland 1142

**INTRODUCTION**

1. This is a submission on Private Plan Change 100: Riverhead (the **plan change**) to the Auckland Unitary Plan (Operative in Part) (**AUP**) by Riverhead Landowner Group (the **Applicant**).
2. This submission by Auckland Council is in its capacity as submitter (**ACS**).
3. ACS could not gain an advantage in trade competition through this submission.

## THE SPECIFIC PROVISIONS OF THE PROPOSAL THE SUBMISSION RELATES TO

4. The submission relates to the plan change in its entirety and all provisions including:
  - a. The Riverhead Precinct (the **Precinct**); and
  - b. The Auckland Unitary Plan Maps.

## SUBMISSION

5. ACS is concerned that the proposed zoning and plan change provisions are not the most appropriate to achieve the purpose of the RMA, given the potential flood hazard to infrastructure and property downstream of the plan change area, lack of public transport serving Riverhead and likely timing for delivery of the infrastructure prerequisites identified in the Auckland Future Development Strategy 2023 - 2053 (**FDS**).
6. ACS opposes the plan change, unless the matters raised in this submission are addressed.

### Strategic context

7. The National Policy Statement on Urban Development (**NPS-UD**) and Auckland Regional Policy Statement (**RPS**) Chapters B2 and B3 of the AUP contain objectives and policies that place strong emphasis on the importance of ensuring the integration of infrastructure, including transport infrastructure, with land use / urbanisation. There is also an emphasis on contributing to a well-functioning urban environment and quality compact urban form. Section 75(3) of the RMA requires the plan change to “give effect to” these higher order provisions.
8. Examples of these provisions include:
  - a) Objective 6 of the NPS-UD which requires local authority decisions on urban development that affect urban environments to be “*Integrated with infrastructure planning and funding decisions*”.
  - b) Policy 1 of the NPS-UD which requires planning decision to contribute to well-functioning urban environments that as a minimum have “*good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport*”.
  - c) RPS provisions in chapters B2 and B3, including B2.2.1(1); B2.2.2(2)(c) and (d); B2.2.2(4) and (7); B3.3.1(1)(b); B3.3.2(5). These provisions relate to growth occurring in a way that contributes to a well-functioning urban environment and integrates with the provisions of infrastructure.

9. Policy B2.2.2(7)<sup>1</sup> is directly relevant to the plan change as it applies to Future Urban Zoned land.

*B2.2.2(7) Enable rezoning of land within the Rural Urban Boundary or other land zoned future urban to accommodate urban growth in ways that contribute to a well-functioning urban environment and that do all of the following:*

- (a) support a quality compact urban form;*
- (b) provide for a range of housing types and employment choices for the area;*
- (c) integrate with the provision of infrastructure;*
- (caa) provide good accessibility, including by way of efficient and effective public or active transport;*
- (ca) incorporate improved resilience to the effects of climate change;*
- (d) follow the structure plan guidelines as set out in Appendix 1; and*
- (e) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets.*

10. B2.9 Explanation and Principal Reasons for Adoption of the objectives and policies, states:

*In addressing the effects of growth, a key factor is enabling sufficient development capacity in the urban area and sufficient land for new housing and businesses over the next 30 years. The objectives and policies guide the location of urban growth areas. They identify how greenfield land which is suitable for urbanisation will be managed until it is re-zoned for urban development. They encourage provision for Mana Whenua to develop and use their resources. They also set out the process to be followed to ensure that urban development is supported by infrastructure on a timely and efficient basis.*

*They should be considered in conjunction with the Council's other principal strategic plans such as the Auckland Plan, the Long-term plan and the Regional Land Transport Plan. The strategies and asset management plans of infrastructure providers will also be highly relevant.*

---

<sup>1</sup> As amended by decision on Plan Change 80

11. The explanatory text at B3.5 of the RPS confirms the intention that *“development, especially that associated with growth in greenfield areas, must be integrated and co-ordinated with the provision of infrastructure and the extension of networks”*.

### **Future Development Strategy**

12. Auckland Council recently adopted the FDS. This replaces the Future Urban Land Supply Strategy (2023-2027). Preparation of an FDS is a mandatory requirement for Tier 1 urban authorities (such as Auckland Council) under clause 3.13 NPS-UD. Subclause (1) of clause 3.13 states the purpose of an FDS is as follows:

*(a) to promote long-term strategic planning by setting out how a local authority intends to:*

- (i) achieve well-functioning urban environments in its existing and future urban areas; and*
- (ii) provide at least sufficient development capacity, as required by clauses 3.2 and 3.3, over the next 30 years to meet expected demand; and*

*(b) assist the integration of planning decisions under the Act with infrastructure planning and funding decisions.*

13. While the plan change was lodged prior to the FDS being finalised, it is relevant to consideration of the plan change, particularly in terms of whether urbanisation of the plan change land will integrate with the planning and funding of requisite infrastructure requirements.

### **Infrastructure prerequisites**

14. The FDS introduces infrastructure prerequisites, linked to the development readiness of areas. This is to ensure that bulk infrastructure for development is well-coordinated and is able to provide a safe, sustainable environment on which communities can be based. In the previous strategy the plan change area was identified as being development ready in the first half of decade two between 2028-2032. The FDS identifies the timing for the plan change area is now not before 2050+. The infrastructure prerequisites<sup>2</sup> identified for the Kumeu-Huapai-Riverhead Future Urban Areas are:

- Brigham to Waimauku SH16 Upgrade
- SH16 Main Road Upgrade
- Alternative State Highway

<sup>2</sup> Auckland Future Development Strategy 2023-2053, Appendix 6 Future urban infrastructure prerequisites, at p39

- Access Road upgrade
  - Coatesville-Riverhead Highway upgrades
  - Northwest Rapid Transit extension to Huapai
  - Riverhead separation from the KHR WW Main
15. Matters concerning the provision, timing and funding of infrastructure are directly relevant to decisions on zoning. It is not sound resource management practice and contrary to the purpose of the RMA to zone land for an activity when the infrastructure necessary to allow that activity to occur without adverse effects on the environment does not exist, or there is a high degree of uncertainty as to whether that infrastructure will be provided in a timely and efficient way.<sup>3</sup>
  16. Where infrastructure needed to support a plan change is not planned for in the Long Term Plan and Regional Land Transport Plan<sup>4</sup>, it is incumbent on the Applicant to show how the infrastructure needed to service the development would be provided.
  17. A key concern for ACS is therefore that the plan change must adequately provide for the strategic integration of transport, water and wastewater infrastructure, and the planning / funding of such infrastructure, with land use, otherwise it would be contrary to the principles of the FDS and the relevant provisions of the NPS-UD and RPS.
  18. ACS understands that Watercare Services Limited (**Watercare**) intends to file a submission addressing the impacts on its existing and planned water and wastewater networks. For the purposes of its submission, ACS notes that the Kumeu-Huapai-Riverhead wastewater main is not planned to be delivered until 2050 or later, which is not within the horizon of this plan change.
  19. Te Tupu Ngātahi Supporting Growth Alliance has lodged Notices of Requirement on behalf of Auckland Transport and Waka Kotahi New Zealand Transport Agency for route protection of planned transport projects in the North-West. These projects are not currently funded and there is no certainty on the timing/delivery of these projects. Moreover, the Notices of Requirement did not include the upgrade of Riverhead Road. Riverhead Road bisects the plan change area. While the Precinct provisions include a standard to enable the future road widening of Riverhead Road, there is no funding in the Regional Land Transport Plan for this project. The plan change includes Precinct provisions to require upgrades to nearby intersections and part of Coatesville-Riverhead Highway in the vicinity of the plan change area but does not address improvements to the wider network. ACS is concerned that urbanisation of the Riverhead future urban

<sup>3</sup> See, for instance, *Foreworld Developments Ltd v Napier City Council* EnvC Wellington W8/2005, 2 February 2005.

<sup>4</sup> Documents to which regard must be had under section 74(2)(b)(i) of the RMA.

area is premature and risks the area becoming an island of development connected to the wider transport network by rural roads with existing road safety issues. ACS understands that Auckland Transport (AT) intends to file a submission addressing the transport infrastructure upgrades and public transport services that would be necessary to support this plan change.

20. The FDS recognises there may be times where alternative funding methods or partners enable all or parts of these future urban areas to be live zoned earlier than where the provision of infrastructure solely rely on council funding. At this time, there are no Infrastructure Funding Agreements in place to deliver the required infrastructure earlier than what is provided for in the FDS.
21. ACS acknowledges that the Applicant has gone some way to address issues relating to infrastructure prerequisites. Specifically, the Precinct provisions include a standard relating to the staging of development to coincide with some identified transport upgrades in the vicinity of the plan change area. However, ACS is concerned that the provisions are not sufficient to address the funding and delivery of all the necessary transport and wastewater infrastructure prerequisites. ACS consider this is fundamental to enabling land zoned Future Urban to be rezoned for development ahead of the areas prioritised for investment in the FDS.

### **Stormwater management and flood risk**

22. The Section 32 Assessment Report identifies that the plan change area is traversed by a number of overland flow paths and that the northern portion is subject to flooding. A Stormwater Management and Flood Risk Assessment has been prepared in support of the plan change.
23. ACS acknowledges that part of the plan change area has been identified as subject to flooding and therefore not suitable for urbanisation and is proposed to be rezoned Rural – Mixed Rural. However, this area appears to be reduced in extent when compared to the area shown in the FDS for removal from the future urban area.<sup>5</sup> Furthermore, it does not align with the 100 year proposed flood extents shown in the Stormwater Management and Flood Risk Assessment.<sup>6</sup> ACS wishes to understand the basis for how the extent of the Rural – Mixed Rural zone was determined.
24. The Stormwater Management and Flood Risk Assessment recommends the application of the Stormwater Management Area Control – Flow 1 across the majority of the plan change area. ACS supports this.

<sup>5</sup> Future Development Strategy, Appendix 7, Figure 45 at p48

<sup>6</sup> At Appendix 1 Sheet A20405, Drawing 004

25. Additional information is required to understand changes in potential flood hazard to infrastructure and property downstream of the plan change area. This assessment should consider duration and frequency of flooding and potential impacts on the downstream network capacity. There are known flooding areas identified on the northern boundary of the plan change area, and potential flood risk to property downstream. Greater detail is required on the flood risk through the design storm profiles and not just concentrated on peak flood levels. In the absence of this information, ACS maintains significant concerns regarding potential flooding impacts resulting from the proposed land use change and the stormwater management approach. Urban environments that are resilient to the likely current and future effects of climate change are a minimum requirement under Policy 1(f) of the NPS-UD.

### **National Grid**

26. There is an 110kV transmission line traversing the northwest corner of the plan change land. The AUP applies the National Grid Corridor overlay to an area measuring 34 metres in width, with additional areas applying around the transmission towers. The National Grid Yard (Uncompromised) applies to an area within the overlay measuring 24 metres in width. The structure plan is inconsistent with policy D26.3(2) which directs that structure plans take into account the National Grid Corridor overlay to ensure the national grid is not compromised by reverse sensitivity and other effects. Rezoning land for residential activities within the National Grid Yard has the potential to compromise the national grid.
27. The plan change proposes that land subject to the National Grid Corridor Overlay is rezoned Mixed Rural and Mixed Housing Suburban Zone. Rezoning this land for residential use is contrary to AUP policies D26.3(1)(h) and D26.3(1)(j) which direct that establishment of activities sensitive to transmission lines are to be avoided in the National Grid Yard, as are new structures and buildings in the National Grid Yard (Uncompromised).

### **Well-functioning urban environment**

28. ACS has concerns about enabling this level of intensification at Riverhead and the extent to which it will contribute to a well-functioning urban environment. In addition to the concerns discussed earlier in this submission in relation to the strategic integration of transport and wastewater infrastructure, ACS is concerned about the level of accessibility for future residents of this area to employment, schools and services and the potential increase in greenhouse gas emissions. The minimum requirements of a well-functioning urban environment are set out in Policy 1 of the NPS-UD and include good accessibility and an urban environment that supports reductions in greenhouse gas emissions.



29. Riverhead is not served by a rapid transit network or frequent transit network, nor is it within a walkable catchment. ACS understands that there is no funding available to improve public transport services to Riverhead. While the Precinct provisions would deliver walking and cycling infrastructure within the plan change area, the funding and timing for delivery of improvements to connect Riverhead and Kumeu is not confirmed. The development of this area to the intensity proposed will result in an increase in vehicle trips due to the lack of planned and funded public transport and cycling infrastructure. This in turn will contribute to an increase in greenhouse gas emissions generated by additional road users.

## DECISION SOUGHT

30. ACS seeks the that the plan change is declined in its entirety, unless the matters raised in this submission are addressed. | 186.1
31. In the alternative to the primary relief, ACS seeks the following decisions if the plan change is approved:
- a. Amend the zoning of the land within the plan change so that:
    - i. The extent of the Rural – Mixed Rural zone encompasses all land in the plan change area that is within areas subject to significant risk of flooding and/or the National Grid Yard (Uncompromised). | 186.2
  - b. Retain the extent of the Stormwater Management Flow 1 area. | 186.3
  - c. Amend the Precinct description to identify that there are transport upgrades and bulk water supply and wastewater infrastructure required prior to subdivision and development. | 186.4
  - d. Amend the Precinct to add new objectives and policies to only enable subdivision and development to occur once upgrades to transport infrastructure and necessary bulk water supply and wastewater infrastructure are operational. | 186.5
  - e. Amend the Precinct to add new rules and standards to classify subdivision and development in advance of transport upgrades and necessary bulk water supply and wastewater infrastructure as a non-complying activity. | 186.6
  - f. Amend the Precinct to add new objectives, policies and rules to ensure downstream hazards are not exacerbated and to require appropriate mitigation. | 186.7

- g. Amend the Precinct to add a special information requirement to require all applications for two or more dwellings and subdivision to provide a Wastewater Infrastructure Capacity Assessment. | 186.8
- h. Amend the Precinct to address concerns in this submission relating to the adverse stormwater effects of urbanisation and downstream flooding. | 186.9
- i. Any other alternative or consequential amendments to address the matters outlined in this submission. | 186.10

### APPEARANCES AT THE HEARING

- 32. ACS wishes to be heard in support of its submission.
- 33. If others make a similar submission, ACS will consider presenting a joint case with them at the hearing.

**DATED** 17 May 2024

On behalf of Auckland Council as submitter:



---

Craig Cairncross, Manager Central South (Acting), Plans and Places

Address for service:

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Auckland 1142

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Kirsten Mills  
**Date:** Friday, 17 May 2024 1:45:15 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Kirsten Mills

Organisation name: -

Agent's full name:

Email address: k.l.mills@hotmail.com

Contact phone number:

Postal address:

ALbert Street

Riverhead

Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Full plan change 100

Property address: Riverhead

Map or maps: Riverhead

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

The specific note of no occupancy of the development until the SH16/Riverhead highway 'upgrade' is insufficient. The current road plan is a safety upgrade and will not address the already existing congestion issue. Additional pressure on the road network will make the area un-livable and the developer(s) and NZTA need to take sufficient future planning action to alleviate the issue.

I or we seek the following decision by council: Decline the plan change

Submission date: 17 May 2024

187.1

#### Attend a hearing

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Brett James Dickie  
**Date:** Friday, 17 May 2024 1:45:15 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Brett James Dickie

Organisation name: N/A

Agent's full name: N/A

Email address: bdickie178@hotmail.com

Contact phone number: 021 751 966

Postal address:  
 20 Tauwaka Crescent  
 Riverhead  
 Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:  
 Change to zoning, allowing an increase of housing, resulting in an increase of vehicles on already  
 burdened vehicle traffic infrastructure.

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
 The extra physical impact on time resulting from the already high traveling times in, around or  
 through Riverhead, resulting from the extra vehicles that the proposed housing will put on the road.  
 The roading to and from this area is already under substantial pressure and unrealistic wait times  
 on the road, this proposed increase in housing will increase this to a level that is unsustainable for  
 most people in the area to get to Work/schooling.

I or we seek the following decision by council: Decline the plan change

188.1

Submission date: 17 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Anne Clarke  
**Date:** Friday, 17 May 2024 1:45:18 pm

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Anne Clarke

Organisation name:

Agent's full name: Anne Clarke

Email address: anneclarke198@gmail.com

Contact phone number:

Postal address:

22 Rosella Grove WAIMAUKU 0812

Waimauku

Waimauku 0812

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:

Property address: Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

This massive multi-story apartment development will effectively double the population of Riverhead and add to our traffic (and flooding woes). It will also ruin the character of Old Riverhead.

Roading issues from Kumeu to the motorway - especially the Coatesville Riverhead Highway intersection - MUST be sorted BEFORE this development goes in.

More thought needs to be given to stormwater than what they have provided. This concrete jungle will add more pressure to storm water issues for our community, who have already suffered greatly from flooding 3x during the "once in a hundred year" floods.

Where are all these kids going to go to school? We've been asking for a high-school for decades. Massey High is at capacity now! How much further out will we need to send our children as they get older.



I or we seek the following decision by council: Decline the plan change

189.1

Submission date: 17 May 2024

### Attend a hearing

Do you wish to be heard in support of your submission? No

### Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Michelle Gillespie  
**Date:** Friday, 17 May 2024 2:00:20 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Michelle Gillespie

Organisation name:

Agent's full name:

Email address: mcnairm@hotmail.com

Contact phone number:

Postal address:  
 11 William Blake Way  
 Riverhead  
 Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

The plan change requests is frivolous or vexatious Clause 25(4)(a); The plan change request is not in accordance with the sound resource management practice

Property address: All

Map or maps: All

Other provisions:

Lack of infrastructure, including emergency services, roading, schools, public transport etc. The report mention character of Riverhead describing it as workings man environment and a satellite area - contradicts itself by suggesting the urban growth inline with what has occurred in Kumeu/Huapai.

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

The current road infrastructure struggles to accommodate current road users, with peak times being some of the worst in Auckland. The area has limited police, ambulance presence and is supported by a volunteer fire station in kumeu.

Riverhead lacks adequate safe footpaths, street lighting and has many open drains.

School options are limited with many of the local children once reaching intermediate having to travel over an hour each way to be able to access decent education options.

With more green space being taken up by higher density housing (small sections, townhouses, apartments) where there is little ability for the ground to absorb the rain during the downpours more

chances of greater flooding to the surrounding areas.

I or we seek the following decision by council: Approve the plan change without any amendments | 190.1

Details of amendments:

Submission date: 17 May 2024

### **Attend a hearing**

Do you wish to be heard in support of your submission? No

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Glen MacKellaig  
**Date:** Friday, 17 May 2024 2:00:35 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Glen MacKellaig

Organisation name:

Agent's full name:

Email address: glen@mackellaig.com

Contact phone number: 02102798384

Postal address:

14 Maude Street

Riverhead

Auckland 0840

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

As a resident for over 12 years, I can't believe the lack of investment in infrastructure and schools in the area. Traffic is already a nightmare and to consider this development going ahead is a joke. No High Schools in Kumeu/Riverhead- Riverhead zoned for Massey High School??? Unbelievable.

I or we seek the following decision by council: Decline the plan change

191.1

Submission date: 17 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**Before you fill out the attached submission form, you should know:**

You need to include your full name, an email address, or an alternative postal address for your submission to be valid. Also provide a contact phone number so we can contact you for hearing schedules (where requested).

By taking part in this public submission process your submission will be made public. The information requested on this form is required by the Resource Management Act 1991 as any further submission supporting or opposing this submission is required to be forwarded to you as well as Auckland Council. Your name, address, telephone number, email address, signature (if applicable) and the content of your submission will be made publicly available in Auckland Council documents and on our website. These details are collected to better inform the public about all consents which have been issued through the Council.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious.
- It discloses no reasonable or relevant case.
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

## Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 16, 135 Albert Street  
Private Bag 92300  
Auckland 1142

For office use only

Submission No:

Receipt Date:

### Submitter details

#### Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full  
Name)

Olga Sakey

#### Organisation Name (if submission is made on behalf of Organisation)

Kumeu Community Action but officially known as The Kumeu-Huapai Residents and Ratepayers Association Incorporated

#### Address for service of Submitter

30 Matatea Road R D 1 Waimauku, Auckland 0881.

Telephone:

21774784

Email:

olga.sakey@gmail.com

Contact Person: (Name and designation, if applicable)

### Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 100 (Private)

Plan Change/Variation Name

Riverhead

#### The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Or

Property Address

All the land identified in the application for Private Plan Change by Riverhead Landowner Group, 80.5 hectares on Western side of Riverhead

Or

Map

Or

Other (specify)

### Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)



I **support** the specific provisions identified above ☐

I **oppose** the specific provisions identified above ☒

I wish to have the provisions identified above amended Yes ☐ No ☒

The reasons for my views are:

Refer to attached submission.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

☐

Accept the proposed plan change / variation with amendments as outlined below

☐

Decline the proposed plan change / variation

☒

192.1

If the proposed plan change / variation is not declined, then amend it as outlined below.

☐

Refer to the attached submission.

I wish to be heard in support of my submission

☒

I do not wish to be heard in support of my submission

☐

If others make a similar submission, I will consider presenting a joint case with them at a hearing

☒


Signature of Submitter  
(or person authorised to sign on behalf of submitter)

17/05/2024

Date

#### Notes to person making submission:

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could ☐ /could not ☒ gain an advantage in trade competition through this submission.

**If you could gain an advantage in trade competition through this submission please complete the following:**

I am ☐ / am not ☐ directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

## Submission on Private Plan Change 100: Riverhead

### 1. Introduction

- 1.1. This document forms part of Kumeu Community Action's (officially known as The Kumeu-Huapai Residents & Ratepayers Association Inc) (KCA) submission to Auckland Council on Private Plan Change 100 Riverhead (PC100).
- 1.2. KCA consists of residents and ratepayers in the Kumeu-Huapai and surrounding areas. The purpose of our group is to represent the views and interest of residents in the area, with a particular focus on improving infrastructure, public transport, public services and ensuring the coordinated planning and design of development and intensification.
- 1.3. KCA's interest in PC100 relates to ensuring future urban land is suitably identified in areas that are outside of natural hazards and that can be serviced with the appropriate level of infrastructure required.

### 2. Matters of Interest to KCA

#### *Lack of Infrastructure*

- 2.1. PC100 aims to rezone 6 ha of land in Riverhead from Future Urban to Rural-Mixed Rural zone and 75.5 ha of land to a mix of Residential-Mixed Housing Suburban and Residential – Terrace Housing and Apartment Building, Business-Local Centre and Business-Neighbourhood Centre zones. PC100 also proposes shifting the Rural Urban Boundary to align with the boundary between the proposed Rural Mixed Rural zoning and the urban zones.
- 2.2. Of interest to KCA, this plan change constitutes a significant plan change that, if approved, would result in a departure from Auckland Council's own Future Development Strategy.
- 2.3. As KCA has noted in previous submissions and feedback to Council, Riverhead and its surrounding areas have been subject to considerable residential development over the last ten years – however infrastructure has not kept up with demand. PC100 involves 75.5 ha of land being rezoned to a high density zoning, which will result in thousands of houses and more pressure on roading and social infrastructure that is already under pressure.
- 2.4. This issue was noted by Auckland Council when they put forward the Draft Future Development Strategy (now adopted). The Riverhead and surrounding area are not equipped to deal with the scale of development that this plan change would result in.
- 2.5. It is also noted that this plan change will result in higher vehicle kilometres travelled (VKT) and transport-related emissions, compared to other future urban areas currently zoned, as public transport and employment opportunities in Riverhead and Kumeu / Huapai remain limited.

- 2.6. On that basis, KCA considers that PC100 would result in inappropriate development, that will ultimately result in higher VKT and pressure on infrastructure that is already under resourced.

#### ***Natural Hazards***

- 2.7. PC100 involves rezoning land to Future Urban that are in identified 1% AEP floodplains.
- 2.8. This will result in residential development occurring in land that is subject to natural hazards, which completely contradicts Auckland Council's own Future Development Strategy.
- 2.9. In the past two years, the Kumeu-Huapai and Riverhead areas have experienced three significant flood events that have resulted in extensive damage to homes and businesses. Avoiding further residential development in these areas in the future is vital, in light of more frequent and impactful weather events occurring as a result of climate change. PC100 will result in inappropriate residential development occurring in land that is subject to natural hazards, which not only endangers property but ultimately poses a risk to people and lives.

### **3. Conclusion**

KCA **opposes** PC100 and seeks that Auckland Council **declines** the application.

KCA wishes to be **heard** in support of their submission.

Yours sincerely,



Olga Sakey

**Deputy Chair**

**Kumeu Community Action** (The Kumeu-Huapai Residents & Ratepayers Association Inc)

[www.kumeucommunityaction.org.nz](http://www.kumeucommunityaction.org.nz)

Dated 17 May 2024

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Olga Sakey  
**Date:** Friday, 17 May 2024 2:45:19 pm  
**Attachments:** [KCA Submission on PC100 - Final.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Olga Sakey

Organisation name: Kumeu Community Action (The Kumeu-Huapai Residents and Ratepayers Association Incorporated)

Agent's full name: Olga Sakey (Deputy Chairperson)

Email address: olga.sakey@gmail.com

Contact phone number: 021774784

Postal address:  
 30 Matatea Road  
 Waimuaku  
 Auckland 0881

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:

Property address: All the land identified in Private Change 100 by Riverhead Landowner Group, 80.5 hectares on Western side of Riverhead.

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:  
 Refer to attached submission paper.

I or we seek the following decision by council: Decline the plan change

Submission date: 17 May 2024

Supporting documents  
 KCA Submission on PC100 - Final.pdf

#### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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## Submission on Private Plan Change 100: Riverhead

### 1. Introduction

- 1.1. This document forms part of Kumeu Community Action's (officially known as The Kumeu-Huapai Residents & Ratepayers Association Inc) (KCA) submission to Auckland Council on Private Plan Change 100 Riverhead (PC100).
- 1.2. KCA consists of residents and ratepayers in the Kumeu-Huapai and surrounding areas. The purpose of our group is to represent the views and interest of residents in the area, with a particular focus on improving infrastructure, public transport, public services and ensuring the coordinated planning and design of development and intensification.
- 1.3. KCA's interest in PC100 relates to ensuring future urban land is suitably identified in areas that are outside of natural hazards and that can be serviced with the appropriate level of infrastructure required.

### 2. Matters of Interest to KCA

#### *Lack of Infrastructure*

- 2.1. PC100 aims to rezone 6 ha of land in Riverhead from Future Urban to Rural-Mixed Rural zone and 75.5 ha of land to a mix of Residential-Mixed Housing Suburban and Residential – Terrace Housing and Apartment Building, Business-Local Centre and Business-Neighbourhood Centre zones. PC100 also proposes shifting the Rural Urban Boundary to align with the boundary between the proposed Rural Mixed Rural zoning and the urban zones.
- 2.2. Of interest to KCA, this plan change constitutes a significant plan change that, if approved, would result in a departure from Auckland Council's own Future Development Strategy.
- 2.3. As KCA has noted in previous submissions and feedback to Council, Riverhead and its surrounding areas have been subject to considerable residential development over the last ten years – however infrastructure has not kept up with demand. PC100 involves 75.5 ha of land being rezoned to a high density zoning, which will result in thousands of houses and more pressure on roading and social infrastructure that is already under pressure.
- 2.4. This issue was noted by Auckland Council when they put forward the Draft Future Development Strategy (now adopted). The Riverhead and surrounding area are not equipped to deal with the scale of development that this plan change would result in.
- 2.5. It is also noted that this plan change will result in higher vehicle kilometres travelled (VKT) and transport-related emissions, compared to other future urban areas currently zoned, as public transport and employment opportunities in Riverhead and Kumeu / Huapai remain limited.

- 2.6. On that basis, KCA considers that PC100 would result in inappropriate development, that will ultimately result in higher VKT and pressure on infrastructure that is already under resourced.

#### ***Natural Hazards***

- 2.7. PC100 involves rezoning land to Future Urban that are in identified 1% AEP floodplains.

- 2.8. This will result in residential development occurring in land that is subject to natural hazards, which completely contradicts Auckland Council's own Future Development Strategy.

- 2.9. In the past two years, the Kumeu-Huapai and Riverhead areas have experienced three significant flood events that have resulted in extensive damage to homes and businesses. Avoiding further residential development in these areas in the future is vital, in light of more frequent and impactful weather events occurring as a result of climate change. PC100 will result in inappropriate residential development occurring in land that is subject to natural hazards, which not only endangers property but ultimately poses a risk to people and lives.

### **3. Conclusion**

KCA **opposes** PC100 and seeks that Auckland Council **declines** the application.

KCA wishes to be **heard** in support of their submission.

Yours sincerely,



Olga Sakey

**Deputy Chair**

**Kumeu Community Action** (The Kumeu-Huapai Residents & Ratepayers Association Inc)

[www.kumeucommunityaction.org.nz](http://www.kumeucommunityaction.org.nz)

Dated 17 May 2024



**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Christopher James Redditt  
**Date:** Friday, 17 May 2024 2:15:20 pm

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Christopher James Redditt

Organisation name:

Agent's full name: Christopher Redditt

Email address: chris.redditt@gmail.com

Contact phone number: 0274749952

Postal address:

17 Princes Street

Riverhead

Auckland 0820

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:

Proposed Plan Change 100 (Private)

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

The stormwater analysis conducted for the proposed development predates 2023 and fails to adequately address recent significant rain and hydrological events, including those contributing to the 2023 Auckland Anniversary floods in Riverhead. The current Annual Exceedance Probability (AEP) calculations likely underestimate the impact on surrounding areas. If the development proceeds, Auckland Council may face liability for exacerbating local floods and causing further damage to nearby properties, potentially leading to loss of property and life. Additionally, forthcoming flood mapping data from Niwa needs consideration. It's my belief that diverting additional stormwater downstream, given the current infrastructure and anticipated climate changes, poses significant challenges.

Additionally, the infrastructure in Riverhead, including roads, public transport, and schooling, is ill-equipped to handle a doubling of the population. The roads are already over capacity, not just in Riverhead but also in the neighbouring communities of Kumeu and Huapai, with traffic from all three

areas converging on a single carriageway highway. Riverhead School, the only primary school in the neighbourhood, is already nearing capacity, and the nearest high school is 15km away. Most high school students face a 1.5-hour bus journey to schools on the North Shore. Thus, Riverhead is not prepared for a significant population increase.

The land in question is arable farmland. Within the Auckland region, we have overdeveloped similar land, particularly in the Pukekohe area. It is crucial to preserve arable land for food production, especially considering the impact of climate change on food production overseas.

I or we seek the following decision by council: Decline the plan change | 193.1

Submission date: 17 May 2024

### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Rachel Spencer  
**Date:** Friday, 17 May 2024 2:30:23 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Rachel Spencer

Organisation name:

Agent's full name:

Email address: riverheadrachel@icloud.com

Contact phone number:

Postal address:  
37 Great North Rd  
Riverhead  
Auckland 0820

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:  
Land Use  
Traffic  
Stormwater/ flooding

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
The conversion of fertile agricultural land into housing exacerbates Auckland's urban sprawl issues. Instead, Auckland Council should consider compulsory acquisition of sizable privately owned residential estates in central suburbs like Parnell and Remuera to promote urban intensification. Developers should prioritize these areas over green belts.

Due to past inadequate development strategies, whenever there is rain of any significance, homes in the area on the cusp of the proposed development, being Duke St, Wautiti Lane, and Crabfields Lane, are prone to flooding. It's implausible to assert that further development in this region won't exacerbate the existing issues. The developers' assurances lack credibility; engineering solutions alone cannot resolve these challenges.

The current road infrastructure around Riverhead, especially the connection from the town to SH16 and onto the North-western motorway, is deficient, with the Coatesville Riverhead Highway as a single lane road connecting the North Shore to SH16 via Riverhead. The traffic volumes, aside from Riverhead commuters, is enormous as people from the whole region use this connection for their daily travel. Any increase in housing development will exacerbate this problem. There is also inadequate public transport, with no direct bus route from Riverhead to Auckland City.

I or we seek the following decision by council: Decline the plan change

194.1

Submission date: 17 May 2024

### **Attend a hearing**

Do you wish to be heard in support of your submission? No

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Sandra Wyatt  
**Date:** Friday, 17 May 2024 2:30:27 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Sandra Wyatt  
 Organisation name:  
 Agent's full name: Racheal Wyatt  
 Email address: [happtdays@yahoo.com](mailto:happtdays@yahoo.com)  
 Contact phone number:  
 Postal address:  
 44 Forestry Road  
 Riverhead  
 Auckland 0892

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)  
 Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:  
 land identified in the private plan change landowner group  
 Property address: 80.5 hectares on western side of Riverhead  
 Map or maps:  
 Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:  
 Infrastructure need to be upgrade. traffic is at capacity. Also storm water waste water is already at capacity. we need a another school as numbers are growing there too

I or we seek the following decision by council: Decline the plan change

195.1

Submission date: 17 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? No

#### Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Jen Mein  
**Date:** Friday, 17 May 2024 2:30:39 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Jen Mein

Organisation name:

Agent's full name:

Email address: jen.mein@icloud.com

Contact phone number: 021380883

Postal address:

177 Orahia Road

Kumeu

Auckland 0892

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:

Property address: All the land identified in the Private Plan Change (PC100) by Riverhead Landowner Group, namely 80.5 hectares on Western Sign of Riverhead)

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

No infrastructure to support this and there has been no infrastructure to support the past 15 years of huge growth in Riverhead, Kumeu and Huapai. We basically have one road only to get us out of Riverhead and Norwest to head South. It can take upwards of 30 minutes or more just to get out of Riverhead and Kumeu at the current time which has been like this for some years. Nothing has been actioned to date, only plans to change this. It's not good enough, it's a waste of personal time, fuel, and stress to approve a plan change to add more housing to a dysfunctional roading and transport system. It really does not work and it won't work for a very long time. The bottle necks that form even on SH16 after leaving Riverhead-Coatesville Road is extreme from 6am until well past 10am in the mornings.

In the afternoon we have the home coming problem of the huge back log of cars then heading north west from the end of the North Western Motorway can be as long as 1 kilometre to get to the roundabout where it meets Bringham Creek Roundabout, it's sadly again a waste of time, fuel, and



adds to a huge amount of stress even as things stand. Once you add at least another 2000-3000 vehicles to this if the private plan change to build a significantly huge amount of housing which is what the Riverhead Landowners Group wish to do, it will physically bring to a halt movements in, out and around Riverhead and the North west.

Another issue to be addressed is the truck movements in and out of the area should the private plan change be approved, as previously stated we have had no roading infrastructure upgrades, we have numerous potholes forming weekly, having the huge amount of truck movements that would be required to undertake all the development being proposed would destroy our roads, is a huge safety concern for all of those living and driving in the area. Riverhead does not have the infrastructure, roading network or roading and transport capacity to support such a plan change.

The other issue is the significant flooding that has occurred on the land that is proposed for the plan change. It is Council's responsibility to not let any further building occur around or on these areas which in turn would put the current housing already there and any new housing at risk of flooding damage. It is irresponsible after all the significant flooding we have had to approve such a plan change knowing that this will impact Riverhead with further flooding.

I or we seek the following decision by council: Decline the plan change

196.1

Submission date: 17 May 2024

### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Christoper Wyatt  
**Date:** Friday, 17 May 2024 2:45:19 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Christoper Wyatt

Organisation name:

Agent's full name: Racheal Wyatt

Email address: wyattutp@xtra.co.nz

Contact phone number:

Postal address:  
 44 Forestry Road  
 Riverhaed  
 Auckland 0892

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:  
 Private plan change by Riverhead Landowner Group

Property address: 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:  
 Infrastructure need to be upgrade. traffic is at capacity. Also storm water waste water is already at capacity. we need a another school as numbers are growing there too

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:  
 traffic is at capacity Infrastructure need to be upgrade. traffic is at capacity. Also storm water waste water is already at capacity. we need a another school as numbers are growing there too

I or we seek the following decision by council: Decline the plan change

Submission date: 17 May 2024

197.1

#### Attend a hearing

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - James Anthony Hendra  
**Date:** Friday, 17 May 2024 2:45:31 pm  
**Attachments:** [Submission to PC 100 James Hendra.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: James Anthony Hendra

Organisation name:

Agent's full name:

Email address: james@wla.net.nz

Contact phone number: 021347348

Postal address:  
 41 Great North Rd  
 Riverhead  
 Auckland 0820

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:  
 objectives, policies, rules, s32

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
 attached

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

198.1

Details of amendments: attached

Submission date: 17 May 2024

Supporting documents  
 Submission to PC 100 James Hendra.pdf

#### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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## Submission to PC 100 (Private): Riverhead

Submitter: James Hendra

41 Great North Road, Riverhead.

Overall, I oppose the plan change for the reasons set out. I consider the plan change should be refused unless significant changes are made to address the matters set out in this submission.

I wish to be heard.

I am an independent planner and a member of the NZPI. Whilst this brings an ability to understand the context and process of a plan change request, I am submitting as a community member.

I have lived in Riverhead for 20 years. A decade ago, I served as a member and chair of the Riverhead Residents and Ratepayers (now RCA) for a 7-year term. My children have grown up and been schooled here, this is our home. This is the place we are grounded. This is the place where many of our friends live, within walking distance of each other. We are there for each other. This is a place of community. I know this place.

How development in the FUZ land is enabled and is provided for under a plan change, should it be approved, matters a great deal to me. I am not prepared to accept generic or incomplete analysis, superseded or partially accurate supporting reports, aspirational neighbourhood and urban design visions which fail to be realised by policy and rules in application, or new zones without clear and rational basis. I am also not prepared to accept that the presence of the Matvin land within the FUZ area is a basis to dismiss the logical and good practice planning outcomes which should be proposed on such a large and strategically positioned parcel of land.

I am not convinced that the aspirational green corridor network will be delivered in practice due to a lack of clarity of what it should comprise and how it would be delivered and owned as a cohesive whole. Similarly, the comprehensive stormwater proposal, which integrates with the green corridor, also suffers from the reality of needing to be designed in the whole but is without an overall comprehensive method to ensure it is delivered in this way. Both of these site-wide features are at risk of inconsistent delivery and fragmented staged development. There is no overall cohesive proposal to define and deliver these fundamental components.

The transport improvements proposed are not framed with an acceptance that SH16 is already at capacity and further development will add to the dysfunction. Morning CRH to SH16 commuter queues are routinely to the golf club or beyond to Hallertau. Riverhead is a dormitory suburb, poorly serviced by a single bus route which is timed to not even support a working day in the city. The upgrade of the Boric roundabout by Waka Kotahi is a safety improvement and will not address capacity of the highways. The SGA

programme of works is still at the designation stage, with eventual capacity and rapid transit being 20 to 30 years in the future.

The local transport projects proposed do not acknowledge the under provisioned state of many Riverhead local roads, nor that the development of the plan change area would place further strain and put people's safety at risk. The proposed timing of the projects, related to occupation of specific areas of land, will not address the effects overall, or those effects which will occur as soon as earthworks and civil works begin.

The lack of provisions to require the green corridor to extend to the Rangitopuni tributary fails to maintain and enhance access to the Rangitopuni River and coastal environment. A matter of national importance.

The justification of the extent of business zoned land is not convincing, based upon a very wide catchment area. The intended transition of scale and density is likely to be inconsistent in delivery.

The plan change has virtually no requirement to integrate the new development with Riverhead by way of physical connections or development typologies. Recognising the challenge of the bisecting CRH, the Cambridge Road interface and north of this are the key areas where the development area intersects with existing Riverhead. Consideration should be given to the treatment of Cambridge Road, connecting pedestrian and cycle routes, and sympathetic development controls to provide some level of transition.

The entire enormous Matvin land holding is clearly under provisioned for local roads and pedestrian permeability. The plan change proposal is to retain this land as a large privatised development void of integration with existing Riverhead and the new development area, creating an isolated area of new development to the north.

The key node at Riverhead Road and CRH provides the logical place for a public space/transition to the Riverhead War Memorial Park (the heart of Riverhead). However, simple business zoning is proposed at the node with no requirement to enhance the relationship between the new and the existing.

The residential zones will result in dense development with few trees. The character will therefore be very different to the spacious and treed character of Riverhead, including Riverhead South which was guided by a planning framework which has allowed sufficient space at the front and rear of sites for large trees.

In closing, I assisted the RCA in preparation of their submission and concur with the comments and requests made in that submission. I also intend to be heard on behalf for the RCA at the hearings, and as such do not repeat the matters and relief sought. For clarity, please consider this submission to also contain the same in content as the RCA submission.

198.2



**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Racheal Wyatt  
**Date:** Friday, 17 May 2024 3:00:19 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Racheal Wyatt  
 Organisation name:  
 Agent's full name: Racheal Wyatt  
 Email address: rachealwyatt95@gmail.com  
 Contact phone number: 0211466410  
 Postal address:  
 44 Forestry Road  
 Riverhead  
 Kumeu 0892

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)  
 Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:  
 Land identified in the Private Plane Change by Riverhead Landowner Group

Property address: 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

The roading infrastructure is not suited to another 4000 homes in the community. Its bad enough as it is. Riverhead school is the only school in the area and there would need to be another school built in the area.

I or we seek the following decision by council: Decline the plan change

199.1

Submission date: 17 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?

Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Danielle Jordan  
**Date:** Friday, 17 May 2024 3:00:23 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Danielle Jordan

Organisation name:

Agent's full name:

Email address: danielle.p.egan@gmail.com

Contact phone number: 0274665899

Postal address:  
 126 Worrall Road  
 Kumeu  
 Auckland 0891

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Property address: The entire development area.

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

I'm concerned about the lack of infrastructure in place. Traffic on State Highway 16 mostly at the Coatesville Riverhead Highway is shockingly bad. Adding additional traffic into and already overwhelmed area will not be good. This is not good for people who are stuck spending hours in traffic that shouldn't be there. The north western area namely Kumeu, Riverhead etc needs a massive amount of roading upgrades before any further developments are considered.

I would also be concerned about flooding in the area, surely the floods in the last few years and cyclone Gabriel have been enough to realise that the area is far too overdeveloped housing wise and not enough areas like wet lands etc. Please see reason here and do not allow this to go through.

I or we seek the following decision by council: Decline the plan change

200.1

Submission date: 17 May 2024

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Junaid Shaik  
**Date:** Friday, 17 May 2024 3:15:30 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Junaid Shaik

Organisation name:

Agent's full name:

Email address: ahmedjunaid7842@gmail.com

Contact phone number:

Postal address:  
 50 Pohutukawa Parade Riverhead  
 Riverhead  
 Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:  
 I'm not happy with the rules

Property address: 50 Pohutukawa Parade Riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
 More infrastructure development

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

201.1

Details of amendments: More infrastructure development before any housing development

201.2

Submission date: 17 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? Yes

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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## SUBMISSION ON A NOTIFIED PROPOSAL FOR POLICY STATEMENT OR PLAN, CHANGE OR VARIATION

### CLAUSE 6 OF SCHEDULE 1, RESOURCE MANAGEMENT ACT 1991

**To:** Auckland Council  
Private Bag 92300  
Victoria Street West  
Auckland 1142  
[unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

**Name of submitter:** F Boric & Sons ("**Boric**") on behalf of the Boric Food Market, Blossoms Café and tenants/residents on the site

#### Introduction

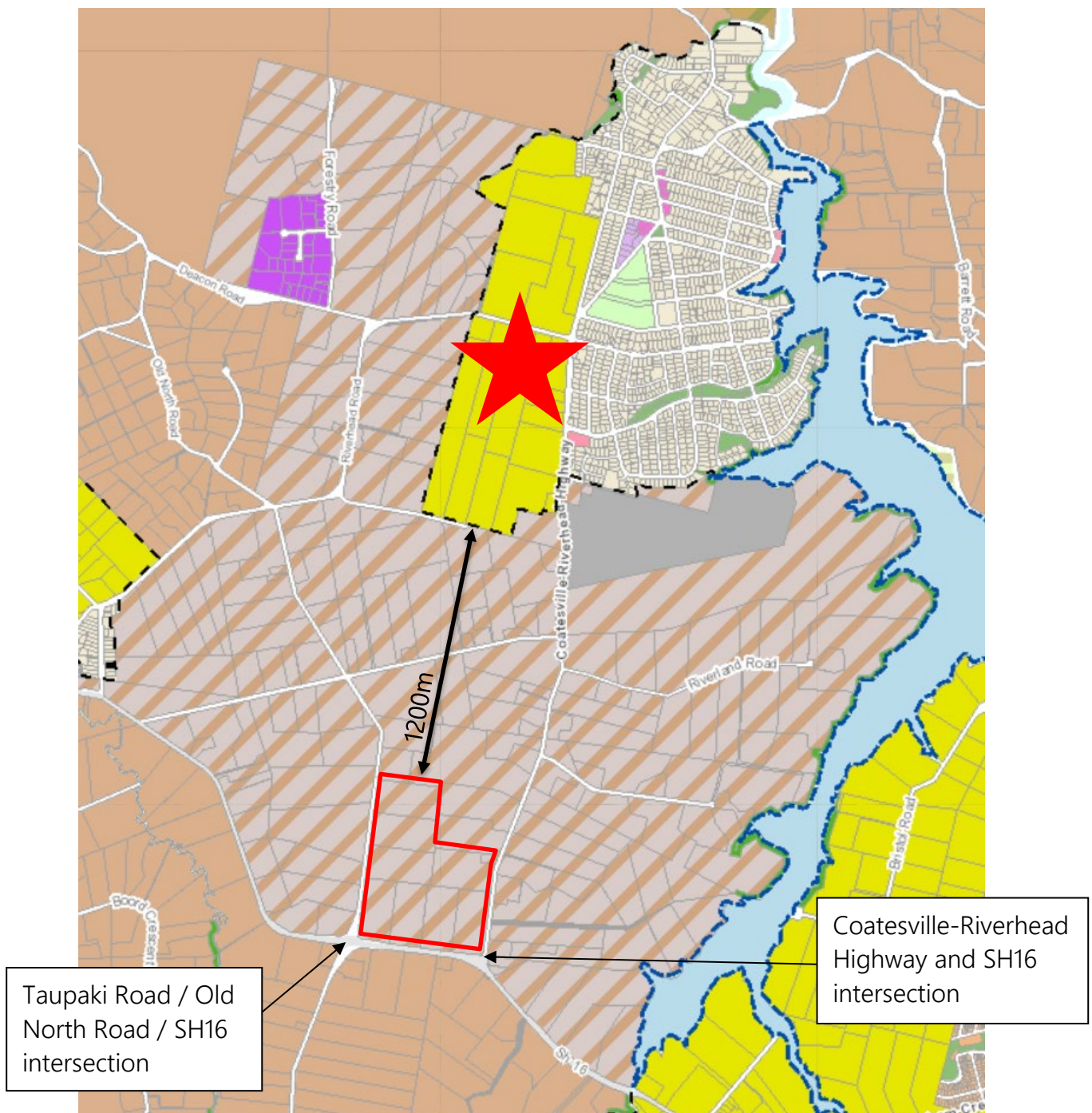
1. This is a submission on the application for Private Plan Change 100 ("**PC100**") to the Auckland Unitary Plan (Operative in Part) ("**AUP**") by Riverhead Landowner Group ("**Applicant**").
2. The Applicant proposes to rezone land in Riverhead from Future Urban to a mix of zones, as follows: approximately 6ha of land to Rural – Mixed Rural zone, and 75.5ha to a mix of Residential – Mixed Housing Suburban, Residential – Terrace Housing and Apartment Building, Business – Local Centre and Business – Neighbourhood Centre zones, with associated precinct provisions. The request also seeks to shift the Rural Urban Boundary ("**RUB**") to align with the boundary between the newly proposed Rural – Mixed Rural zoning and the urban zones.
3. Boric has operated an orchard at the land bound by Coatesville-Riverhead Highway, SH16 and Old North Road since 1962. The Boric landholding is located 1200m to the south of the plan change area, as shown at Figure 1 and termed "**the Boric Site**" throughout this submission. As well as operating the orchard, Boric has established a cafe (Blossoms Café, 1998) and a food retail business (Boric Food Market, 2012). Access to the café and food retail activities is taken from the southern end of the site's eastern frontage to Coatesville-Riverhead Highway. As such, the Boric family is a longstanding part of the Riverhead, Kumeū and Huapai communities and has observed increased growth and associated traffic generation effects over this time.
4. Boric has actively participated in the Supporting Growth Alliance's Notice of Requirement process for the North West region, specifically in respect of proposed



upgrades to Coatesville-Riverhead Highway (NOR R1). A copy of that submission is attached at **Appendix 1** for context.

5. Boric has also engaged with Waka Kotahi for several years in respect of the design of SH16 Brigham Creek to Waimauku - Stage 2 works in relation to its landholdings, the southern frontage and access arrangements of which are impacted by the proposed upgrade.

**Figure 1 – F Boric & Sons Landholdings (shown in red; PC100 at red star)**







*Existing access to café and food retail activities shown at red arrows*



### Scope and Reasons for Submission

6. Boric's key concerns relate to the traffic effects generated by the proposed plan change, and the associated impact this may have on access to, from, and into, the Boric Food Market. Boric **supports** the Application on the basis that, if the matters raised in this submission are addressed, the Application:
  - a) will promote the sustainable management of resources and therefore will achieve the purpose and principles of the RMA;
  - b) is generally consistent with Part 2 and other provisions of the RMA;
  - c) will meet the reasonably foreseeable needs of the future generations;
  - d) will enable social, economic and cultural wellbeing;
  - e) is generally consistent with the purposes and provisions of the relevant statutory planning instruments, including the Unitary Plan;
  - f) will avoid, remedy or mitigate adverse environmental effects, including on the surrounding road network and the Boric Site.
7. Boric is not a trade competitor for the purposes of the Resource Management Act 1991 ("**RMA**") and in any event is directly affected by an effect of the proposal.
8. The following comments are made in particular without derogating from the generality of the above.
9. The following provides relevant background to and sets out Boric's submission accordingly.

### Submission

#### Infrastructure prerequisites

#### *Rule IX.4.1(A4)*

10. Boric understands from attending the community meeting with the Applicant in early May 2024 that, in principle, it is the Applicant's intent that no dwellings or buildings within the plan change area will be occupied prior to the proposed roundabout at the intersection of SH16 and Coatesville-Riverhead Highway being constructed and operational.
11. It is clear from Rule IX.4.1(A4) that the roundabout is required to be delivered prior to occupation of the first dwelling within the precinct.

12. However, there appears to be a gap in the precinct provisions as notified, whereby a commercial building or other non-residential building could be occupied prior to construction and operation of this roundabout. It is unclear whether this is intentional, but regardless, would enable the occupation of non-residential buildings prior to delivery of the roundabout, with the potential to generate significant adverse traffic safety and operational effects on the intersection of SH16 and Coatesville-Riverhead Highway, especially in a cumulative sense on top of existing capacity issues with this network. There is no traffic modelling demonstrating these effects or any assessment in the plan change application. Boric considers this gap could be resolved by replacing the reference to 'dwelling' with 'building' at Standard IX.6.1(1). 202.2
13. Proposed Rule IX.4.1(A4) proposes discretionary activity status to infringe Standard IX.6.1(1), triggered in the event that a dwelling (or as Boric proposes, any building) is occupied prior to delivery of the above-mentioned roundabout and upgrades to the intersection of Coatesville-Riverhead Highway and Old Railway Road, and Coatesville-Riverhead Highway and Riverland Road. However, recent plan changes in the vicinity of Riverhead (Precinct I616 Spedding Block Precinct, and the recently approved Brigham Creek Road precinct) as well various precincts in Drury, demonstrate that the delivery of infrastructure is integral to unlocking greenfield land, and therefore, a non-complying activity status has been applied in these instances. This approach is intended to provide Council and submitters a high degree of certainty that the necessary mitigation will be in place before the Applicant is genuinely able to commence development. Likewise, Boric considers a non-complying activity status is appropriate in respect of Rule IX.4.1(A4). 202,3
14. Also consistent with these recent examples, "subdivision and development" are typically separated into two separate activities within the Activity Table, whereas in PC100 both are grouped under the "subdivision" sub-heading at (A4) and (A5) which may cause confusion as to the applicability of the rule where only one or the other is proposed (i.e. if development is proposed, but not subdivision). A suggested approach is provided below from I616 Spedding Block Precinct: 202.4

Table I616.4.1 Activity table

Activity		Activity status
Use and development		
(A1)	Activities listed as permitted or restricted discretionary activities in Table H17.4.1 ActivityTable in the Business Light Industry Zone.	
(A2)	Use and development that does not comply with Standard I616.6(1)	NC
(A3)	Use and development that does not comply with Standard I616.6(2)	NC
Subdivision		
(A4)	Subdivision listed in Chapter E38 Subdivision	
(A5)	Subdivision that does not comply with Standard I616.6(4)(a)-(c)	NC

*Standard IX.6.1 Staging of development with transport upgrades*

15. Standard IX.6.1(1) requires the construction and completion of a roundabout at SH16 and Coatesville-Riverhead Highway prior to occupation of the first dwelling within the precinct. The roundabout is part of Stage 2 of the Waka Kotahi project referred to as “SH16 Brigham Creek to Waimauku”, the full scope of which includes:<sup>1</sup>
- *“Between Brigham Creek and Kumeū we are creating a dedicated shared path for people who walk and cycle to provide genuine travel choice.*
  - *Installing road safety barriers in the middle of the road and roadside, to prevent drivers from leaving their lane before hitting something harder like other vehicles, trees, poles or ditches, except between Taupaki and Kumeū.*
  - *Adding extra lanes between Brigham Creek and Taupaki roundabout from two lanes to four (two in each direction) to make travelling along SH16 more efficient in the short-term.*
  - *Installing a flush median between Taupaki and Kumeū, which is a painted area in the middle of the road to give you more room and a safe place to wait before turning, while traffic can continue to flow.*
  - *Putting in a roundabout at the SH16/Coatesville Riverhead Highway intersection to help traffic flow better and make it safer to turn.”*
16. These works will require changes to the frontage and access arrangements to the Boric site. By way of background and as stated above, Boric has engaged with

<sup>1</sup> <https://www.nzta.govt.nz/projects/sh16-brigham-creek-and-waimauku/>

Waka Kotahi for several years in respect of the design and layout of the Stage 2 works as it affects their landholding. In addition to this, the eastern boundary of the Boric site is affected by the Supporting Growth Alliance's NOR R1, the Hearing Panel for which has recently recommended be accepted subject to changes to conditions. These numerous planned changes to the wider road network are occurring on the 'doorstep' of the Boric site, directly interacting with people's ability to travel to, and access, the café and food market, all of which interact with PC100 and the traffic it is anticipated to generate.

17. The Integrated Transport Assessment appears to rely on the implementation of the full suite of Stage 2 works to appropriately mitigate the operational and safety effects of the traffic that is anticipated to be generated. However, only the roundabout is identified as an infrastructure prerequisite at Standard IX.6.1(1). Without the full suite of safety upgrades, particularly "four laning" SH16 between the Brigham Creek and Taupaki Road roundabouts, there is a risk of greater adverse effects on the road network which have not been assessed. Therefore, Boric considers the full extent of works comprised in Stage 2 should be constructed and operational prior to occupation of the first dwelling (or ideally, building), and the triggers in PC100 should be updated accordingly. 202.5
18. Similarly, the assessment criteria at IX.8.2(g) (in respect of an infringement to standards IX.6.1(2)-(4)) should require an assessment against the progress made towards the full suite of works within Stage 2, rather than simply the intersection of SH16 and Coatesville-Riverhead Highway. 202.6

Commencement of construction prior to roundabout delivery

19. As set out above, Standard IX.6.1(1) requires the construction and operation of various transport upgrades prior to occupation of the first dwelling. If the upgrade works are required to mitigate the effects of a single dwelling which may generate around 8 vehicle movements per day, the construction of that dwelling would also require the same upgrades to be in place, as traffic associated with the construction of that dwelling (and any bulk earthworks and infrastructure preceding house construction) could generate greater vehicle movements. Further, if those construction vehicles were to access the precinct area from SH16 at the same time as the Waka Kotahi Stage 2 works and roundabout were under construction, the cumulative traffic effects would be significant, beyond that which could be reasonably managed via a Construction Traffic Management Plan given the intersection is already heavily congested and unsafe. The Integrated Transportation Assessment does not assess the potential effects arising from these scenarios, nor

is there sufficient information to comfortably rely on a management plan to mitigate the potential effects in this regard. Without further analysis, civil, infrastructure and construction work within the precinct should be delayed until the full suite of Waka Kotahi's Stage 2 works are constructed and operational. | 202.7

#### Traffic modelling – signalised pedestrian crossings

20. The Integrated Transport Assessment does not appear to have made allowance in the traffic modelling for the pedestrian crossings proposed at the roundabout of SH16 and Coatesville-Riverhead Highway, as part of the Stage 2 works. Waka Kotahi proposes to install a signalised pedestrian crossing immediately south of the roundabout plus a standard zebra crossing on the Coatesville-Riverhead Highway approach. Without including these crossings in the modelling, the performance of the roundabout may be overstated, and the queues on the northern approach and Coatesville-Riverhead Highway approach may be longer, especially during peak times. Insufficient information has been provided to readily assess the effects of the plan change on the future SH16 roundabout. Increases in the length of times there are queues on Coatesville-Riverhead Highway approach directly impact on the Boric Food Market access. | 202.8

#### Weekend trip generation

21. The Integrated Transport Assessment states at section 7.3 (page 52) "As the weekend includes a number of discretionary trips, our focus is on weekdays...". However, Boric frequently witnesses queues up to 2km long on Coatesville-Riverhead Highway on weekend days, with drivers waiting to turn onto SH16. The ITA also indicates that flows on weekends along SH16 are higher than a typical weekday. While Waka Kotahi's Stage 2 works are expected to improve this, the Integrated Transport Assessment does not sufficiently assess weekend traffic to confirm the effect additional traffic may have on the intersection of SH16 / Coatesville-Riverhead Highway. This queue runs along the frontage of the Boric Food Market and affects access to, and into, the Site.
22. Similarly, the intersection of SH16 / Taupaki Road experiences long queues on weekends from vehicles travelling north along Taupaki Road. The same analysis is required in this regard.
23. Further analysis is required to understand the effects the proposal will have on weekend traffic volumes. | 202.9



## Relief Sought

24. Boric seeks that the Plan Change is approved, subject to resolution of the matters | 202.1 outlined in this submission.
25. Boric wishes to be heard in support of its submission.
26. Boric would consider presenting a joint case with others at the hearing.

**DATED** at Auckland this 17th day of **May 2024**

**Signature:**

F Boric & Sons

1404 Coatesville-Riverhead Highway  
Kumeū  
Auckland  
[hello@boricfoodmarket.co.nz](mailto:hello@boricfoodmarket.co.nz)

## APPENDIX 1

Boric submission on North West Local Network: Coatesville – Riverhead Highway  
(NoR R1) Auckland Transport

## SUBMISSION ON A REQUIREMENT FOR A DESIGNATION SUBJECT TO FULL NOTIFICATION

### FORM 21, SECTIONS 168A, 169, 181, 189A, 190 AND 195A OF THE RESOURCE MANAGEMENT ACT 1991

**To:** Auckland Council  
Private Bag 92300  
Auckland 1142

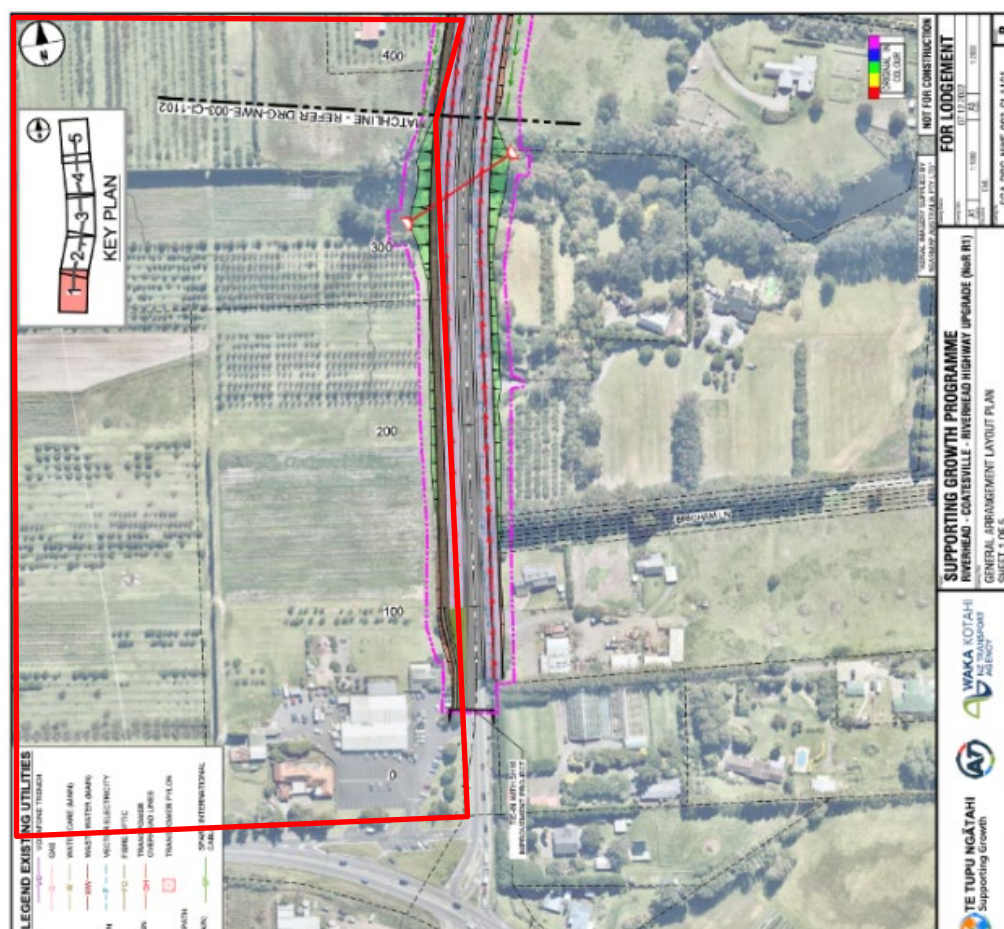
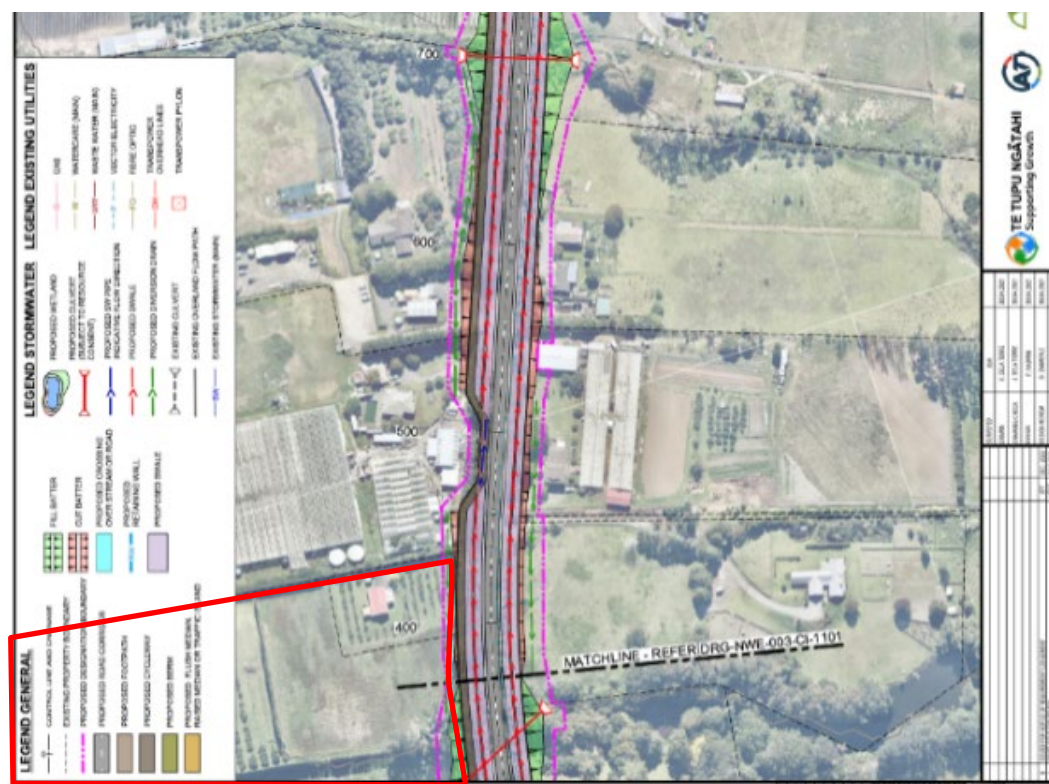
**Attention:** Planning Technician  
[unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

**Name of submitter:** F. Boric and Sons Limited (“the submitter”)

#### Introduction

1. This is a submission on the Notice of Requirement requested by Auckland Transport as Requiring Authority for a new designation in relation to Northwest Local Network: Coatesville-Riverhead Highway, in the Auckland Unitary Plan (“**AUP**”), being the upgrade and widening of Coatesville-Riverhead Highway between SH16 in the south and Riverhead in the north.
2. The site affected is 1368 - 1404 Coatesville-Riverhead Highway comprised of eight lots together shown in blue below, including the Boric Food Market on the corner of SH16 and Coatesville-Riverhead Highway. The NoR affects the eastern boundary of the site.









### Reasons for Submission

- The Submitter supports the NoR subject to amendments which reduce the overall width of land required along the frontage of 1368 - 1404 Coatesville-Riverhead Highway. The reasons for the Submitter's view are as follows.
- The Assessment of Transport Effects states that it is proposed to upgrade the southern section of the corridor between SH16 and Short Road (including the eastern boundary of the subject site) to a 33m-wide two-lane low speed rural arterial with active mode space on the western side, as illustrated below.

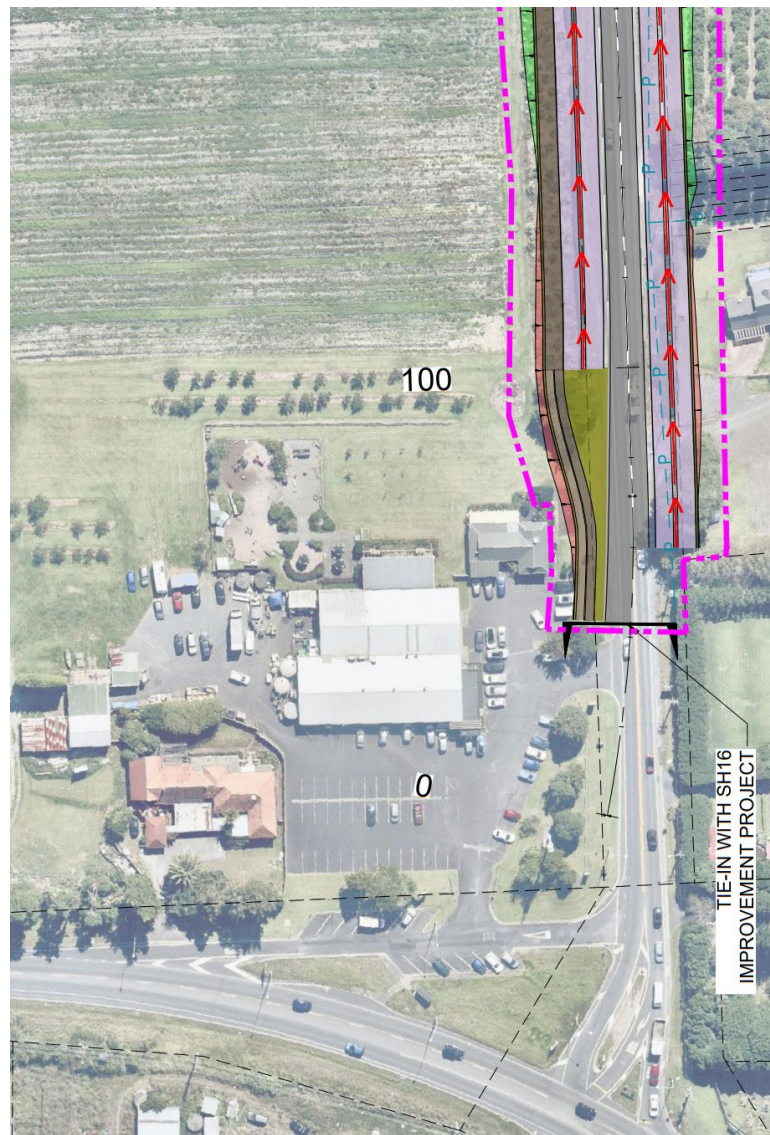
**Figure 8-2: Indicative future Coatesville Riverhead Highway corridor design between SH16 and Short Road (adjoining eastern boundary)**



### Implications of NoR on Boric Food Market

- Firstly, the southern end of the land to which this NoR relates culminates on the northern edge of the existing vehicle crossing to the Boric Food Market. The southern end will tie into the future roundabout at SH16 as part of the Waka Kotahi SH16 Safety Improvements Project, which is understood to be the subject of a separate (yet to be notified) application. Without understanding how both NoR applications will tie in together, it is difficult to understand and assess the potential effects the proposal will have on the existing access arrangement, being the main vehicle access to the commercial activity on the site. In particular, the potential

impacts from the proposed active mode path on the western side of the Highway on the access are unclear.

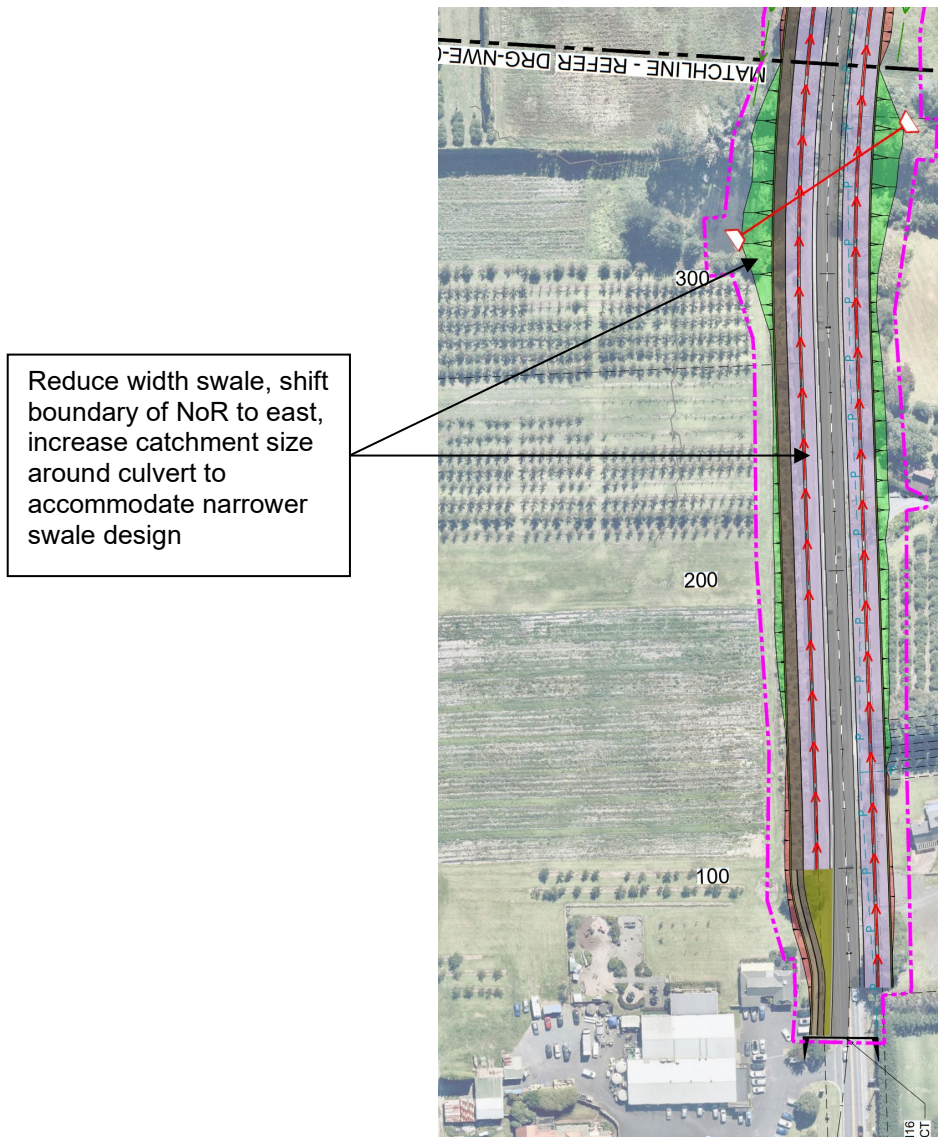


6. At its southern end, the proposed boundary of the NoR (pink dashed line) appears excessively wide relative to the proposed extent of works within the corridor, resulting in the loss of at-grade parking at the eastern boundary of the Boric Food Market and require the site's western boundary to be relocated immediately adjacent to an existing building on the site – further separation is required in order to maintain the existing building.

#### Implications of NoR on the horticultural activity

7. The width of the NoR boundary appears overly wide relative to the extent of proposed works along the full length of the corridor between SH16 and Short Road. The swale shown in purple appears overly wide, contributing to the width of the

designation overall. It is suggested instead to narrow its width and rather increase the area of land that is proposed to be taken around the existing stormwater pond adjacent the culvert (illustrated below). This approach will coincidentally narrow the extent of highly productive land that is required to be taken for swales, utilising land already used for stormwater purposes.



8. The NoR boundary appears to have been designed to stop short of the eastern end of trees within the orchard. However, this is not the case as in practice, a buffer of approximately 18-20m is required between the eastern boundary and the nearest productive trees, for the reasons set out below.
9. The proposed works will have the following implications on the operation of the orchard activity:



- a) Loss of around six rows of trees (and equivalent productive land) to provide a buffer of 18-20m at the eastern end of the orchard to accommodate the designation, comprising the necessary separation distance between horticultural land use and underground wastewater discharge driplines, perimeter hedging, trees and fencing along the new eastern boundary, resulting in long-term commercial implications on the orchard and loss of income.
  - b) Removal and relocation of 10m wide underground wastewater discharge driplines which are currently situated parallel to the eastern boundary, between the orchard and road boundary;
  - c) Removal and relocation of approx. 260m of hedging, trees and fencing along the eastern boundary, all requiring relocation / replanting within the new site boundary.
10. The Submitter acknowledges these works are physically possible and is open to working with the Requiring Authority to undertake these works if required, however all associated costs and loss of income from the removal of productive trees within the orchard will require compensation accordingly, over and above the value of the land itself.

#### Implications of NoR on access to Lot 400

11. A residential dwelling is located at the northern extent of the site's eastern frontage (within Lot 400). The extent to which the existing vehicle crossing serving Lot 400 will be impacted by the corridor widening works is unclear as it is proposed to introduce active modes, a diversion drain and swale, and cut earthworks in the location of the access, shown below. Further detail is required to assess the actual and potential transportation effects accordingly.



12. Finally, the Submitter requests certainty that construction effects on the Submitter's property will be appropriately managed at the time of construction.

### **Relief Sought**

13. The Submitter seeks that NoR Coatesville-Riverhead Highway be accepted provided conditions are inserted to address the following:

- a) That the designation be amended and conditions imposed on the designation to ensure that:

- i. The NoR is removed entirely from the Submitter's property, and if this is not possible, that:

- The width of the swale on the western side of the corridor is reduced in and coincidentally reduce the extent to which the western NoR boundary encroaches the Submitter's property. Assess the option to increase the area of the stormwater pond at the culvert to mitigate this change accordingly and reduce the extent to which highly productive land is affected by the proposed works.
- The Requiring Authority confirms it will compensate the Submitter for the costs associated with the loss of income otherwise generated by the productive trees that are required to be removed, the physical works necessary to accommodate the proposed corridor widening, and for the land itself.
- The Requiring Authority confirms the on-going operation and safety of the existing vehicle access serving Lot 400 will not be adversely affected by the proposed active modes, swale nor cut works at the eastern boundary of the site.

- b) That conditions are imposed on the designation to ensure that:

- i. Prior to the commencement of construction in the vicinity of the Submitters' land, a site-specific construction management plan applying to the area in the immediate vicinity of the Submitters' land is:

- Prepared by the requiring authority in consultation with the Submitter;
- Provided to Council, along with details of the Submitter's observations and comments on the plan, if any; and
- Approved by the Council.

- c) Such other conditions, relief or other consequential amendments as are considered appropriate or necessary to address the matters outlined in this submission.
- 14. If the above relief is not accepted, the Submitter seeks that NoR Coatesville-Riverhead Highway be declined.
- 15. The Submitter wishes to be heard in support of this submission.
- 16. If others make a similar submission, the Submitter would consider presenting a joint case with them at the hearing.

**DATED** at Auckland this                      24th    day of **April 2023**

**Signature:**

**Milenko Boric**  
Director

**Address for Service:**  
Forme Planning Ltd  
Suite 203, Achilles House  
8 Commerce Street  
Auckland 1010  
[Hannah@formeplanning.co.nz](mailto:Hannah@formeplanning.co.nz)

Attn: Auckland Council

SLR Ref No.: PC100\_Z Energy  
Submission\_v1.0

---

17 May 2024

SLR Ref No.: PC100\_Z Energy Submission\_v1.0

Attn: Auckland Council

By email: [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)**Re: Submission on Plan Change 100 (PC100) to the Auckland Unitary Plan****Submitter:**

Z Energy Limited

PO Box 2091

Wellington 6140

**Address for Service**

SLR Consulting New Zealand

PO Box 911310

Victoria St West

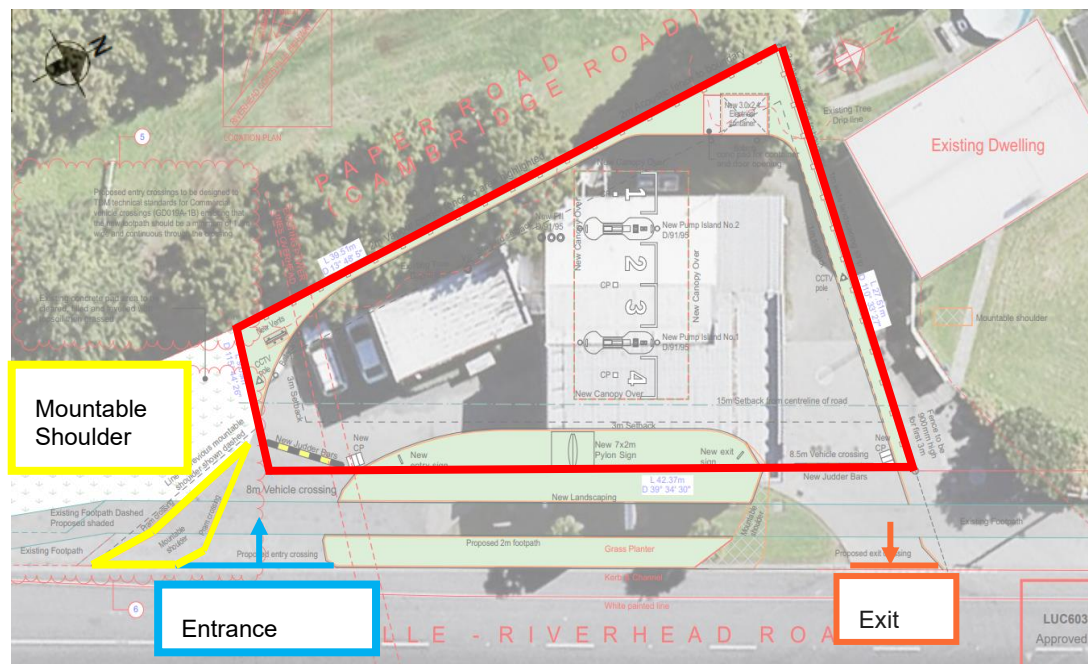
Auckland 1142

Attention: Phil Brown

Phone: 027 467 1566

Email: [philip.brown@slrconsulting.com](mailto:philip.brown@slrconsulting.com)

1. This is a submission on Plan Change 100 (PC100) to the Auckland Unitary Plan (AUP). PC100 is a private plan change which proposes to establish a Riverhead Precinct and involves the rezoning of approximately 75.5 hectares of Future Urban Zone land.
2. Z Energy supports the principle of PC100, insofar as it will accommodate the future growth and urbanisation of Riverhead. Z Energy has a particular interest in ensuring that road changes associated with the plan change will not adversely affect the operation of the Caltex Riverhead service station located at 1090 Coatesville Riverhead Highway, Riverhead.
3. Z Energy, the Submitter, could not gain an advantage in trade competition through this submission and the submission does not raise matters that relate to trade competition or the effects of trade competition.
4. Z Energy's interest in PC100 relates specifically to:
  - a. Upgrades / changes to Cambridge Road, a paper road adjoining Caltex Riverhead's western / rear boundary; and
  - b. Upgrades / changes to the Coatesville-Riverhead Highway including a future pedestrian crossing between Edward Street and Princes Street (location unconfirmed).
5. Caltex Riverhead was recently redeveloped as a service station having obtained resource consent in 2022 (LUC60392331 & DIS60398679). It is served by two existing crossings along the Coatesville-Riverhead Highway frontage, which tankers and customers use on a frequent basis. A mountable shoulder is positioned near the entrance crossing and extends over the property boundary, and this was approved by Auckland Transport as part of the resource consent to facilitate safe access for tankers entering the site. The site also has a building line restriction inside its front boundary. These site features are depicted in Figure 1 below. Z Energy seeks to ensure that these aspects of the site are not impacted by road changes proposed through PC100.

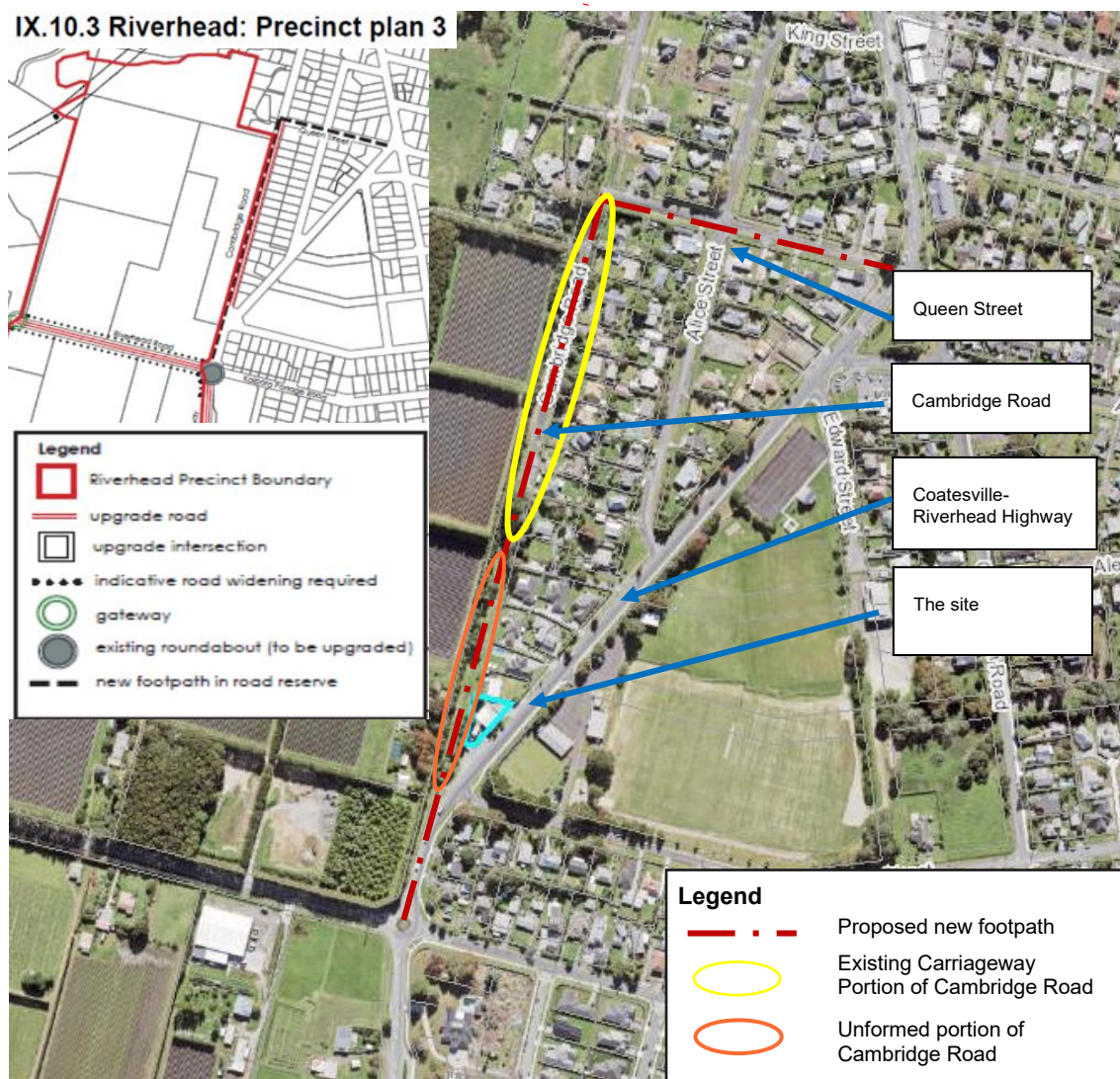


**Figure 1: Existing site plan (site boundary shown by red line)**



6. Standard IX.6.1(5) of the Proposed Riverhead Precinct Chapter requires that prior to occupation of a building on a site with vehicle access to and/or from Cambridge Road, (a) a new footpath shall be constructed on the western side of Cambridge Road between Queen Street and Riverhead Road, and (b) the existing carriageway of the formed portion of Cambridge Road shall be upgraded to an urban standard. Z Energy understands that the applicant's intention, consistent with these provisions, is to provide vehicle access for only the existing formed portion of Cambridge Road (to the north of Caltex Riverhead), with only a pedestrian footpath (no vehicle access) in the existing paper road portion of Cambridge Road next to Caltex Riverhead. Refer to Figure 2 below. Z Energy seeks confirmation regarding the road changes proposed through PC100, noting that Precinct Plan 3 indicates that there is potential for the entirety of Cambridge Road to be 'upgraded' (refer to Figure 2 below).

203.1



**Figure 2: PC100 Proposed Road Upgrades**

7. Z Energy supports the proposal for only a pedestrian footpath and no vehicle carriageway in the unformed portion of Cambridge Road next to Caltex Riverhead, if this is proposed as part of PC100. This arrangement ensures that vehicles can continue to safely enter the Caltex site, including via the mountable shoulder that sits outside its boundaries. If, on the other hand, a new vehicle carriageway was proposed at the Cambridge Road / Coatesville-Riverhead Highway intersection, this could

implicate the Caltex site's entrance and ability for tankers to safely turn into the site using the mountable shoulder.

8. Standard IX.6.1(5)(d) of the Proposed Riverhead Precinct Chapter requires that prior to occupation of a building on a site with vehicle access to and/or from Cambridge Road, an additional vehicle crossing facility on the Coatesville-Riverhead Highway is constructed between Edward Street and Princes Street. No other changes along the section of the Coatesville-Riverhead Highway next to Caltex Riverhead appear to be proposed through PC100.
9. Z Energy seeks to ensure that the future pedestrian crossing on the Coatesville-Riverhead Highway is not situated proximal to Caltex Riverhead, as this could result in an unsafe environment for vehicles and pedestrians. Both customer vehicles and tankers (carrying large volumes of hazardous substances) frequently enter and exit the site to / from the Coatesville-Riverhead Highway, and placing a pedestrian crossing in this context would increase the risk of accidents and result in an unsafe environment for vehicles and pedestrians. 203.2
10. In summary, Z Energy seeks confirmation regarding the nature of road changes on Cambridge Road and the Coatesville-Riverhead Highway proximal to the Caltex Riverhead site. Z Energy also requests to be consulted by the applicant and / or Auckland Transport when the relevant road upgrades are undertaken, to ensure that these do not unduly restrict the site's operation. 203,3
11. Z Energy appreciates the opportunity to submit in relation to PC100 and would be pleased to meet with the applicant, Auckland Transport, and/or Auckland Council to discuss this submission.

Signed on behalf of Z Energy Limited

Regards,

**SLR Consulting New Zealand**



**Phil Brown**

Associate Planner

[philip.brown@slrconsulting.com](mailto:philip.brown@slrconsulting.com)





New Zealand Defence Force  
 Defence Estate and Infrastructure  
 NZDF Headquarters  
 Private Bag 39997  
 Wellington 6045

## Submission on Proposed Plan Change 100 Auckland Unitary Plan (Operative in Part)

*Clause 6 of First Schedule, Resource Management Act 1991*

**To:** Auckland Council  
**Address:** Private Bag 92300  
 Auckland 1142  
**Email:** [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

**Submitter:** New Zealand Defence Force  
**Contact Person:** Rebecca Davies, Principal Statutory Planner

**Address for Service:** New Zealand Defence Force  
 C/- Tonkin + Taylor  
 PO Box 5271  
 Victoria Street West,  
 Auckland 1142  
 Attention: Karen Baverstock

**Phone:** +64 21 445 482  
**Email:** [rebecca.davies@nzdf.mil.nz](mailto:rebecca.davies@nzdf.mil.nz) / [kbaverstock@tonkintaylor.co.nz](mailto:kbaverstock@tonkintaylor.co.nz)

### Background

1. This is a submission on Proposed Private Plan Change 100 (Private): Riverhead to the Auckland Unitary Plan – Operative in Part (“PPC100”).
2. The New Zealand Defence Force (“NZDF”) operates the Royal New Zealand Air Force (RNZAF) Base Auckland at Whenuapai, located to the south-east of the PPC100 area. RNZAF Base Auckland is a significant Defence facility, of strategic importance regionally, nationally and internationally. Ensuring that this facility can continue to operate to meet Defence purposes under section 5 of the Defence Act 1990 is critical. Defence purposes include the defence of New Zealand, the provision of assistance to the civil power either in New Zealand or elsewhere in times of emergency, and the provision of public service when required. RNZAF Base Auckland is essential to achieving these purposes.
3. The location of the area subject to PPC100 (PPC area) is within Minister of Defence Designation 4311 “Whenuapai Airfield Approach and Departure Path Protection” (Designation 4311) which applies to the airspace in the vicinity of RNZAF Base Auckland. The purpose of the designation is “Defence purposes (as defined by section 5 of the Defence Act 1990) – protection of approach and departure paths”.

4. Designation 4311 requires that no obstacle shall penetrate the approach and departure path obstacle limitation surfaces (OLS) (as shown on the planning maps and described in the designation) without the prior approval in writing of NZDF.
5. Such obstacles present a significant safety risk for the operation of aircraft at RNZAF Base Auckland.
6. PPC100 proposes a mix of Terrace Housing and Apartment Building Zone, Mixed Housing Suburban Zone, Local Centre Zone, Neighbourhood Centre Zone and Mixed Rural Zone and applies a Precinct to the area. NZDF understands that PPC100 provides for a maximum total building height of up to 18m in the Local Centre zone and 16m in the Terraced Housing and Apartment Building zone.
7. Across the PPC100 area, the separation distance between ground level and the OLS is approximately 30 - 80m. Accordingly, proposed permanent structure heights are unlikely to be an issue (although this is indicative only and should be surveyed). However, there is the potential for cranes, or other construction equipment, to be an issue during construction. NZDF wishes to highlight that any proposed intrusion into the OLS, including temporary intrusions required for construction equipment including cranes, will require prior written approval from NZDF in accordance with the requirements of Designation 4311. The applicant may also need to notify the Civil Aviation Authority (CAA) under Part 77 CAA Rules.
8. The impact to flight operations from unapproved crane use within the OLS is that it forces the closure of the RNZAF Base Auckland runway, which constrains the use of RNZAF Base Auckland. Whilst Designation 4311 should prevent this occurring, there have been many instances where NZDF has not been notified prior to the operation of cranes or erection of other temporary structures within the OLS. Incorporating provisions into the Precinct is therefore necessary to avoid risk to flight safety and operations, and will increase visibility and awareness of the OLS.
9. The objectives and policies in the Auckland Unitary Plan Regional Policy Statement (RPS) provide a strong policy direction for the protection of infrastructure. Policy B3.2.2(4) seeks to "avoid", where practicable, adverse effects on infrastructure in the first instance, or otherwise remedy or mitigate. Policy B3.2.2(5) seeks to "ensure" development "does not constrain" the operation and upgrading of existing infrastructure. PPC100 therefore needs to give effect to these objectives and policies by ensuring appropriate provisions are included in the AUP.
10. NZDF seeks an amendment to PPC100 to specifically reference the OLS and requirements in Designation 4311. The specific relief sought is set out in the attached table.

NZDF **could not** gain an advantage in trade competition through this submission.

NZDF **wishes to be heard** in support of this submission.

If others make a similar submission, **NZDF will consider** presenting a joint case with them at the hearing.



\_\_\_\_\_  
Person authorised to sign  
on behalf of New Zealand Defence Force

17 May 2024  
Date \_\_\_\_\_

Point	Provision	Support/ Oppose	Reasons	Relief Sought
1	IX.1. Precinct description	Oppose in part	<p>The proposed Precinct is subject to Designation 4311. Designation 4311 requires that no obstacle shall penetrate the approach and departure path obstacle limitation surfaces (OLS). Although the height of permanent structures is expected to be below the OLS, temporary construction structures such as cranes have the potential to penetrate the OLS and cause safety issues and require approval from NZDF and possible notification to the Civil Aviation Authority.</p> <p>PPC100 needs to give effect to the RPS objectives and policies by ensuring appropriate provisions are included in the AUP to protect this existing infrastructure.</p> <p>For clarity, NZDF considers that the existence of the designation and its requirements should be referenced in the Precinct chapter, including in the description.</p>	<p>Amend the Precinct chapter to reference Designation 4311 requirements.</p> <p>Amend IX.1 Precinct description to add a sentence referencing Designation 4311 (additions underlined):</p> <p><i>All relevant overlay, Auckland-wide and zone provisions apply in this precinct unless otherwise specified below.</i></p> <p><i><u>The precinct is subject to Designation 4311 Whenuapai Airfield Approach and Departure Path Protection which imposes restrictions in relation to permanent and temporary structure height. No permanent or temporary obstacle shall penetrate the approach and departure path obstacle limitation surfaces identified in Designation 4311 without the prior approval in writing of the New Zealand Defence Force.</u></i></p>
2	IX.4. Activity table	Oppose in part	<p>The proposed Precinct is subject to Designation 4311. Designation 4311 requires that no obstacle shall penetrate the approach and departure path obstacle limitation surfaces (OLS). Although the height of permanent structures is expected to be below the OLS, temporary construction structures such as cranes have the potential to penetrate the OLS and cause safety issues and require approval from NZDF and possible notification to the Civil Aviation Authority.</p> <p>PPC100 needs to give effect to the RPS objectives and policies by ensuring appropriate provisions are included in the AUP to protect this existing infrastructure.</p> <p>For clarity, NZDF considers that the existence of the designation and its requirements should be referenced above the Activity table.</p>	<p>Amend IX. Activity table to add a sentence referencing Designation 4311 (additions underlined):</p> <p><i>Activity Table IX.4.1 specifies the activity status of subdivision and development in the Riverhead Precinct pursuant to sections 9(3) and 11 of the Resource Management Act 1991.</i></p> <p><i><u>The precinct is subject to Designation 4311 Whenuapai Airfield Approach and Departure Path Protection which imposes restrictions in relation to permanent and temporary structure height. No permanent or temporary obstacle shall penetrate the approach and departure path obstacle limitation surfaces identified in</u></i></p>

204.1

204.2

Point	Provision	Support/ Oppose	Reasons	Relief Sought
				<u>Designation 4311 without the prior approval in writing of the New Zealand Defence Force.</u>

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Boman Zakeri  
**Date:** Friday, 17 May 2024 3:30:19 pm  
**Attachments:** [FINAL PC100 Submission.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Boman Zakeri

Organisation name: Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir, Boman Zakeri

Agent's full name:

Email address: bnzakeri@gmail.com

Contact phone number: 0211691696

Postal address:  
 30 Cambridge Road  
 Riverhead  
 Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:  
 See attached PDF

Property address: See attached PDF

Map or maps: See attached PDF

Other provisions:  
 See attached PDF

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
 See attached PDF

I or we seek the following decision by council: Approve the plan change with the amendments I requested

205.1

Details of amendments: See attached PDF

Submission date: 17 May 2024

Supporting documents  
 FINAL PC100 Submission.pdf

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**SUBMISSION ON PRIVATE PLAN CHANGE 100 (RIVERHEAD) TO THE AUCKLAND UNITARY PLAN  
(OPERATIVE IN PART)**

**Clause 6 of First Schedule, Resource Management Act 1991**

TO: Auckland Council

By Email: unitaryplan@aucklandcouncil.govt.nz

Submitter: **LUXEMBOURG DEVELOPMENT COMPANY LTD**  
**RIVERHEAD TREELIFE TRUSTEE LTD**  
**OMIDULLAH ZAKERI**  
**RAFIULLAH MOHAMMAD TAHIR**

Address for Service: Boman Zakeri  
[bnzakeri@gmail.com](mailto:bnzakeri@gmail.com)  
021 169 1696

**1. INTRODUCTION**

- 1.1 This is a submission on Private Plan Change 100 to the Auckland Unitary Plan (Operative in Part) (**AUP**), requested by the Riverhead Landowner Group (**the Plan Change**).
- 1.2 The Plan Change proposes to rezone 6 hectares of land in Riverhead from Future Urban to Rural-Mixed Rural zone and 75.5 hectares of Residential – Mixed Housing Suburban, Residential – Terrace Housing and Apartment Buildings, Business – Local Centre and Business – Neighbourhood Centre zones with associated precinct provisions. The Plan Change also proposes to shift the Rural Urban Boundary to align with the boundary between the proposed Rural-Mixed Rural zoning and the urban zones.
- 1.3 This submission is filed on behalf of a number of landowners and occupiers who have existing business and land interests within the Plan Change area and are directly affected by it. These entities are Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir and Boman Zakeri (**the Boman Submitters**) are directly affected by the Plan Change. Further detail on the Boman Submitters is set out in Section 2 below. **Table 1** and **Appendix A** show the affected landholdings that the Boman Submitters own.

**Table 1. Land owned by the Submitter group within the proposed precinct/plan change area**

<b>Street Address</b>	<b>Registered Title</b>	<b>Owner</b>
30 Cambridge Road	742646	Luxembourg Development Company Limited
340 Riverhead Road	NA20D/4	Omidullah Zakeri, Rafiullah Mohammad Tahir
1140 Coatesville-Riverhead Highway	NA18B/1033	Riverhead Treelife Trustee Limited



- 1.4 The Boman Submitters support enabling greater urban growth in the Riverhead area, including on the Boman Submitters' landholdings. However, the Boman Submitters consider further refinement of the Precinct Provisions would provide greater clarity and certainty for all plan users.
- 1.5 The Boman Submitters could not gain an advantage in trade competition through this submission and in any event is directly affected by an effect of the subject matter of the submission that (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.
- 1.6 The changes requested by the Boman Submitters are made to:
  - (a) Ensure that the proposed provisions are the most appropriate to achieve sustainable management of natural and physical resources and are not otherwise contrary to the purpose and principles in Part 2 of the Resource Management Act 1991 (RMA);
  - (b) Ensure the requirements of section 32 of the RMA are met;
  - (c) Reduce interpretation and processing complications for decision makers so as to provide for plan enabled development; and
  - (d) Provide clarity for all plan users.

## **2. THE SUBMITTERS**

- 2.1 Mr Boman Zakeri is the founder and owner of one of the largest strawberry producers in New Zealand, operating under the brands "Best Berries Farms", "Zaberri World" and "Good Planet". Mr Zakeri also operates a well-known popular "pick your own" Riverhead visitor site in West Auckland. Best Berries has over 45 ha of planting at the Riverhead site and supplies to both the New Zealand and international market wholesale market. The business contributes to 13% of the berry producer industry in New Zealand. Best Berries is both an innovator and a leader in the strawberry industry with a focus on quality and environmental sustainability. The farm sites at Riverhead have been carefully managed in keeping with this approach.
- 2.2 The Boman Submitters understand that the underlying rural production land in the area including the growing sites have been zoned for future urban development and support the intent of the Plan Change to live zone this area. However, the Boman Submitters would like to ensure that any urban development is appropriately managed in a timely manner and sequenced with the necessary infrastructure upgrades to ensure a smooth transition from the existing rural uses to future urban and to provide for the necessary and appropriate level of community input. These submission points are provided against that background.

## **3. AREAS OF SUPPORT**

- 3.1 The Boman Submitters generally support the rezoning of their affected landholdings (refer **Table 1** above) to Residential – Mixed Housing Suburban, Residential – Terrace Housing and Apartment Building, Business – Local Centre.

## **4. AREAS OF CONCERN**

- 4.1 There are five general areas of concern in relation to the proposed precinct provisions, being:

(a) ***Precinct Plan and urban design***

The Precinct Plan has sought to directly implement a concept design from the structure plan process. While the structure plan has demonstrated that the Plan Change land is appropriate for urbanisation, the Precinct Plan has gone further to imbed the structure plan into the AUP. This approach can be appropriate in some instances, however in this case a specific approach to designing portages, swales, ecological corridors and walking trails has been proposed which have been mandated by the Precinct provisions. The Boman Submitters consider the design approaches included in the Precinct Plan are one of many outcomes that could be relevant to the opportunities and constraints. Greater flexibility in the Precinct Provisions is required to allow for alternative design options.

The multi-purpose green corridors are one example of a designer's vision being directly translated to the Precinct Plan as the outcome. However, this approach relies on vesting the asset with the Council in the future, a process which can be uncertain and take significant time. Recent experience with similar provisions in practice has shown that the Council is reticent for these types of assets to be vested as Council assets, due to the long-term maintenance and renewal obligations and the impact this may have on limited and constrained budgets.

While the corridors may have a legitimate stormwater conveyance function, the other aspects of the "multi-purpose" functions rely on Council decisions that may not be forthcoming at the time of future resource consents. To address this issue, the Boman Submitters consider it is appropriate that the Precinct Provision clearly state that the multi-purpose functionality components of these corridors are a "nice to have" urban design feature, not a fundamental structural requirement.

The multi-purpose green corridors are not necessary to achieve amenity outcomes in the Plan Change area. For example, recreation amenity can be provided by neighborhood parks, and walking and cycling opportunities in the standard manner through the road reserves. There are no ecological features to provide corridors or connections to. The vistas or portages are not considered to be of such significance that land should be put aside or development constrained.

There is no s32 evaluation of the multi-purpose green corridors in terms of their costs or their effects on the provisions of housing.

None of the matters identified on the Precinct Plans are considered to be qualifying matters in accordance with the National Policy Statement on Urban Development, as the proposed rezoning of the Plan Change area will bring this land into the scope of the NPS-UD.

(b) ***The proposed size of the local centre and extent of high density housing***

While the Boman Submitters acknowledge that a Business – Local Centre is necessary to support the day-to-day needs of the future residents within the Precinct, there is concern that proposed Business – Local Centre zoning is too large and that other retail opportunities will be too dispersed within the Plan Change area.

The Boman Submitters also consider that non-residential activities in Sub-precinct A should be capped based on the Sub-precinct as a whole, rather than being capped on a per-site basis.

The Boman Submitters query the necessity of a Business – Neighbourhood Centre Zone of such a large size in close proximity to the Business – Local Centre. It is not clear how this approach would appropriately support the development of a centre for employment and services to meet the day-to-day needs of the community. The Boman Submitters consider there is a risk that this approach may disperse and dilute the critical mass required to create an effective centre.

The Boman Submitters acknowledge that housing choice and affordability will require more variety in housing typologies within the Precinct. Apart from retirement villages, which utilise typologies such as apartments, the Boman Submitters consider that the proposed Residential – Terrace Housing and Apartment Buildings zoning is somewhat out of keeping with the objectives and policies of the Precinct, and creates an expectation of high density residential development which the market may not be able to sustain in Riverhead.

The Boman Submitters consider that the proposed zones within the Precinct require more refinement specific to this village concept. While the urban design assessment for the Plan Change may have translated urban concepts from Auckland, height and density (and creating the perception of density or the pressure of not achieving the maximum potential of density), this approach is not necessary to implement the Precinct's objectives or give effect to the Regional Policy Statement.

(c) ***Proposed staging of works through infrastructure triggers***

There is a concern that the triggers proposed have been established in such a manner which effectively result in development within the Precinct being stalled in the short to medium term. The infrastructure triggers either rely on the actions of third parties outside the control of the landowners, or require all the landowners to coordinate frontage upgrades and road widening at the time of first subdivision or development. While coordinated development outcomes are ideal, they may not always be feasible and could stall development or lead to inferior outcomes.

The Boman Submitters consider the infrastructure triggers should provide greater flexibility, focussed on appropriately addressing effects.

(d) ***Uncertainty relating to precinct standards informed by indicative maps***

The Precinct Plan identifies nearly every feature as “indicative”, yet the policies and provisions require their implementation. Many of the features identified relate to “nice to have” urban design features rather than fundamental structural elements. The Precinct Provisions should clearly identify which features must be implemented.

(e) ***Gap in precinct rules where subdivision to "super lots" could be allowed***

The Precinct provisions do not appropriately enable the creation of superlot titles to better support and enable future development opportunities.

- 4.2 The specific submission points in the appended table generally relate to these five general concerns. The appended table does not limit the general scope of the submission points listed above. The Boman Submitters are interested in the appropriate density and operation of the Plan Change provisions in their entirety.

**5. RELIEF SOUGHT**

- 5.1 The Boman Submitters seek that the Plan Change be allowed, subject to all necessary amendments set out below to address the concerns in this submission including any consequential or other necessary amendments required to give effect to the relief sought.
- 5.2 The Boman Submitters wish to be heard in support of its submission. If other parties make a similar submission, the Boman Submitters would consider presenting a joint case with them at any hearing.



Table of Specific Submission Points

ID	Section of the Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
1	IX.1 Precinct Description Proposed Centre zone extent on 1140 Coatesville-Riverhead Road plus all related provisions including Table IX.4.2	" A Local Centre is provided at the intersection of Coatesville-Riverhead Highway and Riverhead Road. This centre will provide for the establishment of retail to meet the day to day needs of residents and some increased employment opportunities in a central location to enhance walkability."	Support in part	The Boman Submitters support the intent of the provision of the local centre but query whether the current extent of the centre appropriately sized for the Precinct.	Amend the size of the Business - Local Centre Zone to better reflect the realistic opportunities in the short to medium term for retail and services.  Delete or reduce the size of the Business - Neighbourhood Centre Zone.  Table IX.4.2 – Cap non-residential activities in Sub-precinct A to the sub-precinct as a whole rather than on a per site basis.
2	IX.1 Precinct Description THAB zone extent on 340 Riverhead Road plus all related provisions	"The precinct provides for a range of residential densities, including higher residential densities close to the Local Centre and the intersection of Coatesville-Riverhead Highway and Riverhead Road. Medium residential densities are enabled in the remainder of the precinct, with height generally limited to two storey development to respond to the built character of the existing Riverhead settlement."	Support in part	The Boman Submitters support the provision of higher density zoning on 340 Riverhead Road property but considers current extent of the zoned area is excessive and/or the zoning creates expectations for height that are unlikely to be realised.	Amend the zones to either reduce the extent of Residential – Terrace Housing and Apartment Buildings Zone and/or utilise the Residential – Mixed Housing Urban Zone as a part or full replacement or alternative.
3	Precinct Plan 1, Precinct Plan 2 Precinct Plan 3	Precinct Plans 1, 2 and 3	Support in part / oppose in part	The Precinct Plans do not find the correct balance between critical framework infrastructure and “nice to have” design matters. It theorises a structure which is unlikely to be delivered in the manner illustrated, and relies on decisions to be made by the Council in the future in terms of vesting assets. While opportunities may exist, these are not fundamental to the urban form and infrastructure necessary to be illustrated on the Precinct Plans.	Delete Precinct Plan 1 and the relevant supporting provisions in the Precinct.  Amend Precinct Plan 2 to: <ul style="list-style-type: none"><li>Delete the Multi-purpose Green Corridor and replace it with an annotation for stormwater conveyance.</li><li>Straighten the “bends” in the Collector Roads.</li><li>Delete the “key local roads”.</li><li>Align the “key pedestrian connections” to the Collector Roads.</li></ul>
4	IX.2 Objectives Objective 3	(3) Activities in the Business – Local Centre zone provide local employment opportunities and complement the function, role and amenity of the City Centre Zone, Business – Metropolitan centre Zone and Business – Town Centre Zone.	Support in part	The references to complementing the other forms of centres is misplaced. The Riverhead Local Centre has no effect on those functions of the other centres. The objective should focus on the outcomes of the zone to Riverhead	Amend Objective 3 as follows:  (3) Activities in the Business – Local Centre zone provide <u>for the day-to-day needs of the community and</u> local employment opportunities <u>and</u> complement the function, role and

ID	Section of the Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<del>amenity of the City Centre Zone, Business — Metropolitan centre Zone and Business — Town Centre Zone</del>
5	IX.1 Precinct Description IX.3 Policies Policy 4 Table IX.4.1 (A4) and (A5) Standard IX.6.1	<p>"The transport and other infrastructure networks within Riverhead will be progressively upgraded over time to support development in the precinct. The precinct includes provisions to ensure that the subdivision and development of land for development is coordinated with the transport and infrastructure upgrades necessary to manage potential adverse effects on the wider transport network."</p> <p><b>Policy IX.3:</b></p> <p>(4) Require the occupation of buildings in the precinct to be coordinated with required transport infrastructure upgrades to minimise the adverse effects of development on the safety, efficiency and effectiveness of the surrounding road network.</p> <p><b>Table IX.4.1:</b></p> <p>(A4) Subdivision and development that does not comply with Standard IX.6.1(1) Staging of Development with Transport Upgrades</p> <p>(A5) Subdivision and development that does not comply with Standard IX.6.1(2)-(6) Staging of Development with Transport Upgrades</p> <p><b>Standard IX.6.1: Staging of development with transport upgrades</b></p> <p>(1) Prior to occupation of a dwelling within the Riverhead Precinct, the following transport infrastructure must be constructed and operational:</p> <p>(a) Upgrade of the Coatesville-Riverhead Highway / Main Road (SH16) intersection to a roundabout, as part of the SH16 Brigham Creek to Waimauku project, led by Waka Kotahi NZ Transport Agency.</p> <p>(b) Upgrade of the Coatesville-Riverhead Highway / Old Railway Road intersection to provide a right turn bay.</p> <p>(c) Upgrade of the Coatesville-Riverhead Highway / Riverland Road intersection to provide a right turn bay.</p> <p>(2) Prior to occupation of a building on a site with vehicle access to and/or from Coatesville-Riverhead Highway, the following road infrastructure upgrades must be constructed and operational:</p> <p>(a) Upgrade and urbanise Coatesville-Riverhead Highway from 80m south of Short Road to the Coatesville-Riverhead Highway / Riverhead Road roundabout, including</p>	Support in part	<p>The Boman Submitters support general intent of the coordinated development of the Precinct with necessary infrastructure networks and transport infrastructure. However, the Boman Submitters consider that the interaction of policy directives, indicative precinct plans and precinct provisions which rely on implementation of specified mapped features require greater clarity for plan users particularly where they form part of the activity standards or pre-occupation requirements in the Precinct.</p> <p>There is a concern that road frontage upgrades are all required as a single tranche before any development can occur within the Precinct. This approach necessitates coordination of all landowners, particularly with those who own land that is required for the road widening. There is a risk that this approach, could be used by some landowners to stall the provision of needed housing and business activities due to of the high degree of coordination required.</p>	<p>Amend the policies, activity table and provisions (standards) to avoid the creation of opportunities where third parties or other landowners could prevent the development of the Precinct.</p> <p>Clarify that road widening relates to the vesting of land for that purpose at the time of subdivision and development of that site.</p>

205.9

205.10



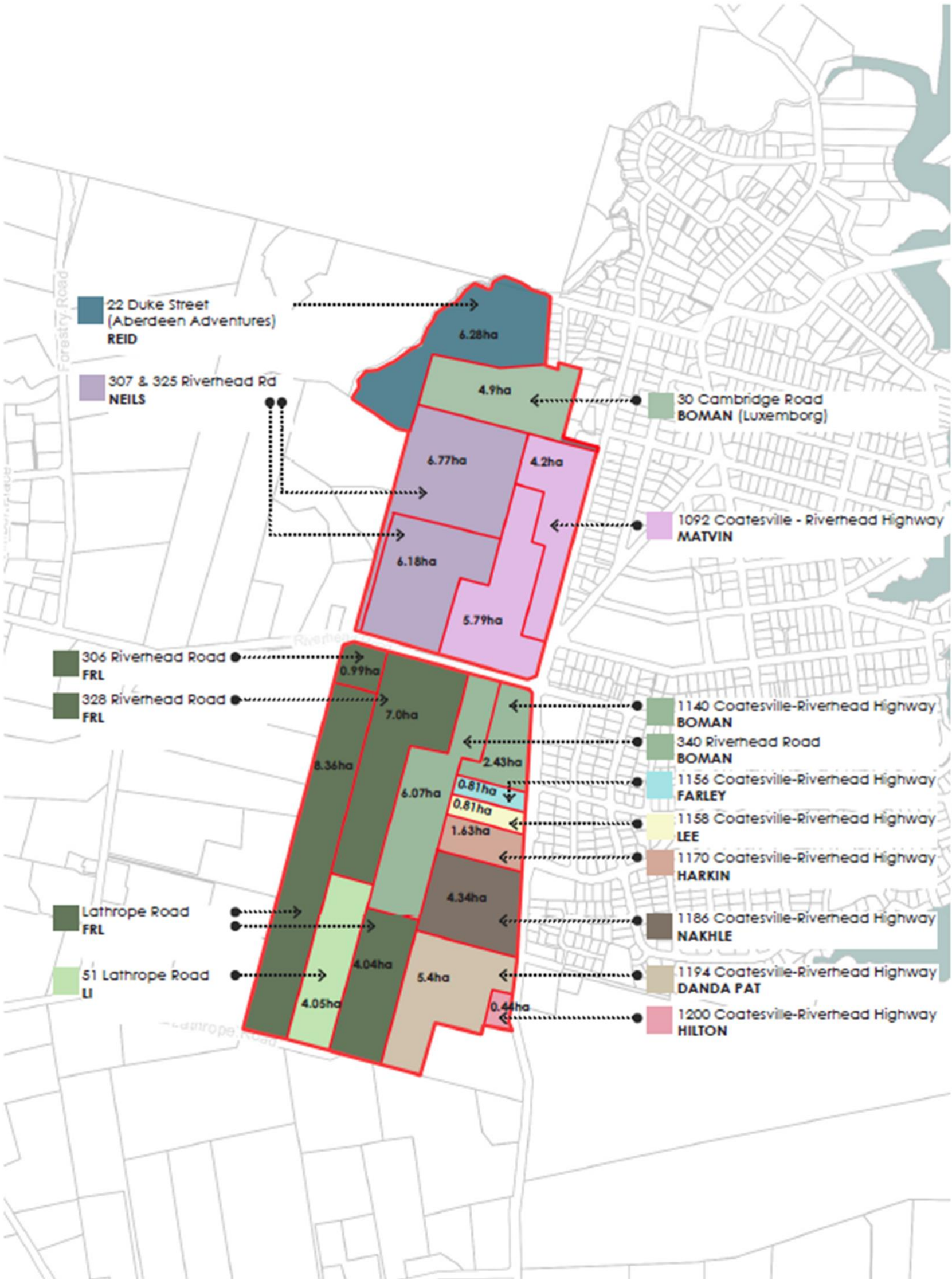
ID	Section of the Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>walking/cycling infrastructure, gateway treatment and public transport infrastructure in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2; and</p> <p>(b) Upgrade and urbanise the Coatesville-Riverhead Highway / Riverhead Road roundabout, in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2</p> <p>(3) Prior to occupation of a building on a site with vehicle access to and/or from Riverhead Road, the following road infrastructure upgrades must be constructed and operational:</p> <p>(a) Upgrade and urbanise Coatesville-Riverhead Highway from 80m south of Short Road to the Coatesville-Riverhead Highway / Riverhead Road roundabout, including walking/cycling infrastructure, gateway treatment and public transport infrastructure in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2; and</p> <p>(b) Upgrade and urbanise the Coatesville-Riverhead Highway / Riverhead Road roundabout, in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2; and</p> <p>(c) Upgrade and urbanise Riverhead Road, from the eastern boundary of 307 Riverhead Road to Coatesville-Riverhead Highway, including walking/cycling infrastructure, gateway threshold treatment, and public transport infrastructure in accordance with IX.10.3 Riverhead: Precinct plan 3.</p> <p>(4) Prior to occupation of a building on a site with vehicle access to and/or from Lathrope Road, the following road infrastructure upgrades must be constructed and operational:</p> <p>(a) Upgrade Lathrope Road between Riverhead Road and the new access point, in accordance with IX.10.3 Riverhead: Precinct plan 3 and Appendix 2; and</p> <p>(b) Upgrade the Riverhead Road/Lathrope Road intersection to a Give-Way controlled intersection, in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2.</p> <p>(5) Prior to occupation of a building on a site with vehicle access to and/or from Cambridge Road, the following road infrastructure upgrades must be constructed and operational:</p> <p>(a) A new footpath on the western side of Cambridge Road between Queen Street and Riverhead Road in accordance with IX.10.3 Riverhead: Precinct plan 3;</p> <p>(b) Upgrade and urbanise the existing carriageway of the formed portion of Cambridge Road south of Queen Street to an urban standard, in accordance IX.10.3 Precinct Plan 3;</p> <p>(c) A new footpath on the northern side of Queen Street between Coatesville Riverhead Highway and Cambridge Road in accordance with IX.10.3 Riverhead: Precinct plan 3; and</p> <p>(d) An additional pedestrian crossing facility on Coatesville-Riverhead Highway between Edward Street and Princes Street.</p>			

ID	Section of the Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
6	IX.3 Policies Policy 3	(3) Encourage appropriately-scaled office activities, including co-working spaces, to establish in the Local Centre zone to provide local employment opportunities and support the surrounding land uses in Riverhead Precinct	Support in part	It is unclear why office activities are being elevated to such prominence above the provisions of the local centre to provide for a range of employment activities and to meet the day-to-day needs of the community.	Amend Policy 3 as follows:  (3) <del>Encourage appropriately-scaled office activities, including co-working spaces, to establish in the Local Centre zone to provide for the day-to-day needs of the community,</del> local employment opportunities and support the surrounding land uses in Riverhead Precinct
7	IX.3 Policies Policy 5	(5) Require subdivision and development in the precinct to be coordinated with the provision of sufficient stormwater, wastewater, water supply, energy and telecommunications infrastructure.	Support in part	The Boman Submitters support Policy IX.3 in relation to development, but consider it is unnecessary to impose such a restriction on subdivision.  The Boman Submitters consider the preparation of development ready "super lots" should be enabled ahead of other critical infrastructure.	Reference to subdivision should be deleted from Policy 5.  The activity table at IX.4.1 should be amended to separate subdivision from development. Subdivision should have blanket RD status.
8	IX.3 Policies Policy 8	(8) Require the key local roads and pedestrian connections to be generally in the location shown in IX.10.2 Riverhead: Precinct plan 2, while allowing for variation where it would achieve a highly connected street layout that integrates with the surrounding transport network	Oppose	The local road network including pedestrian connections is a matter for detailed design at the time of subdivision and development. The imposition of design outcomes from a concept plan does not take into account the manner in which the fine grained road network would be established.  There is no section 32 analysis that demonstrates that all other options for local roads and connections are not as equally valid design solutions.  Policy 9 is considered appropriate, along with those in E38 to achieve desired connectivity.	Delete Policy (8)
9	IX.3 Policies Policy 13	(13) Encourage the provision of a continuous and connected multi-purpose green corridor in the locations indicatively shown on IX.10.2 Riverhead: Precinct plan 2, which achieves the following outcomes	Oppose	While the Boman Submitters agree that stormwater conveyance is necessary, they disagree that a multi-purpose green corridor is necessary to give effect to the NPS-UD or the RPS.  The multi-purpose green corridors do not connect with any no ecological features Pedestrian and cycle amenity can be achieved within the road network. Recreation amenity can	Delete Policy (13)

ID	Section of the Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>be achieved by the provision of neighbourhood reserves.</p> <p>There are no qualifying matters relating to the green corridor, nor do they provide connections between any such features.</p> <p>The multi-purpose green corridors are a nice to have design feature which have been elevated to be a requirement. , Implementation of the multi-purpose green corridors could be restricted due to the reliance on vesting the assets to Council.</p> <p>The purpose of multi-purpose green corridors could be achieved through standard subdivision and design responses.</p>	
10	IX.3 Policies Policy 17	(17) Require subdivision and development to be consistent with the water sensitive approach outlined in the supporting stormwater management plan, including: (a) Providing a central stormwater management treatment spine through the precinct in general accordance with the multi-purpose green corridor in the locations indicatively shown on IX.10.2 Riverhead: Precinct plan 2	Oppose	<p>The Boman Submitters consider that a range of alternatives should be available to manage stormwater management devices rather than the current proposal being within or proximate to the proposed green corridor.</p> <p>Stormwater conveyance, along with treatment and retention/detention is a matter distinct from the establishment of multi-purpose green corridors. These functions can be achieved through a variety of means which does not require, by policy, a green corridor to be established.</p>	<p>Amend Policy 17 to</p> <ul style="list-style-type: none"> <li>delete references to the multi-purpose green corridor; and</li> <li>focus on appropriate solutions for stormwater conveyance, along with treatment and retention/detention.</li> </ul>
11	IX.8.1 Matters of Discretion	<p>(2) For new buildings prior to subdivision; and subdivision, including subdivision establishing private roads:</p> <p>(a) Location and design of the collector road, key local roads and connections with neighbouring sites to achieve an integrated street network, and appropriately provide for all modes;</p>	Support	<p>The Boman Submitters agree that integration of a development with the rest of the precinct should be a matter of discretion.</p>	<p>Retain as notified except where consequential relief is necessary to address matters otherwise addressed by this submission.</p>
12	IX.8.2 Assessment Criteria IX.8.2(2)(i)-(k) IX.8.2(2)(e) IX.8.2(2)(g) IX.8.2(2)(m)-(p)	<p>(2) For new buildings prior to subdivision, and subdivision, including subdivision establishing private roads:</p> <p>(d) ...</p> <p>(m) Whether development is in accordance with the approved Stormwater Management Plan and Policies E1.3(1)-(14).</p>	Support in part	<p>The Boman Submitters consider that it is highly unlikely that Auckland Transport will support departures from design to incorporate cultural values in the design of roads. The provisions are unclear in terms of the outcomes sought and are aspirational.</p>	<p>Delete reference to streets in IX.8.2(2) and Policy IX.3(19) and limit the provisions to the design of public open spaces.</p> <p>Delete the multi-purpose green corridors in IX.8.2(2)(i)-(k).</p>

ID	Section of the Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	IX.3 Policies IX.3(19)			The Boman Submitters agree with coordinated approach to stormwater management provided flexibility is retained for conveyance, treatment and retention/detention at the subdivision scale.	Amend the stormwater flooding matters to address stormwater quality, quantity and flooding matters distinct from limiting mitigation measures to one solution in IX.8.2(2)(m)-(p). 205.20
					Retain the remainder of IX.8.2 as notified except where consequential relief is necessary to address matters otherwise addressed by this submission. 205.21
13	IX.9 special information requirement	(3) Large or highly visible commercial or community focused buildings	Oppose	It is unnecessary to make this a mandatory information requirement where it is at best a matter which is encouraged.	Delete IX.9(3) Retain the remainder of IX.9 as notified. 205.22
14	IX.11.1 Appendix 1: Road function and design elements table – Internal Roads within Precinct	Appendix 1: Road function and design elements table – internal roads within precinct	Support in part	The Collector Road and Local Road dimensions are wider than is necessary or that is identified in Auckland Transport’s design manuals.  The extent of road widening of existing roads is a matter of detailed design. It is unnecessary to identify the minimum widening as this will vary.	Reduce the width of Collector Roads (without adjacent reserve) to 21m and Local Road to 16m as minimums. 205.23
					Identify that road widening is to be determined through detailed design. 205.24
					Retain the remainder of the table as notified. 205.25

Appendix A – Map showing landholding ownership within the Plan Change Area







**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Emma Pearson  
**Date:** Friday, 17 May 2024 3:30:23 pm

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The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Emma Pearson

Organisation name:

Agent's full name:

Email address: e.stanyard@gmail.com

Contact phone number:

Postal address:

20 Alice Street

Riverhead

Riverhead

Auckland 0820

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:

Property address: Land to west of Riverhead, as per Private Plan Change by Riverhead Landowner Group, 80.5 hectares

Map or maps:

Other provisions:

1. Traffic and pedestrian access from Cambridge Road to central Riverhead
2. Green space allowance
3. General transport infrastructure to/out of the area.
4. Business catchment area

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

1. There appears to be no consideration for the increased traffic along existing roads (Cambridge, Queen and Alice) that are already unsafe, poorly lit, partly footpathed and often in poor condition. Also the impacts on King street and Alice street junctions with the highway. These are already dangerous especially with regards pedestrians (King street) and parked vehicles when park is in high use (Alice Street). Additional pedestrian and vehicle access to Duke street could alleviate some pressure from the development but still of concern.
2. Lack of allowance for trees in housing/business use areas to maintain character with the rural surrounds and existing Riverhead. And will the northern most area next to the stream have public



access and be managed as park area? unclear as to impacts of proposed change.

3. SH16 continues to be a major issue in the northwest with no relief in sight as improvements get delayed or shelved etc. Traffic on weekdays and weekends at peak times, which are getting longer in duration, along the Coatesville Riverhead Highway is dire, with many residents already modifying their work hours, other activities, travel routes to try and avoid sitting in traffic. Even the construction phase of this project will add to this mayhem and no development should go ahead until the local transport network is in much better shape.

4. The catchment area for business is overoptimistic! Anyone on Dairy Flat highway is not likely to come to Riverhead when Albany is closer.

I or we seek the following decision by council: Decline the plan change

206.1

Submission date: 17 May 2024

### **Attend a hearing**

Do you wish to be heard in support of your submission? No

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Carole Paulus  
**Date:** Friday, 17 May 2024 3:45:51 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Carole Paulus

Organisation name:

Agent's full name: Carole Paulus

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Contact phone number:

Postal address:

Grey Lynn  
Auckland 1021

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:

My submission applies to the plan change in its entirety (as well as all precinct provisions)

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

I believe this plan change will deliver much needed residential housing in the North West, alongside additional amenity to the existing area, while also addressing issues around infrastructure (roading, flooding etc).

I or we seek the following decision by council: Approve the plan change without any amendments

207.1

Details of amendments:

Submission date: 17 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Janelle Lisa Redditt  
**Date:** Friday, 17 May 2024 3:45:58 pm

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Janelle Lisa Redditt

Organisation name:

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Contact phone number: 0211050490

Postal address:  
janelleericksen@gmail.com  
Riverhead  
Riverhead 0820

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:

Property address: 17 Princes Street, Riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

As the stormwater analysis for the proposed development was completed before 2023 it fails to consider the recent significant rain and weather events and the impact of the 2023 Auckland Anniversary floods in Riverhead. As such, the current Annual Exceedance Probability (AEP) calculations likely underestimate the true impact on our local community.

The completion of the proposed development will increase the impact of local flooding causing significant damage to existing properties, the livelihood and well-being of our community, and at worst cause loss of life.

There are significant challenges to the proposal of diverting additional stormwater downstream considering the capabilities of our current infrastructure and of course climate change.

The infrastructure of Riverhead is already struggling to cater to the community, particularly the roads (with public transport options lacking), only having one school (which doesn't cater to high school students), and a lack of services in the area.

High school students have to travel for hours each day to and from school, early childhood centers are already full as are doctors in the neighbouring communities.

The roads are over capacity with many having to drive hours to make it to work - the single-lane highway is not fit for purpose currently and certainly would not handle more traffic. Even on the weekends, there is a line of traffic waiting to get out of Riverhead.

Riverhead (and our neighbouring communities) is simply not set up for a population influx.

I or we seek the following decision by council: Decline the plan change

208.1

Submission date: 17 May 2024

### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Wayne Mitchell  
**Date:** Friday, 17 May 2024 3:45:58 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Wayne Mitchell

Organisation name:

Agent's full name: Wayne Mitchell

Email address: wayne@mitchell-consulting.co.nz

Contact phone number: 0275055501

Postal address:

57 Queen St  
Riverhead  
Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Property address: As above

Map or maps: As above

Other provisions:

As above

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

This development must not proceed in any way whatsoever until the kumeu bypass is completed, the sh16 riverhead round about is completed and all roading, stormwater and sanitary drainage infrastructure between sh 16 and Albany Hill is upgraded and completed.

I or we seek the following decision by council: Decline the plan change

209.1

Submission date: 17 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Terence L Klein  
**Date:** Friday, 17 May 2024 4:00:18 pm  
**Attachments:** [Plan Change submission Terence Klein.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Terence L Klein

Organisation name:

Agent's full name: Terence Klein

Email address: kleint122@gmail.com

Contact phone number:

Postal address:  
28 Langston Avenue  
Palmerston North  
Palmerston North 4414

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:

Property address: 4 Princes Street

Map or maps:

Other provisions:  
Plan Change in Riverhead

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
The planned development puts extreme pressure on the existing local and regional infra-structure that does not appear to be addressed in a timely by the developer or the long range Council plans.

I or we seek the following decision by council: Decline the plan change

210.1

Submission date: 17 May 2024

Supporting documents  
Plan Change submission Terence Klein.pdf

#### **Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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## Concerns related to Riverhead development plan

### Transport

The roading infrastructure currently does not handle the number of cars on the road well: Coatesville Riverhead Highway entrance onto 16 heading into Auckland has significant delays no matter the time of day and, of course by rush hour. At times, it takes more than ½ hour to go from Princes Street to the roundabout that feeds the highway into Auckland and Fred Taylor Drive

The developers apparently have come to some agreements that will mitigate some of the problems, but Auckland Transport and Waka Kotahi as well as the residents of Riverhead do not believe the roading infrastructure is sufficient to handle the increased use caused by the planned development. An Auckland Transport document regarding Riverhead holds that “There is no funding in place to improve public transport services to support any urbanisation to align with the project’s delivery timeframe, with the development being car-oriented,” Further AT wrote, “There is no funding in place to improve public transport services to support any urbanisation to align with the project’s delivery timeframe, with the development being car-oriented.” In several documents the Council mentions road infrastructure “improvements,” being fully funded and finished in 2025, but no evidence of that work can be seen.

The Plan Change request and the development in Riverhead must be halted until roading development can handle the current and future increased numbers. That circumstance appears to be years away.

Mass transit remains insufficient and slow as well. Auckland Transport journey planner cites that the trip from Riverhead to Auckland CBD takes 1 hour and 40 minutes (if buses are running perfectly) and can require using three different buses. During the morning and evening rush hours that will be significantly longer. When is the proposed Northwest Bus Lane to be started? Finished? Perhaps never?

The Plan Change request and the development in Riverhead should be halted until mass transit can efficiently handle the current and future increased numbers.

### Flooding

The Plan Change group indicates its flood control for the area within the development. However, the Council has not addressed the flooding that occurs in many areas of Riverhead, not just in the area of the proposed development. Much of the drainage problem is likely the tidal nature of the Rangitopuni Stream changing the local drainage base level. How will that be addressed to allow for effective drainage in the entire area?

The Plan Change Request and its development in Riverhead should be halted until all areas of Riverhead have good water management infrastructure.

### Electricity

Over the past several years, Princess Street has had many power outages due catastrophic transformer failures during storms, often caused by downed trees.

The electrical grid regionally is not robust and contains many kilometers of “rural standard” lines.

The Plan Change Request and its development in Riverhead should be halted until all areas of Riverhead have robust electrical management infrastructure.

## Housing

The proposed Plan Change touts adding terraced housing and apartments with a 4-storey structure.

The tall buildings will detract from the character of Riverhead. A possible solution would be to move any 4-storey building to the corners furthest away from Coatesville Riverhead Highway where there are fewer houses affected.

If the Plan Change is approved, no buildings taller than a main and 1<sup>st</sup> level should sit on Coatesville Riverhead Highway.

The Plan Change also hopes to “increase the amount of available housing.”

Currently Riverhead has several developments that have failed to progress: the area at 1066-1070 Coatesville Riverhead Highway has a partially developed lot with pipes unburied and no progress being made. This area (between Alice and Coatesville Riverhead Highway also has terraced housing --- mostly finished, but completely unoccupied. Construction for those terraced houses and the amenities they would bring began about 5 years ago and has sat in its current state for 3 or 4 years. Both sites are blights on the community.

The Plan Change Request and its development in Riverhead should be halted until the current developments that sit idle are finished and occupied.

## Education

Riverhead School (primary school) is currently near capacity and will remain so even after the current additions are completed. Adding more housing (and therefore families) directly affects the schools and their children. Riverhead, Kumeu, and Huapai do not have a secondary school. Students must travel up to an hour to get a high school education. How and when will this undesirable situation be resolved?

The Plan Change Request and its development in Riverhead should be halted until educational resources coincide with the numbers of children of all ages in the area.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Benjamin David Pennell  
**Date:** Friday, 17 May 2024 4:00:52 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Benjamin David Pennell

Organisation name:

Agent's full name:

Email address: family@teampennell.nz

Contact phone number: 021493267

Postal address:  
20 Crabb Fields Lane  
Riverhead  
Auckland 0820

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:

Property address: Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

The primary reason we oppose this development is due to the lack of supporting infrastructure in our community and the issues that we already experience being magnified further.

The major concerns we have relate to:

1. Flooding
2. Schooling
3. Transport

Flooding

The surrounding area is flood-prone, having been significantly impacted by floods in the last few years. Our concern is that the further development of impermeable land will only exacerbate the issues we have experienced. Climate change related weather events appear to be increasing in

nature - both in frequency and impact - and we do not see how the proposed development seeks to reduce the impact our community has experienced.

#### Schooling

Our local primary school (Riverhead Primary) is already over capacity with nearly 1/3 of the school field now covered with 'temporary' buildings to accommodate the rapidly expanding school roll. The area around the school has become particularly dangerous during drop-off and pick-up due to the lack of safe on or off-street parking.

There is a distinct lack of in-zone options for our children to attend once they complete their primary years. With no planned intermediate or secondary school development in the community this issue will only be amplified if the development was to proceed.

#### Transport

The roading infrastructure in the community is very poor - both in terms of the state of the roads and their design. Travelling to/from the city for work in peak hours is incredibly challenging with limited viable public-transport options available. Traffic is often backed up to the Golf Club from SH16 in the morning, and in reverse the queues at Brigham Creek Roundabout have only lengthened in the 8 1/2 yrs that we have lived here. The intersection at SH16 / CRH is particularly dangerous; we have been involved in 2 accidents ourselves in the last 2 years.

We don't see how the proposed development will do anything other than increase the frequency and severity of traffic delays and accidents.

I or we seek the following decision by council: Decline the plan change

211.1

Submission date: 17 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

#### Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Jann Olding  
**Date:** Friday, 17 May 2024 4:15:19 pm  
**Attachments:** [PPC 100 - Riverhead Community Association Submission FINAL\\_20240517161353.312.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Jann Olding

Organisation name:

Agent's full name:

Email address: jandjolding@gmail.com

Contact phone number:

Postal address:  
 15 Pitoitoe Drive  
 Riverhead  
 0820

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:

Property address: Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

Proposed Intensified housing - THABs and related issues noted below - height of structure and off-street Occupier Garaging.

Parks areas

Green Corridor

Location of Neighbourhood centre

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

Having read the PPC 100 Riverhead Community Association Submission Final response document I support every point made and the suggested solutions. The other things that thoroughly irks me is the THAB's that brings with it the associated intensification - THIS IS NOT RIVERHEAD. I don't recall any information that clarifies whether the Apartments and Terraced units will have off-street garaging for all the occupiers, if not you can imagine how clogged the streets will be, starting to look like Avondale!! The Parks areas don't look like Parks but more like "Small Greens" the size of a postage stamp, no quality offered there. The green corridor running through offers nothing other



than the appearance of a covered stormwater drain, to call it multi-purpose is a gross exaggeration, surely the design team can be more imaginative. The Plan Change and the proposed housing needs to be clarified more about how high the Apartments will be, is it 3 stories or 6 stories??? And again what about Apartment and THAB Occupiers garaging of their vehicles. The Neighbourhood Centre location looks weird - out on its own.

I or we seek the following decision by council: Decline the plan change

212.1

Submission date: 17 May 2024

Supporting documents

PPC 100 - Riverhead Community Association Submission FINAL\_20240517161353.312.pdf

### **Attend a hearing**

Do you wish to be heard in support of your submission? No

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.



## **Riverhead Community Association submission to PC 100 (Private): Riverhead**

### **Introduction**

The Riverhead Community Association (RCA) is an incorporated society comprising of residents passionate about our community.

The RCA has 70 financial members and our Facebook group has 670 members, 170 of which have recently joined after the Plan Change 100 was put out for submissions.

The RCA provides a combined local voice and works collaboratively with Auckland Council and Auckland Transport on issues and projects which affect the Riverhead communities.

The RCA has a proven track record of advocating for community needs. From 2006 when Riverhead went through a plan change process for Riverhead South, RCA was at the table making a difference. We influenced the outcomes that were incorporated into the SPECIAL 30 (RIVERHEAD SOUTH) ZONE (legacy Rodney District Plan) which resulted in the spacious and attractive built form of Riverhead South.

The RCA has been active informing the community of PC100 via 2 public meetings and multiple topic Facebook updates. We have taken notice of key themes which have emerged, and these are compiled into this submission. In our view, this submission captures the major topics of concern consistently raised by the community at large.

The RCA is not anti-development.

We wish to be heard.

### **Council's Position Pre-Notification**

The RCA is cognisant of council's pre-notification reporting and the decision of the Planning, Environment and Parks Committee.

We concur in principle with council's description of the main issues, however, outline further matters of specific concern in this submission<sup>1</sup>.

*"The main issues will be the provision of infrastructure, whether the layout and provision for connections through the area are appropriate, the management of natural hazards and the intensity of development proposed. In respect of infrastructure, the applicant is proposing to provide new local transport upgrades as the land is developed. The extent to which these are sufficient can be considered through the analysis of submissions and*

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<sup>1</sup> Planning, Environment and Parks Committee, Agenda, Thursday 4 May, 2023, Paras. 72, 73

*detailed plan change review. It is noted that there are no committed or funded public transport service improvements at this time.”*

*And*

*“An important consideration is the effect of additional traffic from the potential new development enabled by the plan change on the wider transport network, and most notably the operation of SH16. NZTA Waka Kotahi are planning an upgrade to SH16 in the vicinity with the upgrade project to be completed in 2024/2025. The project extends from the end of the North Western Motorway from the Brigham Creek Road/Fred Taylor Drive/SH16 roundabout through to Waimauku - a 10km stretch. The section from Brigham Creek Road to the Taupaki roundabout will be four-laned with a new two-lane roundabout at the SH 16 /Coatesville Riverhead Highway intersection. It will also include wire rope median barriers and a 3-metre-wide shared path from Brigham Creek Road/Fred Taylor Drive/ SH 16 roundabout to Kumeu. The section from Huapai to Waimauku involves installation of wire rope median barriers and shoulder widening.”*

## **RCA – Position Overview**

The RCA opposes the plan change for the reasons set out in this submission.

The RCA welcomes the opportunity to work with the requestors and the council to resolve matters raised in this submission.

Matters of concern and remedies sought are listed below.

### **Transport:**

1. The plan change fails to adequately recognise and propose transport infrastructure upgrades required to manage adverse effects on the wider transport network. For example, SH16 is at times completely gridlocked with commuter traffic, the queue to get onto SH16 comes back to Hallertau at 6.30am! During weekends the line to Boric (the Coatesville Riverhead Highway (CRH)/SH16 intersection) is at the golf course. Another 3,000 residencies at Riverhead will exacerbate this greatly. There are very few local employment opportunities, most people will commute to work, and the single route bus is inadequate, inefficient and unreliable. The road has no capacity for walking or cycling to Westgate or Kumeu. Driving on roads is the only option.
2. Significantly, the development relies upon construction of a roundabout at the (CRH)/ Main Road (SH16) intersection to be built by Waka Kotahi NZ Transport Agency at some future time. Whilst this upgrade has been a long time coming it only addresses safety at the intersection. It will not improve capacity of the network which is already often dysfunctional. We also understand that this project is not currently programmed or funded.



3. The end of the NW motorway often backs up for a kilometre or more, and the roundabout intersection is routinely dysfunction creating huge traffic jams.
4. The plan change fails to recognise comprehensive local network transport improvements (within existing Riverhead) are warranted necessary to manage adverse effects on local transport.
5. The proposal is for limited local road 'upgrades'. But, to only deliver these in a fragmented and staged way based upon occupation of adjacent property. The upgrades do not have to be in place prior to construction when the first traffic impacts start.
6. Riverhead has under-provisioned streets, often with open drains, a lack of footpaths, unformed carriageway edges and few street trees. Some blocks are poorly connected and contain unformed paper roads. The development will increase pedestrian use over all of Riverhead, including to Riverhead School and to the two walkable pre-schools. All the realistic routes from the plan change area to destinations in Riverhead such as schools, pre-schools, shops, War Memorial Park and public walkways should be reviewed in terms of footpath provision and safety, and upgrades should be completed prior to the main development starting. This is to enable safety pedestrian movements for the existing and future people and children of Riverhead.
7. The plan change fails to recognise that local and wider transport upgrades are necessary to complete prior to development (earthworks and civil) commencement to manage the effects of construction traffic and safety.
8. The huge development area will require extensive earthworks and civil construction, including thousands of truck and vehicle movements well before any residence is occupied. Traffic upgrades, such as turning bays and pedestrian networks need to be functional and safe before the heavy traffic begins. The current plan change proposal to require limited improvements prior to occupation of a dwelling fails to recognise and mitigate the adverse construction traffic effects which will be particularly severed at main access routes and where locations where site access is feasible.
9. New subdivisions often lack on street parking. Demand for parking would spill over into the existing community where there are no formed road edges and open stormwater drains. Adequate on street parking needs to be required as we don't have the public transport options available.

### ***Transport – remedies sought***

10. Include provisions which state that development of the plan change area cannot proceed until wider network capacity and safety issues are addressed.
11. Include provisions which state that development of the plan change area cannot proceed until local road improvements have been completed, including function and safety assessments and any required upgrades to footpath routes and networks in Riverhead likely to be used by residents of the plan change area to access local destinations.
12. The enormous retirement village privatised site creates pinch points of available connectivity between the plan change area and existing Riverhead. These should be recognised and addressed by requirements for upgrades in the plan change provisions. For example, the road and pedestrian network of Te Roera Place, Duke Street, Cambridge Road, Queen Street, Alice Street and King Street will all be well used routes for people moving in and out of the plan change area, as pedestrians and in vehicles. These roads, and further routes to Riverhead School all warrant assessment and specific upgrades to ensure they are functional and safe. Similarly, the connection between the plan change area and Riverhead War Memorial Park has not been recognised as a primary route which is restricted by the CRH and the retirement village development. Specific provisions should also be applied to this area to ensure that development enables safe and logical east/west connections and road crossings.
13. Include provisions which require all required local and wider transport improvements to be in place prior to earthworks and related traffic impacts commencing.

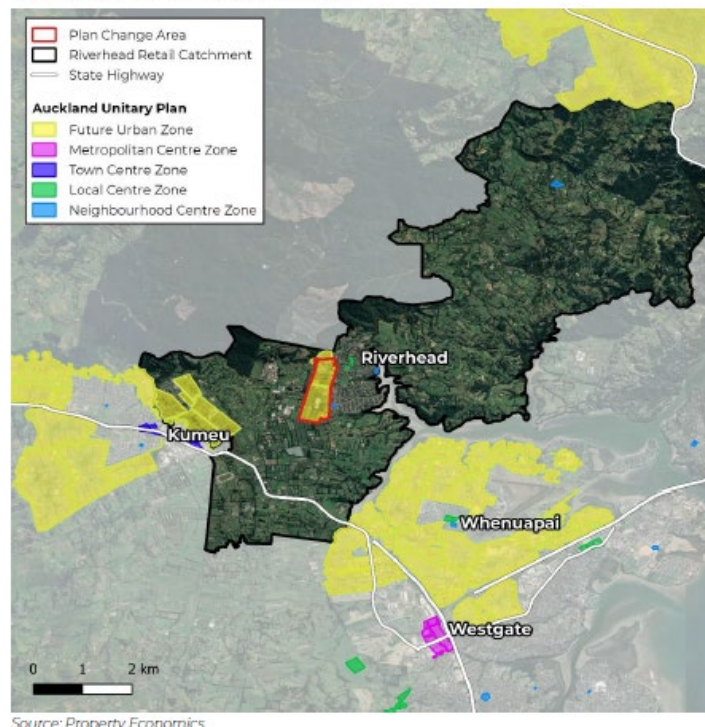
### **Commercial Zoning – Local Centre Zone and the Neighbourhood Centre Zone:**

14. A Local Centre zone is proposed at the corner of Riverhead Road and the CRH and a Neighbourhood Centre Zone is proposed opposite Riverhead Point Drive (Hallertau).
15. Riverhead already has a consolidated area of Business Mixed Use zone and Local Centre zones sites which house 2 mini-marts, a real estate office, a restaurant/bar, bottle shop and a vape shop and Heritage café/takeaways on School Road. There is also the local vet and two-preschools, Lulu's café, and other retail and commercial yard type activities. The mixed-use zoned triangle contains a development which when completed will include a series of ground level shop or business, and the final part of the triangle is also under development and also zoned Business Mixed Use, therefore, is also available for commercial use. Hallertau sits further down the CRH.

16. The basis for the proposed commercial zones is an economic report which predicts future demand (Appendix 7 – Centres Assessment). This report provides a cursory summary of the existing commercial activities and zoning. It also bases predicted demand on a ‘Riverhead Core Retail Catchment’. The report provides no basis for the extent of this catchment despite it being a formative assumption. Astonishingly, the catchment extends and wraps around Kumeu and goes all the way to the Dairy Flat Highway.

extent of Riverhead's core economic market.

FIGURE 1: RIVERHEAD CORE RETAIL CATCHMENT



17. Defining this as a catchment for Riverhead as a retail destination is ridiculous at both extents of the area shown. People in the Kumeu area have no incentive to travel to Riverhead for shopping. Kumeu is well served with a supermarket and a huge range of retail and commercial services. Council's own consultation documents for Kumeu show the extensive land at Kumeu dedicated for these activities.

See below.





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18. People east of Coatesville are well served by old Albany and the Albany centre and beyond. Presuming that these people would also flock to Riverhead for shopping is not realistic because Albany is more accessible and contains a much greater range of shops and services.
19. The economic report also does not appear to consider the retirement village development and the hospitality, medical and other services it will contain which would be available to the residents and to the public. Restaurants, retail and healthcare facilities are specifically enabled by the proposed Sub-Precinct A within the retirement site.
20. The proposed THAB zoned areas also allows a range of commercial and service activities (via a RC). It is not clear why the economic report does not account for the possibility that the THAB zone can also contain businesses and retail, especially the area in proximity to the proposed Neighbourhood Centre zone where this development may be likely.
21. Another concern is that the proposed isolated Neighbourhood Centre Zone (adjacent Hallertau) will exacerbate an undesirable pattern of commercial strip development down the CRH.
22. A complete and justified basis for zoning this land as a Neighbourhood Centre Zone has not been provided. The proposed zone does represent a defined area of FRL landholding which naturally raises the question as to whether this discrete proposed zone is motivated by commercial gain rather a demonstrated need or sound design principles.
23. The original structure plan for Riverhead South reinforced the community's expectation of a defined centre. The existing Riverhead centre is located in a



relatively consolidated and logical manner, and also has connection to Riverhead War memorial Park.

24. The Urban Design assessment (Appendix 6) shows that the main Local Centre Zone is within a 400m walkable catchment for all residents within the plan change area. So, the isolated Local Centre Zone it is not justified by pedestrian accessibility. As noted, the existing Riverhead centre supports two min-marts or diaries, and major supermarkets are located on all routes west (Kumeu), South (Westgate) and east (Albany).

### ***Commercial Zoning – Local Centre Zone and the Neighbourhood Centre Zone – remedies sought***

25. We want any proposed commercial zoning to be justified by economic analysis that is based on a clear outline of existing zoning and activities in Riverhead, including under-utilising of zoned land and potential capacity, and recognition of the activities and services that would be provided by the retirement village and commercial activities that can be undertaken in the THAB zone via resource consent.
26. We want any proposed commercial zoning to be justified by economic analysis that is based on a well-reasoned and justifiable customer catchment which recognises the commercial and retail centres of Kumeu, Westgate and Albany, and does not unrealistically anticipate that people who live near these centres would instead travel to Riverhead for their shopping needs.
27. We want any new business zoning to demonstrate a consolidated and legible town centre, not exacerbate strip commercial areas fronting the highway. Most importantly by removing the proposed Local Centre Zone opposite Riverhead Point Road.

### **Residential Zoning - Mixed Housing Suburban Zone:**

28. Most of the land is proposed as Mixed Housing Suburban Zone. This zone allows for two and three storey detached and attached housing in a variety of types and sizes. Up to three dwellings are permitted as of right subject to compliance with the standards.
29. In comparison, existing Riverhead is mostly Single House zone. The plan change will result in much more dense development and generally taller houses and lots of multi-unit townhouses. Existing Riverhead is characterised by many large trees on private properties.
30. In contrast, large trees would be infrequent in the proposed Mixed Housing Suburban Zone which has minimal landscaping requirements (only 20% and this can be paved if there is canopy cover over (IX6.11. Landscaped area within the

Mixed Housing Suburban Zone) and only a 2.5m front yard standard which is not adequate for large growing tree. The outcome is that buildings will dominate the neighbourhood character. Overall, due to a lack of space or a requirement to plant trees on private sites, the neighbourhood character would be markedly different compared to existing Riverhead. We expect this difference in character to be noticeable and jarring, resulting in a lower quality of amenity. We want any new development to fit into the existing urban fabric of our community.

31. We are not sure that this character represents the 'unique sense of place' described as an intension in the precinct description.
32. No requirements for road reserve tree planting are proposed either, leaving the street tree outcome uncertain or minimal. Even in the green corridor there are no measurable outcomes for vegetation cover or trees.
33. The proposal fails to mention or adopt the council Auckland's Urban Ngahere (Forest) Strategy. The strategy recognises the social, environmental, economic, and cultural benefits of our urban ngahere (forest), and sets out a strategic approach to knowing, growing, and protecting it. It seeks to achieve increased canopy cover to 30 per cent across Auckland's urban area, and at least 15 per cent in every local board area. The proposed plan change should seek to provide overall canopy cover of 30% which would provide a range of health, social and economic benefits including reducing the urban heat effect of roads, buildings and impermeable surfaces. This could go some way to integrating the old and the new.
34. The precinct description also seeks to 'enable transition from the rural to the urban environment'. It achieves this outcome abruptly, rather than a smooth transition.
35. The zoning proposed does not provide any transition at the rural edge, for example, single house zoning could be applied to the outer 100 metres. There is little attempt to provide certainty of transition of scale or density, overall. Policies which direct this outcome adopt soft non-comital language, such as 'Encourage' (policies 15 and 16). It is not clear how 'encourage' has any real influence at the resource consent stage.
36. A 5 metre rear yard setback standard is proposed at the rural zone interface. This is to landscape or plant trees in the rear yard. A 5 metre yard would have no material visual difference to the abrupt transition between residential development and the rural environment. A larger rear yard, say 15m with a requirement to plant at least one large tree and a rural fence typology are obvious designs requirements that would go some way to achieving the intended transition outcome.
37. There is also no requirement to provide adequate front yards to enable the planting of trees. This was a requirement of the Riverhead South development, which contributes to the 'treed' neighbourhood character established and respects the character of old Riverhead and the many prominent mature trees. This requirement

should at least apply to the rural fringe parts of the site and would also contribute overall to sense of transition between the rural and residential land uses.

38. Another formative design requirement of Riverhead South was a rule prohibiting tall front yard fences. This outcome can also be observed widely in Riverhead South and contributes significantly to a sense of spaciousness with buildings set back and front yard landscaping visible. The plan change seeks to removes the usual requirement for low or visually permeable front yard fences without any explanation as to why. (refer IX.6. Standards page 11). This may result in a proliferation of tall front yard fences detrimental to a desired spacious character. It also has negative effects on CPTED outcomes.
39. There is no requirement to plant regular street trees on roads. Whilst often achieved during development, the supporting AUP policy context is vague. To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, we request minimum tree quantity outcomes are required for new roads. The density for the housing will result in no tree cover of value, so the work must be done in the streets.
40. The zone also does not propose any design response to the proposed green corridor network, aside from a lonely fence height standard. There are no provisions proposed to give effect to the Urban Design recommendation for: *“a high quality and vegetated interface for higher density development along the key movement routes and adjacent to existing residential development which contributes to the current landscaped character of streets in Riverhead.”* There is also little detail on how this will be achieved, given council parks recent directive for no gardens within the streetscape we are left wondering what this ‘green corridor’ will contain.

### ***Residential Zoning - Mixed Housing Suburban Zone – Relief sought***

41. Generally, we accept that density needs to be increased compared to the predominant Single house zone of Riverhead. But this should be balanced by stronger requirements for good urban design (for example, low front yard fences) and green infrastructure (for example requirements to plant trees on sites and on roads). Graduated density should be considered at the transition to rural zoning and higher density can be placed near the neighbourhood centre and open spaces.
42. We want front yards sized to be adequate for planting large trees, for example, 6 metres. We want a requirement for each site in the zone to plant one tree capable of growing 6m plus in height.
43. We want specific yard and landscape standards to apply at the rear of all sites which adjoin a rural zone to help establish a transition between the residential and rural environments.

44. We want a front yard fence control applied which applies H5.6.15 Front, side and rear fences and walls.
45. To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, we request minimum tree quantity outcomes are required for new roads. Trees are often the last consideration and underground infrastructure dominates the road corridor.
46. Overall, we want the plan change to require sufficient private and public planted areas to give effect to the intent of Auckland's Urban Ngahere (Forest) Strategy. This will also help integrate the higher intensity development with the character of existing Riverhead and the rural interface.

## Residential Zoning - Terrace Housing and Apartment Zone (THAB):

47. The THAB zone provides for high intensity living in the form of terrace house and apartments and should be predominantly around centres and the public transport network to support the highest levels of intensification.
48. North of Riverhead Road this zone is located within the retirement village area. If that goes ahead this area of THAB zoned land would be developed with a retail/hospitality corner and privatised retirement apartments.
49. The other area of THAB zone that will be available for development and housing which is not privatised is immediately west of the Neighbourhood Centre zone at the corner of Riverhead Road and CRH. This is overlaid with Sub-Precinct B



50. There is very little reasoning provided for this discrete area of zoning proposed, and why it does not also front CRH, or warp around the south of the Local Centre zone. We do not think the proposed zoning reflects a land parcel, and this may be influencing the proposed location and extent of that zone.

### ***Residential Zoning - Terrace Housing and Apartment Zone (THAB)- remedies sought***

51. We want any THAB zone location and extent to be based on a reasoned analysis and reflect the intent of the zone which is to provide density around a transport hub and/or a town centre.
52. We want the transition edge of THAB to the Mixed House Suburban zone to contain a local road to create a natural transition space between the different densities and building scale/forms.

### **Mixed Rural Zone:**

53. A mixed rural zone is proposed at the northern part of the plan change area.
54. This is a response to the obvious flaw with the original (pre-notification but rejected by the council) proposal which proposed this flood plain area as suitable for residential development.
55. The main issue with this zoning is that the land will not be able to be further developed or subdivided.
56. The outcome is that the 'key move' of a green corridor extending to the river, and an esplanade reserve vested as public space to the council cannot be realised. The maintenance and enhancement of public access to and along rivers is a matter of national importance under the RMA. The current proposal fails to achieve this.

### ***Mixed Rural Zone – relief sought***

57. We want provision to require the 20m margin of land from the stream to be zoned as public open space and vested to the council.
58. We want the green corridor to be extended to the open space esplanade reserve and be available for public access. The river is an important taonga for our community. Previous development has turned its back to it.

## Flooding and Stormwater:

59. We are concerned that current best practice stormwater system design methodologies (as outlined within Appendix 10) would not adequately address adverse effects of the development. Council's current practice has failed Riverhead as evidenced in the Auckland Floods February 2023 where new developments designed to council's standards resulted in flooding harm.
60. We request robust peer review and an overall bottom line requirement that stormwater will not cause upstream or downstream adverse effects.
61. Objective (6) is very weak in that it that allows for the outcome of inadequate stormwater management:  
*(6) Stormwater is managed to avoid, as far as practicable, or otherwise minimise or mitigate, adverse effects on the receiving environment.*
62. In our view, if there is so much uncertainty that the requestor seeks scope for it to not be 'practicable to 'avoid, remedy or mitigate adverse stormwater effects', then this indicates a lack of confidence that stormwater issues can be appropriately addressed. We consider that the objective must be amended to remove the caveat 'as far as practicable' so the adverse stormwater effects must be avoided, remedied or mitigated.
63. Stormwater systems across the plan change area are proposed via a 'central stormwater management treatment spine' intended to be part of a 'multi-purpose green corridor' To ensure a coordinated delivery there needs to be a requirement for this to be designed and agreed prior to development.
64. Without an overarching agreed plan for the stormwater corridor, it is not clear how an overall integrated stormwater system will result from development of multiple individual lots and/or stages and what specific land parts must occur on. The risk is that fragmented and uncoordinated design and implementation would result due to a lack of design clarity and responsibilities.
65. Despite a 'designed' stormwater spine system' being proposed, zoning is not used to clarify the location and extent of the system. The extensive land required for this purpose is inappropriately zoned residential. Zoning would provide certainty of the land required for the stormwater and green corridor purposes.
66. A matter of significant concern is that the open space and stormwater functions of the corridor will be located over many separate parcels, landowners, and development stages. It is also located on parcels owned by parties not subject to the plan change.

67. There is no requirement for the overall green corridor to be designed prior to development. If this was a requirement then it would be clear what needs to occur and where. The lack of clarity will likely result in a fragmented outcome overall due to separate parties leading different parts of the development at different times.
68. It is recommended that a policy be added to require a clear overall design for the combined stormwater and open space corridor needs to be agreed by council prior to development within the precinct. We request objectives, policies and standards be included to define the corridor, its various functions, and require it to be implemented in a staged and coordinated manner.
69. Policy 17 states:  
*“(17) Require subdivision and development to be consistent with the water sensitive approach outlined in the **supporting stormwater management plan**, including: ...”*  
  
It is not appropriate for a plan change to require adherence to a document that has not been reviewed and accepted by the council. The report itself clarifies: *“This report has been prepared solely for the benefit of our client with respect to the particular brief and it may not be relied upon in other contexts for any other purpose without the express approval by CKL.”*
70. In general, it is not good practice for an enduring planning document (the AUP OP) to refer to a third party report prepared in support of a plan change.
71. The supporting stormwater report was prepared when 22 Duke Street was proposed to be zoned for residential development. This land is now largely proposed to be zoned rural, and consequently could not be subdivided. This casts doubt as to whether this land can still be used for stormwater management and conveyance to the Rangitopuni tributary. It is not clear if this affects the integrity of the stormwater report findings.

### ***Flooding and Stormwater - relief sought***

72. We want robust peer review and an overall bottom line requirement in the plan change provisions that stormwater will not cause upstream or downstream adverse effects.
73. We want the clause of ‘as far as practicable’ to be removed from Objective (6), for example: *“Stormwater is managed to avoid, or minimise or adequately mitigate, adverse effects on the receiving environment.”*
74. We want a requirement for the overall stormwater corridor system and green network design to be agreed with council prior to development and not incrementally addressed via multiple separate development proposals. This would



likely require staging of development to align with development of the stormwater/green network corridor necessary to support that development.

75. We want clarity of the intended use and function of 22 Duke Street with regard to stormwater.

## Wastewater:

76. Residents report that the existing system is prone to failure, often setting off alarms particularly during rain events, we understand due to groundwater and ingress of water into the council's system. The concern is that the existing poor performing system is not fit for purpose overall, and that expanding it over a large area with high groundwater will negatively impact everybody.

## Wastewater – relief sought

77. We want provisions which ensure that the wastewater system is appropriate and fit for purpose, and that addition of the plan change area will not negatively impact existing and future users.

## Parks and Reserves:

78. The 'multi-purpose green corridors' are defined by the requestor as a 'key move' from an urban design perspective. This outcome agreed and supported in principle.
79. There is no requirement that the green corridor be offered to council for vesting, but this is commonly required under existing AUPOP precinct plans to provide certainty for council and developers. In our mind, a green corridor is not a wider road with more street trees.
80. Riparian margins are to be vested, but these are minimal and go nowhere near establishing the green corridor which needs to be located on a variety of land tenures. There needs to be a requirement that land necessary for the green network, but not accepted for vesting by council, is developed and held by an entity, like the proposal for riparian margins. Otherwise, parts of the network might not get delivered.
81. The intent of a contiguous open space network comprising of stormwater and passive open space functions is supported. Unfortunately, the provisions fail to define what the corridor will comprise of in real terms and do not require it to be delivered in practice. For example, what will be located in-between the stormwater ponds?
82. Policy (13)(d) suggests *"Co-locates smaller open spaces along the multi-purpose green corridor to achieve a connected network of open space."*

83. This policy shows a lack of consideration that the separately proposed ‘neighbourhood parks’ are limited to 3 separate locations and a flawed presumption that council would accept ad-hoc vesting of a range of “smaller parks” required to join-up the green corridor network. The network may be partly on the road reserves, but if this is the intention, then that needs to be clear and also needs to be a requirement of the road design.
84. The policy fails to incorporate the depth of the description of the green corridor in the s32 report:

*“The central north-south multi-purpose green corridor is a key structuring component in both the Greenways Plan and the proposed Structure Plan. Along with the collector road, this green corridor accommodates both passive and active open spaces, footpaths and dedicated cycleways. It also incorporates an existing intermittent stream.”*
85. A clear description the intended corridor composition and the types of land it will occupy is required in the plan. As noted, it appears that parts of the green network would likely be upon road reserve. However, there are no provisions which explain this or require ‘linking roads’ to deviate from a standard design to perform this function. For example, to ensure that necessary roads are designed to be a width adequate to contain a high level of green infrastructure in a dedicated or protected zone within the road reserve.
86. Clear expectations are needed in the plan to ensure that the multiple components of the green networks are considered and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor. Without this being a clear directive it is likely that conventional design would be applied to the various parts, and overall the green network would not be cohesively designed and delivered.
87. Overall, clear objectives, policies, standards and design/outcome expectations are required in the plan to ensure the overall ‘multi-purpose green corridors’ is delivered as anticipated. Policy 13 as drafted will not achieve this outcome.
88. The precinct description seeks to realise “...the opportunity to establish green corridors through the precinct”. Policy (13) only requires the council to encourage “...the provision of a continuous and connected multi-purpose green corridor”. The word ‘encourage’ is a weak and non-committal directive. Clauses (a) to (d) provide an unclear framework without specific detail of what is ‘required’ to be achieved. A stronger word such as ‘require’ is needed to ensure the overarching urban design ‘key move’ of the green corridor is delivered.

89. Policy 17 requires development and subdivision to provide “... a central stormwater management treatment spine through the precinct in general accordance with the multi-purpose green corridor in the locations indicatively shown on IX.10.2 Riverhead: Precinct plan 2;” This cannot be achieved in isolation of an overall agreed plan which spans the plan change area.
90. The supporting Stormwater and Flooding assessment contains a ‘Preliminary Masterplan’ which shows significant areas of land to be occupied by stormwater devices and green infrastructure, extending in area at some locations much further than shown on Precinct Plan 2.
91. If this drawing represents the modelled stormwater requirements, then the precinct plan should also include the same information so that developers and the community can understand what is required.

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Figure 10: Preliminary Master Plan - Version 10 (Source: Urban Acumen)



92. The supporting Urban Design report (Named Neighbourhood Design Statement) shows the multi-purpose green corridor extending via the land a 22 Duke Street to the Rangitopuni tributary and beyond via existing and potential future esplanade reserves alongside the stream and river.
93. We support the connection and the esplanade reserve alongside the tributary and note the extensive high quality esplanade reserve that has resulted from the Riverhead South network. A long term aspiration is to have a complete network of coastal connections. The proposed zoning of 22 Duke Street as (predominantly) Mixed Rural removes the possibility of subdivision and vesting of esplanade reserve along the tributary. The small parts which are proposed to be residentially zoned would appear to still leave the parent site over 4HA, and therefore not trigger the esplanade reserve vesting upon subdivision. We expect that this is an unintended consequence of changing the proposed zoning. We request that the 20m margin of

the tributary be zoned Open Space – Conservation, as part of the plan change, and that it's heavily weed infested margins be restored and planted, and that land be vested to the council. These are the outcomes which would have occurred if the land was able to be subdivided and are necessary to secure a necessary part of the long-term aspirational esplanade reserve network.

94. Objectives, policies and standards are also required to achieve public access links from the development to the zoned esplanade reserve. If 22 Duke Street is available for stormwater management purposes, then this outcome should be easily achieved, especially if parcels are subdivided as drainage reserves, as this may trigger the 4Ha or less lot size adjacent to the tributary to trigger esplanade reserve vesting.



95. There is no direct requirement to deliver the 3 proposed neighbourhood parks, only an indirect reference to section E38. We seek a direct requirement to deliver the parks, presuming support from council parks division.
96. One high value (notable value) Beech tree is identified which is clustered with many impressive specimen trees (including a 13m tall Kauri). The Beech sits within a cluster of magnificent trees worthy of retention and is an obvious location for a Neighbourhood Park. Policy (12) seeks that the Beech tree is incorporated into an open space, but Precinct Plan 2 does not identify this location for a Neighbourhood Park. This inconsistency needs to be corrected. This cluster of trees, planted by a family who have been in Riverhead for multiple generations could further help connect the character of existing Riverhead to that of the plan change area.
97. The Beech tree and surrounds should not be compromised by stormwater functions which also appear to be proposed within this location (refer structure plan) page 8.



98. Policy 12 does not require the retention of ‘other mature trees that are worthy of retention’ by caveating the policy with ‘*where possible*’. We seek that the option to ‘not retain worthy trees’ be removed and more directive wording applied. The site is a huge greenfield area with a lot of flexibility for development locations. Any trees of value should be required to be retained. The value of this cluster extends beyond the arboriculture assessment.
99. Large trees located near the CRH appear to not be recorded in the arboricultural report which appears to be an error.
100. The green corridor graphic, or ‘east-west connections reflecting potential original portage routes promoting awa ki awa linkage’ is shown on Precinct Plan 1 extending along and outside of the southern plan change boundary. Policy 19 contains an obtuse requirement for development to acknowledge key views and spiritual connections respond to identified on IX.10.1 Riverhead: Precinct plan 1 in the layout and/or design of development; in particular, sightlines to Te Ahu and Pukeharakeke, and connections to Papakoura Awa and Te Tōangaroa.
101. We of course cannot speak for mana whenua but note that the actual outcomes required are limited to locating and orientating streets and public open spaces to reference and respect the Māori cultural landscape values. This is unlikely to result in any material outcome in the development form. The proposed west-east roading pattern already adequately achieves the expected outcome. It is not clear how the development is required to respond to the southernmost connection, that is not even within the plan change area.

### ***Parks and Reserves – relief sought***

102. We want the requirement and composition for the green corridor to be determined and agreed in principle with council prior to any development, so that the required environmental, stormwater and connectivity outcomes are understood and delivered appropriately and fully by each discrete development parcel or stage.
103. We seek that necessary parts of the green corridor infrastructure which do not comprise of roads, neighbourhood parks or drainage reserves are offered to council for vesting or protected and maintained in perpetuity by an appropriate legal mechanism (as per IX.6.3. Riparian margin).
104. We want a clear description the intended corridor composition is required in the plan, and an explanation of how the multiple components of the green networks are to be determined and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor, and any other land that may be required.

105. We want the green corridor to extend to the Rangitopuni tributary and provide a public connection to a zoned open space esplanade reserve.
106. Overall, clear objectives, policies, standards and design/outcome expectations are required in the plan to ensure the overall 'multi-purpose green corridors' is delivered as anticipated, because Policy 13 as drafted will not achieve this outcome.
107. We want a neighbourhood park to be located to include the Beech tree and the overall grove of high value trees at this location.

### **Retirement Village (Matvin Group land):**

108. The technical approach of the plan change with respect to the Matvin retirement village land is unclear. It is noted in the s32 report but not in the plan change provisions. It is also noted in the urban design report as a consented development, containing buildings up to 5 stories tall, with 410 dwellings including 310 apartments. It is also included in the supporting stormwater report.
109. The plan change maps and provisions do not respond to the scale and poor urban design connectivity outcomes of the retirement village development. The only response is to propose zoning part of the site as THAB and the remainder as Mixed House Suburban, and Sub-Precinct B. This is of concern because the retirement village is located at the interface of the plan change area and existing Riverhead at Cambridge Road. It occupies a 500 metre long flank and only provides for a single pedestrian cross connection, available during daylight hours only.
110. The development of the retirement village is not certain to occur, however, the plan change proposal treats it as a certainty. Evidenced by the lack of local roads, pedestrian connectivity, or a considered interface with Cambridge Road, all of which would be expected on a greenfield area some 10 Hectares in area and positioned at a critical location. If the retirement village does not go ahead then the plan change should be able to provide a good practice development framework for this area consistent with the remainder of the plan change area, and adopting the key design drivers of the Urban Design report, being:
  - a connected physical environment
  - an integrated community
  - access to nature
  - vibrant and local
  - housing choice and affordability
  - proximity/convenience
111. Concerningly, despite recognising the retirement village (by way of omitting expected outcomes such as a green corridor, local roads and pedestrian connectivity, and a considered interface at Cambridge Road) the plan change also

does not propose any wider response to the retirement village form and function, should it go ahead.

112. For example, the Urban Design report recommends: *“a transition between taller buildings around the centre to lower densities and building forms in the remaining areas of the site” (pg 51)*. Requiring roads and pedestrian routes to interface with the lone public route through the retirement village should also be required in the plan change. The Sub-precincts which seek to provide some level of transition of buildings do not adjoin the retirement site but are contained within it.
113. Especially concerning is the detrimental impact that the retirement village will have on connectivity for the northern part of the plan change area and movements to and from the adjacent existing Riverhead. This matter is noted also in our transport section.

### ***Retirement Village (Matvin Group land) – remedies sought***

114. It is requested that the plan change be complete and robust in terms of dealing with the two scenarios of the retirement village being in place or not. Requiring cross-site connectivity and local roads for the scenario of the retirement village not being built.

### **Structure Plans and Consultation:**

115. Back in 2006, prior to being rezoned for development, Riverhead South also went through a plan change which was informed by a Structure Plan. This was Council led and involved the community through a series of consultation meetings including interactive design workshops. The people of Riverhead were actively involved in a meaningful way over a carefully planned process.
116. The structure plan was adopted into the then Rodney District plan ‘SPECIAL 30 (RIVERHEAD SOUTH) ZONE’. This included a comprehensive range of issues, objectives, policies, standards and assessment criteria to ensure that development reflected the needs of the community and council’s intent, whilst providing for good quality development.
117. That document delivered a planning framework informed by community participation. A range of built form outcomes are visible in Riverhead South today which were a product of this community/council collaborative process. Most significantly there was an emphasis on dwellings being set back from the street and for low or no front fences. These create a sense of spaciousness and openness at the front of houses and make for safe streets with high levels of passive surveillance.
118. These previously expressed community desires are not captured by the proposed plan change. The obvious outcome is that the character of the plan change area will be markedly different and not consistent with existing Riverhead. Density can be



provided, but it can also be balanced with adequate and open front yards and a requirement for trees. Mature trees are a defining element of existing Riverhead, including Riverhead south where significant trees were retained and sites are large enough to accommodate new large growing species.

119. In stark contrast the 'Structure Plan' (refer Appendix 4) supporting the current plan change application was not prepared with meaningful community involvement. Community consultation involved a meeting over a coffee with some members of the RCA, 2 'drop in community sessions and a summary of 'feedback'. In our view, these represent a token level of consultation designed to 'tick the box'.
120. We do not understand why the previous council led (but developer funded) process was collaborative and genuinely engaging, and the current process has been superficial, how is that democratic?
121. The Quality Planning website outlines good practice consultation for structure planning. It says:

*Consultation with key stakeholders and the community affected is an important component of the structure plan development process. The number and type of stakeholders identified and consulted with for a structure plan will depend on the scale and characteristics of the area and the issues to be managed.*

*To assist with consultation, it is good practice to develop an overall consultation plan for all groups including key stakeholders, tangata whenua and the wider community. This helps to identify all stakeholder and ensure that consultation and communications are managed in an integrated and co-ordinated way. This can also help to provide certainty to stakeholders about the opportunities to input into the structure plan process and the how the various consultation processes will be integrated into the final output. It is important that the communication or consultation plan recognises the potential for land ownership to change during the course of the structure planning exercise and any subsequent RMA plan changes.*

*Commencing consultation early in the process is important, and can help with:*

- *obtaining stakeholder buy-in to the process;*
- *gauging community and stakeholder levels of acceptance to broad concepts (such as the overall level of development) being proposed;*
- *fulfilling statutory duties under the RMA, LGA and Land Transport Management Act;*
- *incorporating and working through stakeholder concerns and aspirations while there is flexibility in the process to do so;*
- *identifying constraints and opportunities.*



122. In our view the consultation process fell well short of best practice. This is evidenced by how poorly the current plan change portrays the concerns and aspirations of the community compared to the previous process which involved meaningful involvement and consultation.
123. We are not out to stop change or development, as evidenced by involvement in the previous planning process. Rather we seek to ensure that the good things promised (such as the green corridor and infrastructure improvements) are properly designed, will be delivered as described (and when needed prior to adverse construction effects), and that due consideration is given to simple changes that could better integrate the plan change area with existing Riverhead, such as adequate front yards and tree planting. We very much would have preferred this submission to say that the process has been collaborate and effective, rather than needing to write such an involved submission and speak to these issues at a hearing and appeals if it gets to that.
124. We welcome the opportunity to conference with the requestors to resolve any matters of difference pre-hearing.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Natalie Vose  
**Date:** Friday, 17 May 2024 4:30:30 pm  
**Attachments:** [Riverhead plan 100 Opposition.pdf](#)

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The following customer has submitted a Unitary Plan online submission.

#### Contact details

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#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Property address: Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:  
in the attached

I or we seek the following decision by council: Decline the plan change

213.1

Submission date: 17 May 2024

Supporting documents

Riverhead plan 100 Opposition.pdf

#### Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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## **Opposition Document**

### **Auckland Council Regarding Proposed Development of the Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead**

#### **PC 100 (Private): Riverhead**

#### **Traffic Congestion**

##### **Overview of Traffic Concerns**

The proposed development plan inadequately addresses the significant traffic congestion issues already prevalent in the area, particularly on the Riverhead Coatesville Highway (CRH), State Highway 16 (SH16), and the Northwest Motorway (NW Motorway). The addition of new residences will exacerbate these problems, making current conditions untenable.

##### **Specific Issues**

#### **1. Lack of Alternatives and Single Lane Dependency**

- The Coatesville Riverhead Highway is a single-lane road with no viable alternative routes for entering or exiting the area beyond CRH. All alternatives funnel traffic onto SH16, a major bottleneck.
- Current peak morning traffic queues extend far beyond Hallertau, and weekend traffic often backs up to the Huapai Golf Club just to enter the CRH/SH16 intersection.

#### **2. Persistent SH16 Congestion**

- SH16 is consistently congested from Kumeu through to the Brigham Creek Roundabout, causing delays at all times of the day.
- The proposed roundabout, while improving intersection safety, will not alleviate overall congestion. Instead, it may contribute to traffic slowdowns.

#### **3. Impact of Proposed Intensification**

- The introduction of circa 1500-1750 new residences and business zone likely to attract a minimum of 1-2 vehicles, will significantly increase traffic volume on these already burdened roads.

- With limited local employment, most residents will need to commute via CRH and SH16 to Albany, Central, or South Auckland, putting further pressure on these routes.

#### 4. **Inadequate Public Transport**

- The current public transport network is insufficient to support the expanding Northwest community, including Kumeu, Huapai, and Riverhead.
- There are bus lanes or park-and-ride facilities for the NW motorway, and existing services are unreliable and inefficient.
- As an example, a bus journey to Westgate, a mere 5km away, estimated to take at least 30 minutes. Traveling to Auckland CBD requires two bus transfers and over an hour, complicating and extending commute times.

#### 5. **Lack of Active Transport Infrastructure**

- There are no footpaths or cycle paths to facilitate alternative transport options to local facilities or to connect with the NW cycleway.
- Without viable alternatives, residents have no option but to rely on cars, increasing traffic congestion.

### **Conclusion on Traffic Concerns**

It is irresponsible to approve a development of intensified 2-3 story terrace and apartment housing without a comprehensive and viable plan for improving public transport and road infrastructure, ahead of the development. The proposed development plan must include specific, actionable measures to address these issues satisfactorily for the community function.

### **Flooding and Environmental Concerns**

#### **Overview of Flooding Issues**

The proposal to use standard stormwater design practices, involving stormwater management ponds along a central corridor, is insufficient. Recent flooding events have shown that current designs are inadequate and unable to handle increasingly frequent extreme weather events.

#### **Specific Issues**

### 1. **Inadequate Design Capacity**

- While current designs claim to handle a 1 in 100-year event, recent flooding events in 2023 demonstrate these events occur more frequently and with greater intensity than anticipated.
- Existing developments in north-west Riverhead, Kumeu/Huapai were designed to these standards but still failed, resulting in significant residential and infrastructural flooding.

### 2. **Frequent Overflows and Inadequate Assessments**

- The stormwater pond at Jessie Rise frequently overflows during regular rain events, indicating that the system is already operating beyond its intended capacity.
- The assessment performed (Appendix 10) appears outdated, and relying on current standards will likely result in repeated system failures.

### 3. **Increased Pressure on Infrastructure**

- Further development using the existing design standards will lead to failures in storm and wastewater infrastructure, particularly once the design limits are exceeded.
- There is a need to reassess and upgrade the stormwater management strategy to accommodate future capacity requirements and to prevent flooding.

## **Conclusion on Flooding and Environmental Concerns**

The proposed development plan must incorporate updated, resilient stormwater management practices capable of handling more frequent and severe weather events. Without these improvements, further development will only exacerbate existing flooding issues, compromising the safety and sustainability of the community.

## **Final Recommendations**

While development is inevitable in the continued expansion of Auckland, Auckland Council must address these concerns comprehensively before approving any proposed development plan. Specifically, there should be:



1. A thorough and updated traffic impact assessment, with concrete plans to expand and improve road infrastructure and public transport services.
2. Implementation of robust, future-proof stormwater management solutions to provide for future weather events including flooding and provision of adequate wastewater services to protect the environment.



**FORM 5**

**Submission on a publicly notified proposal for policy statement or plan, change or variation  
under Clause 6 of Schedule 1, Resource Management Act 1991**

To: Auckland Council

**Name of submitter:** Te Tāhuhu o te Mātauranga | Ministry of Education

Address for service: C/- Beca Ltd  
PO Box 6345  
Wellesley  
Auckland 1141

Attention: Eden Rima

Phone: +64 9 300 9000

Email: Eden.Rima@beca.com

**This is a submission on the Plan Change 100 (Private): Riverhead**

**Background**

Te Tāhuhu o te Mātauranga | Ministry of Education ('the Ministry') is the Government's lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government's goals for education. The Ministry assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.

The Ministry has responsibility for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing. The Ministry is therefore a considerable stakeholder in terms of activities that may impact existing and future educational facilities and assets the Auckland region.

## **The Ministry of Education's submission is:**

### **Future school network impacts**

Plan Change 100 (PC 100) is seeking to rezone approximately 80.5 hectares of land located between Lathrope Road and Riverhead Road from Future Urban Zone to a mix of residential zones with a small Local Centre and Neighbourhood Centre. The proposed plan change will provide development capacity of approximately 1,450-1,750 new additional dwellings<sup>1</sup> within a developable area of approximately 73.3ha. Although the rezoning of this land was anticipated as it is being rezoned from Future Urban Zone, PC 100 would facilitate urban growth, thereby increasing the demand on the local school network in Riverhead.

Riverhead is located in the Massey Hobsonville Kaipara catchment as defined in the National Education Growth Plan 2030. The areas of Kumeū, Huapai, and Riverhead are identified as locations for future growth in the Auckland Unitary Plan with significant areas identified as Future Urban Zone. The Ministry has identified the requirement for an additional primary school in Riverhead to cater for future growth and the demand generated by the development signalled in PC 100.

The Ministry will continue to liaise with the Applicant to discuss opportunities for educational facilities within the plan change area (PCA). In addition, the Ministry considers that the current precinct provisions are consistent with other recent plan changes, and appropriately recognise that education facilities should be enabled throughout residential areas where student populations reside.

### **Walking and cycling provisions**

The Ministry broadly agrees with the proposed walking and cycling provisions through the PCA. Quality pedestrian and cycle connections to schools and through neighbourhoods have health and safety benefits for children and reduce traffic generation at pick up and drop off times. All future schools should be well serviced by safe and accessible pedestrian and cycling links through the community. This includes safe and convenient connections to the existing developed Riverhead area so that the site covered by the PCA is well integrated into the existing urban structure. The Ministry requests that the applicant ensure these linkages are installed and operational to support the development and that they consider the most vulnerable users in their design.

### **Stormwater**

The Ministry seeks to ensure that PC 100 provides flexibility in stormwater management in terms of enduring obligations for a potential future school.

In this regard, the Ministry understands that a Stormwater Management Plan (SMP) was lodged with PC 100, and that the aspirations within that SMP would translate through to future provisions - at both a regional and district level - that would have a bearing on development within a potential future school. In particular, the Ministry has identified that most of the PCA (except for two properties) is subject to a Stormwater Management Area Flow 1 (SMAF) control overlay. Therefore a potential future school within this area will likely be located within the SMAF 1 area. Additionally, the SMP makes reference to

<sup>1</sup>Riverhead Private Plan Change Request S32 Report, B&A Urban & Environmental, 2023. Available at: <https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/02-pc100-s32-report-riverhead-pc.pdf>

wetlands, overland flow paths, communal and on-lot devices, and potential peak flow attenuation requirements, all of which would likely have a bearing on a potential future school.

The Ministry requests that provisions are included in the SMP/plan change to address how appropriate stormwater management for schools will be resolved, without restrictive device obligations at this point (for example, stormwater tanks that would currently be required through the proposed SMP and SMAF-1 framework).

### **The Ministry's position on the Proposed Plan Change**

The Ministry is **neutral** on PC 100 with proposed precinct provisions for education in its current form.

The Ministry is also **neutral** on PC 100 if the provisions for stormwater and transport are accepted.

The Ministry has been working with the Applicant for some time to identify a site for a potential new school and enable policy provisions for education. Continued planning and communication between the Applicant, Auckland Council and the Ministry is needed to ensure the planning for stormwater and transport can accommodate a potential future school(s) in the PCA.

The Ministry therefore has an ongoing interest in:

- How development is planned and sequenced, particularly in terms of infrastructure provision such as roading as this will impact where and when a school can be established.
- Ensuring the relevant Precinct provisions specifically acknowledge and provide for schools. This is critical given schools are an essential piece of social and community infrastructure. An absence of supportive provisions can place obstacles in the way of the establishment of education facilities in future years.
- How safe walking and cycling infrastructure will be planned and delivered.
- The urban form and amenity provided through connected and usable areas of public open space.

The Ministry agrees with provisions in the plan change that seek to put in place a framework that will deliver integrated communities with a street and block pattern that enables the concepts of liveable, walkable and connected neighbourhoods. This includes a transport network that is easy and safe to use for pedestrians and cyclists and is well connected to public transport, shops, schools, employment, open spaces and other amenities.

The Ministry's requested relief will ensure a school (or schools) can be located in an appropriate location with suitable infrastructure in place, so that any future school can serve the surrounding residential catchments, and be connected to town centres and the surrounding community in a safe and effective manner for all school users.

### **Decision sought**

In the event that the Council confirms the proposed plan change, the Ministry requests that the following policy wording in the plan change be retained as this enables the establishment of a future educational facility, should the need arise:

*Objective 8: Development is supported by social facilities, including education and healthcare facilities.*

214.1

*Policy 6: Provide for new social facilities, including education facilities, that meet the needs of the community.*

The Ministry wants to ensure that ākonga (students) have the ability to safely and conveniently walk and cycle to their local school. As such, the Ministry requests the objectives and policies that create safe walking and cycling networks through the precinct are retained, in particular the following:

*Policy 10: Require streets to be attractively designed and to appropriately provide for all transport modes by: (a) providing for safe access for cyclists on collector roads.*

214.2

*Policy 11: Provide safe connections to public transport facilities and social infrastructures such as open space and schools.*

In addition to this, the Ministry notes the following points in relation to traffic and the provisions within the Integrated Transport Assessment (ITA):

#### Bus Transport Provisions:

The Ministry has identified that under section 4.6.1 and 6.6 of the ITA, there is no reference to the proposed roading and transport infrastructure having been designed (or future proofed) to allow for such future bus services and infrastructure. There is also limited assessment of the potential for bus services to access a future school site and the physical and operational requirements that might be needed to facilitate this in a safe and convenient manner – in respect of both buses and other road users. The Ministry requests:

- That the Plan Change provisions include the appropriate level of provision and design detail to facilitate potential school bus routes to and from any future school site, connecting with Riverhead Road and Lathrope Road and in a manner that ensures safety for all road users, especially pedestrians travelling to and from the school.

214.3

#### External Transport Network Constraints and SH16/Coatesville Riverhead Upgrade:

Under Section 5.1 of the ITA, the Plan Change proposes a Restricted Discretionary Activity (RDA) status for any activity being established within the Plan Change in advance of the identified threshold as to “ensure effects of any occupied development are appropriately assessed”. The RDA assessment accompanying a resource consent application could make a specific assessment using management plans or specific features of an activity to refer or sidestep the requirement for certain pieces of infrastructure being in place to the detriment of the network and landuse development pattern overall.

The Ministry requests:

- that the RDA status for consents ensures activities are appropriately assessed if they are delivered ahead of the Implementation Plan infrastructure items.

214.4

### Proposed Speed Limits:

The ITA places a high degree of reliance upon the proposed reduction of speed limits especially along Coatesville-Riverhead Highway, Riverhead and Lathrope Road yet there is limited control or jurisdiction by the Plan Change applicants over the creation of reduced speed limits. These are determined by third parties with some elements of public consultation, which the ITA relies on heavily to deliver safe and effective transport outcomes. However, there does not appear to be any specific additional measures or conditions that could be put in place to “tie in” Auckland Transport to the speed limit bylaw process other than what is proposed via the threshold provision in the Plan Change.

Therefore, the Ministry recommends:

- that greater specificity and even strategic alignment with Auckland Transport be provided to ensure that the Plan Change outcomes can be delivered where there is reliance upon this matter to mitigate some of the effects of the proposed rezoning.

214.5

### School Access – Road Network:

The ITA refers to the strategic consideration of the local and collector road network within the portion of the Plan Change between Riverhead Road and Lathrope Road to the west of Coatesville-Riverhead Highway as being to limit through traffic movement. However, the ITA does not assess how the structure of the proposed local and collector road network within the Plan Change area might serve and relate to a future school site. The road network should consider how any future school site might contribute to the operation of the surrounding road network.

The Ministry requests:

- Required roading standards to be delivered for the surrounding roads (local and/or collector roads) with respect to any future school site and clarity on the responsibility for establishment of the surrounding roads and associated walking and cycling features;

214.6

### School Access – Walking & cycling

Any future school site will need to be well served by safe pedestrian and cycle routes to all areas of the school zone or catchment area. The proposed upgrading of Coatesville-Riverhead Highway between Riverhead and Riverhead Point Road proposes inclusion of a raised pedestrian and cyclist crossing to facilitate movement between the development areas to the east (existing) and west (Plan Change) parts of Riverhead. This connection point would be of prime importance for active mode access to the proposed school site as well as facilitating and encouraging local trips to be made by active modes. The connection of this point to the school site is important and appears to have been captured in the Boffa Miskell work considering school access. The ITA identifies the importance of this connection but does not identify anything specifically required to facilitate the safe movement of school-age ākonga and family/whanau within the local and collector road network anticipated in the block between Lathrope and Riverhead Roads.

As such, the Ministry requests:

- for the inclusion (or otherwise) of the establishment of a safe cycle/walking facility across Coatesville-Riverhead Highway within the Implementation Plan (and triggering of this via the Plan Change provisions and threshold activity status).

214.7

**The Ministry wishes to be heard in support of its submission.**

P.P. Krupa Patel



**Eden Rima**  
**Planner – Beca Ltd**  
**(Consultant to the Ministry of Education)**

**Date:** 17 May 2024



**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Taraani Mohammed  
**Date:** Friday, 17 May 2024 5:00:20 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Taraani Mohammed

Organisation name:

Agent's full name:

Email address: mohammedt9835@gmail.com

Contact phone number:

Postal address:  
 9 Greenstead Close  
 Flat Bush  
 Auckland 2016

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:  
 Rezoning to allow for housing intensification

Property address: -

Map or maps: -

Other provisions:

-

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

The plan change will unlock land to enable more affordable housing in Auckland and I am supportive of the developers leading this change as they have a track record of successful developments, but more importantly creating successful communities.

I or we seek the following decision by council: Approve the plan change without any amendments

215.1

Details of amendments:

Submission date: 17 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Chantelle  
**Date:** Friday, 17 May 2024 5:15:16 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Chantelle

Organisation name:

Agent's full name:

Email address: cfraser2@hotmail.com

Contact phone number:

Postal address:

51 queen street

Riverhead

Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

51 queen street riverhead

Property address: 51 queen street riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Added traffic, no infrastructure and not enough local resources to meet the needs of more people and housing

I or we seek the following decision by council: Decline the plan change | 216.1

Submission date: 17 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? No

#### Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Barbara Lynn Chatfield  
**Date:** Friday, 17 May 2024 5:15:23 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Barbara Lynn Chatfield

Organisation name:

Agent's full name:

Email address: valleyviewnz@xtra.co.nz

Contact phone number:

Postal address:

0793

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:

Section 32 evaluation report (analysis of costs and benefits).

Agree with comments on page 22 of community input - Appendix 18

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

I have serious concerns about possible environmental effects involving traffic, flooding and lack of infrastructure when adding the number of dwellings proposed to Riverhead. Stormwater drainage and the amount of impermeable surfaces that will result.

I also question the purpose of the plan change that professes to provide additional housing along with a local centre, neighbourhood centre and network of open spaces. Does this not exist in Riverhead now? What about the Riverhead Hall for example?

I or we seek the following decision by council: Decline the plan change | 217.1

Submission date: 17 May 2024

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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 Auckland 1142, New Zealand  
 Telephone +64 9 442 2222  
[www.watercare.co.nz](http://www.watercare.co.nz)

Auckland Council  
 Unitary Plan Private Bag 92300  
 Auckland 1142

Attn.: Planning Technician

[unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

**TO:** Auckland Council

**SUBMISSION ON:** Plan Change 100 (Private): Riverhead Road, Coatesville-  
 Riverhead Highway, Cambridge Road and Duke Street,  
 Riverhead

**FROM:** Watercare Services Limited

**ADDRESS FOR SERVICE:** [planchanges@water.co.nz](mailto:planchanges@water.co.nz)

**DATE:** 17th May 2024

**Watercare could not gain an advantage in trade competition through this submission.**

## **1. WATERCARE'S PURPOSE AND MISSION**

- 1.1. Watercare Services Limited ("Watercare") is New Zealand's largest provider of water and wastewater services. Watercare is a council-controlled organisation under the Local Government Act 2002 and is wholly owned by the Auckland Council ("Council").
- 1.2. As Auckland's water and wastewater services provider, Watercare has a significant role in helping Auckland Council achieve its vision for the Auckland region. Watercare's mission is to provide reliable, safe, and efficient water and wastewater services to Auckland's communities.
- 1.3. Watercare is required to manage its operations efficiently with a view to keeping overall costs of water supply and wastewater services to its customers (collectively) at minimum levels, consistent with the effective conduct of its undertakings and the maintenance of the long-term integrity of its assets. Watercare must also give effect to relevant aspects of the Council's Long Term Plan, and act consistently with other plans and strategies of the Council, including the Auckland Unitary Plan (Operative in Part) and the Auckland Future Development Strategy 2023-2053<sup>1</sup>.

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<sup>1</sup> Local Government (Auckland Council) Act 2009, s58.



## 2. SUBMISSION

### General

- 2.1. This is a submission on a private plan change requested by Riverhead Landowner Group ("Applicants") to the Auckland Unitary Plan (Operative in Part) (AUP OP) that was publicly notified on 18 April 2024 ("Plan Change 100").
- 2.2. Plan Change 100 affects approximately 80.5 ha of land and is located on 19 properties. Plan Change 100 requests to:
  - a) rezone approximately 6 ha of land from Future Urban Zone to Rural - Mixed Rural Zone;
  - b) rezone approximately 75.5ha of land from Future Urban Zone comprised of:
    - i. 69 ha to Residential – Mixed Housing Suburban;
    - ii. 4.3 ha to Residential – Terrace Housing and Apartment Building;
    - iii. 1.8 ha to Business – Local Centre; and
    - iv. 0.7 ha to Business – Neighbourhood Centre Zone.
  - c) move the Rural Urban Boundary to align with the boundary between the proposed Rural - Mixed Rural Zone and the proposed urban zones.
- 2.3. Plan Change 100 also proposes a new precinct to be included in the AUP OP known as the Riverhead Precinct. The proposed Riverhead Precinct provisions include two sub-precincts (A and B). The purpose of Plan Change 100 as outlined in section 4.2 of the Section 32 Assessment Report is to enable the provision of additional housing in Riverhead along with a Local Centre, a Neighbourhood Centre and a network of open spaces.
- 2.4. The purpose of this submission is to address the technical feasibility of the proposed water and wastewater servicing to ensure that the effects of future development enabled under Plan Change 100 on Watercare's existing and planned water and wastewater network are appropriately considered and managed in accordance with the Resource Management Act 1991 (RMA).
- 2.5. In making its submission, Watercare has considered the relevant provisions of the Auckland Plan 2050, Te Tahua Pūtea Tau 2021-2031 / The 10-year Budget 2021-2031, the Auckland Future Development Strategy 2023-2053 (FDS), the Water Supply and Wastewater Network Bylaw 2015, the Water and Wastewater Code of Practice for Land Development and Subdivision and the Watercare Asset Management Plan 2021 – 2041. Watercare has also considered the relevant RMA documents including the AUP (OP) and the National Policy Statement on Urban Development 2020 (updated in May 2022).
- 2.6. For the reasons set out below, Watercare **opposes** Plan Change 100. Any infrastructure delivery dates provided in this submission below are forecast dates only and therefore subject to change.

### Specific parts of the Plan Change

- 2.7. Watercare's submission in opposition to Plan Change 100 relates to the Plan Change in its entirety.

- 2.8. Without limiting the generality of 2.7 above, the specific parts of Plan Change 100 that Watercare has a particular interest in are:
- a) the actual and potential effects of Plan Change 100 on Watercare's existing and planned water and wastewater networks; and
  - b) the proposed Precinct provisions insofar as they relate to water supply and wastewater servicing.

### **Sequencing of development - Riverhead Future Urban Area**

- 2.9. The FDS informs Watercare's asset planning and infrastructure funding priorities and sequencing. The FDS replaced the Auckland Future Urban Land Supply Strategy 2017 (FULSS) in December 2023.
- 2.10. Plan Change 100 refers to the FULSS, however it should be updated to refer to the FDS. The FULSS identified the Plan Change 100 area as being development ready in "Decade 2 1st half 2028-2032"<sup>2</sup> which is a significant shift from what is provided for in the FDS, as noted below.
- 2.11. Plan Change 100 is located within the Riverhead Future Urban Area (FUA) which the FDS identifies as not ready for development before 2050+.<sup>3</sup>
- 2.12. Appendix 6 of the FDS identifies the infrastructure prerequisites that enable the development of the FUAs.<sup>4</sup> The FDS states:<sup>5</sup> *"The timing of the live-zoning future urban areas spans over 30 years from 2023 – 2050+ and is necessary in acknowledging the council's limitations in funding infrastructure to support growth. Distributing the live zoning of future urban areas over this timeframe enables proactive planning in an orderly and cost-efficient way, ensuring the areas are supported by the required bulk infrastructure and able to deliver the quality urban outcomes anticipated in this FDS."*
- 2.13. The Riverhead separation from the Kumeu-Huapai-Riverhead (KHR) wastewater main (Riverhead Wastewater Separation Project) is identified as an infrastructure prerequisite necessary to support the development and growth of the Kumeu-Huapai and Riverhead FUAs.<sup>6</sup> The Riverhead Wastewater Separation Project is planned to be delivered in line with the timing set out by the FDS of 2050+.
- 2.14. Under the FDS, the area subject to Plan Change 100 will not be development ready until 2050+, and the infrastructure required to support the development envisaged by Plan Change 100 is not scheduled to be delivered until after 2050. Given this, Plan Change 100 is therefore "out of sequence", and substantially so. This is one of the key reasons why Watercare opposes Plan Change 100.

### **Structure Planning**

- 2.15. The Spatial Land Use Strategy – North West, Kumeu-Huapai, Riverhead, Redhills North (Spatial Land Use Strategy) was prepared by Auckland Council and adopted in May 2021. The Spatial Land Use

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<sup>2</sup> FULSS (July 2017) at p. 13.

<sup>3</sup> FDS, Appendix 6 at p. 39.

<sup>4</sup> As defined and introduced in the FDS 2023 Appendix 6 at p. 32.

<sup>5</sup> FDS, Appendix 6 at p. 35.

<sup>6</sup> FDS, Appendix 6 at p. 39.

Strategy is a high-level outline of the future land uses in the Kumeu-Huapai, Riverhead and Redhills North Future Urban Zoned (FUZ) areas and was required to inform the future transport network. The Spatial Land Use Strategy does not anticipate the commencement of structure plans for these areas until around 2025, and states the relevant area is not anticipated to be development ready for another 8-12 years.

- 2.16. B&A prepared the Riverhead Structure Plan (dated October 2023) for the Applicants.<sup>7</sup> The Riverhead Structure Plan refers to the FULSS and should be updated to refer to the FDS. The Structure Plan guidelines contained in the AUP OP are part of the Regional Policy Statement and set out the process, documents to be taken into account, matters that must be identified, and the types of specialist documents to support the structure plan as part of the plan change process.<sup>8</sup>
- 2.17. The AUP OP Structure Plan guidelines make clear that structure plans should be developed first, followed by a plan change process.<sup>9</sup> Policy 3 of the Urban Growth and Form policies set out in the AUP OP Regional Policy Statement provides that the rezoning of future urban zoned land for urbanisation should be enabled following structure planning and plan change processes in accordance with the Structure plan guidelines.<sup>10</sup>
- 2.18. The Riverhead Structure Plan prepared on behalf of the Applicant states that there is immediate capacity in the existing water and wastewater infrastructure for development of the Riverhead FUZ to commence and that identified upgrades will provide additional capacity as development progresses. Watercare agrees that there is some limited immediate capacity in the existing water and wastewater networks and that upgrades, to both the local and bulk networks, will be required to provide additional capacity to support development from the Plan Change 100 area. Water supply and wastewater capacity is discussed in detail at paragraph 2.34 to 2.41.

### **Yield and density**

- 2.19. To support Plan Change 100, an assessment of potential yield and the existing and planned infrastructure required to service that yield has been undertaken by the Applicant<sup>11</sup>. This assessment assists in assessing the effects of the development envisaged by Plan Change 100 on Watercare's existing and planned water and wastewater network.
- 2.20. Watercare understands that Plan Change 100 seeks to provide capacity for approximately 1450-1750 additional dwellings<sup>12</sup> and other land use activities such as retail, schools, healthcare, childcare and retirement villages<sup>13</sup> which equates to approximately 1,861 development unit equivalents (DUEs).<sup>14</sup> For the purpose of water and wastewater planning, 1,861 DUEs is equivalent to a population of 5,583.
- 2.21. The FDS does not provide anticipated dwelling capacities for the Riverhead FUA but does inform Auckland Council's Growth Scenario, which must be used by Auckland Council and CCOs as a basis to inform planning for services and infrastructure as well as their funding and financing. The most

<sup>7</sup> Application for Plan Change 100, Appendix 4.

<sup>8</sup> AUP OP, Appendix 1.

<sup>9</sup> AUP OP, Appendix 1 at [1.2]: *"The regional policy statement promotes the preparation of structure plans as a precursor to plan changes and to support any of the following..."*.

<sup>10</sup> AUP OP at B2.2.2(3)

<sup>11</sup> Riverhead Future Urban Zone Water and Wastewater Servicing Strategy Development dated 28 June 2022 and subsequently revised by the Water and Wastewater Servicing Memorandum 3 dated 28 September 2023.

<sup>12</sup> Section 2 of the Section 32 Assessment Report dated 4 October 2023.

<sup>13</sup> Section 2.2 of the Water and Wastewater Servicing Strategy Development dated 28 June 2022.

<sup>14</sup> Water and Wastewater Servicing Memorandum 3 dated 28 September 2023.

recent Auckland Council Growth Scenario was issued in February 2024 and is being incorporated as the new baseline in Watercare's population model.

- 2.22. Plan Change 100 incorporates density and subdivision rules that replicate the Medium Density Residential Standards ("MDRS") introduced by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.
- 2.23. There is some uncertainty in respect of the level of development that could be enabled by Plan Change 100. Watercare's experience is that when resource consents for subdivision and development enabled by approved plan changes are lodged, the level of development for which consent is sought can often be much more intensive than previously indicated through the plan change process. Where this increase in density has occurred previously, water and wastewater capacity has been taken up faster than planned which means that applications for connections to the network from live zoned areas may not be able to be approved by Watercare for some time.
- 2.24. The density of development possible under the AUP OP where the more permissive MDRS are incorporated can result in significantly higher development yield. Memorandum 3 (dated 28 September 2023) revises the proposed development scenario within Section 2.2 of Appendix 14 of Plan Change 100 and lists other activities which will also increase demand on the water supply and wastewater networks such as schools, retail, retirement villages, childcare and medical centres.
- 2.25. Given the above, the potential yield and density of Plan Change 100 has the potential to be significantly more than the 1450-1750 dwellings specified in the application and against which bulk water and wastewater infrastructure requirements has been assessed. Any density changes proposed at a future resource consent stage would then need to be assessed again separately by Watercare.

### **Proposed Plan Change 78**

- 2.26. Plan Change 78 (PC 78) gives effect to the National Policy Statement on Urban Development 2020 (NPS-UD), and requirements of the RMA.
- 2.27. Auckland Council is required to, amongst other things, incorporate the MDRS in relevant residential zones, and identify qualifying matters to reduce the level of development enabled by the MDRS in areas where full intensification is not appropriate. PC 78 was notified on 18 August 2022 and hearings are ongoing until 30 April 2025, having been given an extension by the Government in March 2024. It is noted the Government has signalled changes may be made to MDRS this year.
- 2.28. As part of PC 78 Watercare assisted Council in identifying sites subject to water and/or wastewater servicing constraints in the medium to long term (as defined in the NPS-UD) and these sites were identified as being subject to a qualifying matter under section 77I(j) of the RMA. This is discussed in detail in Auckland Council's section 32 evaluation report for PC 78. The Water and Wastewater Servicing Constraints qualifying matter is proposed to be included in PC 78 as an additional layer/new control on the AUP OP planning maps.
- 2.29. PC 78 does not apply to Future Urban Zoned land, and the area of Plan Change 100 is located outside the urban environment, as demonstrated on PC 78 map viewer. Under the AUP OP the primary residential zone in Riverhead is Residential - Single House Zone. PC 78 does not propose to increase the density of the urban area in Riverhead by rezoning land to Residential – Mixed Housing Urban. The MDRS provisions have been included in the provisions for the proposed Riverhead Precinct through referencing the standards in the Residential - Mixed Housing Urban Zone chapter of the AUP

OP [as amended by PC 78], rather than using the standards in the Residential - Mixed Housing Suburban Zone. Furthermore, PC 78 amends the Residential - Mixed Housing Suburban Zone to state "The zone does not incorporate Medium Density Residential Standards as it is not a relevant residential zone."

- 2.30. It would be useful for the Applicant to clarify how the potential yield for the Plan Change 100 area has been calculated, given it seems to have been calculated using the proposed precinct provisions for the Riverhead Precinct which incorporate the Residential Mixed Housing Urban Zone provisions (as modified by PC 78), rather than the provisions from the Residential - Mixed Housing Suburban Zone. Under the proposed precinct provisions for the Riverhead Precinct, more than 3 dwellings per site require a resource consent as a restricted discretionary activity and must comply with certain permitted activity standards.
- 2.31. The Applicant's justification of applying the MDRS through the application of the proposed Residential Mixed Housing Suburban Zone is set out in section 6.1 of the Section 32 Assessment Report. It discusses the MDRS, and notes that Tier 1 local authorities have discretion whether to apply the MDRS to settlements predominantly urban in character with a population under 5,000 as these are not captured by the definition of a 'relevant residential zone'. This discretion applies to Riverhead. It further states the Plan Change 100 area will increase the population of Riverhead to over 5,000 and states the Plan Change 100 documentation has demonstrated the density enabled by the MDRS is appropriate within the area for Plan Change 100 for a number of reasons.

### **Wastewater servicing**

- 2.32. The Applicant will be required to extend the local pressure sewer network to service the Plan Change 100 area. Delivery of the required local network upgrades are the responsibility of the developer, with the design subject to Watercare's approval at the time of Resource Consent.
- 2.33. Options and constraints for servicing of the Plan Change 100 area will depend on timing and staging of development in relation to the timing and capacity of Watercare's bulk wastewater infrastructure delivery.
- 2.34. Watercare agrees that the existing Riverhead Wastewater Pump Station (Riverhead WWPS) currently has capacity to service an additional 500 DUE, ahead of the planned abandonment of the Whenuapai Village WWPS. Following the planned abandonment of the Whenuapai Village WWPS, an additional 500 DUE can be serviced by the existing Riverhead WWPS, bringing the total additional DUE able to be serviced to 1,000.
- 2.35. The timing of the removal of Whenuapai Village WWPS from the shared Riverhead Rising Main will depend on the delivery of the wider Whenuapai wastewater programme, in particular the delivery of the interim Slaughterhouse WWPS.
- 2.36. For servicing development above 1,000 DUE, the Riverhead WWPS will need to be either upgraded or separated from the KHR wastewater main. The latter being the Riverhead Wastewater Separation Project listed in the FDS as the infrastructure prerequisite for enabling development in the Riverhead, Kumeu and Huapai FUAs. Ultimately the Brigham Creek WWPS will be required to support the future development of Riverhead. The Riverhead Wastewater Separation Project and the Brigham Creek WWPS will be delivered in line with the demand and timing as forecast under the FDS.
- 2.37. Without prejudice to Watercare's overall opposition to Plan Change 100, further discussion is required with the Applicant on the use of a private smart sewer network, including in regard to controls which

could be put in place to enable Watercare to ensure adherence to the proposed off-peak pumping methodology. The current ownership model would leave control of the smart networks with the private village operator, requiring an agreement to ensure compliance and/or modifications as required to achieve the desired capacity outcomes. As currently proposed, the off peak pumping proposal would not be supported by Watercare.

### **Water supply servicing**

- 2.38. The existing local water supply network currently has capacity for approximately 250 additional dwellings. Beyond this, a dual watermain along Deacon Road (as proposed by the Applicant) will be required to support development of the Plan Change 100 area. Delivery of the required local network upgrades are the responsibility of the developer, with the design subject to Watercare's approval at the time of Resource Consent.
- 2.39. The existing bulk water supply network has good capacity in both trunk and storage to service an additional 4,500 DUEs across the entire Riverhead and Kumeu / Huapai water supply areas. Development in excess of this (either from development enabled in the Plan Change 100 area or via infill or future plan changes in Kumeu or Huapai) will trigger the requirement for an additional bulk reservoir.

### **Precinct Provisions**

- 2.40. As set out above, Watercare opposes Plan Change 100. | 218.1
- 2.41. Without prejudice to its overall opposition to the Plan Change, if the Commissioners are minded to approve the Plan Change notwithstanding Watercare's opposition, Watercare seeks precinct provisions that require subdivision and development to be coordinated with the provision of adequate water supply and wastewater infrastructure. That is, subdivision and development must be precluded by under the precinct provisions from proceeding prior to completion of any necessary bulk water supply and wastewater infrastructure projects required to service the development enabled by Plan Change 100. | 218.2
- 2.42. In that regard, Watercare therefore seeks the following amendments (as set out in Attachment 1) to the proposed Riverhead Precinct provisions:
- a) Non-complying activity status for any subdivision and/or development that precedes the provision of adequate bulk water supply and wastewater infrastructure. | 218.3
  - b) All of the necessary water supply and wastewater infrastructure upgrades are located outside of the precinct boundaries. | 218.4
  - c) Amendments to the precinct description to include the purpose and function of the amended provisions. | 218.5
  - d) Amendments to Objective 5 to include the reference to 'capacity' and specify 'wastewater' and ensuring subdivision and development is coordinated with local infrastructure. This also supports the non-complying activity status. | 218.6
  - e) New Objective 5(A) which addresses the coordination, provision and capacity of bulk water and wastewater infrastructure necessary to service the new precinct. This supports the non-complying activity status. | 218.7

- f) Amendments to Policy 5 and addition of a new Policy 5A to support the non-complying activity status subdivision or development that precedes the provision of adequate bulk water supply and wastewater infrastructure. | 218.8
- g) Amendments to include new standard IX6.16 Water and Wastewater Infrastructure to require development and subdivision to connect to functioning bulk wastewater and water supply infrastructure with sufficient capacity to service the development. | 218.9
- h) Amendments to Table IX4.1(A2A) to require up to 3 dwellings to comply with new standard IX6.16 Water and Wastewater Infrastructure. | 218.10
- i) Amendments to Table IX.4.1(A2B) to require more than three dwellings per site to comply with new standard IX6.16 Water and Wastewater Infrastructure. | w218.11
- j) Amendments to IX.5 Notification (1A) requiring Watercare to be limited notified where resource consents infringe new standard IX6.16 Water and Wastewater Infrastructure. | 218.12
- k) Amendments to include new standard IX.9(6) Water and Wastewater Servicing Plan as a special information requirement. | 218.13

### 3. DECISION SOUGHT

- 3.1. Watercare opposes Plan Change 100 on the basis that the Plan Change is significantly out of sequence with the expected timing for development of the Riverhead Future Urban Area provided in the FDS.
- 3.2. In the event that Plan Change 100 is approved notwithstanding Watercare's opposition, Watercare seeks that the Commissioners:
  - a) Ensure that subdivision and development is precluded by the Plan Change provisions from proceeding prior to completion of any necessary bulk water supply and wastewater infrastructure projects required to service the development enabled by Plan Change 100; and | 218.14
  - b) Include the proposed amendments to the precinct provisions as set out in Attachment 1, or similar provisions that will achieve the same outcomes as sought by Watercare. | 218.15
- 3.3. In addition, Watercare notes that it will require:
  - c) The Applicant to commit to delivering and funding the local water supply and wastewater network capacity and servicing requirements of the development enabled by Plan Change 100; and
  - d) An Infrastructure Funding Agreement to bring forward the required bulk infrastructure to enable the development envisaged by Plan Change 100 earlier than what Watercare is planning to provide in accordance with its Asset Management Plan is agreed with the Applicant, to Watercare's satisfaction.

### 4. HEARING

- 4.1. Watercare wishes to be heard in support of its submission.



17th May 2024

*Mark Iszard*

Mark Iszard  
**Head of Major Developments**  
**Watercare Services Limited**

Address for Service:  
Amber Taylor  
Development Planning Lead  
Watercare Services Limited  
Private Bag 92521  
Victoria Street West  
Auckland 1142  
Phone: 022 158 4426  
Email: [Planchanges@water.co.nz](mailto:Planchanges@water.co.nz)

## ATTACHMENT 1.

### IX.1. Precinct description

The Riverhead Precinct applies to approximately 75.5ha of land with a contiguous boundary to the existing urban settlement of Riverhead.

The purpose of the Riverhead Precinct is to provide for the development of a new, comprehensively planned residential community as an extension to Riverhead Village that supports a well-functioning urban environment and a quality compact built form.

A Local Centre is provided at the intersection of Coatesville-Riverhead Highway and Riverhead Road. This centre will provide for the establishment of retail to meet the day to day needs of residents and some increased employment opportunities in a central location to enhance walkability.

The precinct provides for a range of residential densities, including higher residential densities close to the Local Centre and the intersection of Coatesville-Riverhead Highway and Riverhead Road. Medium residential densities are enabled in the remainder of the precinct, with height generally limited to two storey development to respond to the built character of the existing Riverhead settlement.

There are two Sub-precincts within the Riverhead Precinct:

- Sub-precinct A is zoned Residential - Terrace Housing and Apartment Building and provides for the greatest height and residential densities at a key intersection location adjacent to the Local Centre Zone and public transport facilities. A wider range of non-residential activities is provided for at ground floor.
- Sub-precinct B is zoned Residential Mixed Housing Suburban and provides for a transition in building height between Sub-precinct A and the surrounding Mixed Housing Suburban area where height has been limited to two storeys to respond to the existing built character of the Riverhead settlement.

...

The transport and other infrastructure networks within Riverhead will be progressively upgraded over time to support development in the precinct. The precinct includes provisions to ensure that the subdivision and development of land for development is coordinated with the transport and infrastructure upgrades necessary to manage potential adverse effects on the wider transport network.

**Subdivision and / or development is restricted until land within the Riverhead Precinct is able to be serviced by bulk water supply and wastewater infrastructure. Water supply and wastewater infrastructure requires a series of upgrades to avoid, remedy or mitigate adverse impacts on the existing and planned water supply and wastewater infrastructure. Many of the necessary water supply and wastewater infrastructure upgrades are located outside of the precinct boundaries.**

The zoning of land within this precinct is Residential – Terrace Housing and Apartment Building, Residential – Mixed Housing Suburban, Business – Local Centre and Business – Neighbourhood Centre.

All relevant overlay, Auckland-wide and zone provisions apply in this precinct unless otherwise specified below.

## IX.2. Objectives

(1) Riverhead Precinct is a well-functioning urban environment that integrates with the existing Riverhead settlement, the natural environment and respects Mana Whenua values.

(2) A variety of housing types and sizes are provided that respond to:

(a) Housing needs and demand; and

(b) The neighbourhood's planned built character.

(3) Activities in the Business – Local Centre zone provide local employment opportunities and complement the function, role and amenity of the City Centre Zone, Business – Metropolitan Centre Zone and Business – Town Centre Zone.

(4) Access to and from the precinct occurs in a safe, effective and efficient manner for all modes of transport.

(5) Subdivision and development are coordinated with the supply and capacity of sufficient adequate transport, local water supply and wastewater, energy and communications infrastructure.

**(5A) Subdivision and development are co-ordinated with the provision of bulk water supply and wastewater infrastructure with sufficient capacity to service the precinct.**

(6) Stormwater is managed to avoid, as far as practicable, or otherwise minimise or mitigate, adverse effects on the receiving environment.

(7) Identified ecological values within wetland and stream habitats are protected, restored and enhanced.

(8) Development is supported by social facilities, including education and healthcare facilities.

(9) Te Kawerau ā Maki and Ngāti Whātua ō Kaipara (as well as any other relevant tangata whenua) cultural values and their relationship associated with the Māori cultural landscapes, including ancestral lands, water, sites, wāhi tapu, and other taonga, in the Riverhead Precinct are identified, recognised, protected, and enhanced.

## IX.3. Policies

...

*Transport, infrastructure and staging*

(4) Require the occupation of buildings in the precinct to be coordinated with required transport infrastructure upgrades to minimise the adverse effects of development on the safety, efficiency and effectiveness of the surrounding road network.

(5) Require subdivision and development in the precinct to be coordinated with the provision **and capacity** of ~~sufficient~~ **adequate** stormwater, wastewater, water supply, energy and telecommunications infrastructure.

**(5A) Avoid subdivision and development progressing ahead of the provision of bulk water supply and wastewater infrastructure with sufficient capacity to service subdivision and development within the precinct.**

(6) Provide for new social facilities, including education facilities, that meet the needs of the community.

...

#### IX.4. Activity table

All relevant overlay, Auckland-wide and zone activity tables apply in this precinct except for the following:

##### **All Sub-Precincts**

- H4 Residential – Mixed Housing Suburban Zone:
  - H4.4.1(A3) Up to three dwellings per site
  - H4.4.1(A4) Four or more dwellings per site

##### **Sub-precinct A**

- H6 Residential – Terrace Housing and Apartment Buildings Zone:
  - H6.4.1(A15) Restaurants and cafes up to 100m<sup>2</sup> gross floor area per site
  - H6.4.1(A25) Healthcare facilities up to 200m<sup>2</sup> gross floor area per site

Activity Table IX.4.1 specifies the activity status of subdivision and development in the Riverhead Precinct pursuant to sections 9(3) and 11 of the Resource Management Act 1991.

**Table IX.4.1 Activity table – Precinct-wide activities**

Activity		Activity status
<b>Development</b>		
(A1)	New buildings prior to subdivision	RD
(A2)	Infringements to IX6.2 Road Widening Setback along Riverhead Road	D
(A2A)	Buildings for up to 3 residential dwellings per site in the Mixed Housing Suburban Zone <b><u>that comply with Standard IX6.16 Water Supply and Wastewater Infrastructure</u></b>	P
(A2B)	Buildings for more than 3 residential dwellings per site in the Mixed Housing Suburban Zone that comply with Standards IX6.7. Building	RD

	height within the Mixed Housing Suburban Zone, IX6.8. Height in Relation to Boundary within the Mixed Housing Suburban Zone, IX6.9. Yards within the Mixed Housing Suburban Zone, <u><b>IX6.16 Water Supply and Wastewater Infrastructure.</b></u>	
<u><b>(A2C)</b></u>	<u><b>Any new buildings, dwellings or development that does not comply with Standard IX6.16 Water Supply and Wastewater Infrastructure.</b></u>	<u><b>NC</b></u>
<b>Subdivision</b>		
(A3)	Subdivision, including subdivision establishing private roads	RD
(A4)	Subdivision and development that does not comply with Standard IX.6.1(1) Staging of Development with Transport Upgrades	D
(A5)	Subdivision and development that does not comply with Standard IX.6.1(2)-(6) Staging of Development with Transport Upgrades	RD
(A6)	Subdivision and development that does not comply with Appendix 1: Road function and design elements table - Internal roads within Precinct, and / or Appendix 2: Road function and design elements table - External roads to the Precinct	RD
<u><b>(A7)</b></u>	<u><b>Subdivision that does not comply with Standard IX6.16 Water Supply and Wastewater Infrastructure.</b></u>	<u><b>NC</b></u>

Table IX.4.2 Activity table – Sub-precinct A activities

Activity		Activity status
<b>Commerce</b>		
(A7)	Restaurants and cafes up to 250m <sup>2</sup> gross floor area per site	P
(A8)	Retail up to 100m <sup>2</sup> gross floor area per site	P
<b>Community</b>		
(A9)	Healthcare facility up to 250m <sup>2</sup>	RD
<u><b>(A10)</b></u>	<u><b>Any commerce or community activity that does not comply with Standard IX6.16 Water Supply and Wastewater Infrastructure.</b></u>	<u><b>NC</b></u>

**IX.5. Notification**

- (1) Any application for a restricted discretionary activity listed in Table IX.4.1 Activity table above, will be considered without public or limited notification or the need to obtain written

approval from affected parties unless the Council decides that special circumstances exist under sections 95A(9) or 95B(10) of the Resource Management Act 1991.

**(1A) Any application for resource consent that infringes the following standard will be considered without public or limited notification to any person other than Watercare or the need to obtain the written approval from any other affected parties unless the Council decides that special circumstances exist under section 95A(9) of the Resource Management Act 1991:**

**(a) Standard IX6.16 Water Supply and Wastewater Infrastructure.**

(2) Any application for resource consent for an activity listed in Table IX.4.1 Activity table above and which is not listed in IX.5(1) will be subject to the normal tests for notification under the relevant sections of the Resource Management Act 1991.

(3) When deciding on who is an affected person in relation to any activity for the purposes of section 95E of the Resource Management Act 1991 the Council will give specific consideration to those persons listed in Rule C1.13(4).

## **IX.6. Standards**

All relevant overlay, Auckland-wide and zone standards apply in this precinct except for the following:

### **Precinct-wide**

- H4 Residential – Mixed Housing Suburban Zone Standards:

- o H4.6.4 Building height
- o H4.6.5 Height in relation to boundary
- o H4.6.6 Alternative height in relation to boundary
- o H4.6.7 Yards
- o H4.6.8 Maximum impervious area
- o H4.6.9 Building coverage
- o H4.6.10 Landscaped area
- o H4.6.11 Outlook space
- o H4.6.13 Outdoor living space

- E27.6.1 – Trip Generation

All activities, except activities listed in Activity Table IX.4.1 (A2B), listed as permitted and restricted discretionary in Activity Table IX.4.1, Activity Table IX.4.2, Activity Table H11.4.1, Activity Table H12.4.1, Activity Table H6.4.1 and Activity Table H4.4.1 must comply with the following permitted activity standards.

Activities listed in Activity Table IX.4.1(A2B) are not required to comply with standards IX6.10. Building coverage within the Mixed Housing Suburban Zone, IX6.11. Landscaped area within the Mixed Housing Suburban Zone, IX6.12. Maximum impervious area within the Mixed Housing Suburban Zone, IX6.13. Outlook space within the Mixed Housing Suburban Zone, IX6.14. Outdoor living space within the Mixed Housing Suburban Zone, IX6.15. Windows to the street within the Mixed Housing Suburban Zone, H5.6.13 Daylight, H5.6.15 Front, side and rear fences and walls, and H5.6.16 Minimum dwelling size, but must comply with all the other following permitted activity standards.

### **IX.6.1. Standards**

#### **IX.6.1. Staging of development with transport upgrades**

...

#### **IX.6.16 Water Supply and Wastewater Infrastructure**

##### **Purpose:**

- **To ensure bulk water supply and wastewater infrastructure with sufficient capacity is available to support the subdivision and development of the Riverhead Precinct.**
- (1) **All subdivision and / or development within the Precinct must be able to be serviced by a publicly available functioning bulk wastewater network and water supply network with sufficient capacity to service the precinct.**

...

### **IX.8. Assessment – restricted discretionary activities**

#### **IX.8.1. Matters of discretion**

The Council will restrict its discretion to all of the following matters when assessing a restricted discretionary activity resource consent application, in addition to the matters specified for the relevant restricted discretionary activities in the overlays, Auckland wide or zones provisions:...

- (3) For four or more dwellings on a site:

...

- (c) Infrastructure and servicing.

#### **IX.8.2. Assessment criteria**

The Council will consider the relevant assessment criteria below for restricted discretionary activities, in addition to the assessment criteria specified for the relevant restricted discretionary activities in the overlays, Auckland-wide or zones provisions: .

- (3) For four or more dwellings on a site:

...

- (h) infrastructure and servicing:



- (i) Whether there is adequate capacity in the existing stormwater and public reticulated water supply and wastewater network to service the proposed development.
- (ii) Where adequate network capacity is not available, whether adequate mitigation is proposed.

## IX.9 Special information requirements

...

### (5) Local Network Water and Wastewater Servicing Plan

(1) At the first stage of subdivision and / or development of any site existing at (date of plan change approval) within the Precinct applicants are required to provide a Local Network Water and Wastewater Servicing Plan for the Precinct Area. The Local Network Water and Wastewater Servicing Plan must:

(a) Identify the overall local water supply and wastewater network for the Precinct Area.

(b) Identify the location, size and capacity of the key water and wastewater infrastructure dependencies located outside of the Precinct Area but are necessary to service the Precinct.

(c) Identify the location, size and capacity of the local connections within the Precinct.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Clare Bradley  
**Date:** Friday, 17 May 2024 5:30:21 pm

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Clare Bradley

Organisation name: Muriwai Community Association Incorporated

Agent's full name: Clare Bradley

Email address: cb@clarebradley.nz

Contact phone number: 021447262

Postal address:  
 33 Domain Crescent  
 Muriwai  
 Muriwai 0881

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:  
 PC100 aims to rezone 6 ha of land in Riverhead from Future Urban to Rural-Mixed Rural zone and 75.5 ha of land to a mix of Residential-Mixed Housing Suburban and Residential – Terrace Housing and Apartment Building, Business-Local Centre and Business-Neighbourhood Centre zones. PC100 also proposes shifting the Rural Urban Boundary to align with the boundary between the proposed Rural Mixed Rural zoning and the urban zones.

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

We have seen the submission made on behalf of Kumeu Community Action (KCA) with respect to this proposed plan. MCA supports what KCA has submitted.

MCA's concerns are, in summary, that any such development would

- 1 increase pressure on the existing (already at capacity) transport infrastructure
- 2 need to be accompanied by adequate future transport infrastructure including public transport establishment - this is particularly with respect to the timing and capacity of such a development
- 3 increased pressure on the existing (already at capacity) use of the Muriwai Regional Park and Muriwai Beach environment

I or we seek the following decision by council: Decline the plan change

219.1

Submission date: 17 May 2024

### Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?

No

### Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Harshitha Murthy  
**Date:** Friday, 17 May 2024 5:30:21 pm  
**Attachments:** [Submission on Plan Change 100 \(Private\) Riverhead South \[EJP\]\\_20240517171800.220.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Harshitha Murthy  
 Organisation name: Equal Justice Project  
 Agent's full name:  
 Email address: hmur817@aucklanduni.ac.nz  
 Contact phone number:  
 Postal address:

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)  
 Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:  
 Property address:  
 Map or maps:  
 Other provisions:  
 The lack of climate consideration given.

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
 This plan does not consider Aotearoa's international obligations nor domestic legislation aimed at protecting our environment and mitigating our impacts on the climate.

I or we seek the following decision by council: Decline the plan change | 220.1

Submission date: 17 May 2024

Supporting documents  
 Submission on Plan Change 100 (Private) Riverhead South [EJP]\_20240517171800.220.pdf

#### Attend a hearing

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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## Submission on Plan Change 100 (Private): Riverhead South Equal Justice Project

### Introduction

1. The Equal Justice Project ('EJP') is a non-partisan pro bono charitable entity (CC54347) that utilises law students' legal training and knowledge to advocate for change, including the promotion of effective climate action in Auckland.
2. The EJP welcomes the opportunity to make submissions on Plan Change 100 (Private): Riverhead South.
3. By way of introduction, following the release of the third Intergovernmental Panel on Climate Change (IPCC) on 4 April 2022, the UN Secretary-General said that:<sup>1</sup>

“We are on a fast track to climate disaster. Major cities under water. Unprecedented heatwaves. Terrifying storms. Widespread water shortages. The extinction of a million species of plants and animals. This is not fiction or exaggeration. It is what science tells us will result from our current energy policies. We are on a pathway to global warming of more than double the 1.5°C limit agreed on in Paris. Some Government and business leaders are saying one thing but doing another. Simply put, they are lying. And the results will be catastrophic. This is a climate emergency.”

4. At COP27 on 8 November 2022, the UN Secretary-General followed this extraordinary statement above by then saying that: “We are on a highway to climate hell with our foot on the accelerator.”<sup>2</sup>
5. The New Zealand Parliament declared a climate change emergency in December 2020. Similar declarations have been made in many other jurisdictions. Parliament's declaration includes recognition of: “the devastating impact that volatile and extreme weather will have on New Zealand and the wellbeing of New Zealanders, on our primary industries, water availability, and public health, through flooding, sea-level rise, and wildfire damage.” Parliament's emergency declaration stated that “climate change is one of the greatest challenges of our time” and that “New Zealand has committed to taking urgent action on greenhouse gas mitigation and climate change adaptation.” Included in the declaration is a commitment to implement the policies required to meet the targets in the Climate Change Response (Zero Carbon) Amendment Act 2019, and to increase support for striving towards 100 percent renewable electricity generation, low carbon energy, and transport systems.<sup>3</sup>
6. In its Report *New Directions for Resource Management in New Zealand* (June 2020), the Resource Management Review Panel devoted an entire chapter to climate change and natural hazards. At the outset of Chapter 6 on climate change and natural hazards, the Review Panel observed:<sup>4</sup>

<sup>1</sup> <https://www.un.org/sg/en/content/sg/statement/2022-04-04/secretary-generals-video-message-the-launch-of-the-third-ipcc-report-scroll-down-for-languages>

<sup>2</sup> <https://www.rnz.co.nz/news/world/478257/cop27-we-re-on-a-highway-to-climate-hell-un-boss>

<sup>3</sup> [https://www.parliament.nz/en/pb/hansard-debates/rhr/combined/HansDeb\\_20201202\\_20201202\\_08](https://www.parliament.nz/en/pb/hansard-debates/rhr/combined/HansDeb_20201202_20201202_08)

<sup>4</sup> Report of the Resource Management Review Panel, *New Directions for Resource Management in New Zealand* (June 2020), page 164.

“Climate change is often described as the defining issue of our time. Limiting global warming to 1.5 degrees Celsius above pre-industrial levels will require rapid, far-reaching and unprecedented changes in all aspects of society. We are already experiencing the effects of climate change, including through flooding and coastal erosion that threaten our essential infrastructure and the safety of whole communities. We need to respond with urgency.”

7. These Submissions are being made following the disastrous climate change induced floods and slips that have wreaked havoc across the upper North Island in early 2023. The Prime Minister at the time, Chris Hipkins, acknowledged that a cause of these floods and slips is climate change.<sup>5</sup> If ever there was a ‘wake-up call’ to turn the words of the New Zealand Parliament’s declaration of a climate change emergency into action, this has to be it.

### **Submissions**

Private Plan Change (100) seeks to rezone six hectares of land in Riverhead from Future Urban to Rural-Mixed Rural zone and 75.5 hectares to a mix of Residential – Mixed Housing Suburban, Residential – Terrace Housing and apartment Building, Business – Local Centre and Business – Neighbourhood Centre Zones to align with the boundary between the proposed Rural Mixed Rural zoning and urban zones.

Our submission relates to the entire Plan Change.

The EJP opposes the entire Plan Change.

The decision the EJP seeks from the Council is to decline Plan Change (100).

### **Reasons for opposing the entire Plan Change**

Our reasons for opposing the entire Plan Change are set out below.

#### **Resource Management Amendment Act 2020**

First, the Resource Management Amendment Act 2020 (**‘RMAA2020’**) has reintroduced specific consideration of climate change and these provisions had effect from 30 November 2022.<sup>6</sup> We believe they apply to Plan Change (100).<sup>7</sup>

In particular, the RMAA2020 provisions state that Councils must have regard to emissions reduction plans and national adaptation plans under the CCRA (as amended by the Climate Change Response (Zero Carbon) Amendment Act 2019) when making and amending regional policy statements, regional plans and district plans (sections 61, 66, 74 RMA).

<sup>5</sup> <https://www.youtube.com/watch?v=NScyur2wglc>

<sup>6</sup> Resource Management Amendment Act 2020 Commencement Order 2021.

<sup>7</sup> Although it should be noted that the Review Panel did support the Resource Management Amendment Act 2020 Bill that was before Parliament and the proposal to remove the statutory barriers to RMA consideration of greenhouse gas emissions. See Report of the Resource Management Review Panel, *New Directions for Resource Management in New Zealand* (June 2020), page 178.



**61 Matters to be considered by regional council (policy statements)**

... when preparing or changing a regional policy statement, the regional council shall have regard to—

- (d) any emissions reduction plan made in accordance with section 5ZI of the Climate Change Response Act 2002; and
- (e) any national adaptation plan made in accordance with section 5ZS of the Climate Change Response Act 2002.

**66 Matters to be considered by regional council (plans)**

... when preparing or changing a regional plan, the regional council shall have regard to—

- (d) any emissions reduction plan made in accordance with section 5ZI of the Climate Change Response Act 2002; and
- (e) any national adaptation plan made in accordance with section 5ZS of the Climate Change Response Act 2002.

**74 Matters to be considered by territorial authority**

... when preparing or changing a district plan, a territorial authority shall have regard to—

- (d) any emissions reduction plan made in accordance with section 5ZI of the Climate Change Response Act 2002; and
- (e) any national adaptation plan made in accordance with section 5ZS of the Climate Change Response Act 2002.

We note that an emissions reduction plan has been made in accordance with section 5ZI of the Climate Change Response Act 2002 - *Te hau mārohi ki anamata: Towards a productive, sustainable and inclusive economy: Aotearoa New Zealand's First Emissions Reduction Plan* (June 2022).<sup>8</sup> In addition, a national adaptation plan has also been made in accordance with section 5ZS of the Climate Change Response Act 2002 - *Urutau, ka taurikura: Kia tū pakari a Aotearoa i ngā huringa āhuarangi Adapt and thrive: Building a climate-resilient New Zealand Aotearoa New Zealand's First National Adaptation Plan* (August 2022).<sup>9</sup>

Plan Change (100) does not appear to have regard to either *Te hau mārohi ki anamata: Towards a productive, sustainable and inclusive economy: Aotearoa New Zealand's First Emissions Reduction Plan* (June 2022) nor *Urutau, ka taurikura: Kia tū pakari a Aotearoa i ngā huringa āhuarangi Adapt and thrive: Building a climate-resilient New Zealand Aotearoa New Zealand's First National Adaptation Plan* (August 2022).

**Emissions Reduction and Plan Change (100)**

<sup>8</sup> <https://environment.govt.nz/assets/publications/Aotearoa-New-Zealands-first-emissions-reduction-plan.pdf>

<sup>9</sup> <https://environment.govt.nz/assets/publications/climate-change/MFE-AoG-20664-GF-National-Adaptation-Plan-2022-WEB.pdf>

As noted in *Te hau mārohi ki anamata: Towards a productive, sustainable and inclusive economy: Aotearoa New Zealand's First Emissions Reduction Plan* (June 2022):<sup>10</sup>

“Well-functioning urban environments can reduce emissions and improve wellbeing. Urban environments with a variety of mixed-use, medium- and high-density development that is connected to urban centres, as well as active and public transport routes, will help reduce greenhouse gas emissions. That is partly because they provide more options for people to travel between where we work, live, play and learn. Well-planned urban areas provide an opportunity to realise wider benefits too. They enable a greater supply and diversity of housing to be built at pace and scale, improving affordability. Good access to active and public transport routes that safely take people to workplaces and education centres can provide greater access to learning and job opportunities for households, improve public health and wellbeing and strengthen community cohesion.”

In terms of climate change, the potential adverse impacts of future development from Plan Change (100), mainly includes the use of additional private vehicles. Currently, the area is not sufficiently serviced by public transport, and the most realistic way to travel in the area is by car. Like any outer development proposed in Auckland, Plan Change (100) will result in an increase in Vehicle Kilometres Travelled (“Vkt”) and greenhouse gas emissions because:

- residents will consider themselves residents of Auckland city, as a whole, and will make use of the amenities, services, retail, education, etc in a large segment of Auckland. There is no public transport or cycling network for these trips that will be easier than driving. They will therefore drive, if they can, or be chauffeured if they can't.
- the new residences will increase the Vkt of visitors too. This will include tradespeople, friends and visitors, community service providers, people maintaining council assets, couriers, and trucks delivering to retail outlets. This is a lost opportunity for emissions reductions. Instead of making shorter trips, trips by more sustainable travel modes or trips to more places per trip - as would happen if these new dwellings were added within the built environment via intensification, each of these people will have to make longer trips to visit this development, and will drive.
- Plan Change (100) fails the ‘climate test’ because Auckland cannot provide a low car lifestyle overall without residential development being built in proximity to the amenities of the city. Development must be within the existing built environment.

We cannot see Plan Change (100) suggesting anything other than an increase in Vkt and will undermine the direction towards a Quality Compact Urban Form. Plan Change (100) will have long term, substantial and difficult-to-reverse negative impacts on Auckland's greenhouse gas emissions.

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<sup>10</sup> *Te hau mārohi ki anamata: Towards a productive, sustainable and inclusive economy: Aotearoa New Zealand's First Emissions Reduction Plan* (June 2022), page 127.

### Flooding Risks

As referenced in the Section 32 Report, significant portions of the land proposed for rezoning are prone to flooding. Last year's Cyclone Gabrielle was a harsh lesson in the reality of severe wet weather and the level of damage that can be caused, especially as the global climate continues to warm. Even during Cyclone Gabrielle, areas of Auckland that were not identified to be at risk of flooding were submerged, making it even more imperative that flood risks be seriously considered.

Intensifying housing on flood-prone areas will only saddle Aucklanders with greater concerns and costs in the future, as severe storms become more frequent. Urbanisation in this area is antithetical to Aotearoa's goals of climate resilience.

On behalf of the Equal Justice Project

Harshitha Murthy

[hmur817@aucklanduni.ac.nz](mailto:hmur817@aucklanduni.ac.nz)

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Rebecca Stuart  
**Date:** Friday, 17 May 2024 6:15:21 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Rebecca Stuart

Organisation name:

Agent's full name: Rebecca Stuart

Email address: 1redbek@gmail.com

Contact phone number: 021554958

Postal address:

29 Jelas Drive

Auckland

Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Land identified

Property address: Land identified in the Private Plan Change by Riverhead Landowners Group on the western side of Riverhead on the

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

We do not oppose development, we recognise that all communities need to pull together to support the housing shortage now and in the future. But, any development should not go ahead until current infrastructure issues are remedied under the categories of roading, schooling, and stormwater.

There are 3 teenagers in our household, and my husband and I both work full time in Newmarket.

We are unable to take public transport to or from work as it takes longer than the up to 2 hours a day each way we sit in traffic. Our children go to school in Henderson and Te Atatu Peninsula as there is no schooling they can access locally. These are all choices that we make, but it is increasingly harder as we leave earlier and earlier in the morning to try to get ahead of the traffic - and the hardest part of that 2 hour trip is getting from our home to Boric. Most days Google Maps will direct us to the North Shore and over the harbour bridge which of course we are unable to do as we have to drop kids to school in 2 different suburbs along the north western motorway. Stormwater flooding devastated a number of homes around the area in the Akld Anniversary floods, and

subsequently often since. These families have spent huge amounts of money trying to restore their properties to have them flooded again and again. These families are traumatised, and experience significant anxiety any time it rains heavily now. Finally schooling is inaccessible for children at intermediate age and older. A significant number of students travel to the north shore, Kaipara and Rodney, and West Auckland and often don't get home until close to 5pm in evenings after leaving for their buses at 7am in the morning. This is too long a day for children, and with unreliable buses either public or private through the school that are either full or often don't show up. Our kids are stressed, and tired, at a time in their lives when they need to be supported to teach good life skills and work ethics.

I or we seek the following decision by council: Decline the plan change

221.1

Submission date: 17 May 2024

### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Richard Allan  
**Date:** Friday, 17 May 2024 6:30:12 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Richard Allan

Organisation name:

Agent's full name:

Email address: rdallan2017@outlook.com

Contact phone number:

Postal address:

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:  
PC100

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

RIVERHEAD as well as the Kumeu region has seen huge expansion in housing developments and there has been no thought given to local infrastructure or roading and traffic management. State highway 16 as well as coastville RIVERHEAD highway are already congested and unsafe pretty much 7 days a week. Public transport is poor, roads and surrounding areas continue to have significant weather issues.

Adding 1000's of additional housing and traffic will have a negative effect on the region and impact the environment, put immense pressure on local infrastructure which already is unable to cope.

Build the infrastructure first, get it right. Make sure the local facilities can take not only what is there now, but what is coming in the future.

I or we seek the following decision by council: Decline the plan change

222.1

Submission date: 17 May 2024

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Kellie Christophersen](#)  
**To:** [Unitary Plan](#)  
**Subject:** unitaryplan@aucklandcouncil.govt.nz Riverhead  
**Date:** Friday, 17 May 2024 6:43:21 pm

---

Kia Ora,

I am submitting as an owner of 1050a Coatesville-Riverhead Hwy 0820.

The storm water system on the highway is insufficient to carry enough volume in the heavy rain events.

The traffic is already congested outside the dairy and near the pedestrian crossing.

The development will add to these issues. Therefore, I am opposed to it until commitments are made to upgrade the storm water and proper traffic management is taken care of.

223.1

Regards  
Kellie Christophersen

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Chhitiza Basnet  
**Date:** Friday, 17 May 2024 7:00:14 pm

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Chhitiza Basnet

Organisation name:

Agent's full name:

Email address: tshetiza@gmail.com

Contact phone number:

Postal address:  
16 orchard terrace  
Riverhead  
Auckland 0820

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:  
16 orchard terrace riverhead

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
Infrastructure not ready

I or we seek the following decision by council: Decline the plan change

224.1

Submission date: 17 May 2024

#### **Attend a hearing**

Do you wish to be heard in support of your submission? No

#### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Kelvin Stuart  
**Date:** Friday, 17 May 2024 7:00:17 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Kelvin Stuart

Organisation name:

Agent's full name: Kelvin Stuart

Email address: amkel777@gmail.com

Contact phone number:

Postal address:

29 Jelas Drive

Riverhead

Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Transport (Roding), Stormwater and Flooding

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Current roads in and out of Riverhead are severely congested in both morning and afternoon peaks and in weekends. Although there are plans to make improvements to state highway 16 through to Kumeu, these improvements have been delayed, and are focused on safety rather than capacity. Even if these changes do go ahead they will not improve access to riverhead once you turn off state highway 16. Impact on roads will be felt from when the development starts will before the population increases. Riverhead and it surrounding areas has been impacted by flooding on several occasions since 2021. it is my concern that additional built up area and impermeable surface will only increase the risk of flooding in the future. Overall I feel that bring forward this development will only put extra stress on the existing infrastructure.

I or we seek the following decision by council: Decline the plan change

225.2

Submission date: 17 May 2024

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - John Cook  
**Date:** Friday, 17 May 2024 7:45:29 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: John Cook

Organisation name:

Agent's full name:

Email address: kiwicookie@me.com

Contact phone number:

Postal address:  
 113 Riverhead Road  
 Kumeu  
 Auckland 0892

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Property address: Coatesville Riverhead / Riverhead Road / Cambridge Road

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

We own a business in Riverhead so spend 5/6 days per week there.

The current infrastructure isn't adequate for the population now so there would need to be significant investment by ACC to upgrade roads, infrastructure etc before any further housing was built.

I or we seek the following decision by council: Decline the plan change

226.1

Submission date: 17 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? No

#### Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Timothy Mark Hillier  
**Date:** Friday, 17 May 2024 7:45:35 pm

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Timothy Mark Hillier

Organisation name:

Agent's full name:

Email address: tim.hillier1@gmail.com

Contact phone number: 0211956500

Postal address:  
74a Princes Street  
Riverhead  
Riverhead 0820

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:

1. Height and Density
2. Existing Riverhead character
3. Transport infrastructure
4. Town Centre and Local Centre zoning

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

1. THAB zoning
  - THAB zoning is not in keeping with, or enhancing the existing character of Riverhead and the surrounding rural environment.
  - Existing transport infrastructure is extremely limited in Riverhead and not conducive to high density zoning
  - There is limited employment and schooling in riverhead, not conducive to high density zoning.I would like to see all THAB zoning removed, and height overlays applied to all areas limited to two stories.

2. Existing Character

The plan change application seems to completely disregard the existing character and built form in Riverhead in regards to height, density and built form. Riverhead is a unique semi-rural community in auckland where existing character is of vital importance to the community. Any new residential and commercial zoning should be in keeping with this character. Masterplan appears to place importance on sellable area over urban design and planning. Ideally height overlays should be applied limiting heights to two stories in all areas

3. Commercial Centres: More retail amenity is needed in Riverhead , however I would like to see a more thorough strategy around scale and locations to ensure existing retail is complemented. Proposed retail and existing retail is very spread out , Would be better if located in a walkable area.

4. I support the green walkways -

I or we seek the following decision by council: Approve the plan change with the amendments I requested

227.1

Details of amendments: No THAB zoning, Height overlays applied to all areas limiting building heights to two stories, protections around existing character/rural character, more comprehensive zoning around town centres for both sides of highway, not just developers land.

227.2

227.3

227.4

227.5

Submission date: 17 May 2024

### Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission? Yes

### Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Sandi Gamon  
**Date:** Friday, 17 May 2024 7:45:37 pm  
**Attachments:** [Riverhead\\_development\\_submission.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Sandi Gamon

Organisation name:

Agent's full name: Sandi Gamon

Email address: [trevandsandi@yahoo.co.uk](mailto:trevandsandi@yahoo.co.uk)

Contact phone number:

Postal address:  
[trevandsandi@yahoo.co.uk](mailto:trevandsandi@yahoo.co.uk)  
 Riverhead  
 Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:  
 Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:  
 Significant impacts to the character of Riverhead, no realistic traffic management. Poor storm water management, poor management of trees, rivers reserves and parks

I or we seek the following decision by council: Decline the plan change | 228.1

Submission date: 17 May 2024

Supporting documents  
[Riverhead\\_development\\_submission.pdf](#)

#### Attend a hearing

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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I oppose the plan change for the reasons set out in this submission. I would like to see the council work with the Riverhead Community Association to be given the opportunity to work with the requestors and the council to resolve matters raised in this submission. Matters of concern and remedies sought are listed below.

### **Transport:**

- 1.** The plan change fails to adequately recognise and propose transport infrastructure upgrades required to manage adverse effects on the wider transport network. For example, SH16 is at times completely gridlocked with commuter traffic, the queue to get onto SH16 comes back to Hallertau at 6.30am! During weekends the line to Boric (the Coatesville Riverhead Highway (CRH)/SH16 intersection) is at the golf course. Another 3,000 residencies at Riverhead will exacerbate this greatly. There are very few local employment opportunities, most people will commute to work, and the single route bus is inadequate, inefficient and unreliable. The road has no capacity for walking or cycling to Westgate or Kumeu. Driving on roads is the only option.
- 2.** Significantly, the development relies upon construction of a roundabout at the (CRH)/ Main Road (SH16) intersection to be built by Waka Kotahi NZ Transport Agency at some future time. Whilst this upgrade has been a long time coming it only addresses safety at the intersection. And is currently being designed to accommodate the current traffic issues only. It will not improve capacity of the network which is already often dysfunctional. We also understand that this project is not currently programmed or funded.
- 3.** The end of the NW motorway often backs up for a kilometre or more, and the roundabout intersection is routinely dysfunction creating huge traffic jams.
- 4.** The plan change fails to recognise comprehensive local network transport improvements (within existing Riverhead) are warranted necessary to manage adverse effects on local transport.
- 5.** The proposal is for limited local road 'upgrades'. But, to only deliver these in a fragmented and staged way based upon occupation of adjacent property. The upgrades do not have to be in place prior to construction when the first traffic impacts from construction traffic begins.
- 6.** Riverhead has under-provisioned streets, often with open drains, a lack of footpaths, unformed carriageway edges and few street trees. Some blocks are poorly connected and contain unformed paper roads. The development will increase pedestrian use over all of Riverhead, including to Riverhead School and to the two walkable pre-schools. All the realistic routes from the plan change area to destinations in Riverhead such as schools, pre-schools, shops, War Memorial Park and public walkways should be reviewed in terms of footpath provision and safety, and upgrades should be completed

prior to the main development starting. This is to enable safety pedestrian movements for the existing and future people and children of Riverhead.

**7.** The plan change fails to recognise that local and wider transport upgrades are necessary to complete prior to development (earthworks and civil) commencement to manage the effects of construction traffic and safety.

**8.** The huge development area will require extensive earthworks and civil construction, including thousands of truck and vehicle movements well before any residence is occupied. Traffic upgrades, such as turning bays and pedestrian networks need to be functional and safe before the heavy traffic begins. The current plan change proposal to require limited improvements prior to occupation of a dwelling fails to recognise and mitigate the adverse construction traffic effects which will be particularly severed at main access routes and where locations where site access is feasible.

**9.** New subdivisions often lack on street parking. Demand for parking would spill over into the existing community where there are no formed road edges and open stormwater drains. Adequate on street parking needs to be required as we don't have the public transport options available. Transport – remedies sought

**10.** Include provisions which state that development of the plan change area cannot proceed until wider network capacity and safety issues are addressed.

**11.** Include provisions which state that development of the plan change area cannot proceed until local road improvements have been completed, including function and safety assessments and any required upgrades to footpath routes and networks in Riverhead likely to be used by residents of the plan change area to access local destinations.

**12.** The enormous retirement village privatised site creates pinch points of available connectivity between the plan change area and existing Riverhead. These should be recognised and addressed by requirements for upgrades in the plan change provisions. For example, the road and pedestrian network of Te Roera Place, Duke Street, Cambridge Road, Queen Street, Alice Street and King Street will all be well used routes for people moving in and out of the plan change area, as pedestrians and in vehicles. These roads, and further routes to Riverhead School all warrant assessment and specific upgrades to ensure they are functional and safe. Similarly, the connection between the plan change area and Riverhead War Memorial Park has not been recognised as a primary route which is restricted by the CRH and the retirement village development. Specific provisions should also be applied to this area to ensure that development enables safe and logical east/west connections and road crossings.

**13.** Include provisions which require all required local and wider transport improvements to be in place prior to earthworks and related traffic impacts commencing.

**Commercial Zoning – Local Centre Zone and the Neighbourhood Centre Zone:**

**14.** A Local Centre zone is proposed at the corner of Riverhead Road and the CRH and a Neighbourhood Centre Zone is proposed opposite Riverhead Point Drive (Hallertau).

**15.** Riverhead already has a consolidated area of Business Mixed Use zone and Local Centre zones sites which house 2 mini-marts, a real estate office, a restaurant/bar, bottle shop and a vape shop and Heritage café/takeaways on School Road. There is also the local vet and two-preschools, Lulu's café, and other retail and commercial yard type activities. The mixed-use zoned triangle contains a development which when completed will include a series of ground level shop or business, and the final part of the triangle is also under development and also zoned Business Mixed Use, therefore, is also available for commercial use. Hallertau sits further down the CRH. **16.** The basis for the proposed commercial zones is an economic report which predicts future demand (Appendix 7 – Centres Assessment). This report provides a cursory summary of the existing commercial activities and zoning. It also bases predicted demand on a 'Riverhead Core Retail Catchment'. The report provides no basis for the extent of this catchment despite it being a formative assumption. Astonishingly, the catchment extends and wraps around Kumeu and goes all the way to the Dairy Flat Highway.

**17.** Defining this as a catchment for Riverhead as a retail destination is ridiculous at both extents of the area shown. People in the Kumeu area have no incentive to travel to Riverhead for shopping. Kumeu is well served with a supermarket and a huge range of retail and commercial services. Council's own consultation documents for Kumeu show the extensive land at Kumeu dedicated for these activities. See below.

**18.** People east of Coatesville are well served by old Albany and the Albany centre and beyond. Presuming that these people would also flock to Riverhead for shopping is not realistic because Albany is more accessible and contains a much greater range of shops and services.

**19.** The economic report also does not appear to consider the retirement village development and the hospitality, medical and other services it will contain which would be available to the residents and to the public. Restaurants, retail and healthcare facilities are specifically enabled by the proposed Sub-Precinct A within the retirement site.

**20.** The proposed THAB zoned areas also allows a range of commercial and service activities (via a RC). It is not clear why the economic report does not account for the possibility that the THAB zone can also contain businesses and retail, especially the



area in proximity to the proposed Neighbourhood Centre zone where this development may be likely.

**21.** Another concern is that the proposed isolated Neighbourhood Centre Zone (adjacent Hallertau) will exacerbate an undesirable pattern of commercial strip development down the CRH.

**22.** A complete and justified basis for zoning this land as a Neighbourhood Centre Zone has not been provided. The proposed zone does represent a defined area of FRL landholding which naturally raises the question as to whether this discrete proposed zone is motivated by commercial gain rather a demonstrated need or sound design principles.

**23.** The original structure plan for Riverhead South reinforced the community's expectation of a defined centre. The existing Riverhead centre is located in a relatively consolidated and logical manner, and also has connection to Riverhead War memorial Park.

**24.** The Urban Design assessment (Appendix 6) shows that the main Local Centre Zone is within a 400m walkable catchment for all residents within the plan change area. So, the isolated Local Centre Zone is not justified by pedestrian accessibility. As noted, the existing Riverhead centre supports two mini-marts or dairies, and major supermarkets are located on all routes west (Kumeu), South (Westgate) and east (Albany).

Commercial Zoning – Local Centre Zone and the Neighbourhood Centre Zone – remedies sought 25. We want any proposed commercial zoning to be justified by economic analysis that is based on a clear outline of existing zoning and activities in Riverhead, including under-utilising of zoned land and potential capacity, and recognition of the activities and services that would be provided by the retirement village and commercial activities that can be undertaken in the THAB zone via resource consent.

**26.** We want any proposed commercial zoning to be justified by economic analysis that is based on a well-reasoned and justifiable customer catchment which recognises the commercial and retail centres of Kumeu, Westgate and Albany, and does not unrealistically anticipate that people who live near these centres would instead travel to Riverhead for their shopping needs.

**27.** We want any new business zoning to demonstrate a consolidated and legible town centre, not exacerbate strip commercial areas fronting the highway. Most importantly by removing the proposed Local Centre Zone opposite Riverhead Point Road.

**Residential Zoning - Mixed Housing Suburban Zone:**

**28.** Most of the land is proposed as Mixed Housing Suburban Zone. This zone allows for two and three storey detached and attached housing in a variety of types and sizes. Up to three dwellings are permitted as of right subject to compliance with the standards.

**29.** In comparison, existing Riverhead is mostly Single House zone. The plan change will result in much more dense development and generally taller houses and lots of multi-unit townhouses. Existing Riverhead is characterised by many large trees on private properties.

**30.** In contrast, large trees would be infrequent in the proposed Mixed Housing Suburban Zone which has minimal landscaping requirements (only 20% and this can be paved if there is canopy cover over (IX6.11. Landscaped area within the Mixed Housing Suburban Zone) and only a 2.5m front yard standard which is not adequate for large growing tree. The outcome is that buildings will dominate the neighbourhood character. Overall, due to a lack of space or a requirement to plant trees on private sites, the neighbourhood character would be markedly different compared to existing Riverhead. We expect this difference in character to be noticeable and jarring, resulting in a lower quality of amenity. We want any new development to fit into the existing urban fabric of our community.

**31.** We are not sure that this character represents the ‘unique sense of place’ described as an intension in the precinct description.

**32.** No requirements for road reserve tree planting are proposed either, leaving the street tree outcome uncertain or minimal. Even in the green corridor there are no measurable outcomes for vegetation cover or trees.

**33.** The proposal fails to mention or adopt the council Auckland's Urban Ngahere (Forest) Strategy. The strategy recognises the social, environmental, economic, and cultural benefits of our urban ngahere (forest), and sets out a strategic approach to knowing, growing, and protecting it. It seeks to achieve increased canopy cover to 30 per cent across Auckland's urban area, and at least 15 per cent in every local board area. The proposed plan change should seek to provide overall canopy cover of 30% which would provide a range of health, social and economic benefits including reducing the urban heat effect of roads, buildings and impermeable surfaces. This could go some way to integrating the old and the new.

**34.** The precinct description also seeks to ‘enable transition from the rural to the urban environment’. It achieves this outcome abruptly, rather than a smooth transition.

**35.** The zoning proposed does not provide any transition at the rural edge, for example, single house zoning could be applied to the outer 100 metres. There is little attempt to provide certainty of transition of scale or density, overall. Policies which direct this

outcome adopt soft non-comital language, such as ‘Encourage’ (policies 15 and 16). It is not clear how ‘encourage’ has any real influence at the resource consent stage.

**36.** A 5 metre rear yard setback standard is proposed at the rural zone interface. This is to landscape or plant trees in the rear yard. A 5 metre yard would have no material visual difference to the abrupt transition between residential development and the rural environment. A larger rear yard, say 15m with a requirement to plant at least one large tree and a rural fence typology are obvious designs requirements that would go some way to achieving the intended transition outcome.

**37.** There is also no requirement to provide adequate front yards to enable the planting of trees. This was a requirement of the Riverhead South development, which contributes to the ‘tree-ed’ neighbourhood character established and respects the character of old Riverhead and the many prominent mature trees. This requirement should at least apply to the rural fringe parts of the site and would also contribute overall to sense of transition between the rural and residential land uses.

**38.** Another formative design requirement of Riverhead South was a rule prohibiting tall front yard fences. This outcome can also be observed widely in Riverhead South and contributes significantly to a sense of spaciousness with buildings set back and front yard landscaping visible. The plan change seeks to removes the usual requirement for low or visually permeable front yard fences without any explanation as to why. (refer IX.6. Standards page 11). This may result in a proliferation of tall front yard fences detrimental to a desired spacious character. It also has negative effects on CPTED outcomes.

**39.** There is no requirement to plant regular street trees on roads. Whilst often achieved during development, the supporting AUP policy context is vague. To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, we request minimum tree quantity outcomes are required for new roads. The density for the housing will result in no tree cover of value, so the work must be done in the streets.

**40.** The zone also does not propose any design response to the proposed green corridor network, aside from a lonely fence height standard. There are no provisions proposed to give effect to the Urban Design recommendation for: “a high quality and vegetated interface for higher density development along the key movement routes and adjacent to existing residential development which contributes to the current landscaped character of streets in Riverhead.” There is also little detail on how this will be achieved, given council parks recent directive for no gardens within the streetscape we are left wondering what this ‘green corridor’ will contain.

#### **Residential Zoning - Mixed Housing Suburban Zone – Relief sought**

- 41.** Generally, we accept that density needs to be increased compared to the predominant Single house zone of Riverhead. But this should be balanced by stronger requirements for good urban design (for example, low front yard fences) and green infrastructure (for example requirements to plant trees on sites and on roads). Graduated density should be considered at the transition to rural zoning and higher density can be placed near the neighbourhood centre and open spaces.
- 42.** We want front yards sized to be adequate for planting large trees, for example, 6 metres. We want a requirement for each site in the zone to plant one tree capable of growing 6m plus in height.
- 43.** We want specific yard and landscape standards to apply at the rear of all sites which adjoin a rural zone to help establish a transition between the residential and rural environments.
- 44.** We want a front yard fence control applied which applies H5.6.15 Front, side and rear fences and walls.
- 45.** To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, we request minimum tree quantity outcomes are required for new roads. Trees are often the last consideration and underground infrastructure dominates the road corridor.
- 46.** Overall, we want the plan change to require sufficient private and public planted areas to give effect to the intent of Auckland's Urban Ngahere (Forest) Strategy. This will also help integrate the higher intensity development with the character of existing Riverhead and the rural interface.

#### **Residential Zoning - Terrace Housing and Apartment Zone (THAB):**

- 47.** The THAB zone provides for high intensity living in the form of terrace house and apartments and should be predominantly around centres and the public transport network to support the highest levels of intensification.
- 48.** North of Riverhead Road this zone is located within the retirement village area. If that goes ahead this area of THAB zoned land would be developed with a retail/hospitality corner and privatised retirement apartments.
- 49.** The other area of THAB zone that will be available for development and housing which is not privatised is immediately west of the Neighbourhood Centre zone at the corner of Riverhead Road and CRH. This is overlaid with Sub-Precinct B
- 50.** There is very little reasoning provided for this discrete area of zoning proposed, and why it does not also front CRH, or wrap around the south of the Local Centre zone. We do not think the proposed zoning reflects a land parcel, and this may be influencing the

proposed location and extent of that zone. Residential Zoning - Terrace Housing and Apartment Zone (THAB)- remedies sought

**51.** We want any THAB zone location and extent to be based on a reasoned analysis and reflect the intent of the zone which is to provide density around a transport hub and/or a town centre.

**52.** We want the transition edge of THAB to the Mixed House Suburban zone to contain a local road to create a natural transition space between the different densities and building scale/forms. Mixed Rural Zone:

**53.** A mixed rural zone is proposed at the northern part of the plan change area.

**54.** This is a response to the obvious flaw with the original (pre-notification but rejected by the council) proposal which proposed this flood plain area as suitable for residential development.

**55.** The main issue with this zoning is that the land will not be able to be further developed or subdivided. **56.** The outcome is that the 'key move' of a green corridor extending to the river, and an esplanade reserve vested as public space to the council cannot be realised. The maintenance and enhancement of public access to and along rivers is a matter of national importance under the RMA. The current proposal fails to achieve this. Mixed Rural Zone – relief sought

**57.** We want provision to require the 20m margin of land from the stream to be zoned as public open space and vested to the council.

**58.** We want the green corridor to be extended to the open space esplanade reserve and be available for public access. The river is an important taonga for our community. Previous development has turned its back to it.

### **Flooding and Stormwater:**

**59.** We are concerned that current best practice stormwater system design methodologies (as outlined within Appendix 10) would not adequately address adverse effects of the development. Council's current practice has failed Riverhead as evidenced in the Auckland Floods February 2023 where new developments designed to council's standards resulted in flooding harm.

**60.** We request robust peer review and an overall bottom line requirement that stormwater will not cause upstream or downstream adverse effects.

**61.** Objective (6) is very weak in that it that allows for the outcome of inadequate stormwater management: (6) Stormwater is managed to avoid, as far as practicable, or otherwise minimise or mitigate, adverse effects on the receiving environment.

**62.** In our view, if there is so much uncertainty that the requestor seeks scope for it to not be ‘practicable to ‘avoid, remedy or mitigate adverse stormwater effects’, then this indicates a lack of confidence that stormwater issues can be appropriately addressed. We consider that the objective must be amended to remove the caveat ‘as far as practicable’ so the adverse stormwater effects must be avoided, remedied or mitigated.

**63.** Stormwater systems across the plan change area are proposed via a ‘central stormwater management treatment spine’ intended to be part of a ‘multi-purpose green corridor’ To ensure a coordinated delivery there needs to be a requirement for this to be designed and agreed prior to development.

**64.** Without an overarching agreed plan for the stormwater corridor, it is not clear how an overall integrated stormwater system will result from development of multiple individual lots and/or stages and what specific land parts must occur on. The risk is that fragmented and uncoordinated design and implementation would result due to a lack of design clarity and responsibilities.

**65.** Despite a ‘designed’ stormwater spine system’ being proposed, zoning is not used to clarify the location and extent of the system. The extensive land required for this purpose is inappropriately zoned residential. Zoning would provide certainty of the land required for the stormwater and green corridor purposes.

**66.** A matter of significant concern is that the open space and stormwater functions of the corridor will be located over many separate parcels, landowners, and development stages. It is also located on parcels owned by parties not subject to the plan change.

**67.** There is no requirement for the overall green corridor to be designed prior to development. If this was a requirement then it would be clear what needs to occur and where. The lack of clarity will likely result in a fragmented outcome overall due to separate parties leading different parts of the development at different times.

**68.** It is recommended that a policy be added to require a clear overall design for the combined stormwater and open space corridor needs to be agreed by council prior to development within the precinct. We request objectives, policies and standards be included to define the corridor, its various functions, and require it to be implemented in a staged and coordinated manner.

**69.** Policy 17 states: “(17) Require subdivision and development to be consistent with the water sensitive approach outlined in the supporting stormwater management plan, including: ...” It is not appropriate for a plan change to require adherence to a document that has not been reviewed and accepted by the council. The report itself clarifies: “This report has been prepared solely for the benefit of our client with respect to the particular brief and it may not be relied upon in other contexts for any other purpose without the express approval by CKL.”

**70.** In general, it is not good practice for an enduring planning document (the AUP OP) to refer to a third party report prepared in support of a plan change.

**71.** The supporting stormwater report was prepared when 22 Duke Street was proposed to be zoned for residential development. This land is now largely proposed to be zoned rural, and consequently could not be subdivided. This casts doubt as to whether this land can still be used for stormwater management and conveyance to the Rangitopuni tributary. It is not clear if this affects the integrity of the stormwater report findings.

#### **Flooding and Stormwater - relief sought**

**72.** We want robust peer review and an overall bottom line requirement in the plan change provisions that stormwater will not cause upstream or downstream adverse effects.

**73.** We want the clause of 'as far as practicable' to be removed from Objective (6), for example: "Stormwater is managed to avoid, or minimise or adequately mitigate, adverse effects on the receiving environment."

**74.** We want a requirement for the overall stormwater corridor system and green network design to be agreed with council prior to development and not incrementally addressed via multiple separate development proposals. This would likely require staging of development to align with development of the stormwater/green network corridor necessary to support that development.

**75.** We want clarity of the intended use and function of 22 Duke Street with regard to stormwater.

#### **Wastewater:**

**76.** Residents report that the existing system is prone to failure, often setting off alarms particularly during rain events, we understand due to groundwater and ingress of water into the council's system. The concern is that the existing poor performing system is not fit for purpose overall, and that expanding it over a large area with high groundwater will negatively impact everybody.

#### **Wastewater – relief sought**

**77.** We want provisions which ensure that the wastewater system is appropriate and fit for purpose, and that addition of the plan change area will not negatively impact existing and future users.

#### **Parks and Reserves:**

**78.** The 'multi-purpose green corridors' are defined by the requestor as a 'key move' from an urban design perspective. This outcome agreed and supported in principle.



**79.** There is no requirement that the green corridor be offered to council for vesting, but this is commonly required under existing AUPOP precinct plans to provide certainty for council and developers. In our mind, a green corridor is not a wider road with more street trees.

**80.** Riparian margins are to be vested, but these are minimal and go nowhere near establishing the green corridor which needs to be located on a variety of land tenures. There needs to be a requirement that land necessary for the green network, but not accepted for vesting by council, is developed and held by an entity, like the proposal for riparian margins. Otherwise, parts of the network might not get delivered.

**81.** The intent of a contiguous open space network comprising of stormwater and passive open space functions is supported. Unfortunately, the provisions fail to define what the corridor will comprise of in real terms and do not require it to be delivered in practice. For example, what will be located in-between the stormwater ponds?

**82.** Policy (13)(d) suggests “Co-locates smaller open spaces along the multi-purpose green corridor to achieve a connected network of open space.”

**83.** This policy shows a lack of consideration that the separately proposed ‘neighbourhood parks’ are limited to 3 separate locations and a flawed presumption that council would accept ad-hoc vesting of a range of “smaller parks” required to join-up the green corridor network. The network may be partly on the road reserves, but if this is the intention, then that needs to be clear and also needs to be a requirement of the road design.

**84.** The policy fails to incorporate the depth of the description of the green corridor in the s32 report: “The central north-south multi-purpose green corridor is a key structuring component in both the Greenways Plan and the proposed Structure Plan. Along with the collector road, this green corridor accommodates both passive and active open spaces, footpaths and dedicated cycleways. It also incorporates an existing intermittent stream.”

**85.** A clear description the intended corridor composition and the types of land it will occupy is required in the plan. As noted, it appears that parts of the green network would likely be upon road reserve. However, there are no provisions which explain this or require ‘linking roads’ to deviate from a standard design to perform this function. For example, to ensure that necessary roads are designed to be a width adequate to contain a high level of green infrastructure in a dedicated or protected zone within the road reserve.

**86.** Clear expectations are needed in the plan to ensure that the multiple components of the green networks are considered and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor. Without this being a clear

directive it is likely that conventional design would be applied to the various parts, and overall the green network would not be cohesively designed and delivered.

**87.** Overall, clear objectives, policies, standards and design/outcome expectations are required in the plan to ensure the overall 'multi-purpose green corridors' is delivered as anticipated. Policy 13 as drafted will not achieve this outcome.

**88.** The precinct description seeks to realise "...the opportunity to establish green corridors through the precinct". Policy (13) only requires the council to encourage "...the provision of a continuous and connected multi-purpose green corridor". The word 'encourage' is a weak and non-committal directive. Clauses (a) to (d) provide an unclear framework without specific detail of what is 'required' to be achieved. A stronger word such as 'require' is needed to ensure the overarching urban design 'key move' of the green corridor is delivered.

**89.** Policy 17 requires development and subdivision to provide "... a central stormwater management treatment spine through the precinct in general accordance with the multi-purpose green corridor in the locations indicatively shown on IX.10.2 Riverhead: Precinct plan 2;" This cannot be achieved in isolation of an overall agreed plan which spans the plan change area.

**90.** The supporting Stormwater and Flooding assessment contains a 'Preliminary Masterplan' which shows significant areas of land to be occupied by stormwater devices and green infrastructure, extending in area at some locations much further than shown on Precinct Plan 2. **91.** If this drawing represents the modelled stormwater requirements, then the precinct plan should also include the same information so that developers and the community can understand what is required.

**92.** The supporting Urban Design report (Named Neighbourhood Design Statement) shows the multi-purpose green corridor extending via the land at 22 Duke Street to the Rangitopuni tributary and beyond via existing and potential future esplanade reserves alongside the stream and river.

**93.** We support the connection and the esplanade reserve alongside the tributary and note the extensive high quality esplanade reserve that has resulted from the Riverhead South network. A long term aspiration is to have a complete network of coastal connections. The proposed zoning of 22 Duke Street as (predominantly) Mixed Rural removes the possibility of subdivision and vesting of esplanade reserve along the tributary. The small parts which are proposed to be residentially zoned would appear to still leave the parent site over 4HA, and therefore not trigger the esplanade reserve vesting upon subdivision. We expect that this is an unintended consequence of changing the proposed zoning. We request that the 20m margin of the tributary be zoned Open Space – Conservation, as part of the plan change, and that its heavily weed infested margins be restored and planted, and that land be vested to the council. These

are the outcomes which would have occurred if the land was able to be subdivided and are necessary to secure a necessary part of the long-term aspirational esplanade reserve network.

**94.** Objectives, policies and standards are also required to achieve public access links from the development to the zoned esplanade reserve. If 22 Duke Street is available for stormwater management purposes, then this outcome should be easily achieved, especially if parcels are subdivided as drainage reserves, as this may trigger the 4Ha or less lot size adjacent to the tributary to trigger esplanade reserve vesting.

**95.** There is no direct requirement to deliver the 3 proposed neighbourhood parks, only an indirect reference to section E38. We seek a direct requirement to deliver the parks, presuming support from council parks division.

**96.** One high value (notable value) Beech tree is identified which is clustered with many impressive specimen trees (including a 13m tall Kauri). The Beech sits within a cluster of magnificent trees worthy of retention and is an obvious location for a Neighbourhood Park. Policy (12) seeks that the Beech tree is incorporated into an open space, but Precinct Plan 2 does not identify this location for a Neighbourhood Park. This inconsistency needs to be corrected. This cluster of trees, planted by a family who have been in Riverhead for multiple generations could further help connect the character of existing Riverhead to that of the plan change area.

**97.** The Beech tree and surrounds should not be compromised by stormwater functions which also appear to be proposed within this location (refer structure plan) page 8.

**98.** Policy 12 does not require the retention of 'other mature trees that are worthy of retention' by caveating the policy with 'where possible'. We seek that the option to 'not retain worthy trees' be removed and more directive wording applied. The site is a huge greenfield area with a lot of flexibility for development locations. Any trees of value should be required to be retained. The value of this cluster extends beyond the arboriculture assessment.

**99.** Large trees located near the CRH appear to not be recorded in the arboricultural report which appears to be an error.

**100.** The green corridor graphic, or 'east-west connections reflecting potential original portage routes promoting awa ki awa linkage' is shown on Precinct Plan 1 extending along and outside of the southern plan change boundary. Policy 19 contains an obtuse requirement for development to acknowledge key views and spiritual connections respond to identified on IX.10.1 Riverhead: Precinct plan 1 in the layout and/or design of development; in particular, sightlines to Te Ahu and Pukeharakeke, and connections to Papakoura Awa and Te Tōangaroa. **101.** We of course cannot speak for mana whenua but note that the actual outcomes required are limited to locating and orientating

streets and public open spaces to reference and respect the Māori cultural landscape values. This is unlikely to result in any material outcome in the development form. The proposed west-east roading pattern already adequately achieves the expected outcome. It is not clear how the development is required to respond to the southernmost connection, that is not even within the plan change area.

### **Parks and Reserves – relief sought**

**102.** We want the requirement and composition for the green corridor to be determined and agreed in principle with council prior to any development, so that the required environmental, stormwater and connectivity outcomes are understood and delivered appropriately and fully by each discrete development parcel or stage.

**103.** We seek that necessary parts of the green corridor infrastructure which do not comprise of roads, neighbourhood parks or drainage reserves are offered to council for vesting or protected and maintained in perpetuity by an appropriate legal mechanism (as per IX.6.3. Riparian margin).

**104.** We want a clear description the intended corridor composition is required in the plan, and an explanation of how the multiple components of the green networks are to be determined and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor, and any other land that may be required.

**105.** We want the green corridor to extend to the Rangitopuni tributary and provide a public connection to a zoned open space esplanade reserve.

**106.** Overall, clear objectives, policies, standards and design/outcome expectations are required in the plan to ensure the overall ‘multi-purpose green corridors’ is delivered as anticipated, because Policy 13 as drafted will not achieve this outcome.

**107.** We want a neighbourhood park to be located to include the Beech tree and the overall grove of high value trees at this location. Retirement Village (Matvin Group land):

**108.** The technical approach of the plan change with respect to the Matvin retirement village land is unclear. It is noted in the s32 report but not in the plan change provisions. It is also noted in the urban design report as a consented development, containing buildings up to 5 stories tall, with 410 dwellings including 310 apartments. It is also included in the supporting stormwater report.

**109.** The plan change maps and provisions do not respond to the scale and poor urban design connectivity outcomes of the retirement village development. The only response is to propose zoning part of the site as THAB and the remainder as Mixed House Suburban, and Sub-Precinct B. This is of concern because the retirement village is located at the interface of the plan change area and existing Riverhead at Cambridge Road. It occupies a 500 metre long flank and only provides for a single pedestrian cross connection, available during daylight hours only.

**110.** The development of the retirement village is not certain to occur, however, the plan change proposal treats it as a certainty. Evidenced by the lack of local roads, pedestrian connectivity, or a considered interface with Cambridge Road, all of which would be expected on a greenfield area some 10 Hectares in area and positioned at a critical location. If the retirement village does not go ahead then the plan change should be able to provide a good practice development framework for this area consistent with the remainder of the plan change area, and adopting the key design drivers of the Urban Design report, being: o a connected physical environment o an integrated community o access to nature o vibrant and local o housing choice and affordability o proximity/convenience

**111.** Concerningly, despite recognising the retirement village (by way of omitting expected outcomes such as a green corridor, local roads and pedestrian connectivity, and a considered interface at Cambridge Road) the plan change also does not propose any wider response to the retirement village form and function, should it go ahead.

**112.** For example, the Urban Design report recommends: “a transition between taller buildings around the centre to lower densities and building forms in the remaining areas of the site” (pg 51). Requiring roads and pedestrian routes to interface with the lone public route through the retirement village should also be required in the plan change. The Sub-precincts which seek to provide some level of transition of buildings do not adjoin the retirement site but are contained within it.

**113.** Especially concerning is the detrimental impact that the retirement village will have on connectivity for the northern part of the plan change area and movements to and from the adjacent existing Riverhead. This matter is noted also in our transport section. Retirement Village (Matvin Group land) – remedies sought

**114.** It is requested that the plan change be complete and robust in terms of dealing with the two scenarios of the retirement village being in place or not. Requiring cross-site connectivity and local roads for the scenario of the retirement village not being built. Structure Plans and Consultation:

**115.** Back in 2006, prior to being rezoned for development, Riverhead South also went through a plan change which was informed by a Structure Plan. This was Council led and involved the community through a series of consultation meetings including interactive design workshops. The people of Riverhead were actively involved in a meaningful way over a carefully planned process.

**116.** The structure plan was adopted into the then Rodney District plan ‘SPECIAL 30 (RIVERHEAD SOUTH) ZONE’. This included a comprehensive range of issues, objectives, policies, standards and assessment criteria to ensure that development reflected the needs of the community and council’s intent, whilst providing for good quality development.

**117.** That document delivered a planning framework informed by community participation. A range of built form outcomes are visible in Riverhead South today which were a product of this community/council collaborative process. Most significantly there was an emphasis on dwellings being set back from the street and for low or no front fences. These create a sense of spaciousness and openness at the front of houses and make for safe streets with high levels of passive surveillance.

**118.** These previously expressed community desires are not captured by the proposed plan change. The obvious outcome is that the character of the plan change area will be markedly different and not consistent with existing Riverhead. Density can be provided, but it can also be balanced with adequate and open front yards and a requirement for trees. Mature trees are a defining element of existing Riverhead, including Riverhead south where significant trees were retained and sites are large enough to accommodate new large growing species.

**119.** In stark contrast the 'Structure Plan' (refer Appendix 4) supporting the current plan change application was not prepared with meaningful community involvement. Community consultation involved a meeting over a coffee with some members of the RCA, 2 'drop in community sessions and a summary of 'feedback'. In our view, these represent a token level of consultation designed to 'tick the box'.

**120.** We do not understand why the previous council led (but developer funded) process was collaborative and genuinely engaging, and the current process has been superficial, how is that democratic?

**121.** The Quality Planning website outlines good practice consultation for structure planning. It says: Consultation with key stakeholders and the community affected is an important component of the structure plan development process. The number and type of stakeholders identified and consulted with for a structure plan will depend on the scale and characteristics of the area and the issues to be managed. To assist with consultation, it is good practice to develop an overall consultation plan for all groups including key stakeholders, tangata whenua and the wider community. This helps to identify all stakeholder and ensure that consultation and communications are managed in an integrated and co-ordinated way. This can also help to provide certainty to stakeholders about the opportunities to input into the structure plan process and the how the various consultation processes will be integrated into the final output. It is important that the communication or consultation plan recognises the potential for land ownership to change during the course of the structure planning exercise and any subsequent RMA plan changes. Commencing consultation early in the process is important, and can help with:

- obtaining stakeholder buy-in to the process;

- gauging community and stakeholder levels of acceptance to broad concepts (such as the overall level of development) being proposed;
- fulfilling statutory duties under the RMA, LGA and Land Transport Management Act;
- incorporating and working through stakeholder concerns and aspirations while there is flexibility in the process to do so;
- identifying constraints and opportunities.

**122.** In our view the consultation process fell well short of best practice. This is evidenced by how poorly the current plan change portrays the concerns and aspirations of the community compared to the previous process which involved meaningful involvement and consultation.

**123.** We are not out to stop change or development, as evidenced by involvement in the previous planning process. Rather we seek to ensure that the good things promised (such as the green corridor and infrastructure improvements) are properly designed, will be delivered as described (and when needed prior to adverse construction effects), and that due consideration is given to simple changes that could better integrate the plan change area with existing Riverhead, such as adequate front yards and tree planting. We very much would have preferred this submission to say that the process has been collaborate and effective, rather than needing to write such an involved submission and speak to these issues at a hearing and appeals if it gets to that.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Dianne Allan  
**Date:** Friday, 17 May 2024 8:00:17 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Dianne Allan

Organisation name:

Agent's full name:

Email address: Midwife.di@gmail.com

Contact phone number:

Postal address:  
 16 Munford Lane  
 Riverhead  
 Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Property address: Riverhead new development

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

Infrastructure- the lack of existing infrastructure is problematic with the current community.  
 Riverhead does not have the infrastructure to cope with turning Riverhead into a higher density area. Not all areas have footpaths. We often experience power cuts so more housing will put pressure on the grid.

Roading and traffic. It already it takes 20 minutes to get out of Riverhead on a weekday morning, with pretty much one road in and one road out. SH 16 is congested in the morning and evening with traffic coming from kumeu north. Council has done very little to improve the traffic issues. This is going to be magnified significantly if the proposal goes ahead.

Public transport is a nightmare for the existing community.

I or we seek the following decision by council: Decline the plan change

229.1



Submission date: 17 May 2024

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Emma Hood  
**Date:** Friday, 17 May 2024 8:00:20 pm  
**Attachments:** [PC 100 photos of flooding.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Emma Hood

Organisation name:

Agent's full name:

Email address: emmavrhoood@gmail.com

Contact phone number:

Postal address:

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:

Property address: Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

Flooding/Stormwater

Transport issues

Children's safety

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

- Flooding already occurs in the areas that are part of the proposal. Our house on Te Roera Place flooded in the Auckland Anniversary 2023 floods. With their statement that the effect on Te Roera PI/Duke St/Mill Grove is "less than minor/less than 30mm" we will flood again. The flooding that has occurred on Te Roera PI/Duke St roads prevented us from safely getting to or leaving our home. See pictures attached. The current stormwater systems need fixing before any new development takes place.

- There is inadequate transport infrastructure to support current traffic - there is already substantial delays in getting from Riverhead via Coatesville Riverhead Highway onto SH16 - and then flow of traffic on SH16 is slow, resulting in it often being backed up to Kumeu. This is not only during peak

weekday hours, but also in the weekends. With an increase in 1450-1750 new dwellings, the traffic issues will certainly increase. Something needs to be done to mitigate the current traffic issues, before any new development takes place in Riverhead.

- Coatesville Riverhead Highway is a busy road during school start and finish times - delaying traffic and increasing the risk to children. The crossing outside Riverhead shops is now needing to be managed by volunteers, as a child was hit last year. An increase in dwellings will increase the children walking/biking to school. The crossing needs to be made safer for the children already using the road, before any new development take place in Riverhead.

I or we seek the following decision by council: Decline the plan change

230.1

Submission date: 17 May 2024

Supporting documents  
PC 100 photos of flooding.pdf

### **Attend a hearing**

Do you wish to be heard in support of your submission? No

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.



Flooding Duke Street / Te Roera Place  
Auckland Anniversary 2023





## Flooding Auckland Anniversary 2023

Behind and in front  
of our property,  
before the property  
flooded

549





Flooding  
Auckland Anniversary 2023

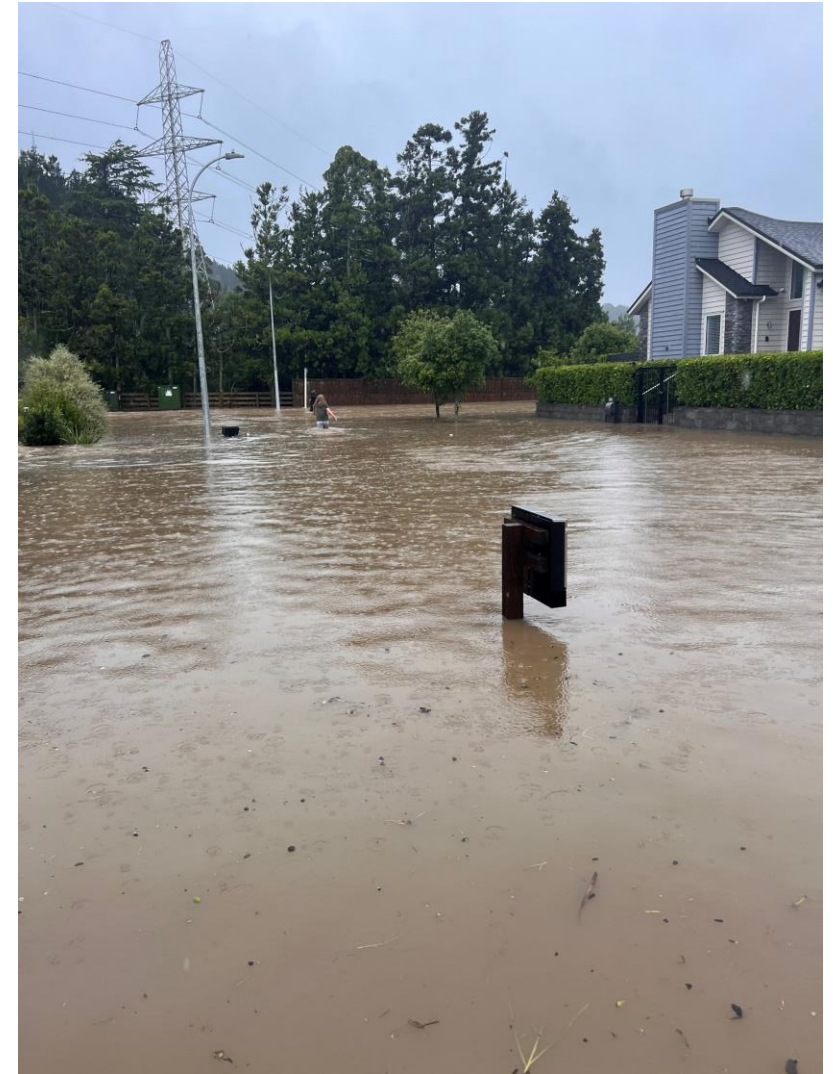
Looking across the road to our property,  
after we flooded and had to evacuate



550

Flooding Te Roera Place  
Auckland Anniversary 2023

#230



Page 6 of 7



Supplied by a neighbour – we weren't yet back in our property after we flooded Auckland Anniversary



**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Manav Vadhiparti  
**Date:** Friday, 17 May 2024 8:00:21 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Manav Vadhiparti

Organisation name:

Agent's full name:

Email address: shaftdogg971@gmail.com

Contact phone number:

Postal address:  
 50 Pohutukawa Parade  
 Riverhead  
 Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:  
 Appendix 6 - Neighbourhood Design Statement

Property address: 50 Pohutukawa Parade Riverhead 0820

Map or maps: -36.767044, 174.583524

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
 Excess Traffic congestion without the proper upgrades to infrastructure change.

I or we seek the following decision by council: Decline the plan change | 231.1

Submission date: 17 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? No

#### Declaration

Could you gain an advantage in trade competition through this submission? No



Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Trevor Gamon  
**Date:** Friday, 17 May 2024 8:00:29 pm  
**Attachments:** [Riverhead\\_development\\_submission\\_20240517195449.449.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Trevor Gamon

Organisation name:

Agent's full name: Trevor Gamon

Email address: trevorgamon@gmail.com

Contact phone number:

Postal address:  
 trevorgamon@gmail.com  
 Riverhead  
 Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:  
 Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:  
 Significant impacts to the character of Riverhead, no realistic traffic management. Poor storm water management, poor management of trees, rivers reserves and parks

I or we seek the following decision by council: Decline the plan change | 231.1

Submission date: 17 May 2024

Supporting documents  
 Riverhead\_development\_submission\_20240517195449.449.pdf

#### Attend a hearing

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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I oppose the plan change for the reasons set out in this submission. I would like to see the council work with the Riverhead Community Association to be given the opportunity to work with the requestors and the council to resolve matters raised in this submission. Matters of concern and remedies sought are listed below.

### **Transport:**

- 1.** The plan change fails to adequately recognise and propose transport infrastructure upgrades required to manage adverse effects on the wider transport network. For example, SH16 is at times completely gridlocked with commuter traffic, the queue to get onto SH16 comes back to Hallertau at 6.30am! During weekends the line to Boric (the Coatesville Riverhead Highway (CRH)/SH16 intersection) is at the golf course. Another 3,000 residencies at Riverhead will exacerbate this greatly. There are very few local employment opportunities, most people will commute to work, and the single route bus is inadequate, inefficient and unreliable. The road has no capacity for walking or cycling to Westgate or Kumeu. Driving on roads is the only option.
- 2.** Significantly, the development relies upon construction of a roundabout at the (CRH)/ Main Road (SH16) intersection to be built by Waka Kotahi NZ Transport Agency at some future time. Whilst this upgrade has been a long time coming it only addresses safety at the intersection. And is currently being designed to accommodate the current traffic issues only. It will not improve capacity of the network which is already often dysfunctional. We also understand that this project is not currently programmed or funded.
- 3.** The end of the NW motorway often backs up for a kilometre or more, and the roundabout intersection is routinely dysfunction creating huge traffic jams.
- 4.** The plan change fails to recognise comprehensive local network transport improvements (within existing Riverhead) are warranted necessary to manage adverse effects on local transport.
- 5.** The proposal is for limited local road 'upgrades'. But, to only deliver these in a fragmented and staged way based upon occupation of adjacent property. The upgrades do not have to be in place prior to construction when the first traffic impacts from construction traffic begins.
- 6.** Riverhead has under-provisioned streets, often with open drains, a lack of footpaths, unformed carriageway edges and few street trees. Some blocks are poorly connected and contain unformed paper roads. The development will increase pedestrian use over all of Riverhead, including to Riverhead School and to the two walkable pre-schools. All the realistic routes from the plan change area to destinations in Riverhead such as schools, pre-schools, shops, War Memorial Park and public walkways should be reviewed in terms of footpath provision and safety, and upgrades should be completed

prior to the main development starting. This is to enable safety pedestrian movements for the existing and future people and children of Riverhead.

**7.** The plan change fails to recognise that local and wider transport upgrades are necessary to complete prior to development (earthworks and civil) commencement to manage the effects of construction traffic and safety.

**8.** The huge development area will require extensive earthworks and civil construction, including thousands of truck and vehicle movements well before any residence is occupied. Traffic upgrades, such as turning bays and pedestrian networks need to be functional and safe before the heavy traffic begins. The current plan change proposal to require limited improvements prior to occupation of a dwelling fails to recognise and mitigate the adverse construction traffic effects which will be particularly severed at main access routes and where locations where site access is feasible.

**9.** New subdivisions often lack on street parking. Demand for parking would spill over into the existing community where there are no formed road edges and open stormwater drains. Adequate on street parking needs to be required as we don't have the public transport options available. Transport – remedies sought

**10.** Include provisions which state that development of the plan change area cannot proceed until wider network capacity and safety issues are addressed.

**11.** Include provisions which state that development of the plan change area cannot proceed until local road improvements have been completed, including function and safety assessments and any required upgrades to footpath routes and networks in Riverhead likely to be used by residents of the plan change area to access local destinations.

**12.** The enormous retirement village privatised site creates pinch points of available connectivity between the plan change area and existing Riverhead. These should be recognised and addressed by requirements for upgrades in the plan change provisions. For example, the road and pedestrian network of Te Roera Place, Duke Street, Cambridge Road, Queen Street, Alice Street and King Street will all be well used routes for people moving in and out of the plan change area, as pedestrians and in vehicles. These roads, and further routes to Riverhead School all warrant assessment and specific upgrades to ensure they are functional and safe. Similarly, the connection between the plan change area and Riverhead War Memorial Park has not been recognised as a primary route which is restricted by the CRH and the retirement village development. Specific provisions should also be applied to this area to ensure that development enables safe and logical east/west connections and road crossings.

**13.** Include provisions which require all required local and wider transport improvements to be in place prior to earthworks and related traffic impacts commencing.

**Commercial Zoning – Local Centre Zone and the Neighbourhood Centre Zone:**

**14.** A Local Centre zone is proposed at the corner of Riverhead Road and the CRH and a Neighbourhood Centre Zone is proposed opposite Riverhead Point Drive (Hallertau).

**15.** Riverhead already has a consolidated area of Business Mixed Use zone and Local Centre zones sites which house 2 mini-marts, a real estate office, a restaurant/bar, bottle shop and a vape shop and Heritage café/takeaways on School Road. There is also the local vet and two-preschools, Lulu's café, and other retail and commercial yard type activities. The mixed-use zoned triangle contains a development which when completed will include a series of ground level shop or business, and the final part of the triangle is also under development and also zoned Business Mixed Use, therefore, is also available for commercial use. Hallertau sits further down the CRH. **16.** The basis for the proposed commercial zones is an economic report which predicts future demand (Appendix 7 – Centres Assessment). This report provides a cursory summary of the existing commercial activities and zoning. It also bases predicted demand on a 'Riverhead Core Retail Catchment'. The report provides no basis for the extent of this catchment despite it being a formative assumption. Astonishingly, the catchment extends and wraps around Kumeu and goes all the way to the Dairy Flat Highway.

**17.** Defining this as a catchment for Riverhead as a retail destination is ridiculous at both extents of the area shown. People in the Kumeu area have no incentive to travel to Riverhead for shopping. Kumeu is well served with a supermarket and a huge range of retail and commercial services. Council's own consultation documents for Kumeu show the extensive land at Kumeu dedicated for these activities. See below.

**18.** People east of Coatesville are well served by old Albany and the Albany centre and beyond. Presuming that these people would also flock to Riverhead for shopping is not realistic because Albany is more accessible and contains a much greater range of shops and services.

**19.** The economic report also does not appear to consider the retirement village development and the hospitality, medical and other services it will contain which would be available to the residents and to the public. Restaurants, retail and healthcare facilities are specifically enabled by the proposed Sub-Precinct A within the retirement site.

**20.** The proposed THAB zoned areas also allows a range of commercial and service activities (via a RC). It is not clear why the economic report does not account for the possibility that the THAB zone can also contain businesses and retail, especially the

area in proximity to the proposed Neighbourhood Centre zone where this development may be likely.

**21.** Another concern is that the proposed isolated Neighbourhood Centre Zone (adjacent Hallertau) will exacerbate an undesirable pattern of commercial strip development down the CRH.

**22.** A complete and justified basis for zoning this land as a Neighbourhood Centre Zone has not been provided. The proposed zone does represent a defined area of FRL landholding which naturally raises the question as to whether this discrete proposed zone is motivated by commercial gain rather a demonstrated need or sound design principles.

**23.** The original structure plan for Riverhead South reinforced the community's expectation of a defined centre. The existing Riverhead centre is located in a relatively consolidated and logical manner, and also has connection to Riverhead War memorial Park.

**24.** The Urban Design assessment (Appendix 6) shows that the main Local Centre Zone is within a 400m walkable catchment for all residents within the plan change area. So, the isolated Local Centre Zone is not justified by pedestrian accessibility. As noted, the existing Riverhead centre supports two mini-marts or dairies, and major supermarkets are located on all routes west (Kumeu), South (Westgate) and east (Albany).

Commercial Zoning – Local Centre Zone and the Neighbourhood Centre Zone – remedies sought 25. We want any proposed commercial zoning to be justified by economic analysis that is based on a clear outline of existing zoning and activities in Riverhead, including under-utilising of zoned land and potential capacity, and recognition of the activities and services that would be provided by the retirement village and commercial activities that can be undertaken in the THAB zone via resource consent.

**26.** We want any proposed commercial zoning to be justified by economic analysis that is based on a well-reasoned and justifiable customer catchment which recognises the commercial and retail centres of Kumeu, Westgate and Albany, and does not unrealistically anticipate that people who live near these centres would instead travel to Riverhead for their shopping needs.

**27.** We want any new business zoning to demonstrate a consolidated and legible town centre, not exacerbate strip commercial areas fronting the highway. Most importantly by removing the proposed Local Centre Zone opposite Riverhead Point Road.

**Residential Zoning - Mixed Housing Suburban Zone:**

**28.** Most of the land is proposed as Mixed Housing Suburban Zone. This zone allows for two and three storey detached and attached housing in a variety of types and sizes. Up to three dwellings are permitted as of right subject to compliance with the standards.

**29.** In comparison, existing Riverhead is mostly Single House zone. The plan change will result in much more dense development and generally taller houses and lots of multi-unit townhouses. Existing Riverhead is characterised by many large trees on private properties.

**30.** In contrast, large trees would be infrequent in the proposed Mixed Housing Suburban Zone which has minimal landscaping requirements (only 20% and this can be paved if there is canopy cover over (IX6.11. Landscaped area within the Mixed Housing Suburban Zone) and only a 2.5m front yard standard which is not adequate for large growing tree. The outcome is that buildings will dominate the neighbourhood character. Overall, due to a lack of space or a requirement to plant trees on private sites, the neighbourhood character would be markedly different compared to existing Riverhead. We expect this difference in character to be noticeable and jarring, resulting in a lower quality of amenity. We want any new development to fit into the existing urban fabric of our community.

**31.** We are not sure that this character represents the ‘unique sense of place’ described as an intension in the precinct description.

**32.** No requirements for road reserve tree planting are proposed either, leaving the street tree outcome uncertain or minimal. Even in the green corridor there are no measurable outcomes for vegetation cover or trees.

**33.** The proposal fails to mention or adopt the council Auckland's Urban Ngahere (Forest) Strategy. The strategy recognises the social, environmental, economic, and cultural benefits of our urban ngahere (forest), and sets out a strategic approach to knowing, growing, and protecting it. It seeks to achieve increased canopy cover to 30 per cent across Auckland's urban area, and at least 15 per cent in every local board area. The proposed plan change should seek to provide overall canopy cover of 30% which would provide a range of health, social and economic benefits including reducing the urban heat effect of roads, buildings and impermeable surfaces. This could go some way to integrating the old and the new.

**34.** The precinct description also seeks to ‘enable transition from the rural to the urban environment’. It achieves this outcome abruptly, rather than a smooth transition.

**35.** The zoning proposed does not provide any transition at the rural edge, for example, single house zoning could be applied to the outer 100 metres. There is little attempt to provide certainty of transition of scale or density, overall. Policies which direct this



outcome adopt soft non-comital language, such as ‘Encourage’ (policies 15 and 16). It is not clear how ‘encourage’ has any real influence at the resource consent stage.

**36.** A 5 metre rear yard setback standard is proposed at the rural zone interface. This is to landscape or plant trees in the rear yard. A 5 metre yard would have no material visual difference to the abrupt transition between residential development and the rural environment. A larger rear yard, say 15m with a requirement to plant at least one large tree and a rural fence typology are obvious designs requirements that would go some way to achieving the intended transition outcome.

**37.** There is also no requirement to provide adequate front yards to enable the planting of trees. This was a requirement of the Riverhead South development, which contributes to the ‘tree-ed’ neighbourhood character established and respects the character of old Riverhead and the many prominent mature trees. This requirement should at least apply to the rural fringe parts of the site and would also contribute overall to sense of transition between the rural and residential land uses.

**38.** Another formative design requirement of Riverhead South was a rule prohibiting tall front yard fences. This outcome can also be observed widely in Riverhead South and contributes significantly to a sense of spaciousness with buildings set back and front yard landscaping visible. The plan change seeks to removes the usual requirement for low or visually permeable front yard fences without any explanation as to why. (refer IX.6. Standards page 11). This may result in a proliferation of tall front yard fences detrimental to a desired spacious character. It also has negative effects on CPTED outcomes.

**39.** There is no requirement to plant regular street trees on roads. Whilst often achieved during development, the supporting AUP policy context is vague. To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, we request minimum tree quantity outcomes are required for new roads. The density for the housing will result in no tree cover of value, so the work must be done in the streets.

**40.** The zone also does not propose any design response to the proposed green corridor network, aside from a lonely fence height standard. There are no provisions proposed to give effect to the Urban Design recommendation for: “a high quality and vegetated interface for higher density development along the key movement routes and adjacent to existing residential development which contributes to the current landscaped character of streets in Riverhead.” There is also little detail on how this will be achieved, given council parks recent directive for no gardens within the streetscape we are left wondering what this ‘green corridor’ will contain.

#### **Residential Zoning - Mixed Housing Suburban Zone – Relief sought**

- 41.** Generally, we accept that density needs to be increased compared to the predominant Single house zone of Riverhead. But this should be balanced by stronger requirements for good urban design (for example, low front yard fences) and green infrastructure (for example requirements to plant trees on sites and on roads). Graduated density should be considered at the transition to rural zoning and higher density can be placed near the neighbourhood centre and open spaces.
- 42.** We want front yards sized to be adequate for planting large trees, for example, 6 metres. We want a requirement for each site in the zone to plant one tree capable of growing 6m plus in height.
- 43.** We want specific yard and landscape standards to apply at the rear of all sites which adjoin a rural zone to help establish a transition between the residential and rural environments.
- 44.** We want a front yard fence control applied which applies H5.6.15 Front, side and rear fences and walls.
- 45.** To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, we request minimum tree quantity outcomes are required for new roads. Trees are often the last consideration and underground infrastructure dominates the road corridor.
- 46.** Overall, we want the plan change to require sufficient private and public planted areas to give effect to the intent of Auckland's Urban Ngahere (Forest) Strategy. This will also help integrate the higher intensity development with the character of existing Riverhead and the rural interface.

#### **Residential Zoning - Terrace Housing and Apartment Zone (THAB):**

- 47.** The THAB zone provides for high intensity living in the form of terrace house and apartments and should be predominantly around centres and the public transport network to support the highest levels of intensification.
- 48.** North of Riverhead Road this zone is located within the retirement village area. If that goes ahead this area of THAB zoned land would be developed with a retail/hospitality corner and privatised retirement apartments.
- 49.** The other area of THAB zone that will be available for development and housing which is not privatised is immediately west of the Neighbourhood Centre zone at the corner of Riverhead Road and CRH. This is overlaid with Sub-Precinct B
- 50.** There is very little reasoning provided for this discrete area of zoning proposed, and why it does not also front CRH, or wrap around the south of the Local Centre zone. We do not think the proposed zoning reflects a land parcel, and this may be influencing the

proposed location and extent of that zone. Residential Zoning - Terrace Housing and Apartment Zone (THAB)- remedies sought

**51.** We want any THAB zone location and extent to be based on a reasoned analysis and reflect the intent of the zone which is to provide density around a transport hub and/or a town centre.

**52.** We want the transition edge of THAB to the Mixed House Suburban zone to contain a local road to create a natural transition space between the different densities and building scale/forms. Mixed Rural Zone:

**53.** A mixed rural zone is proposed at the northern part of the plan change area.

**54.** This is a response to the obvious flaw with the original (pre-notification but rejected by the council) proposal which proposed this flood plain area as suitable for residential development.

**55.** The main issue with this zoning is that the land will not be able to be further developed or subdivided. **56.** The outcome is that the 'key move' of a green corridor extending to the river, and an esplanade reserve vested as public space to the council cannot be realised. The maintenance and enhancement of public access to and along rivers is a matter of national importance under the RMA. The current proposal fails to achieve this. Mixed Rural Zone – relief sought

**57.** We want provision to require the 20m margin of land from the stream to be zoned as public open space and vested to the council.

**58.** We want the green corridor to be extended to the open space esplanade reserve and be available for public access. The river is an important taonga for our community. Previous development has turned its back to it.

### **Flooding and Stormwater:**

**59.** We are concerned that current best practice stormwater system design methodologies (as outlined within Appendix 10) would not adequately address adverse effects of the development. Council's current practice has failed Riverhead as evidenced in the Auckland Floods February 2023 where new developments designed to council's standards resulted in flooding harm.

**60.** We request robust peer review and an overall bottom line requirement that stormwater will not cause upstream or downstream adverse effects.

**61.** Objective (6) is very weak in that it that allows for the outcome of inadequate stormwater management: (6) Stormwater is managed to avoid, as far as practicable, or otherwise minimise or mitigate, adverse effects on the receiving environment.

**62.** In our view, if there is so much uncertainty that the requestor seeks scope for it to not be 'practicable to 'avoid, remedy or mitigate adverse stormwater effects', then this indicates a lack of confidence that stormwater issues can be appropriately addressed. We consider that the objective must be amended to remove the caveat 'as far as practicable' so the adverse stormwater effects must be avoided, remedied or mitigated.

**63.** Stormwater systems across the plan change area are proposed via a 'central stormwater management treatment spine' intended to be part of a 'multi-purpose green corridor' To ensure a coordinated delivery there needs to be a requirement for this to be designed and agreed prior to development.

**64.** Without an overarching agreed plan for the stormwater corridor, it is not clear how an overall integrated stormwater system will result from development of multiple individual lots and/or stages and what specific land parts must occur on. The risk is that fragmented and uncoordinated design and implementation would result due to a lack of design clarity and responsibilities.

**65.** Despite a 'designed' stormwater spine system' being proposed, zoning is not used to clarify the location and extent of the system. The extensive land required for this purpose is inappropriately zoned residential. Zoning would provide certainty of the land required for the stormwater and green corridor purposes.

**66.** A matter of significant concern is that the open space and stormwater functions of the corridor will be located over many separate parcels, landowners, and development stages. It is also located on parcels owned by parties not subject to the plan change.

**67.** There is no requirement for the overall green corridor to be designed prior to development. If this was a requirement then it would be clear what needs to occur and where. The lack of clarity will likely result in a fragmented outcome overall due to separate parties leading different parts of the development at different times.

**68.** It is recommended that a policy be added to require a clear overall design for the combined stormwater and open space corridor needs to be agreed by council prior to development within the precinct. We request objectives, policies and standards be included to define the corridor, its various functions, and require it to be implemented in a staged and coordinated manner.

**69.** Policy 17 states: "(17) Require subdivision and development to be consistent with the water sensitive approach outlined in the supporting stormwater management plan, including: ..." It is not appropriate for a plan change to require adherence to a document that has not been reviewed and accepted by the council. The report itself clarifies: "This report has been prepared solely for the benefit of our client with respect to the particular brief and it may not be relied upon in other contexts for any other purpose without the express approval by CKL."

**70.** In general, it is not good practice for an enduring planning document (the AUP OP) to refer to a third party report prepared in support of a plan change.

**71.** The supporting stormwater report was prepared when 22 Duke Street was proposed to be zoned for residential development. This land is now largely proposed to be zoned rural, and consequently could not be subdivided. This casts doubt as to whether this land can still be used for stormwater management and conveyance to the Rangitopuni tributary. It is not clear if this affects the integrity of the stormwater report findings.

#### **Flooding and Stormwater - relief sought**

**72.** We want robust peer review and an overall bottom line requirement in the plan change provisions that stormwater will not cause upstream or downstream adverse effects.

**73.** We want the clause of 'as far as practicable' to be removed from Objective (6), for example: "Stormwater is managed to avoid, or minimise or adequately mitigate, adverse effects on the receiving environment."

**74.** We want a requirement for the overall stormwater corridor system and green network design to be agreed with council prior to development and not incrementally addressed via multiple separate development proposals. This would likely require staging of development to align with development of the stormwater/green network corridor necessary to support that development.

**75.** We want clarity of the intended use and function of 22 Duke Street with regard to stormwater.

#### **Wastewater:**

**76.** Residents report that the existing system is prone to failure, often setting off alarms particularly during rain events, we understand due to groundwater and ingress of water into the council's system. The concern is that the existing poor performing system is not fit for purpose overall, and that expanding it over a large area with high groundwater will negatively impact everybody.

#### **Wastewater – relief sought**

**77.** We want provisions which ensure that the wastewater system is appropriate and fit for purpose, and that addition of the plan change area will not negatively impact existing and future users.

#### **Parks and Reserves:**

**78.** The 'multi-purpose green corridors' are defined by the requestor as a 'key move' from an urban design perspective. This outcome agreed and supported in principle.

**79.** There is no requirement that the green corridor be offered to council for vesting, but this is commonly required under existing AUPOP precinct plans to provide certainty for council and developers. In our mind, a green corridor is not a wider road with more street trees.

**80.** Riparian margins are to be vested, but these are minimal and go nowhere near establishing the green corridor which needs to be located on a variety of land tenures. There needs to be a requirement that land necessary for the green network, but not accepted for vesting by council, is developed and held by an entity, like the proposal for riparian margins. Otherwise, parts of the network might not get delivered.

**81.** The intent of a contiguous open space network comprising of stormwater and passive open space functions is supported. Unfortunately, the provisions fail to define what the corridor will comprise of in real terms and do not require it to be delivered in practice. For example, what will be located in-between the stormwater ponds?

**82.** Policy (13)(d) suggests “Co-locates smaller open spaces along the multi-purpose green corridor to achieve a connected network of open space.”

**83.** This policy shows a lack of consideration that the separately proposed ‘neighbourhood parks’ are limited to 3 separate locations and a flawed presumption that council would accept ad-hoc vesting of a range of “smaller parks” required to join-up the green corridor network. The network may be partly on the road reserves, but if this is the intention, then that needs to be clear and also needs to be a requirement of the road design.

**84.** The policy fails to incorporate the depth of the description of the green corridor in the s32 report: “The central north-south multi-purpose green corridor is a key structuring component in both the Greenways Plan and the proposed Structure Plan. Along with the collector road, this green corridor accommodates both passive and active open spaces, footpaths and dedicated cycleways. It also incorporates an existing intermittent stream.”

**85.** A clear description the intended corridor composition and the types of land it will occupy is required in the plan. As noted, it appears that parts of the green network would likely be upon road reserve. However, there are no provisions which explain this or require ‘linking roads’ to deviate from a standard design to perform this function. For example, to ensure that necessary roads are designed to be a width adequate to contain a high level of green infrastructure in a dedicated or protected zone within the road reserve.

**86.** Clear expectations are needed in the plan to ensure that the multiple components of the green networks are considered and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor. Without this being a clear

directive it is likely that conventional design would be applied to the various parts, and overall the green network would not be cohesively designed and delivered.

**87.** Overall, clear objectives, policies, standards and design/outcome expectations are required in the plan to ensure the overall ‘multi-purpose green corridors’ is delivered as anticipated. Policy 13 as drafted will not achieve this outcome.

**88.** The precinct description seeks to realise “...the opportunity to establish green corridors through the precinct”. Policy (13) only requires the council to encourage “...the provision of a continuous and connected multi-purpose green corridor”. The word ‘encourage’ is a weak and non-committal directive. Clauses (a) to (d) provide an unclear framework without specific detail of what is ‘required’ to be achieved. A stronger word such as ‘require’ is needed to ensure the overarching urban design ‘key move’ of the green corridor is delivered.

**89.** Policy 17 requires development and subdivision to provide “... a central stormwater management treatment spine through the precinct in general accordance with the multi-purpose green corridor in the locations indicatively shown on IX.10.2 Riverhead: Precinct plan 2;” This cannot be achieved in isolation of an overall agreed plan which spans the plan change area.

**90.** The supporting Stormwater and Flooding assessment contains a ‘Preliminary Masterplan’ which shows significant areas of land to be occupied by stormwater devices and green infrastructure, extending in area at some locations much further than shown on Precinct Plan 2. **91.** If this drawing represents the modelled stormwater requirements, then the precinct plan should also include the same information so that developers and the community can understand what is required.

**92.** The supporting Urban Design report (Named Neighbourhood Design Statement) shows the multi-purpose green corridor extending via the land at 22 Duke Street to the Rangitopuni tributary and beyond via existing and potential future esplanade reserves alongside the stream and river.

**93.** We support the connection and the esplanade reserve alongside the tributary and note the extensive high quality esplanade reserve that has resulted from the Riverhead South network. A long term aspiration is to have a complete network of coastal connections. The proposed zoning of 22 Duke Street as (predominantly) Mixed Rural removes the possibility of subdivision and vesting of esplanade reserve along the tributary. The small parts which are proposed to be residentially zoned would appear to still leave the parent site over 4HA, and therefore not trigger the esplanade reserve vesting upon subdivision. We expect that this is an unintended consequence of changing the proposed zoning. We request that the 20m margin of the tributary be zoned Open Space – Conservation, as part of the plan change, and that its heavily weed infested margins be restored and planted, and that land be vested to the council. These

are the outcomes which would have occurred if the land was able to be subdivided and are necessary to secure a necessary part of the long-term aspirational esplanade reserve network.

**94.** Objectives, policies and standards are also required to achieve public access links from the development to the zoned esplanade reserve. If 22 Duke Street is available for stormwater management purposes, then this outcome should be easily achieved, especially if parcels are subdivided as drainage reserves, as this may trigger the 4Ha or less lot size adjacent to the tributary to trigger esplanade reserve vesting.

**95.** There is no direct requirement to deliver the 3 proposed neighbourhood parks, only an indirect reference to section E38. We seek a direct requirement to deliver the parks, presuming support from council parks division.

**96.** One high value (notable value) Beech tree is identified which is clustered with many impressive specimen trees (including a 13m tall Kauri). The Beech sits within a cluster of magnificent trees worthy of retention and is an obvious location for a Neighbourhood Park. Policy (12) seeks that the Beech tree is incorporated into an open space, but Precinct Plan 2 does not identify this location for a Neighbourhood Park. This inconsistency needs to be corrected. This cluster of trees, planted by a family who have been in Riverhead for multiple generations could further help connect the character of existing Riverhead to that of the plan change area.

**97.** The Beech tree and surrounds should not be compromised by stormwater functions which also appear to be proposed within this location (refer structure plan) page 8.

**98.** Policy 12 does not require the retention of 'other mature trees that are worthy of retention' by caveating the policy with 'where possible'. We seek that the option to 'not retain worthy trees' be removed and more directive wording applied. The site is a huge greenfield area with a lot of flexibility for development locations. Any trees of value should be required to be retained. The value of this cluster extends beyond the arboriculture assessment.

**99.** Large trees located near the CRH appear to not be recorded in the arboricultural report which appears to be an error.

**100.** The green corridor graphic, or 'east-west connections reflecting potential original portage routes promoting awa ki awa linkage' is shown on Precinct Plan 1 extending along and outside of the southern plan change boundary. Policy 19 contains an obtuse requirement for development to acknowledge key views and spiritual connections respond to identified on IX.10.1 Riverhead: Precinct plan 1 in the layout and/or design of development; in particular, sightlines to Te Ahu and Pukeharakeke, and connections to Papakoura Awa and Te Tōangaroa. **101.** We of course cannot speak for mana whenua but note that the actual outcomes required are limited to locating and orientating



streets and public open spaces to reference and respect the Māori cultural landscape values. This is unlikely to result in any material outcome in the development form. The proposed west-east roading pattern already adequately achieves the expected outcome. It is not clear how the development is required to respond to the southernmost connection, that is not even within the plan change area.

### **Parks and Reserves – relief sought**

**102.** We want the requirement and composition for the green corridor to be determined and agreed in principle with council prior to any development, so that the required environmental, stormwater and connectivity outcomes are understood and delivered appropriately and fully by each discrete development parcel or stage.

**103.** We seek that necessary parts of the green corridor infrastructure which do not comprise of roads, neighbourhood parks or drainage reserves are offered to council for vesting or protected and maintained in perpetuity by an appropriate legal mechanism (as per IX.6.3. Riparian margin).

**104.** We want a clear description the intended corridor composition is required in the plan, and an explanation of how the multiple components of the green networks are to be determined and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor, and any other land that may be required.

**105.** We want the green corridor to extend to the Rangitopuni tributary and provide a public connection to a zoned open space esplanade reserve.

**106.** Overall, clear objectives, policies, standards and design/outcome expectations are required in the plan to ensure the overall ‘multi-purpose green corridors’ is delivered as anticipated, because Policy 13 as drafted will not achieve this outcome.

**107.** We want a neighbourhood park to be located to include the Beech tree and the overall grove of high value trees at this location. Retirement Village (Matvin Group land):

**108.** The technical approach of the plan change with respect to the Matvin retirement village land is unclear. It is noted in the s32 report but not in the plan change provisions. It is also noted in the urban design report as a consented development, containing buildings up to 5 stories tall, with 410 dwellings including 310 apartments. It is also included in the supporting stormwater report.

**109.** The plan change maps and provisions do not respond to the scale and poor urban design connectivity outcomes of the retirement village development. The only response is to propose zoning part of the site as THAB and the remainder as Mixed House Suburban, and Sub-Precinct B. This is of concern because the retirement village is located at the interface of the plan change area and existing Riverhead at Cambridge Road. It occupies a 500 metre long flank and only provides for a single pedestrian cross connection, available during daylight hours only.

**110.** The development of the retirement village is not certain to occur, however, the plan change proposal treats it as a certainty. Evidenced by the lack of local roads, pedestrian connectivity, or a considered interface with Cambridge Road, all of which would be expected on a greenfield area some 10 Hectares in area and positioned at a critical location. If the retirement village does not go ahead then the plan change should be able to provide a good practice development framework for this area consistent with the remainder of the plan change area, and adopting the key design drivers of the Urban Design report, being: o a connected physical environment o an integrated community o access to nature o vibrant and local o housing choice and affordability o proximity/convenience

**111.** Concerningly, despite recognising the retirement village (by way of omitting expected outcomes such as a green corridor, local roads and pedestrian connectivity, and a considered interface at Cambridge Road) the plan change also does not propose any wider response to the retirement village form and function, should it go ahead.

**112.** For example, the Urban Design report recommends: “a transition between taller buildings around the centre to lower densities and building forms in the remaining areas of the site” (pg 51). Requiring roads and pedestrian routes to interface with the lone public route through the retirement village should also be required in the plan change. The Sub-precincts which seek to provide some level of transition of buildings do not adjoin the retirement site but are contained within it.

**113.** Especially concerning is the detrimental impact that the retirement village will have on connectivity for the northern part of the plan change area and movements to and from the adjacent existing Riverhead. This matter is noted also in our transport section. Retirement Village (Matvin Group land) – remedies sought

**114.** It is requested that the plan change be complete and robust in terms of dealing with the two scenarios of the retirement village being in place or not. Requiring cross-site connectivity and local roads for the scenario of the retirement village not being built. Structure Plans and Consultation:

**115.** Back in 2006, prior to being rezoned for development, Riverhead South also went through a plan change which was informed by a Structure Plan. This was Council led and involved the community through a series of consultation meetings including interactive design workshops. The people of Riverhead were actively involved in a meaningful way over a carefully planned process.

**116.** The structure plan was adopted into the then Rodney District plan ‘SPECIAL 30 (RIVERHEAD SOUTH) ZONE’. This included a comprehensive range of issues, objectives, policies, standards and assessment criteria to ensure that development reflected the needs of the community and council’s intent, whilst providing for good quality development.

**117.** That document delivered a planning framework informed by community participation. A range of built form outcomes are visible in Riverhead South today which were a product of this community/council collaborative process. Most significantly there was an emphasis on dwellings being set back from the street and for low or no front fences. These create a sense of spaciousness and openness at the front of houses and make for safe streets with high levels of passive surveillance.

**118.** These previously expressed community desires are not captured by the proposed plan change. The obvious outcome is that the character of the plan change area will be markedly different and not consistent with existing Riverhead. Density can be provided, but it can also be balanced with adequate and open front yards and a requirement for trees. Mature trees are a defining element of existing Riverhead, including Riverhead south where significant trees were retained and sites are large enough to accommodate new large growing species.

**119.** In stark contrast the 'Structure Plan' (refer Appendix 4) supporting the current plan change application was not prepared with meaningful community involvement. Community consultation involved a meeting over a coffee with some members of the RCA, 2 'drop in community sessions and a summary of 'feedback'. In our view, these represent a token level of consultation designed to 'tick the box'.

**120.** We do not understand why the previous council led (but developer funded) process was collaborative and genuinely engaging, and the current process has been superficial, how is that democratic?

**121.** The Quality Planning website outlines good practice consultation for structure planning. It says: Consultation with key stakeholders and the community affected is an important component of the structure plan development process. The number and type of stakeholders identified and consulted with for a structure plan will depend on the scale and characteristics of the area and the issues to be managed. To assist with consultation, it is good practice to develop an overall consultation plan for all groups including key stakeholders, tangata whenua and the wider community. This helps to identify all stakeholder and ensure that consultation and communications are managed in an integrated and co-ordinated way. This can also help to provide certainty to stakeholders about the opportunities to input into the structure plan process and the how the various consultation processes will be integrated into the final output. It is important that the communication or consultation plan recognises the potential for land ownership to change during the course of the structure planning exercise and any subsequent RMA plan changes. Commencing consultation early in the process is important, and can help with:

- obtaining stakeholder buy-in to the process;

- gauging community and stakeholder levels of acceptance to broad concepts (such as the overall level of development) being proposed;
- fulfilling statutory duties under the RMA, LGA and Land Transport Management Act;
- incorporating and working through stakeholder concerns and aspirations while there is flexibility in the process to do so;
- identifying constraints and opportunities.

**122.** In our view the consultation process fell well short of best practice. This is evidenced by how poorly the current plan change portrays the concerns and aspirations of the community compared to the previous process which involved meaningful involvement and consultation.

**123.** We are not out to stop change or development, as evidenced by involvement in the previous planning process. Rather we seek to ensure that the good things promised (such as the green corridor and infrastructure improvements) are properly designed, will be delivered as described (and when needed prior to adverse construction effects), and that due consideration is given to simple changes that could better integrate the plan change area with existing Riverhead, such as adequate front yards and tree planting. We very much would have preferred this submission to say that the process has been collaborate and effective, rather than needing to write such an involved submission and speak to these issues at a hearing and appeals if it gets to that.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Rachel Pickett  
**Date:** Friday, 17 May 2024 8:00:33 pm  
**Attachments:** [Plan change 100 submission\\_20240517195439.180.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

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#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Property address: Land identified in the Private Plan Change by Riverhead Landowner Group on western side of Riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

We live locally and oppose the plan change for a number of reasons - these are outlined in the attached submission

I or we seek the following decision by council: Decline the plan change

233.1

Submission date: 17 May 2024

Supporting documents

Plan change 100 submission\_20240517195439.180.pdf

#### Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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We are a young family who live in Riverhead South and have done for the past 6 years. We love the semi-rural village feel of Riverhead and hope that any proposed development embraces this and is designed to compliment it. In its current form we oppose the plan change. We are very concerned about this proposed plan change (Plan Change 100) for a number of reasons in particular:

- Infrastructure – in particular traffic
- Schooling
- Zoning
- Master planning/green spaces

#### **Traffic infrastructure and the upgrades to SH16**

Given the nature of our work (consultant and construction) and the fact that we have young children we have no option but to drive to work (if I were to use public transport it would take half a day just to get to work). Currently during the work week, we often leave extremely early as it is difficult to predict how long it will take to get anywhere both along CRH (which can be back up as far as the golf club and Hallatau on a regular basis) and along Old North Road. Some days (in order to drop my children to daycare) to get to the Taupaki round-a-bout from Riverhead can take up to ½ hr (when in reality it is a 5 min drive). At the weekend if we have errands to run we also get up early to undertake these as CRH again regularly backs up for over a kilometre.

The plan change relies heavily on the proposed upgrades to SH16 – which are desperately needed to improve safety however do not address capacity issues and which are currently on hold due to funding issues. Even if this was completed an additional 3000 residential properties (6000 additional vehicles) will continue to aggravate this. It is also worth noting that this highway is promoted as an alternative route north and over weekends (particularly long weekends or holidays) is heavily used by non locals accessing west coast beaches, outdoor activities (e.g. mountain biking, horse riding etc) and Northland.

Under the current layout the end of the Northwestern Motorway (Brigham Creek Round-a-bout) is also subject to a significant volume of traffic and ever day has a traffic jam, not only through the round-a-bout, but more often than not stretching back almost to the retail centre (over a kilometre away) – the plan change does not take into account traffic impacts on this part of the network or further afield (Taupaki, Kumeu, Waimauku).

The plan change fails to address the impacts on the surrounding roading networks during the construction of the proposed development. In order to undertake the civil works required for such a development there will be many thousands of heavy truck movements, on local network roads which are already under stress (e.g Old North Road).

Given these concerns we would like to see provision in the plan that until the wider network issues are address development cannot proceed.

The plan change does not address how it would form roading networks within the development that embrace and compliment the existing wide feeling, safe streets and address off street parking requirements. Given the distance from the city, the reliance on vehicles to get around for work, schooling, sport, errands etc many modern developments fail to design for the number of vehicles



that are likely to be present (minimum 2/household) and allow for on street parking bays. There is no design requirements within the existing plan to plan for safe streets with clear open pathways – many of our children walk to primary school/day care, ride to the playground and local shops, in the current Riverhead South the wide open street mean that my young children can safely navigate the footpath and (due to the open nature, lack of high fences and hedges) can see cars reversing from driveways. In a country where there are so many preventable deaths from accidents in driveway/footpath space it makes sense to design street which can be navigated safely by all. We would like to see design provision within the plan to address parking and street design that compliments the existing development.

### **Schooling**

The current Riverhead Primary school is currently nearing/or is at capacity, as parents of young children this is extremely concerning. Although the supporting document mentions that it has had discussions with MfE it does not provide any detail on how it will address the lack of capacity for primary right through to secondary schooling in the area. It also does not address the fact that a lack of intermediate or secondary schools in this area and an increase in housing will directly impact the traffic volumes and roading infrastructure which is already under pressure, as many students have to travel for schooling.

### **Residential zoning/Parks and Reserves**

The current plan is for mixed housing suburban which allows for essential medium density housing. As opposed to the rest of Riverhead which is largely single houses. We feel that any development if should be commensurate with the existing community and “village feel” and therefore should be **single house zoned**, with integrated landscaping and linked greenspaces. Part of what is nice about the current Riverhead South is the open feeling streets, linked green spaces (parks/open spaces) and decon point walkway. As evident in other well executed residential developments (e.g. Hobsonville Point) the water side walkway, linked green space and pocket parks are well utilised by the local residents. There is very little design detail in the existing plan documents and although the plans look pretty in concept there appears no requirement for the concepts to be implemented.

### **Commercial zoning**

Riverhead already has a commercial area which is very busy and highly utilised by the local community, with additional space also allowed for in the new development opposite Memorial Park. The proposed plan change commercial space feels disjointed given the existing commercial development. The existing commercial centre provides well for the local community, with large retail centres in Kumeu, Westgate and Albany serving all additional requirements. As stated above part of the appeal of living in Riverhead is its semi-rural village feel creating disjointed stretched out commercial centre would detract from this.

The existing plan also lacks connectivity to the existing neighbourhoods which could be improved.

The supporting documents do not adequately address many of these issues nor set out any requirements when it comes to implementing a design which feels right for the existing community. We are not out to prevent development of this land in principle, however, hope that many of the concerns around infrastructure, planning and design aspirations can be addressed and the

requirements outlined so that the developers are required to deliver on these and the eventual development feels like part of the community.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Philip Doughty  
**Date:** Friday, 17 May 2024 8:30:15 pm

---

The following customer has submitted a Unitary Plan online submission.

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Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Property address: Land identified in private plan change by riverhead land owner group 80.5 ha

Map or maps:

Other provisions:

Traffic congestion

Storm water

Village feel & character

Parks and reserves

Infrastructure

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

Riverhead is a small rural town that is already bursting at the seams. We are rapidly losing our village feel. We have had significant flooding already. Traffic is Extremely bad at generally any time of the day. Our infrastructure can't cope with existing population let alone the proposal to double it.

I or we seek the following decision by council: Decline the plan change

234.1

Submission date: 17 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Christopher James Hull  
**Date:** Friday, 17 May 2024 8:30:19 pm

---

The following customer has submitted a Unitary Plan online submission.

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Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Property address: Land identified in the private plan change by Riverhead Landowner Group, 80.5ha on western side of Riverhead.

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

We moved to Riverhead to enjoy the well thought out subdivision around Riverhead Point where the sections are all reasonable sizes, stand alone houses, open front gardens and no fences on property frontages. I have no problem with this kind of development and would happily see similar in the area designated in this proposal provided surrounding infrastructure is in place first. I do have big issues with high intensity, small sections, narrow roads etc and feel this is not in keeping with the village vibe of Riverhead currently. As far as I know there is also still no high school planned for the Kumeu/Huapai/Riverhead area which is ludicrous considering the development that has happened in the area over the last 10 years.

I or we seek the following decision by council: Decline the plan change

235.1

Submission date: 17 May 2024

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Laura roecoert  
**Date:** Friday, 17 May 2024 8:30:20 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Laura roecoert  
 Organisation name:  
 Agent's full name:  
 Email address: laura.vanwijk@hotmail.com  
 Contact phone number:  
 Postal address:

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)  
 Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:  
 Property address: 80.5 hectares on western side of riverhead  
 Map or maps:  
 Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:  
 Will affect traffic and environment

I or we seek the following decision by council: Decline the plan change

236.1

Submission date: 17 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? No

#### Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:



- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - heidi copland  
**Date:** Friday, 17 May 2024 8:30:21 pm

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: heidi copland

Organisation name:

Agent's full name:

Email address: heidi.copland@xtra.co.nz

Contact phone number:

Postal address:  
0800

Helensville 0800

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:  
riverhead

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
traffic is already a nightmare. babies being born on side of road as stuck in traffic

I or we seek the following decision by council: Decline the plan change

237.1

Submission date: 17 May 2024

#### **Attend a hearing**

Do you wish to be heard in support of your submission? No

#### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Steve Bloxham  
**Date:** Friday, 17 May 2024 8:45:14 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Steve Bloxham

Organisation name:

Agent's full name: Keryn Bloxham

Email address: stephenbloxham@hotmail.com

Contact phone number:

Postal address:

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Property address:

Map or maps: All relevant

Other provisions:

All relevant

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

Hasn't this been considered before? If so what's changed? If nothing, council's decision should remain the same. Avoid wasting time and money. Is this really a plan change that considers the interfaces with the adjoining parts of the regional plan and related impacts on ratepayer funded infrastructure or should it in fact be a resource consent application with appropriate development contributions?

I or we seek the following decision by council: Decline the plan change

238.1

Submission date: 17 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Christina Doughty  
**Date:** Friday, 17 May 2024 8:45:15 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Christina Doughty

Organisation name:

Agent's full name:

Email address: cm.bailey@icloud.com

Contact phone number: 0273132182

Postal address:

2 George St  
Riverhead  
Auckland 0820

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:

Property address: Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

If the plan change is approved, without thorough thought and planning, the following areas will be adversely affected:

Transport

Flooding and stormwater

Parks and reserves

Riverhead village character

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

Transport -

The wider northwest area is already not managing current traffic congestion. There are often multiple kilometer backlogs at key intersections including Coatesville Riverhead highway and Sh16. There have been no significant roading upgrades to support the exploding population. The current infrastructure cannot handle the current population let alone doubling it. Many existing roads are not fit for purpose in our residential areas including open stormwater drains and no footpaths. Roading and significant upgrades to public transport access would need to be in place to fix current issues

before considering adding to our population.

#### Flooding and Stormwater -

The existing system is not handling current needs. Many of the recent downpours have resulted in our land flooding and/or significant flow through of water. Changes to the natural flow of water through the area and reducing green space is very concerning. Upgrades to the existing stormwater system need to be in place before construction and changing the landscape begin.

#### Parks and Reserves -

A big attraction of the current Riverhead village is the abundance of green space and a great new playground. This is utilised by many local families and is very popular. Growing the population will put strain on this and additional parks and reserves will need to be built to accomodate.

#### Riverhead Village Character -

We have been fortunate enough to be able to purchase our family property in the beautiful Riverhead Village. It is a small close nit community who know their neighbours. There is an abundance of mature trees, gardens and green space. Homes have inviting road appeal and their individuality feels welcoming. Industrial, cloned, multi-storey units will change this feel and appeal. They appear cold and institutional (as seen in the current unfinished apartments on the main road). Discretion and foresight into the feel of buildings will need to be undertaken to preserve the warm village feel.

I or we seek the following decision by council: Decline the plan change

239.1

Submission date: 17 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

#### Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Kathryn Stewart  
**Date:** Friday, 17 May 2024 9:00:19 pm

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Kathryn Stewart

Organisation name:

Agent's full name: Kathryn Stewart

Email address: katiefaye@gmail.com

Contact phone number:

Postal address:  
34 Pohutukawa Parade  
Riverhead  
Auckland 0820

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:  
Plan Change 100

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

There are several issues with adding further housing to Riverhead. Ultimately, it relates to infrastructure - or lack there of. Although we live in the "new" part of Riverhead, we have noticed a significant increase in traffic over the last couple of years. Even on a weekend, it can take 20+ minutes to get out for CRH onto SH16. In the morning work rush it can be 30+. Coming back into Riverhead at the end of the day, the congestion at the Brigham Creek roundabout can add another 30 minutes of crawling traffic to your day. Personally I had to change my job as the traffic was just too much to be able to commute in that direction. There needs to be significant upgrades to both CRH and SH16 before we add any more traffic to it.

My other major concern is schooling. Riverhead School is a lovely, slightly country school. It is already struggling to accomodate its growing roll by adding prefabs to the field. Adding more homes will mean more children needing access to the school. We are also without a highschool in the area, currently only zoned for Massey, which is at capacity. There are over 25 primary schools in our



electorate - and one high school - which Riverhead is not zoned for. There must be a high school or college built in this area before any further housing.

I or we seek the following decision by council: Decline the plan change

240.1

Submission date: 17 May 2024

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Mark gibson  
**Date:** Friday, 17 May 2024 9:15:14 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Mark gibson  
Organisation name:  
Agent's full name:  
Email address: mark.gibson@viamedia.co.nz  
Contact phone number:  
Postal address:  
20 Kent terrace  
Riverhead 0820

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)  
Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:  
Storm water  
Land use  
Special character  
Transport

Property address: 20 Kent terrace Riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Riverhead is a historic township and character needs to be maintained. One of oldest schools in the county and was originally going to be the capital city.

Land use has traditionally been used for growing fruit and vegetables will be lost for ever. Especially important to maintain our food security in this time of climate change.

Stormwatrr provisions were put in place for the latest subdivision and more than once houses around duke street have been flooded. With greater development means more impervious surfaces and more risk of flooding.

Transport is currently under developed and doesn't cater for current traffic flows especially in and out of Riverhead. At different times of the working week and also weekends the traffic can back up for over 1km. More subdivisions will mean an even higher demand on already under funded and

under developed infrastructure such as the roads and lack of cycle paths and footpaths.

I or we seek the following decision by council: Decline the plan change

241.1

Submission date: 17 May 2024

### Attend a hearing

Do you wish to be heard in support of your submission? No

### Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Sarah McBride  
**Date:** Friday, 17 May 2024 9:15:14 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Sarah McBride

Organisation name:

Agent's full name:

Email address: sarah@mcbrides.co.nz

Contact phone number:

Postal address:

0820

Riverhead

Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:

Inadequate infrastructure specifically in transport.

Education

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Transport is already an issue with inadequate public transport - there is no direct link to the city where many residents work. The buses which do exist are not often enough.

We have an unused train track which could be a great solution but is consistently removed from considerations.

Education - insufficient schools - Riverhead School cannot physically grow much more and you would anticipate families to be buying into new homes. There are limited options for high schools particularly as the Massey/West Harbour area continues to grow as well.

I or we seek the following decision by council: Decline the plan change

Submission date: 17 May 2024

242.1

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Andrew and Tania Pegler  
**Date:** Friday, 17 May 2024 9:30:20 pm

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Andrew and Tania Pegler

Organisation name:

Agent's full name: Andrew Pegler

Email address: galaxie63@xtra.co.nz

Contact phone number: 0275939339

Postal address:

773 Coatesville Riverhead Highway

RD3 Albany

Auckland 0793

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:

Property address: (Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

Transport issues is the main thing. The plan change fails to recognise and propose transport infrastructure upgrades required to manage adverse effects on the wider transport network. SH16 is at times completely gridlocked with commuter traffic, the queue to get onto SH16 comes back to Hallertau at 6.30am weekdays & during weekends the line to Boric (the Coatesville Riverhead Highway (CRH)/SH16 intersection) is at the golf course. Old North Road the alternative route is also back over 800-900 from SH16 each day and has serious dangerous driving done by people trying to get to the roundabout on the other side of the road. Another 3,000 residencies at Riverhead will exacerbate this greatly. The development relies upon construction of a roundabout at the (CRH)/ Main Road (SH16) intersection to be built by Waka Kotahi NZ Transport Agency. We attended a meeting at least 5 years ago when this was due to commence the following year but still nothing has happened & the accident rate is still prolific. The end of the NW motorway often backs up for a kilometre or more, and the roundabout intersection is routinely dysfunction creating huge traffic jams. This is a every day occurrence and the weekends even more so all day. Allowing this development to commence will totally impact traffic throughout Riverhead, Kumeu and any feeder roads onto SH16. The roads themselves are in dire need of repairs and this will only impact this more as the work required to maintain the roads with the traffic it has now, does not happen. It will only create more delays in road works in the years to come let alone more traffic each day. The lost revenue from people having to sit in these traffic queues must have an impact on our economy.

The effects to stormwater with the increase of concreted areas and loss of vegetation/green areas to absorb rain water can only be detrimental to the area.

The sewage system that has installed in the "new Riverhead subdivision" is as you would know, suffers from frequent maintenance requirements (pump station outside the golf course) Residents experience problems with their property systems due to heavy rain.

Allowing the construction of housing on arable land reduces the benefits of food production on these areas.

A further 3000 homes in this area without infrastructure being in place prior to development only exasperates the situation we are now in with lack of primary/intermediate & high school facilities for the children of this area which exists at present.

These are the main concerns but there is so much more which I am sure our Riverhead Community Association has also submitted to you.

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:  
As detailed above.

I or we seek the following decision by council: Decline the plan change

243.1

Submission date: 17 May 2024

### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Tracy Smytheman  
**Date:** Friday, 17 May 2024 9:45:18 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Tracy Smytheman

Organisation name:

Agent's full name:

Email address: tracy.smytheman@xtra.co.nz

Contact phone number:

Postal address:

130 Lloyd Road

Riverhead

Auckland 0793

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Property address: The land identified in the private plan change by Riverhead Landowner Group - which is 80+ hectares on the western side of Riverhead.

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

The stormwater and flooding and transport recommendations are completely insufficient for the planned development. The Riverhead township and community are already overwhelmed in both matters with the developmen, expanded suburbanisation and population growth over the last 10 years, not to mention the huge stress and damage incurred the the floods as a result of major storms over the last few years.

I or we seek the following decision by council: Decline the plan change

244.1

Submission date: 17 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? No



**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Rose-Muirie Cook  
**Date:** Friday, 17 May 2024 10:30:13 pm

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Rose-Muirie Cook

Organisation name:

Agent's full name:

Email address: muirie@gmail.com

Contact phone number: 021381062

Postal address:  
5 Te Roera Place  
Riverhead  
Auckland 0820

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:

Property address:

Map or maps:

Other provisions:  
Plan Change PC100

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Flooding Risk, we live in part of Riverhead which was affected by the flooding in both August 21 and January 22. We had neighbours that were unable to move back into their house for over 6 months. The plan change says that the flood risk will only increase "less than minor" being 30mm - this is not acceptable for people who had houses underwater and others that were nearly underwater. The flooding assessment was also completed before the serious flooding in January 22 - so I do not believe it to be accurate.

Infrastructure and Transport - Riverhead needs a lot of investment in infrastructure before any more development is allowed. We have a school that has lost large amounts of it's green space as more and more prefab buildings take over the field, we have no local high school - the closest is Massey High which is just being expected to be able to accommodate all the complete and current development through West Hills, as well as Huapai, Kumeu and Riverhead.

We have a limited bus service that the local board needed to fight for and we currently pay a targeted rate for, there is no other public transport - despite a train line that Auckland Transport

won't use for passenger transport.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

245.1

Details of amendments: Investment in Infrastructure and a completed high school

245.2

Submission date: 17 May 2024

245.3

### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Jamie black  
**Date:** Friday, 17 May 2024 10:45:15 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Jamie black

Organisation name:

Agent's full name:

Email address: jamie@haighworkman.co.nz

Contact phone number:

Postal address:

166 Barrett road

Riverhead

Auckland 0794

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

84 hectares

Property address: Riverhead

Map or maps:

Other provisions:

Fletchers fast track

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Infrastructure is not sufficient, not only sh16 but Albany will be contested

I or we seek the following decision by council: Decline the plan change

246.1

Submission date: 17 May 2024

#### Attend a hearing

Do you wish to be heard in support of your submission? No

#### Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**Before you fill out the attached submission form, you should know:**

You need to include your full name, an email address, or an alternative postal address for your submission to be valid. Also provide a contact phone number so we can contact you for hearing schedules (where requested).

By taking part in this public submission process your submission will be made public. The information requested on this form is required by the Resource Management Act 1991 as any further submission supporting or opposing this submission is required to be forwarded to you as well as Auckland Council. Your name, address, telephone number, email address, signature (if applicable) and the content of your submission will be made publicly available in Auckland Council documents and on our website. These details are collected to better inform the public about all consents which have been issued through the Council.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious.
- It discloses no reasonable or relevant case.
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

## Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 16, 135 Albert Street  
Private Bag 92300  
Auckland 1142

For office use only

Submission No:

Receipt Date:

### Submitter details

**Full Name or Name of Agent (if applicable)**

Mr/Mrs/Miss/Ms(Full  
Name)

Deanne Chandler

**Organisation Name (if submission is made on behalf of Organisation)**

**Address for service of Submitter**

22 Elliot St,

Riverhead

Telephone:

2102669493

Email:

chandlerdeanne@yahoo.co.nz

Contact Person: (Name and designation, if applicable)

### Scope of submission

**This is a submission on the following proposed plan change / variation to an existing plan:**

Plan Change/Variation Number

PC 100 (Private)

Plan Change/Variation Name

Riverhead

**The specific provisions that my submission relates to are:**

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Or

Property Address

Land identified in the Private Plan changed by Riverhead Landowner Group. 80.5hectareson Western side of Riverhead

Or

Map

Or

**Other (specify)**

### Submission

**My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)**

I **support** the specific provisions identified above ☒

I **oppose** the specific provisions identified above ☐

I wish to have the provisions identified above amended Yes ☐ No ☒

The reasons for my views are:

I am concerned about this development in relation to the potential for worse flooding in the area (serious flooding last year 2023)

I am concerned about traffic congestion which will result in massive delays to get to work and activities in the area. Coateville/Riverhead Highway connecting with State highway 16 already has terrible congestion and the bypass around Kumeu needs to be completed first.

And there needs to be more public transport options

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

☐

Accept the proposed plan change / variation with amendments as outlined below

☐

Decline the proposed plan change / variation

☒

247.1

If the proposed plan change / variation is not declined, then amend it as outlined below.

☐

I wish to be heard in support of my submission

☐

I do not wish to be heard in support of my submission

☒

If others make a similar submission, I will consider presenting a joint case with them at a hearing

☐

*Deanne C Chandler*

Signature of Submitter  
(or person authorised to sign on behalf of submitter)

05/17/2024

Date

#### Notes to person making submission:

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could ☐ /could not ☒ gain an advantage in trade competition through this submission.

**If you could gain an advantage in trade competition through this submission please complete the following:**

I am ☒ / am not ☐ directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.



## Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 16, 135 Albert Street  
Private Bag 92300  
Auckland 1142

For office use only

Submission No:

Receipt Date:

### Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Linda Barton-Redgrave

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

11 George Street, Riverhead, Auckland 0820

Telephone:

274127295

Email:

beezakiwi@gmail.com

Contact Person: (Name and designation, if applicable)

### Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number PC 100 (Private)

Plan Change/Variation Name Riverhead

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s) objecting to PC100

Or

Property Address across the PC100 area

Or

Map

Or

Other (specify)

### Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I **support** the specific provisions identified above ☐

I **oppose** the specific provisions identified above ☒

I wish to have the provisions identified above amended Yes ☒ No ☐

The reasons for my views are:

I have lived in the township of Riverhead for 37 years. There has been significant change in that time - and I feel I am well placed to comment on its character. Firstly it is actually a small village or township - it is NOT a suburb attached to other suburbs. We live here because we do want to know!

Please note that I have included the above on a separate attached sheet as it doesn't fit into the allocated space. Thank you

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation ☐

Accept the proposed plan change / variation with amendments as outlined below ☐

Decline the proposed plan change / variation ☒

If the proposed plan change / variation is not declined, then amend it as outlined below. ☐

248.1

I wish to be heard in support of my submission ☒

I do not wish to be heard in support of my submission ☐

If others make a similar submission, I will consider presenting a joint case with them at a hearing ☐

*L. Barker-Redgrave*

Signature of Submitter  
(or person authorised to sign on behalf of submitter)

05/17/2024

Date

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could ☐ / could not ☒ gain an advantage in trade competition through this submission.

**If you could gain an advantage in trade competition through this submission please complete the following:**

I am ☒ / am not ☐ directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

I have lived in the township of Riverhead for 37 years. There has been significant change in that time – and I feel I am well placed to comment on its character.

Firstly it is actually a small village or township – it is NOT a suburb attached to other suburbs. We live here because we do want to know those around us, to feel part of a community.

The growth of Riverhead South was significant, however it did link with the existing character – largely single dwelling homes on 600 to 800 square metre sections.

The proposed development this time though does not link with the existing Riverhead township.

With its commercial space, multi-level dwellings and smaller sections, it is like another suburb just plonked down next to the existing township, and dominating the area.

I would like more consideration to be given to linking with the existing Riverhead village character.

Also, there is NOT sufficient infrastructure capacity in Riverhead.

In regard to Traffic Congestion and Safety: at present our roads are regularly at a stand still at the intersection with Highway 16. It is hard to judge how long the traffic queue will be, resulting in the necessity to add an average extra ½ to ¾ hour travel time when you plan to head out.

It is also relevant to note that the proposed improvements to the Brighams Creek intersection with Highway 16 to enable cars to exit or enter the Coatesville-Riverhead Highway have been proposed for many years and still hasn't happened.

Citizens of Riverhead are regularly subjected to angry drivers from Huapai who don't want to let Riverhead traffic merge onto state highway 16 because they are also so impacted by heavy traffic (you also can't get in at the Taupaki Road roundabout due to traffic backlog there). The situation is such that Auckland transport recently stopped cars turning right out of the Coatesville- Riverhead Rd because it is so unsafe.

I cant imagine the State Highway 16 transport improvements or the Northern Interceptor actually being completed within the next few years – it appears to be a revolving discussion, and even if it did the design will just cope with what the present problem is, without additional resident traffic.

The traffic flowing through Riverhead township itself is already very busy in mornings and afternoons, and during sport gatherings – making it quite hazardous to cross the Riverhead-Coatesville Highway within the township.

The proposed new Local Centre won't be able to be walked to by half of the town because the traffic will be too busy to cross the road. This development will physically divide our town.

It certainly is not safe to cycle any of the rural roads beyond the township (for instance toward Kumeu, Highway 16 or Albany).

Public transport is also still in development – there aren't any bus shelters in Riverhead, and Riverhead is not on a main public transport route so you need to double (or triple) bus rides to get across the city.

Id like to see a more realistic picture presented, with further detail regarding traffic management – as it stands, we will be gridlocked!

In the plan the suggestion is made that people will travel to Riverhead for shopping. Why?

Kumeu, Westgate and Albany are all well served with retail and commercial space.

I'd like to see a more thorough plan for the proposed commercial zone, a business case that justifies if we need it, and detail about what sort of retail or commercial spaces are envisioned?

I am also concerned about the limited amount of planned green space for the public, and the lack of recognition of what is already in place. For instance, there is a lovely property with established trees at 306 Riverhead Road which could be retained.

Riverhead is part of the North-West Wildlink that runs from Tiritiri Island to the Waitakeres.

I would like to see a clear green corridor established for the many native birds in our area, and for walkways alongside this corridor and connecting paths throughout the development.

This matters – we care about the environment and feeling connected to where we live.

Regarding the management of Stormwater and Flooding:

During Cyclone's Hale and Gabrielle early in 2023, the Rangitopuni River was roaring – the sheer force of the water caused huge trees to ram up against the bridge pillars, the drains throughout Riverhead township were transformed into rivers and ponds. The streets around Duke Street (which is next to the planned subdivision) were flooded. In that area I saw houses inundated with water, a car floating, and someone kayaking in the street. People were negatively impacted by the flooding.

Even in ordinary weather, and with farmland to absorb the rain, the stream behind Duke Street#248 flows steadily into the Rangitopuni River – where will the water overflow from a big housing development go?

Despite mitigation measures, such as building water retention tanks, there will still be a significant increase in water from impervious areas such as the paved area of new roads. Even with slow release of water, during an adverse weather event it's just not going to cope – it floods now so the proposed flood plain land is most likely to be inadequate. There can only be a negative impact for those neighbours who are downstream.

We need an overall system of stormwater management to ensure there are no up or downstream flooding and adverse effects. This plan should take into account the worst possible flooding scenario and would include a large portion of land that is solely zoned for the purpose of managing water flow (and not able to be redesignated for residential).

Regarding the Riverhead Sewer System:

Our existing pressure sewer system currently has issues and does not have capacity for additional housing. At present, with heavy rain the Riverhead village sewage lines become over pressurised, resulting high level alarms going off across the township. This ultimately results in damage to the property owners mascerator pumps (as they try to pump into a higher pressure main). This adverse effect is common (as per our own experience and community Facebook comments). The cost is falling on individual property owners.

The sewer system would require significant upgrading to take further load.

Also, Riverhead primary school is in the process of having additional classrooms built, but would not have the physical site space to accommodate the additional children from the proposed subdivision. Through necessity the school field is now tiny, much smaller than when my son went there when there were only 58 kids on the roll - because now as it has additional classrooms and the hall on it that were required for the growing roll.

It takes a long time to plan and build a new school. Certainly one wouldn't be built in the next few years. Where will the new residential development children attend school?

I think its quite clear that we don't have the current infrastructure working effectively – let alone adding more. I oppose the proposed development, Plan Change 100 Riverhead, and ask that Auckland Council declines the application as a result of the hearings.

#### **What I would like to see:**

I would like to see the plan declined.

If it were to proceed. I would like consideration to be given to linking the design and layout of the proposed subdivision with the existing Riverhead village character as part of the requirements for the proposed subdivision (similar to that of Riverhead South).

248.2

I would like to see a more realistic picture presented regarding traffic management, with further detail that shows how the traffic through the town and out onto highway 16 will be managed, how the main road will be crossed at different points, and what will be done to enable more effective public transport.

248.3

I'd like to see a more thorough plan for the proposed commercial zone, a business case that justifies if we need it, and detail about what sort of retail or commercial spaces are envisioned, and where shoppers will park so that the commercial area doesn't add to yet more traffic congestion.

248.4

Riverhead is part of the North-West Wildlink that runs from Tiritiri Island to the Waitakeres. I would like to see a clear green corridor established for the many native birds in our area, and for walkways alongside this corridor and connecting paths throughout the development.

248.5

We need an overall system of stormwater management to ensure there are no up or downstream flooding and adverse effects. This plan should take into account the worst possible flooding scenario and would include a large portion of land that is solely zoned for the purpose of managing water flow (and not able to be redesignated for residential).

248.6

The Riverhead sewer system would definitely require significant upgrading to take further load.

Riverhead will need another primary school as the current site is too small. I'd like to see a long term plan for where the children from the proposed development will attend school.

248.7

248.8

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Shontelle Fawkner  
**Date:** Friday, 17 May 2024 11:00:14 pm

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Shontelle Fawkner

Organisation name:

Agent's full name:

Email address: shontelle22@hotmail.com

Contact phone number: 0211920092

Postal address:  
29 Maude Street  
Riverhead  
Auckland 0820

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:

Property address: My Submission relates to" just place text such as (Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

Riverhead has experienced a huge amount of development in the past decade. Thousands of houses have been built yet the infrastructure has had little to no changes. If the proposed plan was to go ahead this would put even more pressure on an already failing infrastructure not to mention it would negatively impact the lives of everyone in the community at present. A significant issue we battle with everyday is the traffic. It is diabolical, our daily commutes take hours because traffic is so backed up. So many Riverhead families are sacrificing time together because we are all sat in endless traffic because no effort has been made to cope with the masses of houses built out her. The thought of adding thousands more cars to this is preposterous. Another reason the requested plan change should be denied is the risk to the environment. The area is severely affected by flooding during heavy rain and the proposed land has areas that are in the flood zone. Bottom line is we can't even service the current number of houses here adding more will make things immensely worse. As mentioned there is no where near enough robust infrastructure to support this. Fix what is already problematic here and then our community might be more . My street has big wide open

drains, I don't even have a footpath on my side of the road. The rates we pay here are exorbitant to not even have a footpath is ridiculous. Please do not accept the proposed changes, we as a community do not want it and more importantly our small suburb CANNOT accommodate more people when it's already crumbling as it is.

I or we seek the following decision by council: Decline the plan change 249.1

Submission date: 17 May 2024

### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Kit Boyes  
**Date:** Friday, 17 May 2024 11:15:12 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Kit Boyes

Organisation name:

Agent's full name: Kit Boyes

Email address: kitboyes@gmail.com

Contact phone number:

Postal address:  
 29 Cambridge Road  
 Riverhead  
 Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:

Introducing further high density development into an area where infrastructure for previous more than doubling in size has not been provided, area is already congested.

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Introducing further high density development into an area where infrastructure for previous more than doubling in size has not been provided, will produce congestion. Geography channelises transport options into a single vulnerable point of failure. Drift is to use green fields on the periphery of the city as a site for unattractive high density that will inevitably become future slums. The uncompleted failed development in central Riverhead should be a cautionary tale. At minimum infrastructure needs to be completed BEFORE development starts - pattern of building actual development against pretty pictures good will and good intentions to build infrastructure in the future has repeatedly failed.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

250.1

Details of amendments: No development, sales or anything else until better infrastructure to support this growth is completed.

250.2

Submission date: 17 May 2024

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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# Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 16, 135 Albert Street  
Private Bag 92300  
Auckland 1142

For office use only

Submission No:

Receipt Date:

## Submitter details

Full Name or Name of Agent (if applicable)

Mr/Ms/Miss/Ms (Full Name)

DESMOND JOHN REID.

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

01- 24 KARAWAI STREET, RUAKAKA 0116.

Telephone:

(022) 139 4268

Email:

woodcraftbydesign@xtra.co.nz

Contact Person: (Name and designation, if applicable)

## Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 100 (Private)

Plan Change/Variation Name

Riverhead

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Or

Property Address

22 DUKE STREET RIVERHEAD. (LOT 20 DP 499876)

Or

Map

Or

Other (specify)

## Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I **support** the specific provisions identified above ☐

I **oppose** the specific provisions identified above ☒

I wish to have the provisions identified above amended Yes ☒ No ☐

The reasons for my views are:

*Refer to attachment*

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation ☐

Accept the proposed plan change / variation with amendments as outlined below ☒ 251.1

Decline the proposed plan change / variation ☐

If the proposed plan change / variation is not declined, then amend it as outlined below. ☐

*REFER TO ATTACHMENT. - 6 PAGES.*

I wish to be heard in support of my submission ☒

I do not wish to be heard in support of my submission ☐

If others make a similar submission, I will consider presenting a joint case with them at a hearing ☒

*[Signature]*  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

Date

*17-05-2024*

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could ☒ / could not ☐ gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am ☒ / am not ☐ directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.



Private Plan Change 100 (PPC 100) 17th May 2024.

My name is Desmond John Reid.

I am the owner and Managing Director of Aberdeen Adventures Limited.

Aberdeen Adventures Limited is the proprietor of 22 Duke Street, Riverhead.

22 Duke Street, is at the northern end of the Riverhead Future Urban Zone (FUZ).

The Property was included in the FUZ in 2016, by decision of the Environment Court.

Private Plan Change 100 proposes to put effect to urbanising The Riverhead FUZ.

Private Plan Change 100 proposes to substantively exclude 22 Duke Street from its plan.

It is proposed that 22 Duke Street will largely revert to a rural zoning as part of Council's Future Development Strategy (FDS) driven by PPC 100.

This submission contests that premise.

I am not against PPC 100 in principle. The problem, that I have, is that flood management, ecological, transport, and community amenity solutions, as proposed in the plan, essentially involve 22 Duke Street in an adverse manner.

I have not been consulted on these initiatives and oppose their inclusion in PPC 100, as if it is integral to the plan. In fact, the proposal to zone 22 Duke Street as Mixed Rural, alienates the property from being able to support PPC 100.

### **Proposed Mixed Housing Suburban zoning:**

It is proposed that the substantive part of 22 Duke Street will be excluded from the Mixed Housing Suburban zoning enjoyed by the bulk of PPC 100. My land is targeted to be zoned Mixed Rural.

- That will severely impact the economic value of my property.
- It will not adequately address the needs of PPC 100.
- There are better solutions.

If my property were eventually zoned Mixed Rural, my rights and opportunities to exploit my land being in the current FUZ, would be denied me. That infers that I will no longer be able to develop an urban environment. The land will never be further developed or subdivided.

It is proposed to realign the existing Residential / Urban Boundary (RUB) to an indefensible alignment. The current RUB was established by hearing in the Environment Court. It follows defensible boundary features such as topography, geology and particularly the Waitauti stream.

Counterintuitively, excluding 22 Duke Street from the Mixed Housing Suburban zone and not integrating it into PPC 100 will deny coordinated planning opportunities and appropriate access to Waitauti stream for proposed flood control.

Excluding 22 Duke Street from the Mixed Housing Suburban zone means that there will be no esplanade reserve adjacent to Waitauti stream. This denies the opportunity to continue an existing riparian corridor.

Opportunities to integrate PPC 100's proposed 'Green Corridor' to an extended esplanade reserve will be lost.

#### Stormwater Perception:

Interestingly, Council's decision to exclude 22 Duke Street from its FDS, and the consequent removal from PPC 100, seems to have set aside sound reasoning and has apparently been driven by political expediency. Last year's cyclone Gabrielle and Anniversary Weekend storms were very emotive.

Both events were 1 in 200 year events, and the worst weather bombs in Auckland's recorded history.

Formulated science and engineering modelling do not support Council's view of the flooding risk over my entire property. Though some of 22 Duke Street was submerged during these events, both the farmhouse and the barn, each located in the most affected area, were not breached.

The PPC 100 Stormwater and Flooding assessment relies on the inclusion of 22 Duke Street in its modelling. By excluding this property from the plan change, the applicant's modelling, as presented, is flawed.

#### Transport:

22 Duke Street enjoys full width road access to Duke Street.

If the property is zoned Mixed Rural, the opportunities to enhance local road connectivity to the northern end of Riverhead, its two preschools, and its primary school, will be lost.

#### Risk of Adverse Development:

If this subject property were zoned Mixed Housing Suburban, there is no added risk of housing being built in flood prone areas.

Such a zoning confers density, suburban rules, and the requirements of supporting infrastructure.

Zoning a property as Mixed Housing Suburban does NOT confer any added right to build in a flood prone area.

The Resource Management Act confers that right, and that requires suitability testing and consent.



Conversely, the Mixed Rural zone confers rights on the land that allowing it to be intensively farmed.

Thoughts of pig farming, poultry farming, truck and machinery movements, noise and smells, are possibilities that need little imagination.

What I Want:

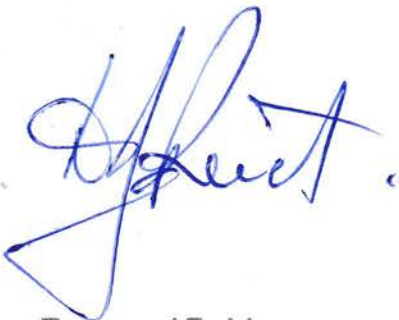
I want the current RUB to remain unchanged, and the whole of 22 Duke Street to remain in the current Future Urban Zone.

From that, I want the property to be included in PPC 100.

I then want diligent consultation with the applicants of PPC 100 to rationalise flood management, particularly around their proposed 'Green Corridor' and to optimise traffic and people movement within the wider catchment.

251.2  
251.3  
251.4  
251.5

In closing, I must say that I am appalled that Council has not reached out directly to Aberdeen Adventures Ltd. as a significant stakeholder and land owner in these deliberations.



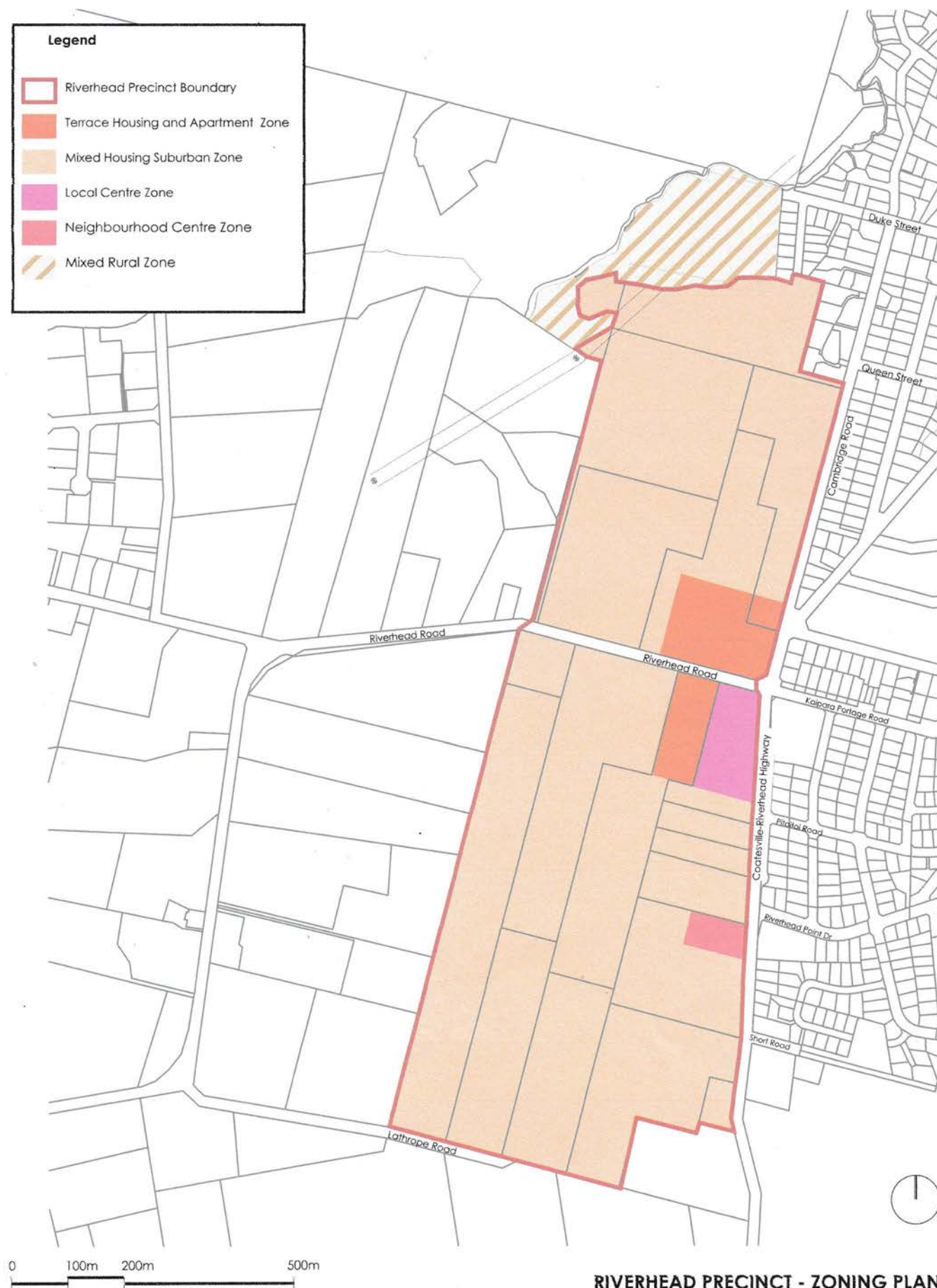
Desmond Reid.

Attachments:

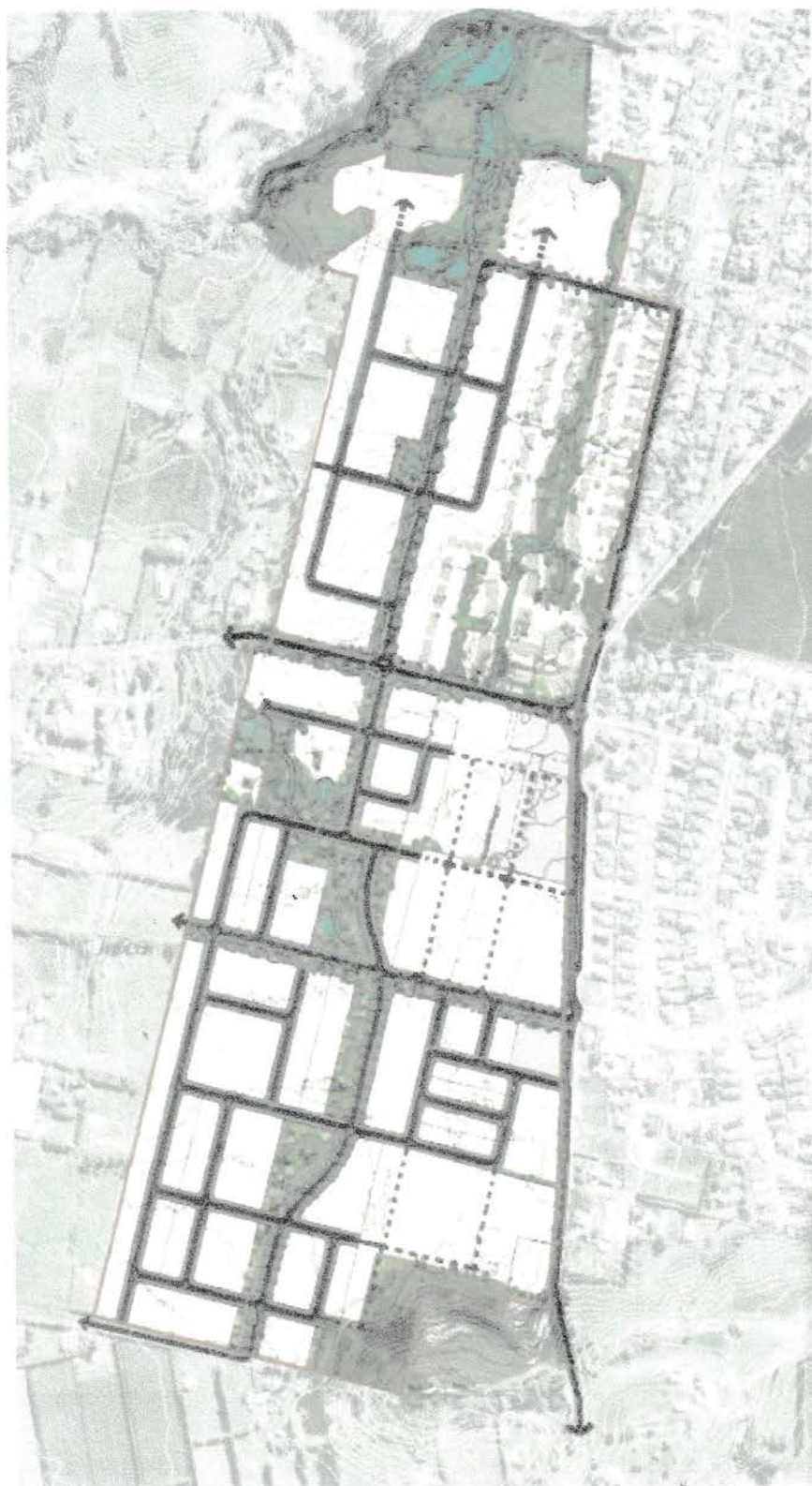
Riverhead Precinct Zoning Plan.

Rendition of PPC 100 Green Corridor.

Conceptual dual purpose Amenity / Stormwater Lake. (Aberdeen Adventures. 2015)



RIVERHEAD PRECINCT - ZONING PLAN



PPC-100 GREEN CORRIDOR.







**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Kathryn Boyes  
**Date:** Saturday, 18 May 2024 12:00:17 am

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Kathryn Boyes

Organisation name:

Agent's full name:

Email address: kat.m.saunders@gmail.com

Contact phone number:

Postal address:  
29 Cambridge Road  
Riverhead  
Auckland 0820

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:

Property address:

Map or maps:

Other provisions:

1. Plans to upgrade the transport network are inadequate.
2. Allowance for stormwater is not adequate.
3. There aren't enough provisions in the plan to maintain the character of Riverhead and create a cohesive village.

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

1. Current roads in the area are unable to cope with the traffic that we have, let alone traffic from up to 1750 new dwellings. There should be absolutely no development done until the upgrades to the transport network have been completed. This would include the SH16/Coatesville Riverhead highway intersection. The roads around Cambridge Rd and Alice Street would need to be upgraded to cope with the extra traffic created if cars from the new buildings are going to channel through there to get to the main road. There would also need to be more footpaths to be able to get around safely with the increased traffic. Especially along the sides of Riverhead road.

2. A storm event like last year would appear to be enough to overwhelm the planned stormwater system. There needs to be specifically designated stormwater areas so that no one is tempted to

minimise the land given over to stormwater. The area dedicated to stormwater also needs to look to the future, when heavy rainfall events are likely to occur more often. The bare minimum will not suffice. Currently Cambridge Road has completely inadequate drainage, with a large overgrown ditch failing to take a lot of the water away. This sort of drainage would need to be sorted and upgraded to cope with the extra development in the area.

3. The creation of the new part of Riverhead had many regulations around what sections should look like, to create a cohesive, spacious feel to the area. There don't seem to be enough concrete provisions for this in the current plan. Any new building needs to fit in with the existing aesthetic of Riverhead, to provide a township that is cohesive. There need to be specific specifications around this to make sure that it is adhered to.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested | 252.1

Details of amendments: No development without infrastructure! | 252,2

Submission date: 17 May 2024

### **Attend a hearing**

Do you wish to be heard in support of your submission? No

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.



**Submission on Proposed Private Plan Change 100 (Private): Riverhead - by Riverhead Landowner  
Group  
to the Auckland Unitary Plan (Operative in Part) -  
Clause 6 of Schedule 1, Resource Management Act 1991 (Form 5)**

---

To: **Auckland Council**

**1. SUBMITTER DETAILS**

Name of Submitter: **The Botanic Limited. Partnership**

This is a submission on Proposed Private Plan Change 100 (PPC100) to the Auckland Unitary Plan – Operative in Part (AUP).

The Botanic Limited Partnership could not gain an advantage in trade competition through this submission.

**2. SCOPE OF SUBMISSION**

The specific aspects and provisions of PPC100 that this submission relates to are:

- a) Support for the rezoning of the land as set out within the Plan Change Documentation and within the Riverhead Zoning Plan, including the proposed Terraced Housing and Apartment Zone and the Mixed Housing Suburban Zone.
- b) Support for the inclusion of Sub-Precinct A and B and the associated Policy framework as set out within the Plan Change Documentation and within the Riverhead Precinct Plan 4.
- c) Support for the proposed Precinct Rules as written within the Plan Change documentation, including the allowance for additional height in the sub-precincts and the provision for additional commercial activities within sub-precinct A which are appropriate to the site.

### 3. SUBMISSION

The Submitter has an interest in the properties within the Plan Change area at 1092 Coatesville Riverhead Highway (Legal reference Lot 1 DP 164590 and Lot 2 DP 164590).

The Submitters representatives (Matvin Group Limited) are included within the “Riverhead Land Owner Group”, being the applicant for PPC100, their interests in the Plan Change area relate to the two legal parcels referred to above.

The Submitter would like to express their overall support for the Proposed Plan Change as currently worded and outlined within the PC100 documentation and retain their right to be involved as the process progresses.

As outlined by the various technical assessments for PPC100, urban development, for residential housing in this location is an appropriate and efficient use of land.

The proposed precinct provisions ensure that the urban development of the land will be undertaken in an integrated way with the appropriate infrastructure delivered, as required, in conjunction with urban development.

### 4. SUMMARY

The Botanic Limited Partnership seeks that Auckland Council approve the request to rezone the Future Urban land as set out within the PPC100 documentation or similar zoning that achieves the same or similar outcome for urban residential land uses.

253.1

The Botanic Partnership Limited wishes to be heard in support of their Submission.

Yours sincerely



Burnette O'Connor  
Director | Planner  
The Planning Collective Limited  
Ph: 021 422 346  
Email: burnette@thepec.co.nz



**Submission on Proposed Private Plan Change 100 (Private): Riverhead - by Riverhead Landowner Group**  
**to the Auckland Unitary Plan (Operative in Part) -**  
Clause 6 of Schedule 1, Resource Management Act 1991 (Form 5)

---

To: **Auckland Council**

**1. SUBMITTER DETAILS**

Name of Submitter: **Matvin Group Limited.**

This is a submission on Proposed Private Plan Change 100 (PPC100) to the Auckland Unitary Plan – Operative in Part (AUP).

Matvin Group Limited could not gain an advantage in trade competition through this submission.

**2. SCOPE OF SUBMISSION**

The specific aspects and provisions of PPC100 that this submission relates to are:

- a) Support for the rezoning of the land as set out within the Plan Change Documentation and within the Riverhead Zoning Plan, including the proposed Terraced Housing and Apartment Zone and the Mixed Housing Suburban Zone.
- b) Support for the inclusion of Sub-Precinct A and B and the associated Policy framework as set out within the Plan Change Documentation and within the Riverhead Precinct Plan 4.
- c) Support for the proposed Precinct Rules as written within the Plan Change documentation, including the allowance for additional height in the sub-precincts and the provision for additional commercial activities within sub-precinct A which are appropriate to the site.

### 3. SUBMISSION

Matvin Group Limited have an interest in the properties within the Plan Change area at 1092 Coatesville Riverhead Highway (Legal reference Lot 1 DP 164590 and Lot 2 DP 164590).

While Matvin Group Limited are included within the "Riverhead Land Owner Group", being the applicant for PPC100, their interests in the Plan Change area relate to the two legal parcels referred to above.

Matvin Group Limited would like to express their overall support for the Proposed Plan Change as currently worded and outlined within the PC100 documentation.

As outlined by the various technical assessments for PPC100, urban development, for residential housing in this location is an appropriate and efficient use of land.

The proposed precinct provisions ensure that the urban development of the land will be undertaken in an integrated way with the appropriate infrastructure delivered, as required, in conjunction with urban development.

### 4. SUMMARY

Matvin Group limited seeks that Auckland Council approve the request to rezone the Future Urban land as set out within the PPC100 documentation or similar zoning that achieves the same or similar outcome for urban residential land uses.

254.1

Matvin Group Limited wishes to be heard in support of their Submission.

Yours sincerely



Burnette O'Connor  
Director | Planner  
The Planning Collective Limited  
Ph: 021 422 346  
Email: burnette@thepec.co.nz

**From:** [UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan further submission - Plan Change 100 - Nick Evans  
**Date:** Friday, 12 July 2024 3:16:05 pm

---

The following customer has submitted a Unitary Plan online further submission.

#### **Contact details**

Full name of person making a further submission: Nick Evans

Organisation name:

Full name of your agent:

Email address: nevans685@gmail.com

Contact phone number: 094164145

Postal address:  
220 riverhead Road  
Kumeu  
Auckland 0892

#### **Submission details**

**This is a further submission to:**

Plan change number: Plan Change 100

Plan change name: PC 100 (Private): Riverhead

#### **Original submission details**

Original submitters name and address:  
Nick Evans 220 Riverhead Road

Submission number: 31

Do you support or oppose the original submission? I or we support the submission

Specific parts of the original submission that your submission relates to:  
Point number Plan change 100

The reasons for my or our support or opposition are:  
Riverhead is a suburb that needs to develop further as it is such a beautiful area and Close proximity to the central city only 30 minutes drive  
The existing subdivision has worked very well as a social hub for families  
This needs to be expanded as we are very short of non-high density Living areas around Auckland

I or we want Auckland council to make a decision to: Allow the whole original submission

Submission date: 12 July 2024

#### **Attend a hearing**

I or we wish to be heard in support of this submission: Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

#### **Declaration**

What is your interest in the proposal? I am the person representing a relevant aspect of the public interest

Specify upon which grounds you come within this category:

I am Living and close proximity to the location of this Develop development

I declare that:

- I understand that I must serve a copy of my or our further submission on the original submitter within five working days after it is served on the local authority
- I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.



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Watercare Services Limited

73 Remuera Road, Remuera,  
Auckland 1050, New Zealand

Private Bag 92521, Victoria Street West,  
Auckland 1142, New Zealand

Telephone +64 9 442 2222

[www.watercare.co.nz](http://www.watercare.co.nz)

Auckland Council  
Unitary Plan Private Bag 92300  
Auckland 1142

Attn.: Planning Technician

[unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

**TO:** Auckland Council

**SUBMISSION ON:** Plan Change 100 (Private): Riverhead Road, Coatesville-  
Riverhead Highway, Cambridge Road and Duke Street,  
Riverhead

**FROM:** Watercare Services Limited

**ADDRESS FOR SERVICE:** [planchanges@water.co.nz](mailto:planchanges@water.co.nz)

**DATE:** 25 July 2024

**Watercare could not gain an advantage in trade competition through this submission.**

## 1. INTRODUCTION

Watercare Services Limited ("**Watercare**") is New Zealand's largest provider of water and wastewater services. Watercare is a council-controlled organisation under the Local Government Act 2002 and is wholly owned by the Auckland Council.

Watercare made an original submission on Proposed Private Plan Change 100 and wishes to make a further submission on the Plan Change. This further submission responds to points raised in other submissions that may have implications on Watercare's assets and operations.

## 2. FURTHER SUBMISSION

Watercare's submissions are included in the **attached** table.

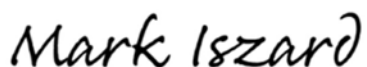
Watercare seeks the following relief:

- a) That the submissions opposed in the **attached** table be disallowed (either in full or in part).
- b) Such further, alternative, or other consequential amendments as may be necessary to fully address Watercare's further submissions.

### 3. HEARING

Watercare wishes to be heard in support of both its submission and further submission.

25 July 2024

A handwritten signature in black ink that reads "Mark Iszard". The script is cursive and fluid.

Mark Iszard  
**Head of Major Developments**  
**Watercare Services Limited**

Address for Service:  
Amber Taylor  
Development Planning Lead  
Watercare Services Limited  
Private Bag 92521  
Victoria Street West  
Auckland 1142  
Phone: 022 158 4426  
Email: [Planchanges@water.co.nz](mailto:Planchanges@water.co.nz)

## FURTHER SUBMISSIONS FROM WATERCARE SERVICES LIMITED

Submitter ID	Submitter Name	Submission point #	Submission point	Support / oppose	Watercare further submission commentary / relief sought
169	Adrian Low	169.3	The submitter seeks to widen the scope of the plan change to include all of the existing village and surrounding rural areas.	Oppose	Watercare opposes the inclusion of all the existing village and surrounding rural areas in the plan change on the basis that it is out of scope.
205	Luxembourg Development Company	205.12	The submitter seeks that reference to subdivision should be deleted from Policy 5.	Oppose	Watercare opposes the removal of reference to subdivision in Policy 5 as it is important that both subdivision and development be coordinated with the provision of necessary infrastructure, including water supply and wastewater infrastructure.
		205.13	The submitter seeks that activity table IX.4.1 be amended to separate subdivision from development, and that subdivision should have blanket restricted discretionary status.	Oppose	Watercare opposes the amendments sought to activity table IX.4.1 for the same reasons provided in relation to submission point 205.12.
251	Desmond John Reid	251.4	The submitter seeks that 22 Duke Street is included in the plan change.	Oppose	Watercare opposes the inclusion of 22 Duke Street in the plan change on the basis that it is out of scope.

**From:** [UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan further submission - Plan Change 100 - Linda McFadyen  
**Date:** Tuesday, 23 July 2024 8:30:12 am

---

The following customer has submitted a Unitary Plan online further submission.

#### **Contact details**

Full name of person making a further submission: Linda McFadyen

Organisation name:

Full name of your agent: Linda McFadyen

Email address: [lijasel@hotmai.com](mailto:lijasel@hotmai.com)

Contact phone number:

Postal address:

7 Floyd Road  
Riverhead  
Auckland 0820

#### **Submission details**

**This is a further submission to:**

Plan change number: Plan Change 100

Plan change name: PC 100 (Private): Riverhead

#### **Original submission details**

Original submitters name and address:

Linda McFadyen  
7 Floyd Road  
Riverhead 0820

Submission number: 178

Do you support or oppose the original submission? I or we oppose the submission

Specific parts of the original submission that your submission relates to:

Point number PC 100

The reasons for my or our support or opposition are:

Lack of infrastructure

I or we want Auckland council to make a decision to: Disallow the whole original submission

Submission date: 23 July 2024

#### **Attend a hearing**

I or we wish to be heard in support of this submission: No

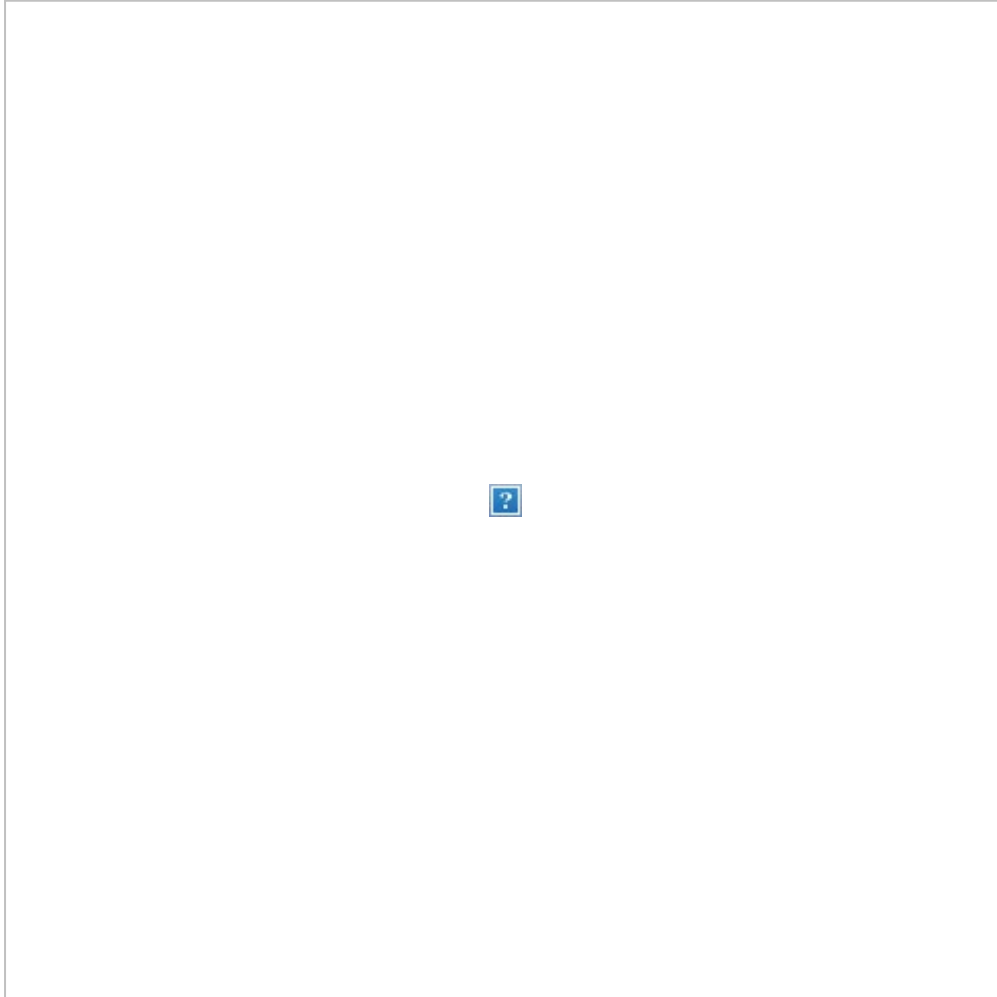
#### **Declaration**

What is your interest in the proposal? I am a person who has an interest in the proposal that is greater than the interest that the general public has

Specify upon which grounds you come within this category:  
I am a resident of Riverhead

I declare that:

- I understand that I must serve a copy of my or our further submission on the original submitter within five working days after it is served on the local authority
- I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.



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26 July 2024

Planning and Resource Consents  
Auckland Council  
Private Bag 92300  
Auckland 1142

Email: [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

### **Further Submission for Proposed Private Plan Change 100 - Riverhead**

Please find attached Auckland Transport's further submission to the submissions lodged on Proposed Private Plan Change 100 - Riverhead. The applicant is the Riverhead Landowner Group.

If you have any queries in relation to this submission, please contact me at [spatialplanning@at.govt.nz](mailto:spatialplanning@at.govt.nz) or on 09 930 5001 ext. 2427.

Yours sincerely



Katherine Dorofaeff  
**Principal Planner, Spatial Planning and Policy Advice**

## Further submission by Auckland Transport on Proposed Private Plan Change 100 - Riverhead

**To:** Auckland Council  
Private Bag 92300  
Auckland 1142

**Further submission on:** Submissions to Proposed Private Plan Change 100 from the Riverhead Landowner Group for land at Riverhead Road, Coatesville-Riverhead Highway, Cambridge Road, and Duke Street, Riverhead

**From:** Auckland Transport  
Private Bag 92250  
Auckland 1142

### 1. Introduction

- 1.1 Auckland Transport represents a relevant aspect of the public interest and also has an interest in the proposal that is greater than the interest that the general public has. Auckland Transport's grounds for specifying this are that it is a Council-Controlled Organisation of Auckland Council ('the Council') and Road Controlling Authority for the Auckland region. Auckland Transport made an original submission on Proposed Private Plan Change 100 (submission number 161).
- 1.2 Auckland Transport's legislated purpose is "to contribute to an effective, efficient and safe Auckland land transport system in the public interest."

### 2. Scope of further submission

- 2.1 The specific parts of the submissions supported or opposed, and the reasons for that support or opposition, are set out in **Attachment 1**.
- 2.2 The decisions which Auckland Transport seeks from the Council in terms of allowing or disallowing submissions are also set out in **Attachment 1**.

### 3. Appearance at the hearing

- 3.1 Auckland Transport wishes to be heard in support of this further submission.
- 3.2 If others make a similar submission, Auckland Transport will consider presenting a joint case with them at the hearing.

**Name:** Auckland Transport

**Signature:**



Rory Power  
Spatial Planning Manager

**Date:** 26 July 2024

**Contact person:** Katherine Dorofaeff  
Principal Planner, Spatial Planning and Policy Advice

**Address for service:** Auckland Transport  
Private Bag 92250  
Auckland 1142

**Telephone:** 09 930 5001 ext. 2427

**Email:** [spatialplanning@at.govt.nz](mailto:spatialplanning@at.govt.nz)



## Attachment 1

#	Submitter	Summary of submission	Support or oppose	Reasons	Decision sought
114.13	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association) <a href="mailto:Mikebrooke@outlook.com">Mikebrooke@outlook.com</a>	Require minimum tree quantity outcomes for new roads	Oppose	Auckland Transport agrees that street trees are important for the amenity, stormwater management, and other natural environment reasons. However Auckland Transport does not support the inclusion of minimum tree quantity requirements for new roads in precinct provisions. The location, number, and species of trees and other vegetation within the legal road is appropriately determined at resource consent and engineering plan approval stages.	Disallow
141.1	Aberdeen Adventures Ltd <a href="mailto:shanehartley@tnp.co.nz">shanehartley@tnp.co.nz</a>	Apply the Mixed Housing Suburban Zone over the whole of the site at 22 Duke Street	Oppose	This would require amendments to the ITA and the precinct provisions to ensure that the transport needs of the additional land are addressed. The ITA and the precinct provisions are based on the assumption that 22 Duke Street will be rezoned to rural and removed from being within the Rural Urban Boundary. In addition, given the flooding and stormwater concerns identified for 22 Duke Road, the related implications for Auckland Transport's existing and future roading network would need to be assessed and mitigated. This would require the applicant to undertake additional assessment.	Disallow
202.4	Boric Food Market et al <a href="mailto:hannah@formeplanning.co.nz">hannah@formeplanning.co.nz</a>	Separately list subdivision and development in the activity table as per Spedding Block Precinct Table I616.4.1	Support	This amendment (or a similar amendment to like effect) will add clarity and is consistent with Auckland Transport's submission 161.17.	Allow
202.5	Boric Food Market et al <a href="mailto:hannah@formeplanning.co.nz">hannah@formeplanning.co.nz</a>	The full extent of works comprised in Stage 2 of the Waka Kotahi project referred as "SH16 Brigham Creek to Waimauku", should be constructed and operational prior to occupation of the first dwelling (or ideally, building), and the triggers in PC100 should be updated accordingly.	Support	Agree that if it is established that the full extent of works is required to support the proposal, then the transport upgrade requirements ('triggers') should be amended accordingly.	Allow

#	Submitter	Summary of submission	Support or oppose	Reasons	Decision sought
202.6	Boric Food Market et al <a href="mailto:hannah@formeplanning.co.nz">hannah@formeplanning.co.nz</a>	Assessment criteria at IX.8.2(g) (in respect of an infringement to standards IX.6.1(2)-(4)) should require an assessment against the progress made towards the full suite of works within Stage 2, rather than simply the intersection of SH16 and Coatesville-Riverhead Highway.	Support	Agree that if it is established that the full suite of works is required to support the proposal, then consequential amendments will be required and this may include assessment criteria. However this needs to be considered in the context of Auckland Transport's submission 161.18 which seeks a non-complying status for subdivision and development that does not comply with the standards requiring specified transport infrastructure to be provided. Submission 161.18 seeks consequential amendments to assessment criteria.	Allow
202.7	Boric Food Market et al <a href="mailto:hannah@formeplanning.co.nz">hannah@formeplanning.co.nz</a>	Without further analysis, civil, infrastructure and construction work within the precinct should be delayed until the full suite of Waka Kotahi's Stage 2 works are constructed and operational.	Support	The submission raises concerns about the cumulative traffic effects if the construction vehicles were to access the precinct area at the same time as the Waka Kotahi Stage 2 works and roundabout are under construction. Auckland Transport agrees that this matter warrants further consideration by the applicant.	Allow
202.8	Boric Food Market et al <a href="mailto:hannah@formeplanning.co.nz">hannah@formeplanning.co.nz</a>	Update the Integrated Transport Assessment to make allowance in the traffic modelling for the pedestrian crossings proposed at the roundabout of SH16 and Coatesville-Riverhead Highway, as part of the Stage 2 works.	Support	Auckland Transport agrees that the proposed pedestrian crossings should be taken into account in traffic modelling for the roundabout. This will contribute to assessing the traffic effects of the proposal.	Allow
202.9	Boric Food Market et al <a href="mailto:hannah@formeplanning.co.nz">hannah@formeplanning.co.nz</a>	Undertake further analysis to understand the effects the proposal will have on weekend traffic volumes.	Support	Auckland Transport agrees that further analysis of weekend traffic volumes at the SH16 / Coatesville-Riverhead Highway intersection is relevant to assessing the traffic effects of the proposal.	Allow
203.1	Z Energy Ltd <a href="mailto:philip.brown@slrconsulting.com">philip.brown@slrconsulting.com</a>	Z Energy seeks confirmation regarding the road changes proposed through PC100, noting that Precinct Plan 3 indicates that there is potential for the entirety of Cambridge Road to be 'upgraded'.	Support in part	Auckland Transport notes that the road upgrades to Cambridge Road are outlined in IX.6.1(5). Notwithstanding this, Auckland Transport is willing to consider amendments to the precinct provisions (including Precinct Plan 3) to clarify the nature and extent of the upgrades. In submission 161.51, Auckland Transport has sought the inclusion of Cambridge Road in the Road Function and Design	Allow in part

#	Submitter	Summary of submission	Support or oppose	Reasons	Decision sought
				Elements table in Appendix 2 of the precinct provisions.	
203.2	Z Energy Ltd <a href="mailto:philip.brown@slrconsulting.com">philip.brown@slrconsulting.com</a>	Z Energy seeks to ensure that the future pedestrian crossing on the Coatesville-Riverhead Highway is not situated proximal to Caltex Riverhead, as this could result in an unsafe environment for vehicles and pedestrians.	Support in part	Auckland Transport agrees that the pedestrian crossing will need to be installed in a safe location. The existing road environment will need to be considered, including the vehicle access arrangements for Caltex Riverhead.	Allow in part
203.3	Z Energy Ltd <a href="mailto:philip.brown@slrconsulting.com">philip.brown@slrconsulting.com</a>	Z Energy seeks confirmation regarding the nature of road changes on Cambridge Road and the Coatesville-Riverhead Highway proximal to the Caltex Riverhead site. Z Energy also requests to be consulted by the applicant and / or Auckland Transport when the relevant road upgrades are undertaken, to ensure that these do not unduly restrict the site's operation.	Support in part	Auckland Transport is willing to consider amendments to the precinct provisions (including Precinct Plan 3) to clarify the nature and extent of the upgrades. However design details will not be determined until later consenting and engineering plan approval stages. In addition, Auckland Transport anticipates that as part of future consenting stages conditions will be imposed requiring a Construction Traffic Management Plan to be provided by the applicant prior to undertaking the works.	Allow in part
205.7	Luxembourg Development Company et al <a href="mailto:bnzakeri@gmail.com">bnzakeri@gmail.com</a>	Amend Precinct Plan 2 to: • Delete the Multi-purpose Green Corridor and replace it with an annotation for stormwater conveyance. • Straighten the “bends” in the Collector Roads. • Delete the “key local roads”. • Align the “key pedestrian connections” to the Collector Roads.	Oppose	The 'bend' in the north-south collector road aligns with the location of the multi-purpose green corridor.  Auckland Transport considers that the key local roads and key pedestrian connections as shown on Precinct Plan 2 are critical components of the transport network and should not be removed.  Most of the components shown on Precinct Plan 2 are shown in an indicative location allowing for some repositioning at consenting stage.	Disallow
205.9	Luxembourg Development Company et al <a href="mailto:bnzakeri@gmail.com">bnzakeri@gmail.com</a>	Amend the policies, activity table and provisions (standards) to avoid the creation of opportunities where third parties or other landowners could	Oppose	It is important the precinct provisions are drafted in a robust manner to ensure that the required transport infrastructure is provided to service subdivision and	Disallow

#	Submitter	Summary of submission	Support or oppose	Reasons	Decision sought
		prevent the development of the Precinct.		development. This may require co-ordination between landowners.	
205.10	Luxembourg Development Company et al <a href="mailto:bnzakeri@gmail.com">bnzakeri@gmail.com</a>	Clarify that road widening relates to the vesting of land for that purpose at the time of subdivision and development of that site.	Oppose	It is not clear which road widening is being referred to and the submitter has not proposed amended precinct provisions.	Disallow
205.12	Luxembourg Development Company et al <a href="mailto:bnzakeri@gmail.com">bnzakeri@gmail.com</a>	Reference to subdivision should be deleted from Policy 5.	Oppose	It is critical that both subdivision and development are co-ordinated with the provision of the required infrastructure.	Disallow
205.13	Luxembourg Development Company et al <a href="mailto:bnzakeri@gmail.com">bnzakeri@gmail.com</a>	The activity table at IX.4.1 should be amended to separate subdivision from development. Subdivision should have blanket RD status.	Oppose in part	Auckland Transport agrees that subdivision and development should be separately listed in the table and has raised this in submission 161.17. However a blanket restricted discretionary status is not appropriate as a more onerous activity category and assessment process should apply to activities that do not comply with critical standards such as the transport infrastructure requirements.	Disallow in part
205.14	Luxembourg Development Company et al <a href="mailto:bnzakeri@gmail.com">bnzakeri@gmail.com</a>	Delete Policy (8).	Oppose	The policy is consistent with ensuring integration between transport and land use by requiring the key local roads and pedestrian connections to be generally in the location shown on Precinct Plan 2. The policy allows for variation where it would still achieve a highly connected street layout that integrates with the surrounding transport network.	Disallow
205.23	Luxembourg Development Company et al <a href="mailto:bnzakeri@gmail.com">bnzakeri@gmail.com</a>	Reduce the width of Collector Roads (without adjacent reserve) to 21m and Local Road to 16m as minimums.	Oppose	The precinct provisions include a restricted discretionary status for non-compliance with the Road Function and Design Elements tables set out in Appendices 1 and 2. Auckland Transport considers this is an appropriate approach and allows proposals for lesser width roads to be assessed on their merits.	Disallow
205.24	Luxembourg Development Company et al <a href="mailto:bnzakeri@gmail.com">bnzakeri@gmail.com</a>	Identify that road widening is to be determined through detailed design.	Oppose	This submission point appears to relate to existing roads. Auckland Transport considers that the minimum road reserve width needed to accommodate the required design elements can be determined	Disallow

#	Submitter	Summary of submission	Support or oppose	Reasons	Decision sought
				without detailed design. In addition, the precinct provisions include a restricted discretionary status for non-compliance with the Road Function and Design Elements tables set out in Appendices 1 and 2. Auckland Transport considers this is an appropriate approach and allows proposals for lesser width roads to be assessed on their merits.	
214.3	Te Tāhuhu o te Mātauranga   Ministry of Education  <a href="mailto:Eden.Rima@beca.com">Eden.Rima@beca.com</a>	That the Plan Change provisions include the appropriate level of provision and design detail to facilitate potential school bus routes to and from any future school site, connecting with Riverhead Road and Lathrope Road and in a manner that ensures safety for all road users, especially pedestrians travelling to and from the school.	Support in part	Auckland Transport agrees access for school buses to a future school site is a relevant matter to consider when designing the transport network and / or the location of the school. However without any indication of or certainty about where the future school is expected to be located it is not possible to address this matter further. The Road Function and Design Elements table in Appendices 1 and 2 of the Precinct Plan identify bus provision for the collector roads, Coatesville-Riverhead Highway, and Lathrope Road. In its submission point #161.50 Auckland Transport has sought that bus provision also be identified for Riverhead Road.	Allow in part
214.4	Te Tāhuhu o te Mātauranga   Ministry of Education  <a href="mailto:Eden.Rima@beca.com">Eden.Rima@beca.com</a>	That the RDA status for consents ensures activities are appropriately assessed if they are delivered ahead of the Implementation Plan infrastructure items.	Oppose in part	The intent of this submission point is not clear and the relief sought does not align with the context given in the submission. As outlined in its submission point 161.18 Auckland Transport seeks that the Activity Table be amended to apply a non-complying activity status to 'Subdivision and development that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades'.	Disallow in part
214.5	Te Tāhuhu o te Mātauranga   Ministry of Education  <a href="mailto:Eden.Rima@beca.com">Eden.Rima@beca.com</a>	That greater specificity and even strategic alignment with Auckland Transport be provided to ensure that the Plan Change outcomes can be delivered where there is reliance upon this matter to mitigate some of the effects of the proposed rezoning.	Oppose	Auckland Transport understands from the context of the submission that this relief relates to the proposed speed limit reductions identified in the ITA. The ITA acknowledges this is outside the direct control of the applicant. The Ministry suggests that there be specific additional measures or conditions to 'tie in' Auckland Transport to the speed limit bylaw process. It is not	Disallow

#	Submitter	Summary of submission	Support or oppose	Reasons	Decision sought
				appropriate to include any prescriptive requirements of this nature in the precinct provisions.	
214.6	Te Tāhuhu o te Mātauranga   Ministry of Education <a href="mailto:Eden.Rima@beca.com">Eden.Rima@beca.com</a>	Required roading standards to be delivered for the surrounding roads (local and/or collector roads) with respect to any future school site and clarity on the responsibility for establishment of the surrounding roads and associated walking and cycling features.	Support in part	Auckland Transport supports standards which ensure that it is clear what transport infrastructure needs to be provided in conjunction with subdivision and development. However without any indication of or certainty about where the future school is expected to be located it is not possible to address this specific aspect of the Ministry's submission point.	Allow in part
214.7	Te Tāhuhu o te Mātauranga   Ministry of Education <a href="mailto:Eden.Rima@beca.com">Eden.Rima@beca.com</a>	The inclusion (or otherwise) of the establishment of a safe cycle / walking facility across Coatesville-Riverhead Highway within the Implementation Plan (and triggering of this via the Plan Change provisions and threshold activity status).	Support	Auckland Transport agrees that safe crossing facilities across Coatesville-Riverhead Highway should be provided in conjunction with subdivision and development.	Allow
251.2	Desmond John Reid <a href="mailto:woodcraftbydesign@xtra.co.nz">woodcraftbydesign@xtra.co.nz</a>	Retain the existing RUB unchanged.	Oppose	Retaining the existing RUB would provide for 22 Duke Road to be urbanised in the future. This would require amendments to the ITA and the precinct provisions to ensure that the transport needs of the additional land are addressed. In addition, given the flooding and stormwater concerns identified for 22 Duke Road, the related implications for Auckland Transport's existing and future roading network need to be assessed and mitigated by the applicant.	Disallow
251.3	Desmond John Reid <a href="mailto:woodcraftbydesign@xtra.co.nz">woodcraftbydesign@xtra.co.nz</a>	The whole of 22 Duke Street to remain the current Future Urban Zone.	Oppose	Retaining the existing Future Urban zoning would provide for 22 Duke Road to be urbanised in the future. This would require amendments to the ITA and to the precinct provisions to ensure that the transport needs of the additional land are addressed. In addition, given the flooding and stormwater concerns identified for 22 Duke Road, the related implications for Auckland Transport's existing and future roading network need to be assessed and mitigated by the applicant.	Disallow

#	Submitter	Summary of submission	Support or oppose	Reasons	Decision sought
251.4	Desmond John Reid <a href="mailto:woodcraftbydesign@xtra.co.nz">woodcraftbydesign@xtra.co.nz</a>	Include 22 Duke Street in PC100.	Oppose	Auckland Transport is opposed to 22 Duke Street being included in the plan change for the purposes of providing for urban development of the land. The ITA and the precinct provisions are based on the assumption that 22 Duke Street will be rezoned to rural and removed from being within the Rural Urban Boundary. This recognises the flooding and stormwater concerns.	Disallow



Date 25/07/2024

Address Auckland Council

Attention: Unitary Plan <unitaryplan@aucklandcouncil.govt.nz

To whom it may concern,

**Further Submission on Plan Change 100 (Private) Riverhead**

Please find attached further submissions made on behalf of Matvin Limited – Submitter #254.

The further submitter has an interest greater than the public generally.

Yours sincerely

Burnette O'Connor

Director/Planner

The Planning Collective

E: [burnette@thepc.co.nz](mailto:burnette@thepc.co.nz)

M: 021-422 346

**Attachments:**

- 1) Form 6
- 2) Further Submission Table



## Attachment 1:



THE PLANNING  
COLLECTIVE

## Form 6

## FURTHER SUBMISSION/S TO PLAN CHANGE 100 (PRIVATE) RIVERHEAD

Clause 8 of Schedule 1, Resource Management Act 1991 (Form 6)

To: **Auckland Council**

**1. SUBMITTER DETAILS**

Name of Submitter: Matvin Limited (Submitter #254)  
 Address for Service: The Planning Collective Limited  
 Mobile: 021 422 346  
 Email: Burnete@thepec.co.nz

**2 SCOPE OF FURTHER SUBMISSION**

This is a further submission addressing the following submissions on Plan Change 100 (Private) Riverhead:

- Submission No. 1, David Lyon
- Submission No. 2, BA Kruse & SM Farley, Beverley Kruse family Trust
- Submission No. 3, Alexandra Grace Roland
- Submission No. 24, Kate Frances Lyon
- Submission No. 28, Jane Sparnon
- Submission No. 35, Anna Johnston
- Submission No. 49, Allyson Shepherd
- Submission No. 55, Branyn Bellaney
- Submission No. 71, Michael Robert Brooke
- Submission No. 93, Chris Harker
- Submission No. 95, Ella McIntosh
- Submission No. 98, Bridget Michelle Hill
- Submission No. 106, Robyn Moore
- Submission No. 114, Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)
- Submission No. 122, Maraetai Land Development Limited
- Submission No. 123, Andrew Coombes and Tara Hatherley
- Submission No. 131, John Olding
- Submission No. 134, Mark and Joanne Robinson

- Submission No. 140, Caroline Church
- Submission No. 155, Susannah Marshall
- Submission No. 156, Gail Sclanders
- Submission No. 161, Auckland Transport
- Submission No. 167, New Zealand Transport Agency/Waka Kotahi
- Submission No. 168, Angela Yelavich
- Submission No. 174, Claire Walker
- Submission No. 176, Jade Lacey
- Submission No. 178, Linda Margaret McFadyen
- Submission No. 179, Francesca Johnson
- Submission No. 186, Auckland Council
- Submission No. 200, Danielle Jordan
- Submission No. 201, Junaid Shaik
- Submission No. 204, New Zealand Defence Force
- Submission No. 206, Emma Pearson
- Submission No. 208, Janelle Lisa Redditt
- Submission No. 209, Wayne Mitchell
- Submission No. 210, Terence L Klein
- Submission No. 212, Jann Olding
- Submission No. 214, Ministry of Education
- Submission No. 218, Watercare Services Limited
- Submission No. 220, Equal Justice Project
- Submission No. 224, Chhitiza Basnet
- Submission No. 226, Chhitiza Basnet
- Submission No. 228, Sandi Gamon
- Submission No. 252, Kahryn Boyes

Please refer to the further submission table provided as **Attachment 2** which details the further submission/s and decisions sought.

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(Persons authorised to sign on behalf of submitter)

Date: 25/07/2024

## Attachment 2: Further Submission/s Table

### Further Submission on Plan Change 100 (Private) Riverhead

DATE 25/07/2024

Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
1	1.1	David Lyon	Decline the plan change	Oppose	<p>The land is zoned for Future Urban purposes, therefore urban development is expected in this location.</p> <p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.</p> <p>It is the role of the Ministry of Education to provide education facilities to meet the current and future growth demands. New schools would be able to establish within the Plan Change area (subject to resource consent) if the Ministry of Education desired.</p> <p>The Plan Change is consistent with the zoning proposed within Plan Change 78 and within the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 which allows for a more intensive type of housing on land within residential environments.</p>	Disallow
2	2.1	BA Kruse & SM Farley, Beverley Kruse family Trust	Approve the plan change without amendments	Support	Support	Allow
3	3.1	Alexandra Grace Roland	Decline the plan change	Oppose	<p>The land is zoned for Future Urban purposes, therefore urban development is expected in this location.</p> <p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.</p> <p>It is the role of the Ministry of Education to provide education facilities to meet the current and future growth demands. New schools will be able to establish within the Plan Change area if the Ministry of Education desired.</p>	Disallow

Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
24	24.5	Kate Frances Lyon	If approved provide a traffic management plan and a public transport plan	<b>Oppose in part</b>	<p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades. Infrastructure will be improved as a result of the Proposed Plan Change to provide for the additional residential capacity.</p> <p>It is the role of the Ministry of Education to provide education facilities to meet the current and future growth demands. New schools will be able to establish within the Plan Change area if the Ministry of Education desired.</p> <p>The Plan Change is consistent with the zoning proposed within Plan Change 78 and within the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 which allows for a more intensive type of housing on land within residential environments. The request for 800m<sup>2</sup> Sections is not consistent with the provisions of the Residential Single House Zone within the AUP or with the Legislation referred to above.</p>	<b>Disallow in part</b>
28	28.1	Jane Sparnon	Decline the plan change	<b>Oppose</b>	<p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades. Infrastructure will be improved as a result of the Proposed Plan Change to provide for the additional residential capacity.</p> <p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p>	<b>Disallow</b>
35	35.1	Anna Johnston	Decline the plan change	<b>Oppose</b>	<p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades. Infrastructure will be improved as a result of the Proposed Plan Change to provide for the additional residential capacity.</p> <p>It is the role of the Ministry of Education to provide education facilities to meet the current and future growth demands. New schools will be able to establish within the Plan Change area if the Ministry of Education desired.</p>	<b>Disallow</b>
49	49.1	Allyson Shepherd	Decline the plan change	<b>Oppose</b>	Auckland Transport have an approved Notice of Requirement R1 (not subject to Appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead and addresses a key concern raised in Submission 49.	<b>Disallow</b>

Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
					<p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.</p> <p>It is the role of the Ministry of Education to provide education facilities to meet the current and future growth demands. New schools will be able to establish within the Plan Change area if the Ministry of Education desired.</p> <p>The Submission makes reference to the Retirement Village consent being in place, which is incorrect. This decision was appealed to the High Court and subsequently declined. The presence of a retirement village does not pose any additional pressure on the primary and high schools and minimal additional pressure on traffic which is a key concern for this submitter. The retirement village proposal also included an early childhood centre which would have had a positive impact on providing educational facilities within Riverhead.</p>	
55	55.2	Branyn Bellaney	If approved build and upgrade roads to handle the traffic first	<b>Oppose in part</b>	<p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p> <p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.</p>	<b>Disallow in part</b>
71	71.1	Michael Robert Brooke	Decline the plan change	<b>Oppose</b>	<p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p> <p>Flooding issues are addressed thorough the Proposed Plan Change provisions and the proposed re-zoning has excluded areas that are susceptible to flooding as being suitable for urban development.</p> <p>While the submitted supports the land being zoned for Future Urban Purposes, they are opposed to the potential infrastructure issues that the Private Plan Change will create. The Private Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades. The proposed rezoning is appropriate for the land and will result in an efficient urban use of the site, within the Rural Urban Boundary of Riverhead.</p>	<b>Disallow</b>

Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
93	93.1	Chris Harker	Decline the plan change	Oppose	Approving the Private Plan Change and enabling the zoning to support a retirement village (subject to a Resource Consent) will assist in delivering some of the infrastructure mentioned such as footpaths. A retirement village will place limited demand on the Sports Park and is unlikely to cause further parking issues at the Memorial Park.	Disallow
95	95.4	Ella McIntosh	If approved review details of retirement village site	Oppose in part	<p>The submitter incorrectly notes that there are no substantial road upgrades being proposed. Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p> <p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.</p> <p>In regard to the Retirement Village, the Private Plan Change will provide for a zoning framework that allows for Retirement Village to establish within the Plan Change (subject to Resource Consent) area as well as other urban land uses. The Private Plan Change does not have to consider the details of the retirement village as this will be managed through the appropriate Resource Consenting Framework under the Auckland Unitary Plan.</p>	Disallow in part
98	98.9	Bridget Michelle Hill	Provide two distinct approaches, one with the retirement village and one without.	Oppose	<p>The proposed zoning is appropriate</p> <p>In regard to the Retirement Village, the Private Plan Change will provide for a zoning framework that allows for Retirement Village to establish within the Plan Change area (subject to Resource Consent) as well as other urban land uses. The Private Plan Change does not have to consider the details of the retirement village as this will be managed through the appropriate Resource Consenting Framework under the Auckland Unitary Plan.</p> <p>The Retirement Village is in the concept stage as it does not have a Resource Consent. The assessment criteria within PC100 will ensure that the effects are appropriately managed.</p>	Disallow
106	106.1	Robyn Moore	Decline the plan change	Oppose	In regard to the Retirement Village, the Private Plan Change will provide for a zoning framework that provides for Retirement Village to establish within the Plan Change area (subject to Resource Consent) as well as other urban land uses. The Private Plan Change does not have to consider the details of the retirement village as this will be managed through the appropriate Resource Consenting Framework under the Auckland Unitary Plan.	Disallow

Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
					The Retirement Village is in the concept stage as it does not have a Resource Consent. It does not need to be considered within the Private Plan Change. The infrastructure needs of any future retirement village will be addressed within the conditions of a future Resource Consent. In any case, the proposed Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.	
114	114.4	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	The proposed retirement village creates roading pinch points that should be addressed by requirements for various road upgrades set out in the submission	Oppose	The proposed retirement village had provision for pedestrian and public connection through the site and also proposed to provide roading connections generally as indicated on the Precinct Plan.  Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.	Disallow
	114.6	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	Any proposed commercial zoning to be justified by economic analysis that is based on a clear outline of existing zoning and activities in Riverhead, including under-utilising of zoned land and potential capacity, and recognition of the activities and services that would be provided by the retirement village and commercial activities that can be undertaken in the THAB zone via resource consent.	Neutral	The Application for Resource Consent for the Retirement Village Under the COVID 19 (Fast Track) Consenting Act 2020 (now repealed), an economic report was submitted that demonstrated that there was sufficient demand for a retirement village and associated commercial activities within this location.	Disallow in part.
	114.30	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	That the plan change be complete and robust in terms of dealing with the two scenarios of the retirement village being in place or not. Requiring cross-site connectivity and local roads for the scenario of the retirement village not being built	Oppose	In regard to the Retirement Village, the Private Plan Change will provide for a zoning framework that provides for Retirement Village to establish within the Plan Change area (subject to Resource Consent) as well as other urban land uses. The Private Plan Change does not have to consider the details of the retirement village as this will be managed through the appropriate Resource Consenting Framework under the Auckland Unitary Plan.	Disallow
122	122.1	Maraetai Land Development Limited	Approve the plan change without amendments	Support	Support	Support
123	123.1	Andrew Coombes and Tara Hatherley	Decline the plan change	Oppose	The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.	Disallow

Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
					<p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p> <p>In regard to the Retirement Village, the Private Plan Change will provide for a zoning framework that provides for Retirement Village to establish within the Plan Change area (subject to Resource Consent) as well as other urban land uses. The Private Plan Change does not have to consider the details of the retirement village as this will be managed through the appropriate Resource Consenting Framework under the Auckland Unitary Plan, including stormwater issues.</p> <p>The commercial zones are justified and consistent with the Economic Analysis provided with the Plan Change.</p>	
131	131.1	John Olding	Decline the plan change	<b>Oppose</b>	The Submitter refers to the Submission by the Riverhead Community Association: Please Refer to submission points against Submitted 114.	<b>Disallow</b>
134	134.1	Mark and Joanne Robinson	Decline the plan change	<b>Oppose</b>	<p>In regard to the Retirement Village, the Private Plan Change will provide for a zoning framework that provides for Retirement Village to establish within the Plan Change area (subject to Resource Consent) as well as other urban land uses. The Private Plan Change does not have to consider the details of the retirement village as this will be managed through the appropriate Resource Consenting Framework under the Auckland Unitary Plan.</p> <p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.</p> <p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p>	<b>Disallow</b>
140	140.1	Caroline Church	Decline the plan change	<b>Oppose</b>	In regard to the Retirement Village, the Private Plan Change will provide for a zoning framework that provides for Retirement Village to establish within the Plan Change area (subject to Resource Consent) as well as other urban land uses. The Private Plan Change does not have to consider the details of the retirement village as this will be managed through the appropriate Resource Consenting Framework under the Auckland Unitary Plan.	<b>Disallow</b>



Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
					<p>The proposed Private Plan Change is consistent with the zoning proposed within Plan Change 78 and within the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 which allows for a more intensive type of housing on land within residential environments.</p> <p>The commercial zones are justified and consistent with the Economic Analysis provided with the Plan Change.</p>	
155	155.1	Susannah Marshall	Decline the plan change	<b>Oppose</b>	<p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.</p> <p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p> <p>Construction effects can be managed through the appropriate Resource Consent Conditions for future development.</p> <p>The land is zoned for Future Urban purposes, therefore some degree of urban development is expected in this location.</p>	<b>Disallow</b>
156	156.1	Gail Sclanders	Decline the plan change	<b>Oppose in Part</b>	<p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.</p> <p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p>	<b>Disallow</b>
161	161.1 161.2 161.3	Auckland Transport	Decline the plan change unless the matters set out in this submission, as outlined in the main body of this submission and in this table, are addressed and resolved to Auckland Transport's satisfaction.	<b>Oppose</b>	<p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p> <p>The land is zoned for future urban purposes; therefore some degree of urban development is expected in this location.</p>	<b>Disallow</b>
	161.4	Auckland Transport		<b>Oppose in part</b>	Subject to reasonable provisions to manage noise being agreed / achieved.	<b>Allow in part</b>

Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
			Amend the plan change by including precinct provisions (an objective, policy, a standard, matter(s) of discretion, and assessment criteria) to require that future developments and alterations to existing buildings mitigate potential road traffic noise effects on activities sensitive to noise from the existing arterials being Coatesville-Riverhead Highway and Riverhead Road.			
	161.5	Auckland Transport	Amend third to last paragraph as follows:  'The precinct includes provisions to ensure that the subdivision and development of land <del>for development</del> is coordinated with the <u>construction</u> of transport and infrastructure upgrades necessary to manage and mitigate <del>potential</del> adverse effects on the <u>local and</u> wider transport network. <u>Provision is also made for the future widening of Riverhead Road.</u> '	Oppose in part	Support in part subject to reasonable outcome on provisions being agreed.	Allow in part
	161.8	Auckland Transport	Insert a new Objective as follows: <u>'(x) Subdivision and development does not occur in advance of the availability of operational transport infrastructure, including regional and local transport infrastructure.'</u>	Oppose in part	Subdivision and development should be delivered in conjunction with suitable transport infrastructure or enable an effects-based assessment.	Disallow
	161.9	Auckland Transport	Insert a new Objective as follows: <u>'(x) Development provides for future road widening on Riverhead Road.'</u>	Oppose in part	Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road and includes road widening.  Support is given to the road widening shown on Precinct Plan 3, within the proposed Private Plan Change.  Support is given to this Objective subject to reasonable outcome road widening outcome, which will be determined at Resource Consent stage.	Allow in part
	161.10	Auckland Transport	Insert a new policy as follows: <u>'(x) Require that subdivision and development in the Precinct does not occur in advance of the availability of operational transport infrastructure.'</u>	Oppose in part	Subdivision and development should be delivered in conjunction with suitable transport infrastructure or enable an effects-based assessment.	Disallow
	161.11	Auckland Transport	Insert a new policy as follows: <u>'(x) Require development with frontage to Riverhead Road to provide for future road widening.'</u>	Oppose in part	Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road and includes road widening.  Support is given to the road widening shown on Precinct Plan 3, within the proposed Private Plan Change.	Allow in part

Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
					Support is given to this Objective subject to reasonable outcome road widening outcome, which will be determined at Resource Consent stage.	
	161.12	Auckland Transport	Amend Policy 4 as follows: '(4) Require <u>subdivision and</u> the occupation of buildings in the precinct to be coordinated with required transport infrastructure upgrades to minimise the adverse effects of development on the safety, efficiency and effectiveness of the surrounding road network.'	Oppose in part	Subdivision and development should be delivered in conjunction with suitable transport infrastructure or enable an effects-based assessment.	Disallow
	161.14	Auckland Transport	Amend Policy 8 as follows: '(8) Require the key local roads and pedestrian connections to be <u>provided</u> generally in the locations shown in IX.10.2 Riverhead: Precinct plan 2, while allowing for variation where it would achieve a highly connected <u>street layout of streets and pedestrian connections</u> that integrates with the <u>collector road network within the precinct and the surrounding existing and proposed</u> transport network.'	Oppose in part	Support is given to Precinct Plan 2 within the proposed Private Plan Change.	Allow
	161.16	Auckland Transport	Amend Policy 10 as follows: '(10) Require streets to be attractively designed and to appropriately provide for all transport modes by: (a) providing <del>for</del> safe <u>separated</u> access for cyclists on <u>arterial and</u> collector roads; (x) <u>providing upgrades to existing road frontages of the precinct to an urban standard and pedestrian connections to the existing Riverhead settlement;</u> (x) <u>providing safe crossing facilities for pedestrians and cyclists;</u> (x) <u>providing upgraded public transport facilities on Coatesville-Riverhead Highway;</u> (b) providing a level of landscaping that is appropriate for the function of the street; and (c) providing for the safe and efficient movement of vehicles.'	Oppose in part	Support for proposed amendments to Policy 10	Allow
	161.17	Auckland Transport	Amend Table IX.4.1 so that either: a) All development activities are listed under "Development" and all subdivision activities are listed under "Subdivision", including (without limitation) so that activities (A4) to (A6) appear in both parts of the activity table; or b) Alternatively, subdivision and development headings are combined and include all activities.	Oppose in part	Table IX4.1 could be worded to make a clearer distinction between subdivision and development	Allow in part
	161.18	Auckland Transport		Oppose in part	The proposed Private Plan change has acceptable consent triggers as currently worded.	Disallow

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			Amend Table IX.4.1 Activity table - Precinct-wide activities, (A4) and (A5), so that non-complying activity status (rather than discretionary or restricted discretionary status) applies to 'Subdivision <u>and</u> development that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades (other than in relation to specific design requirements in Appendix 1: Road function and design elements table - Internal roads within Precinct, and / or Appendix 2: Road function and design elements table - External roads to the Precinct)'. Make consequential amendments to the matters of discretion and assessment criteria to reflect the removal of the restricted discretionary activity.		Subdivision <u>and</u> development that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades (other than in relation to specific design requirements in Appendix 1: Road function and design elements table - Internal roads within Precinct, and / or Appendix 2: Road function and design elements table - External roads to the Precinct)- should be a Discretionary Activity as it will not meet the general standard. The Rule table IX4.1 could be updated to clarify this.	
	161.20	Auckland Transport	Amend Table IX.4.2 Activity table - Sub-precinct A activities by deleting (A7) as follows, together with the associated permitted activity status: <del>'Restaurants and cafes up to 250m<sup>2</sup> gross floor area per site'</del> Make consequential amendments to the exclusions listed under Standard IX.4 Activity table, for Sub-precinct A.	Oppose in part	The THAB Zone allows for Dairies up to 100m2 and Restaurants up to 100m2 as Restricted Discretionary Activities. The present provides greater flexibility for the development of the limited area of the corner site to provide for larger commercial activities.  To be consistent with the THAB Zone, perhaps the activity status of (A9) and (A10) the could be revised, subject to reasonable standards.	Disallow in part
	161.21	Auckland Transport	Amend Table IX.4.2 Activity table - Sub-precinct A activities by deleting (A8) as follows, together with the associated permitted activity status: <del>'Retail up to 100m<sup>2</sup> gross floor area per site'</del>	Oppose in part	The THAB Zone allows for Dairies up to 100m2 and Restaurants up to 100m2 as Restricted Discretionary Activities. The present provides greater flexibility for the development of the limited area of the corner site to provide for larger commercial activities.  To be consistent with the THAB Zone, perhaps the activity status of (A9) and (A10) the could be revised, subject to reasonable standards.	Disallow in part
	161.22	Auckland Transport	Amend Table IX.4.2 Activity table - Sub-precinct A activities by amending (A9) as follows: 'Healthcare facility up to 250m <sup>2</sup> <u>gross floor area</u> '	Oppose in part	Support for addition of GFA	Allow
	161.23	Auckland Transport	Delete Standard IX.5 Notification (1) to enable the normal RMA notification tests to apply. Make a consequential amendment to IX.5(2) to delete reference to (1).	Oppose in part	Restricted Discretionary Consents should not have to be notified as otherwise there is no consenting certainty.  There is a clause in the proposed wording of IX.5 that gives Auckland Transport the opportunity to comment on Restricted Discretionary Activities- as per below:  (1) <i>Any application for a restricted discretionary activity listed in Table IX.4.1 Activity table above, will be considered without public or limited notification or the need to obtain written approval from affected parties unless the Council decides that special circumstances exist under sections 95A(9) or 95B(10) of the Resource Management Act 1991. (emphasis added).</i>	Disallow

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	161.25	Auckland Transport	Amend Standard IX.6.1 Staging of development with transport upgrades, so that it clearly links the requirements for transport upgrades with subdivision as well as development. This will require amendments to items (1) to (5) to require upgrades to be aligned with subdivision as well as the occupation of buildings. An example of appropriate drafting is provided in I451.6.2 of the AUP(OP). The further amendments to Standard IX.6.1 set out later in this submission are subject to this overarching request.	Oppose in part	Support is subject to appropriate effects-based outcome, and the wording of items (1) to (5) being retained in relation to “dwelling” or “building.”	Allow in part
	161.26	Auckland Transport	Amend the title and purpose statement of Standard IX.6.1 as follows: <b>'IX.6.1. Staging of <u>subdivision and development with transport upgrades</u></b> <b>Purpose:</b> <ul style="list-style-type: none"> <li>To <del>manage</del> <u>mitigate</u> the adverse effects of traffic on the safety and efficiency of the surrounding <u>local and wider</u> road network for all modes of transport by ensuring subdivision and development is coordinated with transport infrastructure.</li> <li>To <u>achieve the integration of land use and</u> transport.</li> <li>To <u>ensure that subdivision and development complies with Appendices 1 and 2 Road function and design elements tables.</u></li> </ul>	Oppose in part	Subdivision can be approved subject to s224(c) conditions requiring infrastructure upgrades.	Allow in part
	161.27	Auckland Transport	Subject to Auckland Transport's main submission point above about re-drafting IX.6.1 generally, amend Standard IX.6.1(1) as follows: '(1) Prior to occupation of a <del>dwelling</del> <u>any building</u> within the Riverhead Precinct, the following transport infrastructure must be constructed and operational: (a) ...' Similarly, amend other clauses in IX.6.1 to refer to ' <u>any building</u> ' rather than 'a building'.	Oppose in part	The wording of items (1) being retained in relation to “dwelling” rather than building. It may be appropriate to have some buildings within the precinct that do not need the upgrade of Coatesville-Riverhead Highway to be complete prior to occupation. This needs to be an affects-based assessment for “buildings” which is all inclusive of any development.	Disallow
	161.28	Auckland Transport	Subject to Auckland Transport's main submission point above about re-drafting IX.6.1 generally, amend Standard IX.6.1(2)(a) so that it clearly includes the public transport infrastructure and walking / cycling improvements (such as pedestrian crossings) identified in the ITA.	Oppose in part	The wording of items (1) being retained in relation to “dwelling” rather than building. It may be appropriate to have some buildings within the precinct that do not need the upgrade of Coatesville-Riverhead Highway to be complete prior to occupation. This needs to be an affects-based assessment for “buildings” which is all inclusive of any development.	Disallow
	161.29	Auckland Transport	Subject to Auckland Transport's main submission point above about re-drafting IX.6.1 generally, amend Standard IX.6.1(3)(a) so that it clearly includes the public transport infrastructure and walking / cycling improvements (such as pedestrian crossings) identified in the ITA.	Oppose in part	The wording of items (1) being retained in relation to “dwelling” rather than building. It may be appropriate to have some buildings within the precinct that do not need the upgrade of Coatesville-Riverhead Highway to be complete prior to occupation. This needs to be an affects-based assessment for “buildings” which is all inclusive of any development.	Disallow
				Oppose in part		Disallow in part

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	161.30	Auckland Transport	Subject to Auckland Transport's main submission point above about re-drafting IX.6.1 generally, amend Standard IX.6.1(3)(c) as follows: '(c) Upgrade and urbanise Riverhead Road, from the eastern boundary of 307 Riverhead Road to Coatesville-Riverhead Highway, including walking/cycling infrastructure, gateway threshold treatment, and public transport infrastructure in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2.'		The wording of items (1) being retained in relation to "dwelling" rather than building. It may be appropriate to have some buildings within the precinct that do not need the upgrade of Coatesville-Riverhead Highway to be complete prior to occupation. This needs to be an affects-based assessment for "buildings" which is all inclusive of any development.  Support is given to the proposed wording by Auckland Transport regarding IX.6.1(3)c.	
	161.31	Auckland Transport	Retain Standard IX.6.2, subject to a minor amendment to (1) as follows: '(1) A 2m wide road widening setback must be provided along that part of the frontage of the land adjoining Riverhead Road shown as subject to the <u>'Required Indicative Road Widening Required'</u> notation on the IX.10.3 Riverhead: Precinct plan 3.'	Oppose in part	Support for proposed amendments Standard IX.6.2	Allow
	161.33	Auckland Transport	Amend Matters of Discretion IX.8.1(1) to read: 'Healthcare facility up to 250m <sup>2</sup> <u>gross floor area per site</u> .'	Oppose in part	Support for addition of GFA	Allow
	161.34	Auckland Transport	Amend Matters of Discretion IX.8.1(2) by amending (a) and (b), and adding two new matters as follows: '(a) Location and design of the collector roads, key local roads and connections with neighbouring sites to achieve an integrated street network, and appropriately provide for all modes; (b) Provision of cycling and pedestrian networks and connections; <u>(x) Upgrades to public transport infrastructure;</u> <u>(x) Design and sequencing of upgrades to the existing road network;</u> ....'	Oppose in part	It is unclear to future development what public transport upgrades are needed. Auckland Transport notes in their submission that there is limited public transport in this location. If Auckland Transport need to undertake upgrades in this area, the timing of such should not hinder the development of the land in a way that puts the sole responsibility on the private developer. There may be cases where the land can be developed in such a way where no upgrades are needed to the public transport infrastructure. This will be determined at Resource Consent stage.	Disallow in part
	161.35	Auckland Transport	Make any further amendments to the matters of discretion to give effect to the general relief requested in relation to IX.6.1 above. For example, without limitation, if the Drury East 'model' (I451) is followed as suggested, then include a matter of discretion relating to the imposition of appropriate conditions.	Oppose in part	Refer to rationale in submission points 161.26 to 161.31, 161.33 and 161.34.	Disallow in part
	161.36	Auckland Transport	Delete the reference to Standard IX.6.1(2) - (6) from Matters of Discretion IX.8.1(4). This is consequential from an earlier submission point seeking a non-complying status for non-compliance with this standard.  If reference to Standard IX.6.1(2) - (6) is retained, amend as follows:  '(4) For subdivision and occupation of <del>dwellings</del> <u>buildings</u> that <del>does</del> <u>do</u>	Oppose in part	The wording of items (4) being retained in relation to "dwelling" rather than building. It may be appropriate to have some buildings within the precinct that do not need the upgrade of Coatesville-Riverhead Highway to be complete prior to occupation. This needs to be an affects-based assessment for "buildings" which is all inclusive of any development.  The wording in Table IX4.1 should be amended to have a Discretionary Status when the standards are not complied with- not non-complying as requested by Auckland Transport.	Disallow



Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
			not comply with Standard IX.6.1. Staging of development with transport upgrades. '  Insert the following matter of discretion for noncompliance with Appendices 1 and 2:  '(x) Road design and consistency with the transport related objectives and policies of the precinct'			
	161.37	Auckland Transport	Amend Assessment Criteria IX.8.2(2)(e) and the preceding heading as follows: <i>'Location of roads and other transport connections</i> (e) Whether the collector roads, key local roads and key <del>pedestrian</del> <u>active mode</u> connections are provided generally in the locations shown on IX.10.2 Riverhead: Precinct Plan 2 to achieve a highly connected street layout <u>and active mode network</u> that integrates with the surrounding transport network. <u>Whether an</u> alternative alignment that provides an equal or better degree of connectivity and amenity within and beyond the precinct may be appropriate, having regard to the following functional matters: (i) <u>Landownership patterns</u> , <del>the</del> presence of natural features, natural hazards, <del>or</del> contours <u>or other constraints</u> and how this impacts the placement of roads <u>and active mode connections</u> ; (ii) ... (iii) The constructability of roads and the ability for <del>it</del> <u>them</u> to be delivered by a single landowner <u>and connected beyond any property boundary within the precinct.'</u>	Oppose in part	Support for proposed amendments to Assessment Criteria IX.8.2(2)(e)	Allow
	161.38	Auckland Transport	Amend Assessment Criteria IX.8.2(2)(f) as follows: '(f) Whether a high quality and integrated network of <del>local</del> roads <u>(including collector and local roads)</u> is provided within the precinct that has a good degree of accessibility and supports a walkable street network. Whether roads and <u>active mode connections</u> are aligned to provide visual and physical connections to open spaces, including along the stream network, where the site conditions allow.'	Oppose in part	Support for proposed amendments to IX.8.2(2)(f)	Allow
	161.41	Auckland Transport	"Delete the reference to Standard IX.6.1(2)-(6) from Assessment Criteria IX.8.1(4). This is consequential from an earlier submission point seeking a non-complying status for non-compliance with this standard.  If the reference to Standard IX.6.1(2)-(6) is retained, then the requirement for an Integrated Transport Assessment (in IX.8.2(4)(a)) should be specifically addressed by an addition to IX.9 Special Information	Oppose in part	Non-comply activity status is not considered to be appropriate if the staging is not complied with. Discretionary Activity status should apply, and standards should be retained.	Disallow

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			<p>Requirements.</p> <p>Insert new assessment criteria for non-compliance with the Road Function and Design Elements tables as follows:</p> <p><u>‘(x) For subdivision and / or development that does not comply with the Road Function and Design Elements tables in Appendices 1 and 2</u>  <u>(a) Whether there are constraints or other factors present which make it impractical to comply with the required standards.</u>  <u>(b) Whether the design of the road and associated road reserve achieves the relevant transport-related policies of the Precinct.</u>  <u>(c) Whether the proposed design and road reserve:</u>  <u>(i) incorporates measures to achieve the required design speeds;</u>  <u>(ii) can safely accommodate required vehicle movements;</u>  <u>(iii) can appropriately accommodate all proposed infrastructure and roading elements including utilities and/or any stormwater treatment;</u>  <u>(iv) assesses the feasibility of upgrading any interim design or road reserve to the ultimate required standard.</u>  <u>(d) Whether there is an appropriate interface design treatment at property boundaries, particularly for pedestrians and cyclists.’</u></p> <p>Make consequential amendments to IX.8.2(4)."</p>			
	161.42	Auckland Transport	<p>Amend IX.9 Special information requirements, by adding the following:</p> <p><u>‘(5) Transport Design Report</u>  <u>Any proposed new key road intersection or upgrading of existing key road intersections illustrated on Precinct Plans 2 and 3 must be supported by a Transport Design Report and Concept Plans (including forecast transport modelling and land use assumptions), prepared by a suitably qualified transport engineer confirming that the location and design of any road and its intersection(s) supports the safe and efficient function of the existing and future (ultimate) transport network and can be accommodated within the proposed or available road reserves.</u>  <u>This may be included within a transport assessment supporting land use or subdivision consents.</u></p> <p><u>In addition, where an interim upgrade is proposed, information must be provided, detailing how the design allows for the ultimate upgrade to be efficiently delivered.’</u></p> <p>Make consequential amendments to Precinct Plans 2 and 3 to clearly identify the key road intersections.</p>	Oppose in part	<p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p> <p>Given the NOR this requirement is too onerous on the future developers of the land. More reasonable provisions should be discussed with Auckland Transport in light of the NOR.</p>	Disallow in part
	161.46	Auckland Transport	Amend the table in IX.11.1 Appendix 1 by adding the following footnote to the column headed ‘Minimum road reserve’:	Oppose in part	Support for proposed amendments to IX.11.1	Allow



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			<u>'Typical minimum width which may need to be varied in specific locations where required to accommodate network utilities, batters, structures, stormwater treatment, intersection design, significant constraints or other localised design requirements'</u>			
	161.47	Auckland Transport	Amend the table in IX.11.1 Appendix 1 by adding the following footnote to the column headed 'Bus provision': <u>'Carriageway and intersection geometry capable of accommodating buses. Bus stop form and locations and bus routes shall be determined with Auckland Transport at resource consent and engineering plan approval stage'</u>	Oppose in part	Support for proposed amendments to IX.11.1	Allow
	161.48	Auckland Transport	Amend the table in IX.11.2 Appendix 2 by adding the following footnote to the column headed 'Minimum road reserve': <u>'Typical minimum width which may need to be varied in specific locations where required to accommodate network utilities, batters, structures, stormwater treatment, intersection design, significant constraints or other localised design requirements'</u>	Oppose in part	Support for proposed amendments to IX.11.2	Allow
	161.49	Auckland Transport	Amend the table in IX.11.2 Appendix 2 by adding the following footnote to the column headed 'Bus provision': <u>'Carriageway and intersection geometry capable of accommodating buses. Bus stop form and locations and bus routes shall be determined with Auckland Transport at resource consent and engineering plan approval stage.'</u>	Oppose in part	Support proposed amendments to Appendix 2	Allow
	161.51	Auckland Transport	Amend the table in IX.11.2 Appendix 2 to include a row for Cambridge Road.	Oppose in part	It is not considered necessary to specify the requirements for Cambridge Road. There are no suggested standards for Cambridge Road by Auckland Transport.	Disallow in part
167	167.1	NZ Transport Agency Waka Kotahi (NZTA)	To amend (A4) to a Non Complying Activity.	Oppose in part	Non-complying activity status is not considered to be appropriate if the standards are not complied with. Discretionary Activity status should apply, and standards should be retained.	Disallow
168	168.1	Angela Yelavich	Decline the plan change	Oppose	Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.  The land is zoned for future urban purposes; therefore some degree of urban development is expected in this location.	Disallow
174	174.4	Claire Walker		Oppose	In regard to the Retirement Village, the Private Plan Change will provide for a zoning framework that provides for a Retirement Village to establish within the	Disallow

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			The enormous retirement village privatised site creates pinch points of available connectivity between the plan change area and existing Riverhead. East/west road connections through this area are key – providing chose to residents, weather on foot, bike or car. These should be recognised and addressed by requirements for upgrades		Plan Change area (subject to Resource Consent) as well as other urban land uses. The Private Plan Change does not have to consider the details of the retirement village as this will be managed through the appropriate Resource Consenting Framework under the Auckland Unitary Plan.	
	174.6	Claire Walker	These roads, and further routes to Riverhead School all warrant assessment and specific upgrades to ensure they are functional and safe. Similarly, the connection between the plan change area and Riverhead War Memorial Park has not been recognised as a primary route which is restricted by the CRH and horribly by the retirement village development. The supporting urban design report accurately describes War Memorial Park as the ‘heart of Riverhead’ but this recognition has not resulted in any meaningful response in PPC100. Specific provisions should also be applied to this area to ensure that development enables safe and logical east/west connections and road crossings over CRH. The tension is that the CRH is a significant commuter route, and every move which benefits pedestrians puts more strain on the function of this route for people moving west and east between Albany Highway and SH16.	Oppose	In regard to the Retirement Village, the Private Plan Change will provide for a zoning framework that provides for a Retirement Village to establish within the Plan Change area (subject to Resource Consent) as well as other urban land uses. The Private Plan Change does not have to consider the details of the retirement village as this will be managed through the appropriate Resource Consenting Framework under the Auckland Unitary Plan.  Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.	Disallow
	174.8	Claire Walker	I want any proposed commercial zoning to be justified by economic analysis that is based on a clear outline of existing zoning and activities in Riverhead, including under-utilising of zoned land and potential capacity, and recognition of the activities and services that would be provided by the retirement village (if it happens) and commercial activities that can be undertaken in the THAB zone via resource consent.	Oppose	The proposed Plan Change and the commercial zoning is supported by economic analysis.	Disallow
	174.30	Claire Walker	It is requested that the plan change be complete and robust in terms of dealing with the two scenarios of the retirement village being in place, or not. Requiring cross site connectivity and local roads for the scenario of the retirement village not being built. The interface with the residential community at Cambridge Road should be addressed in terms of appropriate bult form and interface outcomes.	Oppose	In regard to the Retirement Village, the Private Plan Change will provide for a zoning framework that provides for a Retirement Village to establish within the Plan Change area (subject to Resource Consent) as well as other urban land uses in the case of the retirement village not going ahead (i.e. provides for residential development). The Private Plan Change does not have to consider the details of the retirement village as this will be managed through the appropriate Resource Consenting Framework under the Auckland Unitary Plan.	Disallow
176	176.1	Jade Lacey	Decline the plan change	Oppose	The Submitter refers to the Submission by the Riverhead Community Association: Please Refer to submission points against Submitted 114.	Disallow
178	178.1	Linda Margaret McFadyen	Decline the plan change	Oppose	In regard to the Retirement Village, the Private Plan Change will provide for a zoning framework that provides for a Retirement Village to establish within the Plan Change area (subject to Resource Consent) as well as other urban land uses. The Private Plan Change does not have to consider the details of the retirement village as this will be managed through the appropriate Resource Consenting Framework under the Auckland Unitary Plan.	Disallow

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					The Submission makes reference to the Retirement Village consent being in place, which is incorrect. This decision was appealed to the High Court and declined.	
179	179.1	Francesca Johnson	Decline the plan change	<b>Oppose</b>	The Submitter refers to the Submission by the Riverhead Community Association: Please Refer to submission points against Submitted 114.	<b>Disallow</b>
186	186.1	Auckland Council	That the plan change is declined in its entirety, unless the matters raised in this submission are addressed.	<b>Oppose in part</b>	The new zoning provides greater potential to resolve both flooding and Public Transport issues within Riverhead.  Public Transport can be provided in conjunction with urban development and modern engineering solutions deal with stormwater management and flooding in a more sophisticated way than in older subdivisions	<b>Disallow in part</b>
	186.2	Auckland Council	a. Amend the zoning of the land within the plan change so that: i. The extent of the Rural – Mixed Rural zone encompasses all land in the plan change area that is within areas subject to significant risk of flooding and/or the National Grid Yard (Uncompromised).	<b>Oppose in part</b>	There is a potential; flood risk on 1092 Coatesville Riverhead Highway. However, through careful design, the flood risk can be mitigated and managed through appropriate stormwater design and infrastructure.  Flooding issues are addressed thorough the Proposed Plan Change provisions and the proposed re-zoning has excluded areas that are susceptible to flooding as being suitable for urban development.	<b>Disallow in part</b>
	186.4	Auckland Council	Amend the Precinct description to identify that there are transport upgrades and bulk water supply and wastewater infrastructure required prior to subdivision and development.	<b>Oppose in part</b>	The Precinct description should note that infrastructure should be delivered in conjunction with' subdivision and development	<b>Disallow</b>
	186.5	Auckland Council	Amend the Precinct to add new objectives and policies to only enable subdivision and development to occur once upgrades to transport infrastructure and necessary bulk water supply and wastewater infrastructure are operational.	<b>Oppose in part</b>	It is more efficient to require the upgrades as conditions of resource consents, rather than require the upgrades to have occurred before consent will be granted.  Infrastructure should be delivered in conjunction with' subdivision and development.	<b>Disallow</b>
	186.6	Auckland Council	Amend the Precinct to add new rules and standards to classify subdivision and development in advance of transport upgrades and necessary bulk water supply and wastewater infrastructure as a non-complying activity.	<b>Oppose in part</b>	Discretionary Activity is the most appropriate and it should be an effects based assessment, rather than default non-complying for an activity that may not require such upgrades.	<b>Disallow</b>
	186.8	Auckland Council	Amend the Precinct to add a special information requirement to require all applications for two or more dwellings and subdivision to provide a Wastewater Infrastructure Capacity Assessment.	<b>Oppose in part</b>	Support is given to the extent the provision enables urban development of the land subject to appropriate parameters.	<b>Allow in part</b>
	186.9	Auckland Council		<b>Oppose in part</b>	For reasons highlighted against submission 186 above.	<b>Disallow in part</b>

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			Amend the Precinct to address concerns in this submission relating to the adverse stormwater effects of urbanisation and downstream flooding.			
	186.10	Auckland Council	Any other alternative or consequential amendments to address the matters outlined in this submission.	Oppose in part	For reasons highlighted against submission 186 above.	Disallow in part
200	200.1	Danielle Jordan	Decline the plan change	Oppose	Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.  The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.	Disallow
201	201.2	Junaid Shaik	If approved provide more infrastructure before any housing development.	Oppose	Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.  The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.	Disallow
204	204.1	New Zealand Defence Force	Amend the Precinct chapter to reference Designation 4311 requirements Amend IX.1 Precinct description to add a sentence referencing Designation 4311 (additions underlined):  All relevant overlay, Auckland-wide and zone provisions apply in this precinct unless otherwise specified below.  <u>The precinct is subject to Designation 4311 Whenuapai Airfield Approach and Departure Path Protection which imposes restrictions in relation to permanent and temporary structure height. No permanent or temporary obstacle shall penetrate the approach and departure path obstacle limitation surfaces identified in Designation 4311 without the prior approval in writing of the New Zealand Defence Force.</u>	Oppose in Part	The Auckland wide zone provisions should cover this requirement for consultation.	Disallow in part
	204.2	New Zealand Defence Force	Amend IX. Activity table to add a sentence referencing Designation 4311 (additions underlined):	Oppose in Part	The Auckland wide zone provisions should cover this requirement for consultation.	Disallow in part

Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
			<p>Activity Table IX.4.1 specifies the activity status of subdivision and development in the Riverhead Precinct pursuant to sections 9(3) and 11 of the Resource Management Act 1991.</p> <p><u>The precinct is subject to Designation 4311 Whenuapai Airfield Approach and Departure Path Protection which imposes restrictions in relation to permanent and temporary structure height. No permanent or temporary obstacle shall penetrate the approach and departure path obstacle limitation surfaces identified in Designation 4311 without the prior approval in writing of the New Zealand Defence Force.</u></p>			
206	206.1	Emma Pearson	Decline the plan change	Oppose	<p>Matters raised in the submission can be addressed at Resource Consenting stage for any future development.</p> <p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p>	Disallow
208	208.1	Janelle Lisa Redditt	Decline the plan change	Oppose	<p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades. New schools will be able to establish within the Plan Change area if the Ministry of Education desired.</p> <p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p>	Disallow
209	209.1	Wayne Mitchell	Decline the plan change	Oppose	<p>There will be development that can take place without the vast array of infrastructure upgrades as suggested by the submitter.</p> <p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p> <p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.</p>	Disallow

Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
210	210.1	Terence L Klein	Decline the plan change	<b>Oppose</b>	The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.	<b>Disallow</b>
212	212.1	Jann Olding	Decline the plan change	<b>Oppose</b>	The Submitter refers to the Submission by the Riverhead Community Association: Please Refer to submission points against Submitted 114.  The existing provisions of the THAB will apply to the site should the Plan Change be approved. The existing Chapter E27 will apply to the site in regards to parking.	<b>Disallow</b>
214	214.2	Ministry of Education	Retain; Policy 10: Require streets to be attractively designed and to appropriately provide for all transport modes by: (a) providing for safe access for cyclists on collector roads. Policy 11: Provide safe connections to public transport facilities and social infrastructures such as open space and schools.	<b>Neutral</b>	Support for submission point	<b>Allow</b>
	214.3	Ministry of Education	That the Plan Change provisions include the appropriate level of provision and design detail to facilitate potential school bus routes to and from any future school site, connecting with Riverhead Road and Lathrope Road and in a manner that ensures safety for all road users, especially pedestrians travelling to and from the school.	<b>Neutral</b>	This will be determined through the Reosurce Consent process should a new school establish within the proposed Plan Change Area.	<b>Allow in part</b>
	214.4	Ministry of Education	That the RDA status for consents ensures activities are appropriately assessed if they are delivered ahead of the Implementation Plan infrastructure items	<b>Neutral</b>	Agree with this recommendation and to keep the Restricted Discretionary Activity Status where compliance with standards is achieved and Discretinoary if not.	<b>Allow</b>
218	218.1	Watercare services Limited	Decline the plan change	<b>Oppose in part</b>	The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside infrastructure upgrades.  The land is zoned for Future Urban purposes, therefore urban development is expected in this location.	<b>Disallow</b>
	218.2	Watercare services Limited	Without prejudice to its overall opposition to the Plan Change, if the Commissioners are minded to approve the Plan Change notwithstanding Watercare's opposition, Watercare seeks precinct provisions that require subdivision and development to be coordinated with the provision of adequate water supply and wastewater infrastructure. That is, subdivision and development must be precluded by under the precinct provisions from proceeding prior to completion of any necessary bulk water supply and wastewater infrastructure projects required to service the development enabled by Plan Change 100.	<b>Oppose in part</b>	The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside infrastructure upgrades.  It is more efficient to require the upgrades as conditions of resource consents, rather than require the upgrades to have occurred before consent will be granted.  Infrastructure should be delivered in conjunction with subdivision and development, rather than before subdivision and development can be approved.	<b>Disallow in part</b>



Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
	218.3	Watercare services Limited	Non-complying activity status for any subdivision and/or development that precedes the provision of adequate bulk water supply and wastewater infrastructure.	Oppose in part	This activity should be Discretionary Activity at most subject to demonstrating an acceptable solution to connect to the reticulated network.	Disallow
	218.6	Watercare services Limited	Amendments to Objective 5 to include the reference to 'capacity' and specify 'wastewater' and ensuring subdivision and development is coordinated with local infrastructure. This also supports the non-complying activity status.	Oppose in part	This activity should be Discretionary Activity at most subject to demonstrating an acceptable solution to connect to the reticulated network.	Disallow
	218.7	Watercare services Limited	New Objective 5(A) which addresses the coordination, provision and capacity of bulk water and wastewater infrastructure necessary to service the new precinct. This supports the non-complying activity status.	Oppose in part	This activity should be Discretionary Activity at most subject to demonstrating an acceptable solution to connect to the reticulated network.	Disallow
	218.8	Watercare services Limited	Amendments to Policy 5 and addition of a new Policy 5A to support the non-complying activity status subdivision or development that precedes the provision of adequate bulk water supply and wastewater infrastructure.	Oppose in part	This activity should be Discretionary Activity at most subject to demonstrating an acceptable solution to connect to the reticulated network.	Disallow
	218.9	Watercare services Limited	Amendments to include new standard IX6.16 Water and Wastewater Infrastructure to require development and subdivision to connect to functioning bulk wastewater and water supply infrastructure with sufficient capacity to service the development.	Oppose in part	Support this provision with the added wording, <i>"unless, with the agreement of Watercare Services Limited, another acceptable solution is proposed to service the development"</i>	Allow in part
	218.10	Watercare services Limited	Amendments to Table IX4.1(A2A) to require up to 3 dwellings to comply with new standard IX6.16 Water and Wastewater Infrastructure.	Oppose in part	Support this provision with the added wording, <i>"unless, with the agreement of Watercare Services Limited, another acceptable solution is proposed to service the development"</i>	Allow in part
	218.11	Watercare services Limited	Amendments to Table IX.4.1(A2B) to require more than three dwellings per site to comply with new standard IX6.16 Water and Wastewater Infrastructure.	Oppose in part	Support this provision with the added wording, <i>"unless, with the agreement of Watercare Services Limited, another acceptable solution is proposed to service the development"</i>	Allow in part
	218.12	Watercare services Limited	Amendments to IX.5 Notification (1A) requiring Watercare to be limited notified where resource consents infringe new standard IX6.16 Water and Wastewater Infrastructure.	Oppose in part	As per the rationale above.	Allow in part
	218.13	Watercare services Limited	Amendments to include new standard IX.9(6) Water and Wastewater Servicing Plan as a special information requirement.	Oppose in part	Support for the proposed amendments to IX.9(6)	Allow
220	220.1	Equal Justice Project	Decline the plan change	Oppose	The land is zoned for Future Urban purposes, therefore urban development is expected in this location.	Disallow

Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
					<p>The Plan Change is consistent with the zoning proposed within Plan Change 78 and within the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 which allows for a more intensive type of housing on land within residential environments.</p> <p>The Plan change will provide for a well-functioning urban environment.</p>	
224	224.1	Chhitiza Basnet	Decline the plan change	<b>Oppose</b>	<p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.</p> <p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p>	<b>Disallow</b>
226	226.1	John Cook	Decline the plan change	<b>Oppose</b>	<p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.</p> <p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p>	<b>Disallow</b>
228	228.1	Sandi Gamon	Decline the plan change	<b>Oppose</b>	<p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p> <p>The proposed retirement village concept design does include open spaces and the management of trees along Coatesville Riverhead Highway. The details raised in this submission will be addressed at the Resource Consent Stage, rather than the Plan Change stage.</p>	<b>Disallow</b>
252	252.1	Kathryn Boyes	Decline the plan change	<b>Oppose</b>	Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.	<b>Disallow</b>
	252.2	Kathryn Boyes	If approved no development without infrastructure	<b>Support in part</b>	The details raised in this submission will be addressed at the Resource Consent Stage, rather than the Plan Change stage. The Plan Change enables urban development. The Resource Consent stage will manage things like upgrades to Cambridge Road etc and stormwater/flooding management.	<b>Allow in part</b>



Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
					The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.	



END OF REPORT



Date 25/07/2024

Address Auckland Council

Attention: Unitary Plan <unitaryplan@aucklandcouncil.govt.nz

To whom it may concern,

**Further Submission on Plan Change 100 (Private) Riverhead**

Please find attached further submissions made on behalf of The Botanic Limited Partnership - (Submitter #253).

The further submitter has an interest greater than the public generally.

Yours sincerely

Burnette O'Connor  
Director/Planner  
The Planning Collective  
E: [burnette@thepec.co.nz](mailto:burnette@thepec.co.nz)  
M: 021-422 346

**Attachments:**

- 1) Form 6
- 2) Further Submission Table

## Attachment 1:



THE PLANNING  
COLLECTIVE

## Form 6

## FURTHER SUBMISSION/S TO PLAN CHANGE 100 (PRIVATE) RIVERHEAD

Clause 8 of Schedule 1, Resource Management Act 1991 (Form 6)

To: **Auckland Council**

**1. SUBMITTER DETAILS**

Name of Submitter: The Botanic Limited Partnership (#253)  
 Address for Service: The Planning Collective Limited  
 Mobile: 021 422 346  
 Email: Burnete@thepec.co.nz

**2 SCOPE OF FURTHER SUBMISSION**

This is a further submission addressing the following submissions on Plan Change 100 (Private) Riverhead:

- Submission No. 1, David Lyon
- Submission No. 2, BA Kruse & SM Farley, Beverley Kruse family Trust
- Submission No. 3, Alexandra Grace Roland
- Submission No. 24, Kate Frances Lyon
- Submission No. 28, Jane Sparnon
- Submission No. 35, Anna Johnston
- Submission No. 49, Allyson Shepherd
- Submission No. 55, Brany Bellaney
- Submission No. 71, Michael Robert Brooke
- Submission No. 93, Chris Harker
- Submission No. 95, Ella McIntosh
- Submission No. 98, Bridget Michelle Hill
- Submission No. 106, Robyn Moore
- Submission No. 114, Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)
- Submission No. 122, Maraetai Land Development Limited
- Submission No. 123, Andrew Coombes and Tara Hatherley

- Submission No. 131, John Olding
- Submission No. 134, Mark and Joanne Robinson
- Submission No. 140, Caroline Church
- Submission No. 155, Susannah Marshall
- Submission No. 156, Gail Sclanders
- Submission No. 161, Auckland Transport
- Submission No. 167, New Zealand Transport Agency/Waka Kotahi
- Submission No. 168, Angela Yelavich
- Submission No. 174, Claire Walker
- Submission No. 176, Jade Lacey
- Submission No. 178, Linda Margaret McFadyen
- Submission No. 179, Francesca Johnson
- Submission No. 186, Auckland Council
- Submission No. 200, Danielle Jordan
- Submission No. 201, Junaid Shaik
- Submission No. 204, New Zealand Defence Force
- Submission No. 206, Emma Pearson
- Submission No. 208, Janelle Lisa Redditt
- Submission No. 209, Wayne Mitchell
- Submission No. 210, Terence L Klein
- Submission No. 212, Jann Olding
- Submission No. 214, Ministry of Education
- Submission No. 218, Watercare Services Limited
- Submission No. 220, Equal Justice Project
- Submission No. 224, Chhitiza Basnet
- Submission No. 226, Chhitiza Basnet
- Submission No. 228, Sandi Gamon
- Submission No. 252, Kahryn Boyes

Please refer to the further submission table provided as **Attachment 2** which details the further submission/s and decisions sought.

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(Persons authorised to sign on behalf of submitter)

Date: 25/07/2024

Attachment 2:  
Further Submission/s Table

Further Submission on Plan Change 100 (Private) Riverhead

DATE 25/07/2024

Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
1	1.1	David Lyon	Decline the plan change	Oppose	<p>The land is zoned for Future Urban purposes, therefore urban development is expected in this location.</p> <p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.</p> <p>It is the role of the Ministry of Education to provide education facilities to meet the current and future growth demands. New schools would be able to establish within the Plan Change area (subject to resource consent) if the Ministry of Education desired.</p> <p>The Plan Change is consistent with the zoning proposed within Plan Change 78 and within the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 which allows for a more intensive type of housing on land within residential environments.</p>	Disallow
2	2.1	BA Kruse & SM Farley, Beverley Kruse family Trust	Approve the plan change without amendments	Support	Support	Allow
3	3.1	Alexandra Grace Roland	Decline the plan change	Oppose	<p>The land is zoned for Future Urban purposes, therefore urban development is expected in this location.</p> <p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.</p> <p>It is the role of the Ministry of Education to provide education facilities to meet the current and future growth demands. New schools will be able to establish within the Plan Change area if the Ministry of Education desired.</p>	Disallow

Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
24	24.5	Kate Frances Lyon	If approved provide a traffic management plan and a public transport plan	<b>Oppose in part</b>	<p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades. Infrastructure will be improved as a result of the Proposed Plan Change to provide for the additional residential capacity.</p> <p>It is the role of the Ministry of Education to provide education facilities to meet the current and future growth demands. New schools will be able to establish within the Plan Change area if the Ministry of Education desired.</p> <p>The Plan Change is consistent with the zoning proposed within Plan Change 78 and within the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 which allows for a more intensive type of housing on land within residential environments. The request for 800m<sup>2</sup> Sections is not consistent with the provisions of the Residential Single House Zone within the AUP or with the Legislation referred to above.</p>	<b>Disallow in part</b>
28	28.1	Jane Sparnon	Decline the plan change	<b>Oppose</b>	<p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades. Infrastructure will be improved as a result of the Proposed Plan Change to provide for the additional residential capacity.</p> <p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p>	<b>Disallow</b>
35	35.1	Anna Johnston	Decline the plan change	<b>Oppose</b>	<p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades. Infrastructure will be improved as a result of the Proposed Plan Change to provide for the additional residential capacity.</p> <p>It is the role of the Ministry of Education to provide education facilities to meet the current and future growth demands. New schools will be able to establish within the Plan Change area if the Ministry of Education desired.</p>	<b>Disallow</b>
49	49.1	Allyson Shepherd	Decline the plan change	<b>Oppose</b>	Auckland Transport have an approved Notice of Requirement R1 (not subject to Appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead and addresses a key concern raised in Submission 49.	<b>Disallow</b>



Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
					<p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.</p> <p>It is the role of the Ministry of Education to provide education facilities to meet the current and future growth demands. New schools will be able to establish within the Plan Change area if the Ministry of Education desired.</p> <p>The Submission makes reference to the Retirement Village consent being in place, which is incorrect. This decision was appealed to the High Court and subsequently declined. The presence of a retirement village does not pose any additional pressure on the primary and high schools and minimal additional pressure on traffic which is a key concern for this submitter. The retirement village proposal also included an early childhood centre which would have had a positive impact on providing educational facilities within Riverhead.</p>	
55	55.2	Branyn Bellaney	If approved build and upgrade roads to handle the traffic first	<b>Oppose in part</b>	<p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p> <p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.</p>	<b>Disallow in part</b>
71	71.1	Michael Robert Brooke	Decline the plan change	<b>Oppose</b>	<p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p> <p>Flooding issues are addressed thorough the Proposed Plan Change provisions and the proposed re-zoning has excluded areas that are susceptible to flooding as being suitable for urban development.</p> <p>While the submitted supports the land being zoned for Future Urban Purposes, they are opposed to the potential infrastructure issues that the Private Plan Change will create. The Private Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades. The proposed rezoning is appropriate for the land and will result in an efficient urban use of the site, within the Rural Urban Boundary of Riverhead.</p>	<b>Disallow</b>

Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
93	93.1	Chris Harker	Decline the plan change	Oppose	Approving the Private Plan Change and enabling the zoning to support a retirement village (subject to a Resource Consent) will assist in delivering some of the infrastructure mentioned such as footpaths. A retirement village will place limited demand on the Sports Park and is unlikely to cause further parking issues at the Memorial Park.	Disallow
95	95.4	Ella McIntosh	If approved review details of retirement village site	Oppose in part	<p>The submitter incorrectly notes that there are no substantial road upgrades being proposed. Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p> <p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.</p> <p>In regard to the Retirement Village, the Private Plan Change will provide for a zoning framework that allows for Retirement Village to establish within the Plan Change (subject to Resource Consent) area as well as other urban land uses. The Private Plan Change does not have to consider the details of the retirement village as this will be managed through the appropriate Resource Consenting Framework under the Auckland Unitary Plan.</p>	Disallow in part
98	98.9	Bridget Michelle Hill	Provide two distinct approaches, one with the retirement village and one without.	Oppose	<p>The proposed zoning is appropriate</p> <p>In regard to the Retirement Village, the Private Plan Change will provide for a zoning framework that allows for Retirement Village to establish within the Plan Change area (subject to Resource Consent) as well as other urban land uses. The Private Plan Change does not have to consider the details of the retirement village as this will be managed through the appropriate Resource Consenting Framework under the Auckland Unitary Plan.</p> <p>The Retirement Village is in the concept stage as it does not have a Resource Consent. The assessment criteria within PC100 will ensure that the effects are appropriately managed.</p>	Disallow
106	106.1	Robyn Moore	Decline the plan change	Oppose	In regard to the Retirement Village, the Private Plan Change will provide for a zoning framework that provides for Retirement Village to establish within the Plan Change area (subject to Resource Consent) as well as other urban land uses. The Private Plan Change does not have to consider the details of the retirement village as this will be managed through the appropriate Resource Consenting Framework under the Auckland Unitary Plan.	Disallow

Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
					The Retirement Village is in the concept stage as it does not have a Resource Consent. It does not need to be considered within the Private Plan Change. The infrastructure needs of any future retirement village will be addressed within the conditions of a future Resource Consent. In any case, the proposed Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.	
114	114.4	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	The proposed retirement village creates roading pinch points that should be addressed by requirements for various road upgrades set out in the submission	Oppose	<p>The proposed retirement village had provision for pedestrian and public connection through the site and also proposed to provide roading connections generally as indicated on the Precinct Plan.</p> <p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p>	Disallow
	114.6	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	Any proposed commercial zoning to be justified by economic analysis that is based on a clear outline of existing zoning and activities in Riverhead, including under-utilising of zoned land and potential capacity, and recognition of the activities and services that would be provided by the retirement village and commercial activities that can be undertaken in the THAB zone via resource consent.	Neutral	The Application for Resource Consent for the Retirement Village Under the COVID 19 (Fast Track) Consenting Act 2020 (now repealed), an economic report was submitted that demonstrated that there was sufficient demand for a retirement village and associated commercial activities within this location.	Disallow in part.
	114.30	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	That the plan change be complete and robust in terms of dealing with the two scenarios of the retirement village being in place or not. Requiring cross-site connectivity and local roads for the scenario of the retirement village not being built	Oppose	In regard to the Retirement Village, the Private Plan Change will provide for a zoning framework that provides for Retirement Village to establish within the Plan Change area (subject to Resource Consent) as well as other urban land uses. The Private Plan Change does not have to consider the details of the retirement village as this will be managed through the appropriate Resource Consenting Framework under the Auckland Unitary Plan.	Disallow
122	122.1	Maraetai Land Development Limited	Approve the plan change without amendments	Support	Support	Support
123	123.1	Andrew Coombes and Tara Hatherley	Decline the plan change	Oppose	The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.	Disallow

Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
					<p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p> <p>In regard to the Retirement Village, the Private Plan Change will provide for a zoning framework that provides for Retirement Village to establish within the Plan Change area (subject to Resource Consent) as well as other urban land uses. The Private Plan Change does not have to consider the details of the retirement village as this will be managed through the appropriate Resource Consenting Framework under the Auckland Unitary Plan, including stormwater issues.</p> <p>The commercial zones are justified and consistent with the Economic Analysis provided with the Plan Change.</p>	
131	131.1	John Olding	Decline the plan change	<b>Oppose</b>	The Submitter refers to the Submission by the Riverhead Community Association: Please Refer to submission points against Submitted 114.	<b>Disallow</b>
134	134.1	Mark and Joanne Robinson	Decline the plan change	<b>Oppose</b>	<p>In regard to the Retirement Village, the Private Plan Change will provide for a zoning framework that provides for Retirement Village to establish within the Plan Change area (subject to Resource Consent) as well as other urban land uses. The Private Plan Change does not have to consider the details of the retirement village as this will be managed through the appropriate Resource Consenting Framework under the Auckland Unitary Plan.</p> <p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.</p> <p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p>	<b>Disallow</b>
140	140.1	Caroline Church	Decline the plan change	<b>Oppose</b>	In regard to the Retirement Village, the Private Plan Change will provide for a zoning framework that provides for Retirement Village to establish within the Plan Change area (subject to Resource Consent) as well as other urban land uses. The Private Plan Change does not have to consider the details of the retirement village as this will be managed through the appropriate Resource Consenting Framework under the Auckland Unitary Plan.	<b>Disallow</b>

Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
					<p>The proposed Private Plan Change is consistent with the zoning proposed within Plan Change 78 and within the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 which allows for a more intensive type of housing on land within residential environments.</p> <p>The commercial zones are justified and consistent with the Economic Analysis provided with the Plan Change.</p>	
155	155.1	Susannah Marshall	Decline the plan change	<b>Oppose</b>	<p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.</p> <p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p> <p>Construction effects can be managed through the appropriate Resource Consent Conditions for future development.</p> <p>The land is zoned for Future Urban purposes, therefore some degree of urban development is expected in this location.</p>	<b>Disallow</b>
156	156.1	Gail Sclanders	Decline the plan change	<b>Oppose in Part</b>	<p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.</p> <p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p>	<b>Disallow</b>
161	161.1 161.2 161.3	Auckland Transport	Decline the plan change unless the matters set out in this submission, as outlined in the main body of this submission and in this table, are addressed and resolved to Auckland Transport's satisfaction.	<b>Oppose</b>	<p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p> <p>The land is zoned for future urban purposes; therefore some degree of urban development is expected in this location.</p>	<b>Disallow</b>
	161.4	Auckland Transport		<b>Oppose in part</b>	Subject to reasonable provisions to manage noise being agreed / achieved.	<b>Allow in part</b>

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			Amend the plan change by including precinct provisions (an objective, policy, a standard, matter(s) of discretion, and assessment criteria) to require that future developments and alterations to existing buildings mitigate potential road traffic noise effects on activities sensitive to noise from the existing arterials being Coatesville-Riverhead Highway and Riverhead Road.			
	161.5	Auckland Transport	Amend third to last paragraph as follows:  'The precinct includes provisions to ensure that the subdivision and development of land <del>for development</del> is coordinated with the <u>construction</u> of transport and infrastructure upgrades necessary to manage and <del>mitigate potential</del> adverse effects on the <u>local and</u> wider transport network. <u>Provision is also made for the future widening of Riverhead Road.'</u>	Oppose in part	Support in part subject to reasonable outcome on provisions being agreed.	Allow in part
	161.8	Auckland Transport	Insert a new Objective as follows: <u>'(x) Subdivision and development does not occur in advance of the availability of operational transport infrastructure, including regional and local transport infrastructure.'</u>	Oppose in part	Subdivision and development should be delivered in conjunction with suitable transport infrastructure or enable an effects-based assessment.	Disallow
	161.9	Auckland Transport	Insert a new Objective as follows: <u>'(x) Development provides for future road widening on Riverhead Road.'</u>	Oppose in part	Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road and includes road widening.  Support is given to the road widening shown on Precinct Plan 3, within the proposed Private Plan Change.  Support is given to this Objective subject to reasonable outcome road widening outcome, which will be determined at Resource Consent stage.	Allow in part
	161.10	Auckland Transport	Insert a new policy as follows: <u>'(x) Require that subdivision and development in the Precinct does not occur in advance of the availability of operational transport infrastructure.'</u>	Oppose in part	Subdivision and development should be delivered in conjunction with suitable transport infrastructure or enable an effects-based assessment.	Disallow
	161.11	Auckland Transport	Insert a new policy as follows: <u>'(x) Require development with frontage to Riverhead Road to provide for future road widening.'</u>	Oppose in part	Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road and includes road widening.  Support is given to the road widening shown on Precinct Plan 3, within the proposed Private Plan Change.	Allow in part

Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
					Support is given to this Objective subject to reasonable outcome road widening outcome, which will be determined at Resource Consent stage.	
	161.12	Auckland Transport	Amend Policy 4 as follows: '(4) Require <u>subdivision and</u> the occupation of buildings in the precinct to be coordinated with required transport infrastructure upgrades to minimise the adverse effects of development on the safety, efficiency and effectiveness of the surrounding road network.'	Oppose in part	Subdivision and development should be delivered in conjunction with suitable transport infrastructure or enable an effects-based assessment.	Disallow
	161.14	Auckland Transport	Amend Policy 8 as follows: '(8) Require the key local roads and pedestrian connections to be <u>provided</u> generally in the locations shown in IX.10.2 Riverhead: Precinct plan 2, while allowing for variation where it would achieve a highly connected <u>street layout of streets and pedestrian connections</u> that integrates with the <u>collector road network within the precinct and the surrounding existing and proposed</u> transport network.'	Oppose in part	Support is given to Precinct Plan 2 within the proposed Private Plan Change.	Allow
	161.16	Auckland Transport	Amend Policy 10 as follows: '(10) Require streets to be attractively designed and to appropriately provide for all transport modes by: (a) providing <del>for</del> safe <u>separated</u> access for cyclists on <u>arterial and</u> collector roads; (x) <u>providing upgrades to existing road frontages of the precinct to an urban standard and pedestrian connections to the existing Riverhead settlement;</u> (x) <u>providing safe crossing facilities for pedestrians and cyclists;</u> (x) <u>providing upgraded public transport facilities on Coatesville-Riverhead Highway;</u> (b) providing a level of landscaping that is appropriate for the function of the street; and (c) providing for the safe and efficient movement of vehicles.'	Oppose in part	Support for proposed amendments to Policy 10	Allow
	161.17	Auckland Transport	Amend Table IX.4.1 so that either: a) All development activities are listed under "Development" and all subdivision activities are listed under "Subdivision", including (without limitation) so that activities (A4) to (A6) appear in both parts of the activity table; or b) Alternatively, subdivision and development headings are combined and include all activities.	Oppose in part	Table IX4.1 could be worded to make a clearer distinction between subdivision and development	Allow in part
	161.18	Auckland Transport		Oppose in part	The proposed Private Plan change has acceptable consent triggers as currently worded.	Disallow



Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
			Amend Table IX.4.1 Activity table - Precinct-wide activities, (A4) and (A5), so that non-complying activity status (rather than discretionary or restricted discretionary status) applies to 'Subdivision <u>and</u> development that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades (other than in relation to specific design requirements in Appendix 1: Road function and design elements table - Internal roads within Precinct, and / or Appendix 2: Road function and design elements table - External roads to the Precinct)'. Make consequential amendments to the matters of discretion and assessment criteria to reflect the removal of the restricted discretionary activity.		Subdivision <u>and</u> development that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades (other than in relation to specific design requirements in Appendix 1: Road function and design elements table - Internal roads within Precinct, and / or Appendix 2: Road function and design elements table - External roads to the Precinct)- should be a Discretionary Activity as it will not meet the general standard. The Rule table IX4.1 could be updated to clarify this.	
	161.20	Auckland Transport	Amend Table IX.4.2 Activity table - Sub-precinct A activities by deleting (A7) as follows, together with the associated permitted activity status: <del>'Restaurants and cafes up to 250m<sup>2</sup> gross floor area per site'</del> Make consequential amendments to the exclusions listed under Standard IX.4 Activity table, for Sub-precinct A.	Oppose in part	The THAB Zone allows for Dairies up to 100m2 and Restaurants up to 100m2 as Restricted Discretionary Activities. The present provides greater flexibility for the development of the limited area of the corner site to provide for larger commercial activities.  To be consistent with the THAB Zone, perhaps the activity status of (A9) and (A10) the could be revised, subject to reasonable standards.	Disallow in part
	161.21	Auckland Transport	Amend Table IX.4.2 Activity table - Sub-precinct A activities by deleting (A8) as follows, together with the associated permitted activity status: <del>'Retail up to 100m<sup>2</sup> gross floor area per site'</del>	Oppose in part	The THAB Zone allows for Dairies up to 100m2 and Restaurants up to 100m2 as Restricted Discretionary Activities. The present provides greater flexibility for the development of the limited area of the corner site to provide for larger commercial activities.  To be consistent with the THAB Zone, perhaps the activity status of (A9) and (A10) the could be revised, subject to reasonable standards.	Disallow in part
	161.22	Auckland Transport	Amend Table IX.4.2 Activity table - Sub-precinct A activities by amending (A9) as follows: 'Healthcare facility up to 250m <sup>2</sup> <u>gross floor area</u> '	Oppose in part	Support for addition of GFA	Allow
	161.23	Auckland Transport	Delete Standard IX.5 Notification (1) to enable the normal RMA notification tests to apply. Make a consequential amendment to IX.5(2) to delete reference to (1).	Oppose in part	Restricted Discretionary Consents should not have to be notified as otherwise there is no consenting certainty.  There is a clause in the proposed wording of IX.5 that gives Auckland Transport the opportunity to comment on Restricted Discretionary Activities- as per below:  (1) <i>Any application for a restricted discretionary activity listed in Table IX.4.1 Activity table above, will be considered without public or limited notification or the need to obtain written approval from affected parties unless the Council decides that special circumstances exist under sections 95A(9) or 95B(10) of the Resource Management Act 1991. (emphasis added).</i>	Disallow



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	161.25	Auckland Transport	Amend Standard IX.6.1 Staging of development with transport upgrades, so that it clearly links the requirements for transport upgrades with subdivision as well as development. This will require amendments to items (1) to (5) to require upgrades to be aligned with subdivision as well as the occupation of buildings. An example of appropriate drafting is provided in I451.6.2 of the AUP(OP). The further amendments to Standard IX.6.1 set out later in this submission are subject to this overarching request.	Oppose in part	Support is subject to appropriate effects-based outcome, and the wording of items (1) to (5) being retained in relation to “dwelling” or “building.”	Allow in part
	161.26	Auckland Transport	Amend the title and purpose statement of Standard IX.6.1 as follows: <b>'IX.6.1. Staging of <u>subdivision and development with transport upgrades</u></b> <b>Purpose:</b> <ul style="list-style-type: none"> <li>To <del>manage</del> <u>mitigate</u> the adverse effects of traffic on the safety and efficiency of the surrounding <u>local and wider</u> road network for all modes of transport by ensuring subdivision and development is coordinated with transport infrastructure.</li> <li>To <u>achieve the integration of land use and</u> transport.</li> <li>To <u>ensure that subdivision and development complies with Appendices 1 and 2 Road function and design elements tables.</u></li> </ul>	Oppose in part	Subdivision can be approved subject to s224(c) conditions requiring infrastructure upgrades.	Allow in part
	161.27	Auckland Transport	Subject to Auckland Transport's main submission point above about re-drafting IX.6.1 generally, amend Standard IX.6.1(1) as follows: '(1) Prior to occupation of a <del>dwelling</del> <u>any building</u> within the Riverhead Precinct, the following transport infrastructure must be constructed and operational: (a) ...' Similarly, amend other clauses in IX.6.1 to refer to ' <u>any building</u> ' rather than 'a building'.	Oppose in part	The wording of items (1) being retained in relation to “dwelling” rather than building. It may be appropriate to have some buildings within the precinct that do not need the upgrade of Coatesville-Riverhead Highway to be complete prior to occupation. This needs to be an affects-based assessment for “buildings” which is all inclusive of any development.	Disallow
	161.28	Auckland Transport	Subject to Auckland Transport's main submission point above about re-drafting IX.6.1 generally, amend Standard IX.6.1(2)(a) so that it clearly includes the public transport infrastructure and walking / cycling improvements (such as pedestrian crossings) identified in the ITA.	Oppose in part	The wording of items (1) being retained in relation to “dwelling” rather than building. It may be appropriate to have some buildings within the precinct that do not need the upgrade of Coatesville-Riverhead Highway to be complete prior to occupation. This needs to be an affects-based assessment for “buildings” which is all inclusive of any development.	Disallow
	161.29	Auckland Transport	Subject to Auckland Transport's main submission point above about re-drafting IX.6.1 generally, amend Standard IX.6.1(3)(a) so that it clearly includes the public transport infrastructure and walking / cycling improvements (such as pedestrian crossings) identified in the ITA.	Oppose in part	The wording of items (1) being retained in relation to “dwelling” rather than building. It may be appropriate to have some buildings within the precinct that do not need the upgrade of Coatesville-Riverhead Highway to be complete prior to occupation. This needs to be an affects-based assessment for “buildings” which is all inclusive of any development.	Disallow
				Oppose in part		Disallow in part

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	161.30	Auckland Transport	Subject to Auckland Transport's main submission point above about re-drafting IX.6.1 generally, amend Standard IX.6.1(3)(c) as follows: '(c) Upgrade and urbanise Riverhead Road, from the eastern boundary of 307 Riverhead Road to Coatesville-Riverhead Highway, including walking/cycling infrastructure, gateway threshold treatment, and public transport infrastructure in accordance with IX.10.3 Riverhead: Precinct plan 3 and IX.11.2 Appendix 2.'		The wording of items (1) being retained in relation to "dwelling" rather than building. It may be appropriate to have some buildings within the precinct that do not need the upgrade of Coatesville-Riverhead Highway to be complete prior to occupation. This needs to be an affects-based assessment for "buildings" which is all inclusive of any development.  Support is given to the proposed wording by Auckland Transport regarding IX.6.1(3)c.	
	161.31	Auckland Transport	Retain Standard IX.6.2, subject to a minor amendment to (1) as follows: '(1) A 2m wide road widening setback must be provided along that part of the frontage of the land adjoining Riverhead Road shown as subject to the <del>'Required Indicative</del> Road Widening <u>Required</u> ' notation on the IX.10.3 Riverhead: Precinct plan 3.'	Oppose in part	Support for proposed amendments Standard IX.6.2	Allow
	161.33	Auckland Transport	Amend Matters of Discretion IX.8.1(1) to read: 'Healthcare facility up to 250m <sup>2</sup> <u>gross floor area per site</u> .'	Oppose in part	Support for addition of GFA	Allow
	161.34	Auckland Transport	Amend Matters of Discretion IX.8.1(2) by amending (a) and (b), and adding two new matters as follows: '(a) Location and design of the collector roads, key local roads and connections with neighbouring sites to achieve an integrated street network, and appropriately provide for all modes; (b) Provision of cycling and pedestrian networks and connections; <u>(x) Upgrades to public transport infrastructure;</u> <u>(x) Design and sequencing of upgrades to the existing road network;</u> ....'	Oppose in part	It is unclear to future development what public transport upgrades are needed. Auckland Transport notes in their submission that there is limited public transport in this location. If Auckland Transport need to undertake upgrades in this area, the timing of such should not hinder the development of the land in a way that puts the sole responsibility on the private developer. There may be cases where the land can be developed in such a way where no upgrades are needed to the public transport infrastructure. This will be determined at Resource Consent stage.	Disallow in part
	161.35	Auckland Transport	Make any further amendments to the matters of discretion to give effect to the general relief requested in relation to IX.6.1 above. For example, without limitation, if the Drury East 'model' (I451) is followed as suggested, then include a matter of discretion relating to the imposition of appropriate conditions.	Oppose in part	Refer to rationale in submission points 161.26 to 161.31, 161.33 and 161.34.	Disallow in part
	161.36	Auckland Transport	Delete the reference to Standard IX.6.1(2) - (6) from Matters of Discretion IX.8.1(4). This is consequential from an earlier submission point seeking a non-complying status for non-compliance with this standard.  If reference to Standard IX.6.1(2) - (6) is retained, amend as follows:  '(4) For subdivision and occupation of <del>dwelling</del> <u>buildings</u> that <del>does do</del>	Oppose in part	The wording of items (4) being retained in relation to "dwelling" rather than building. It may be appropriate to have some buildings within the precinct that do not need the upgrade of Coatesville-Riverhead Highway to be complete prior to occupation. This needs to be an affects-based assessment for "buildings" which is all inclusive of any development.  The wording in Table IX4.1 should be amended to have a Discretionary Status when the standards are not complied with- not non-complying as requested by Auckland Transport.	Disallow

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			not comply with Standard IX.6.1. Staging of development with transport upgrades. '  Insert the following matter of discretion for noncompliance with Appendices 1 and 2:  '(x) Road design and consistency with the transport related objectives and policies of the precinct'			
	161.37	Auckland Transport	Amend Assessment Criteria IX.8.2(2)(e) and the preceding heading as follows: <i>'Location of roads and other transport connections</i> (e) Whether the collector roads, key local roads and key <del>pedestrian</del> <u>active mode</u> connections are provided generally in the locations shown on IX.10.2 Riverhead: Precinct Plan 2 to achieve a highly connected street layout <u>and active mode network</u> that integrates with the surrounding transport network. <u>Whether an</u> alternative alignment that provides an equal or better degree of connectivity and amenity within and beyond the precinct may be appropriate, having regard to the following functional matters: (i) <u>Landownership patterns</u> , <del>the</del> presence of natural features, natural hazards, <del>or</del> contours <u>or other constraints</u> and how this impacts the placement of roads <u>and active mode connections</u> ; (ii) ... (iii) The constructability of roads and the ability for <del>it</del> <u>them</u> to be delivered by a single landowner <u>and connected beyond any property boundary within the precinct.'</u>	Oppose in part	Support for proposed amendments to Assessment Criteria IX.8.2(2)(e)	Allow
	161.38	Auckland Transport	Amend Assessment Criteria IX.8.2(2)(f) as follows: '(f) Whether a high quality and integrated network of <del>local</del> roads <u>(including collector and local roads)</u> is provided within the precinct that has a good degree of accessibility and supports a walkable street network. Whether roads and <u>active mode connections</u> are aligned to provide visual and physical connections to open spaces, including along the stream network, where the site conditions allow.'	Oppose in part	Support for proposed amendments to IX.8.2(2)(f)	Allow
	161.41	Auckland Transport	"Delete the reference to Standard IX.6.1(2)-(6) from Assessment Criteria IX.8.1(4). This is consequential from an earlier submission point seeking a non-complying status for non-compliance with this standard.  If the reference to Standard IX.6.1(2)-(6) is retained, then the requirement for an Integrated Transport Assessment (in IX.8.2(4)(a)) should be specifically addressed by an addition to IX.9 Special Information	Oppose in part	Non-comply activity status is not considered to be appropriate if the staging is not complied with. Discretionary Activity status should apply, and standards should be retained.	Disallow

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			<p>Requirements.</p> <p>Insert new assessment criteria for non-compliance with the Road Function and Design Elements tables as follows:</p> <p><u>‘(x) For subdivision and / or development that does not comply with the Road Function and Design Elements tables in Appendices 1 and 2</u>  <u>(a) Whether there are constraints or other factors present which make it impractical to comply with the required standards.</u>  <u>(b) Whether the design of the road and associated road reserve achieves the relevant transport-related policies of the Precinct.</u>  <u>(c) Whether the proposed design and road reserve:</u>  <u>(i) incorporates measures to achieve the required design speeds;</u>  <u>(ii) can safely accommodate required vehicle movements;</u>  <u>(iii) can appropriately accommodate all proposed infrastructure and roading elements including utilities and/or any stormwater treatment;</u>  <u>(iv) assesses the feasibility of upgrading any interim design or road reserve to the ultimate required standard.</u>  <u>(d) Whether there is an appropriate interface design treatment at property boundaries, particularly for pedestrians and cyclists.’</u></p> <p>Make consequential amendments to IX.8.2(4)."</p>			
	161.42	Auckland Transport	<p>Amend IX.9 Special information requirements, by adding the following:</p> <p><u>‘(5) Transport Design Report</u>  <u>Any proposed new key road intersection or upgrading of existing key road intersections illustrated on Precinct Plans 2 and 3 must be supported by a Transport Design Report and Concept Plans (including forecast transport modelling and land use assumptions), prepared by a suitably qualified transport engineer confirming that the location and design of any road and its intersection(s) supports the safe and efficient function of the existing and future (ultimate) transport network and can be accommodated within the proposed or available road reserves.</u>  <u>This may be included within a transport assessment supporting land use or subdivision consents.</u></p> <p><u>In addition, where an interim upgrade is proposed, information must be provided, detailing how the design allows for the ultimate upgrade to be efficiently delivered.’</u></p> <p>Make consequential amendments to Precinct Plans 2 and 3 to clearly identify the key road intersections.</p>	Oppose in part	<p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p> <p>Given the NOR this requirement is too onerous on the future developers of the land. More reasonable provisions should be discussed with Auckland Transport in light of the NOR.</p>	Disallow in part
	161.46	Auckland Transport	Amend the table in IX.11.1 Appendix 1 by adding the following footnote to the column headed ‘Minimum road reserve’:	Oppose in part	Support for proposed amendments to IX.11.1	Allow

Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
			<u>'Typical minimum width which may need to be varied in specific locations where required to accommodate network utilities, batters, structures, stormwater treatment, intersection design, significant constraints or other localised design requirements'</u>			
	161.47	Auckland Transport	Amend the table in IX.11.1 Appendix 1 by adding the following footnote to the column headed 'Bus provision': <u>'Carriageway and intersection geometry capable of accommodating buses. Bus stop form and locations and bus routes shall be determined with Auckland Transport at resource consent and engineering plan approval stage'</u>	Oppose in part	Support for proposed amendments to IX.11.1	Allow
	161.48	Auckland Transport	Amend the table in IX.11.2 Appendix 2 by adding the following footnote to the column headed 'Minimum road reserve': <u>'Typical minimum width which may need to be varied in specific locations where required to accommodate network utilities, batters, structures, stormwater treatment, intersection design, significant constraints or other localised design requirements'</u>	Oppose in part	Support for proposed amendments to IX.11.2	Allow
	161.49	Auckland Transport	Amend the table in IX.11.2 Appendix 2 by adding the following footnote to the column headed 'Bus provision': <u>'Carriageway and intersection geometry capable of accommodating buses. Bus stop form and locations and bus routes shall be determined with Auckland Transport at resource consent and engineering plan approval stage.'</u>	Oppose in part	Support proposed amendments to Appendix 2	Allow
	161.51	Auckland Transport	Amend the table in IX.11.2 Appendix 2 to include a row for Cambridge Road.	Oppose in part	It is not considered necessary to specify the requirements for Cambridge Road. There are no suggested standards for Cambridge Road by Auckland Transport.	Disallow in part
167	167.1	NZ Transport Agency Waka Kotahi (NZTA)	To amend (A4) to a Non Complying Activity.	Oppose in part	Non-complying activity status is not considered to be appropriate if the standards are not complied with. Discretionary Activity status should apply, and standards should be retained.	Disallow
168	168.1	Angela Yelavich	Decline the plan change	Oppose	Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.  The land is zoned for future urban purposes; therefore some degree of urban development is expected in this location.	Disallow
174	174.4	Claire Walker		Oppose	In regard to the Retirement Village, the Private Plan Change will provide for a zoning framework that provides for a Retirement Village to establish within the	Disallow

Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
			The enormous retirement village privatised site creates pinch points of available connectivity between the plan change area and existing Riverhead. East/west road connections through this area are key – providing chose to residents, weather on foot, bike or car. These should be recognised and addressed by requirements for upgrades		Plan Change area (subject to Resource Consent) as well as other urban land uses. The Private Plan Change does not have to consider the details of the retirement village as this will be managed through the appropriate Resource Consenting Framework under the Auckland Unitary Plan.	
	174.6	Claire Walker	These roads, and further routes to Riverhead School all warrant assessment and specific upgrades to ensure they are functional and safe. Similarly, the connection between the plan change area and Riverhead War Memorial Park has not been recognised as a primary route which is restricted by the CRH and horribly by the retirement village development. The supporting urban design report accurately describes War Memorial Park as the ‘heart of Riverhead’ but this recognition has not resulted in any meaningful response in PPC100. Specific provisions should also be applied to this area to ensure that development enables safe and logical east/west connections and road crossings over CRH. The tension is that the CRH is a significant commuter route, and every move which benefits pedestrians puts more strain on the function of this route for people moving west and east between Albany Highway and SH16.	Oppose	In regard to the Retirement Village, the Private Plan Change will provide for a zoning framework that provides for a Retirement Village to establish within the Plan Change area (subject to Resource Consent) as well as other urban land uses. The Private Plan Change does not have to consider the details of the retirement village as this will be managed through the appropriate Resource Consenting Framework under the Auckland Unitary Plan.  Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.	Disallow
	174.8	Claire Walker	I want any proposed commercial zoning to be justified by economic analysis that is based on a clear outline of existing zoning and activities in Riverhead, including under-utilising of zoned land and potential capacity, and recognition of the activities and services that would be provided by the retirement village (if it happens) and commercial activities that can be undertaken in the THAB zone via resource consent.	Oppose	The proposed Plan Change and the commercial zoning is supported by economic analysis.	Disallow
	174.30	Claire Walker	It is requested that the plan change be complete and robust in terms of dealing with the two scenarios of the retirement village being in place, or not. Requiring cross site connectivity and local roads for the scenario of the retirement village not being built. The interface with the residential community at Cambridge Road should be addressed in terms of appropriate bult form and interface outcomes.	Oppose	In regard to the Retirement Village, the Private Plan Change will provide for a zoning framework that provides for a Retirement Village to establish within the Plan Change area (subject to Resource Consent) as well as other urban land uses in the case of the retirement village not going ahead (i.e. provides for residential development). The Private Plan Change does not have to consider the details of the retirement village as this will be managed through the appropriate Resource Consenting Framework under the Auckland Unitary Plan.	Disallow
176	176.1	Jade Lacey	Decline the plan change	Oppose	The Submitter refers to the Submission by the Riverhead Community Association: Please Refer to submission points against Submitted 114.	Disallow
178	178.1	Linda Margaret McFadyen	Decline the plan change	Oppose	In regard to the Retirement Village, the Private Plan Change will provide for a zoning framework that provides for a Retirement Village to establish within the Plan Change area (subject to Resource Consent) as well as other urban land uses. The Private Plan Change does not have to consider the details of the retirement village as this will be managed through the appropriate Resource Consenting Framework under the Auckland Unitary Plan.	Disallow



Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
					The Submission makes reference to the Retirement Village consent being in place, which is incorrect. This decision was appealed to the High Court and declined.	
179	179.1	Francesca Johnson	Decline the plan change	Oppose	The Submitter refers to the Submission by the Riverhead Community Association: Please Refer to submission points against Submitted 114.	Disallow
186	186.1	Auckland Council	That the plan change is declined in its entirety, unless the matters raised in this submission are addressed.	Oppose in part	The new zoning provides greater potential to resolve both flooding and Public Transport issues within Riverhead.  Public Transport can be provided in conjunction with urban development and modern engineering solutions deal with stormwater management and flooding in a more sophisticated way than in older subdivisions	Disallow in part
	186.2	Auckland Council	a. Amend the zoning of the land within the plan change so that: i. The extent of the Rural – Mixed Rural zone encompasses all land in the plan change area that is within areas subject to significant risk of flooding and/or the National Grid Yard (Uncompromised).	Oppose in part	There is a potential; flood risk on 1092 Coatesville Riverhead Highway. However, through careful design, the flood risk can be mitigated and managed through appropriate stormwater design and infrastructure.  Flooding issues are addressed thorough the Proposed Plan Change provisions and the proposed re-zoning has excluded areas that are susceptible to flooding as being suitable for urban development.	Disallow in part
	186.4	Auckland Council	Amend the Precinct description to identify that there are transport upgrades and bulk water supply and wastewater infrastructure required prior to subdivision and development.	Oppose in part	The Precinct description should note that infrastructure should be delivered in conjunction with' subdivision and development	Disallow
	186.5	Auckland Council	Amend the Precinct to add new objectives and policies to only enable subdivision and development to occur once upgrades to transport infrastructure and necessary bulk water supply and wastewater infrastructure are operational.	Oppose in part	It is more efficient to require the upgrades as conditions of resource consents, rather than require the upgrades to have occurred before consent will be granted.  Infrastructure should be delivered in conjunction with' subdivision and development.	Disallow
	186.6	Auckland Council	Amend the Precinct to add new rules and standards to classify subdivision and development in advance of transport upgrades and necessary bulk water supply and wastewater infrastructure as a non-complying activity.	Oppose in part	Discretionary Activity is the most appropriate and it should be an effects based assessment, rather than default non-complying for an activity that may not require such upgrades.	Disallow
	186.8	Auckland Council	Amend the Precinct to add a special information requirement to require all applications for two or more dwellings and subdivision to provide a Wastewater Infrastructure Capacity Assessment.	Oppose in part	Support is given to the extent the provision enables urban development of the land subject to appropriate parameters.	Allow in part
	186.9	Auckland Council		Oppose in part	For reasons highlighted against submission 186 above.	Disallow in part

Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
			Amend the Precinct to address concerns in this submission relating to the adverse stormwater effects of urbanisation and downstream flooding.			
	186.10	Auckland Council	Any other alternative or consequential amendments to address the matters outlined in this submission.	Oppose in part	For reasons highlighted against submission 186 above.	Disallow in part
200	200.1	Danielle Jordan	Decline the plan change	Oppose	Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.  The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.	Disallow
201	201.2	Junaid Shaik	If approved provide more infrastructure before any housing development.	Oppose	Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.  The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.	Disallow
204	204.1	New Zealand Defence Force	Amend the Precinct chapter to reference Designation 4311 requirements Amend IX.1 Precinct description to add a sentence referencing Designation 4311 (additions underlined):  All relevant overlay, Auckland-wide and zone provisions apply in this precinct unless otherwise specified below.  <u>The precinct is subject to Designation 4311 Whenuapai Airfield Approach and Departure Path Protection which imposes restrictions in relation to permanent and temporary structure height. No permanent or temporary obstacle shall penetrate the approach and departure path obstacle limitation surfaces identified in Designation 4311 without the prior approval in writing of the New Zealand Defence Force.</u>	Oppose in Part	The Auckland wide zone provisions should cover this requirement for consultation.	Disallow in part
	204.2	New Zealand Defence Force	Amend IX. Activity table to add a sentence referencing Designation 4311 (additions underlined):	Oppose in Part	The Auckland wide zone provisions should cover this requirement for consultation.	Disallow in part



Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
			<p>Activity Table IX.4.1 specifies the activity status of subdivision and development in the Riverhead Precinct pursuant to sections 9(3) and 11 of the Resource Management Act 1991.</p> <p><u>The precinct is subject to Designation 4311 Whenuapai Airfield Approach and Departure Path Protection which imposes restrictions in relation to permanent and temporary structure height. No permanent or temporary obstacle shall penetrate the approach and departure path obstacle limitation surfaces identified in Designation 4311 without the prior approval in writing of the New Zealand Defence Force.</u></p>			
206	206.1	Emma Pearson	Decline the plan change	Oppose	<p>Matters raised in the submission can be addressed at Resource Consenting stage for any future development.</p> <p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p>	Disallow
208	208.1	Janelle Lisa Redditt	Decline the plan change	Oppose	<p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades. New schools will be able to establish within the Plan Change area if the Ministry of Education desired.</p> <p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p>	Disallow
209	209.1	Wayne Mitchell	Decline the plan change	Oppose	<p>There will be development that can take place without the vast array of infrastructure upgrades as suggested by the submitter.</p> <p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p> <p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.</p>	Disallow

Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
210	210.1	Terence L Klein	Decline the plan change	<b>Oppose</b>	The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.	<b>Disallow</b>
212	212.1	Jann Olding	Decline the plan change	<b>Oppose</b>	The Submitter refers to the Submission by the Riverhead Community Association: Please Refer to submission points against Submitted 114.  The existing provisions of the THAB will apply to the site should the Plan Change be approved. The existing Chapter E27 will apply to the site in regards to parking.	<b>Disallow</b>
214	214.2	Ministry of Education	Retain; Policy 10: Require streets to be attractively designed and to appropriately provide for all transport modes by: (a) providing for safe access for cyclists on collector roads. Policy 11: Provide safe connections to public transport facilities and social infrastructures such as open space and schools.	<b>Neutral</b>	Support for submission point	<b>Allow</b>
	214.3	Ministry of Education	That the Plan Change provisions include the appropriate level of provision and design detail to facilitate potential school bus routes to and from any future school site, connecting with Riverhead Road and Lathrope Road and in a manner that ensures safety for all road users, especially pedestrians travelling to and from the school.	<b>Neutral</b>	This will be determined through the Reosurce Consent process should a new school establish within the proposed Plan Change Area.	<b>Allow in part</b>
	214.4	Ministry of Education	That the RDA status for consents ensures activities are appropriately assessed if they are delivered ahead of the Implementation Plan infrastructure items	<b>Neutral</b>	Agree with this recommendation and to keep the Restricted Discretionary Activity Status where compliance with standards is achieved and Discretinoary if not.	<b>Allow</b>
218	218.1	Watercare services Limited	Decline the plan change	<b>Oppose in part</b>	The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside infrastructure upgrades.  The land is zoned for Future Urban purposes, therefore urban development is expected in this location.	<b>Disallow</b>
	218.2	Watercare services Limited	Without prejudice to its overall opposition to the Plan Change, if the Commissioners are minded to approve the Plan Change notwithstanding Watercare's opposition, Watercare seeks precinct provisions that require subdivision and development to be coordinated with the provision of adequate water supply and wastewater infrastructure. That is, subdivision and development must be precluded by under the precinct provisions from proceeding prior to completion of any necessary bulk water supply and wastewater infrastructure projects required to service the development enabled by Plan Change 100.	<b>Oppose in part</b>	The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside infrastructure upgrades.  It is more efficient to require the upgrades as conditions of resource consents, rather than require the upgrades to have occurred before consent will be granted.  Infrastructure should be delivered in conjunction with subdivision and development, rather than before subdivision and development can be approved.	<b>Disallow in part</b>

Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
	218.3	Watercare services Limited	Non-complying activity status for any subdivision and/or development that precedes the provision of adequate bulk water supply and wastewater infrastructure.	Oppose in part	This activity should be Discretionary Activity at most subject to demonstrating an acceptable solution to connect to the reticulated network.	Disallow
	218.6	Watercare services Limited	Amendments to Objective 5 to include the reference to 'capacity' and specify 'wastewater' and ensuring subdivision and development is coordinated with local infrastructure. This also supports the non-complying activity status.	Oppose in part	This activity should be Discretionary Activity at most subject to demonstrating an acceptable solution to connect to the reticulated network.	Disallow
	218.7	Watercare services Limited	New Objective 5(A) which addresses the coordination, provision and capacity of bulk water and wastewater infrastructure necessary to service the new precinct. This supports the non-complying activity status.	Oppose in part	This activity should be Discretionary Activity at most subject to demonstrating an acceptable solution to connect to the reticulated network.	Disallow
	218.8	Watercare services Limited	Amendments to Policy 5 and addition of a new Policy 5A to support the non-complying activity status subdivision or development that precedes the provision of adequate bulk water supply and wastewater infrastructure.	Oppose in part	This activity should be Discretionary Activity at most subject to demonstrating an acceptable solution to connect to the reticulated network.	Disallow
	218.9	Watercare services Limited	Amendments to include new standard IX6.16 Water and Wastewater Infrastructure to require development and subdivision to connect to functioning bulk wastewater and water supply infrastructure with sufficient capacity to service the development.	Oppose in part	Support this provision with the added wording, <i>"unless, with the agreement of Watercare Services Limited, another acceptable solution is proposed to service the development"</i>	Allow in part
	218.10	Watercare services Limited	Amendments to Table IX4.1(A2A) to require up to 3 dwellings to comply with new standard IX6.16 Water and Wastewater Infrastructure.	Oppose in part	Support this provision with the added wording, <i>"unless, with the agreement of Watercare Services Limited, another acceptable solution is proposed to service the development"</i>	Allow in part
	218.11	Watercare services Limited	Amendments to Table IX.4.1(A2B) to require more than three dwellings per site to comply with new standard IX6.16 Water and Wastewater Infrastructure.	Oppose in part	Support this provision with the added wording, <i>"unless, with the agreement of Watercare Services Limited, another acceptable solution is proposed to service the development"</i>	Allow in part
	218.12	Watercare services Limited	Amendments to IX.5 Notification (1A) requiring Watercare to be limited notified where resource consents infringe new standard IX6.16 Water and Wastewater Infrastructure.	Oppose in part	As per the rationale above.	Allow in part
	218.13	Watercare services Limited	Amendments to include new standard IX.9(6) Water and Wastewater Servicing Plan as a special information requirement.	Oppose in part	Support for the proposed amendments to IX.9(6)	Allow
220	220.1	Equal Justice Project	Decline the plan change	Oppose	The land is zoned for Future Urban purposes, therefore urban development is expected in this location.	Disallow

Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
					<p>The Plan Change is consistent with the zoning proposed within Plan Change 78 and within the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 which allows for a more intensive type of housing on land within residential environments.</p> <p>The Plan change will provide for a well-functioning urban environment.</p>	
224	224.1	Chhitiza Basnet	Decline the plan change	Oppose	<p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.</p> <p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p>	Disallow
226	226.1	John Cook	Decline the plan change	Oppose	<p>The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.</p> <p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p>	Disallow
228	228.1	Sandi Gamon	Decline the plan change	Oppose	<p>Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.</p> <p>The proposed retirement village concept design does include open spaces and the management of trees along Coatesville Riverhead Highway. The details raised in this submission will be addressed at the Resource Consent Stage, rather than the Plan Change stage.</p>	Disallow
252	252.1	Kathryn Boyes	Decline the plan change	Oppose	Auckland Transport have an approved Notice of Requirement R1 (not subject to appeal) to upgrade Coatesville Riverhead Highway, including a roundabout at the junction of Coatesville Riverhead Highway and Riverhead Road. These upgrade works will have a positive impact on the traffic travelling to and from Riverhead.	Disallow
	252.2	Kathryn Boyes	If approved no development without infrastructure	Support in part	The details raised in this submission will be addressed at the Resource Consent Stage, rather than the Plan Change stage. The Plan Change enables urban development. The Resource Consent stage will manage things like upgrades to Cambridge Road etc and stormwater/flooding management.	Allow in part

Sub #	Sub Point	Submitter	Summary of Decisions requested- refer to Auckland Council PC100 <i>Summary of Decisions Requested</i>	Support/ Oppose	Further Submission: Decision requested	Decision Sought
					The Plan Change provisions contain infrastructure triggers to manage and mitigate the effects of the future development alongside planned transport and other infrastructure upgrades.	



END OF REPORT

**From:** [UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan further submission - Plan Change 100 - Boman Zakeri  
**Date:** Friday, 26 July 2024 2:45:43 pm  
**Attachments:** [FINAL Further Submission - PC100.pdf](#)

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The following customer has submitted a Unitary Plan online further submission.

#### **Contact details**

Full name of person making a further submission: Boman Zakeri

Organisation name: Luxembourg Development Company Ltd; Riverhead Treelife Trustee Ltd; Omidullah Zakeri, Rafiullah Mohammad Tahir, Boman Zakeri

Full name of your agent:

Email address: [bnzakeri@gmail.com](mailto:bnzakeri@gmail.com)

Contact phone number: 021 169 1696

Postal address:  
 30 Cambridge Road  
 Riverhead  
 Auckland 0820

#### **Submission details**

##### **This is a further submission to:**

Plan change number: Plan Change 100

Plan change name: PC 100 (Private): Riverhead

##### **Original submission details**

Original submitters name and address:  
 See attached

Submission number: See attached

Do you support or oppose the original submission? I or we oppose the submission

Specific parts of the original submission that your submission relates to:  
 Point number See attached

The reasons for my or our support or opposition are:  
 See attached

I or we want Auckland council to make a decision to: Disallow the whole original submission

Submission date: 26 July 2024

Supporting documents  
 FINAL Further Submission - PC100.pdf

#### **Attend a hearing**

I or we wish to be heard in support of this submission: Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
 Yes



**Declaration**

What is your interest in the proposal? I am a person who has an interest in the proposal that is greater than the interest that the general public has

Specify upon which grounds you come within this category:

The Boman Submitters have a greater interest in PC100 than the general public, being an original submitter on PC100 and directly affected landowners / business operators and occupiers within the Plan Change area.

I declare that:

- I understand that I must serve a copy of my or our further submission on the original submitter within five working days after it is served on the local authority
- I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.



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**FURTHER SUBMISSION ON PRIVATE PLAN CHANGE 100 (RIVERHEAD) TO THE AUCKLAND  
UNITARY PLAN (OPERATIVE IN PART)**

**Clause 8 of Schedule 1, Resource Management Act 1991**

**Form 6**

TO: Auckland Council

By Email: unitaryplan@aucklandcouncil.govt.nz

Submitter: **LUXEMBOURG DEVELOPMENT COMPANY LTD**  
**RIVERHEAD TREELIFE TRUSTEE LTD**  
**OMIDULLAH ZAKERI**  
**BOMAN ZAKERI**  
**RAFIULLAH MOHAMMAD TAHIR**

Address for Service: Boman Zakeri  
bnzakeri@gmail.com  
021 169 1696

**1. INTRODUCTION**

- 1.1 Luxembourg Development Company Limited, Riverhead Treelife Trustee Ltd, Omidullah Zakeri, Rafiullah Mohammad Tahir and Boman Zakeri (**Boman Submitters**) make this further submission on Plan Change 100: Riverhead (Private) (**PC100**) in support of and in opposition to primary submissions to PC100 as outlined in **Appendix A**.
- 1.2 The Boman Submitters have a greater interest in PC100 than the general public, being an original submitter on PC100 and directly affected landowners / business operators and occupiers within the Plan Change area.
- 1.3 The Boman Submitters make this further submission in respect of submissions by third parties to the PC100.

**2. REASONS FOR FURTHER SUBMISSION**

- 2.1 The submissions that the Boman Submitters support or oppose are set out in the table attached as **Appendix A** to this further submission.
- 2.2 The reasons for this submission are:
  - (a) The reasons set out in the Boman Submitters' primary submission on PC100;
  - (b) In the case of the primary submissions that are opposed:

- (i) The primary submissions do not promote the sustainable management of natural and physical resources and are otherwise inconsistent with the purpose and principles of the Resource Management Act 1991 (**RMA**);
- (ii) The relief sought in the primary submissions is not the most appropriate in terms of section 32 of the RMA;
- (iii) Rejecting the relief sought in the primary submissions opposed would more fully serve the statutory purpose than would implementing that relief; and
- (iv) The primary submissions are inconsistent with the policy intent, plan provision framework and relief sought by the Boman Submitters.

### **3. RELIEF SOUGHT**

- 3.1 The Boman Submitters wish to be heard in support of their further submission.
- 3.2 If others make a similar submission, the Boman Submitters will consider presenting a joint case within them at a hearing.

Dated 26 July 2024

## APPENDIX A – FURTHER SUBMISSION TABLE

SUBMITTER NAME	SUBMISSION POINTS	BOMAN SUBMITTERS POSITION	REASONS FOR POSITION	DECISION SOUGHT
Auckland Transport	161.1 - 161.51	Oppose all submissions	Proposed relief is inconsistent with the Boman Submitters' primary submission	Submission points be disallowed
NZ Transport Agency Waka Kotahi	167.1 – 167.5	Oppose all submissions	Proposed relief is inconsistent with the Boman Submitters' primary submission	Submission points be disallowed
Auckland Council	186.1 – 186.10	Oppose all submissions	Proposed relief is inconsistent with the Boman Submitters' primary submission	Submission points be disallowed
Watercare Services Ltd	218.1 – 218.15	Oppose all submissions	Proposed relief is inconsistent with the Boman Submitters' primary submission	Submission points be disallowed
Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	114.1 – 114.31	Oppose all submissions	Proposed relief is inconsistent with the Boman Submitters' primary submission	Submission points be disallowed
Claire Walker	174.1 – 174.31	Oppose all submissions	Proposed relief is inconsistent with the Boman Submitters' primary submission	Submission points be disallowed
Te Tāhuhu o te Mātauranga   Ministry of Education	214.4; 214.5; 214.6; 214.7	Oppose submissions	Proposed relief is inconsistent with the Boman Submitters' primary submission	Submission points be disallowed



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## FORM 6

### Further submission in support of, or in opposition to, submission on a notified proposal for Plan Change 100 (Private): Riverhead under Resource Management Act 1991

26 July 2024

Attn: Sarah El Karamany – Planning Technician  
Auckland Council  
Level 24, 135 Albert Street  
Private Bag 92300  
Auckland 1142

Via [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

**Name of further submitter: The New Zealand Transport Agency Waka Kotahi (NZTA)**

This is a further submission on submissions on Private Plan Change 100: Riverhead (**Plan Change**).

NZTA is a person who has an interest in the proposal that is greater than the interest of the general public because it is a Crown Agency with statutory requirements to fulfil. NZTA made a submission on the Plan Change dated 17 May 2024.

The specific parts of the submissions supported or opposed and the reasons for that support or opposition are set out in attachment 1. The decisions which NZTA seeks from the Council in terms of allowing or disallowing submissions are also set out in attachment 1.

### Hearings

NZTA wishes to be heard in support of its further submission. If others make a similar submission, NZTA will consider presenting a joint case with them at a hearing.

Signature of person authorised to sign on behalf of further submitter:

**Rosalind Cowen**  
**Senior Planner – Poutiaki Taiao / Environmental Planning**  
**System Design, Transport Services**  
**Phone: 099565710**  
**Email: [environmentalplanning@nzta.govt.nz](mailto:environmentalplanning@nzta.govt.nz)**

Table 1: NZ Transport Agency Further Submission Auckland Unitary Plan – Private Plan Change 100: Riverhead

Submitter #	Name	Email or Post Address	Submission point	Position	Reasons	Relief sought
24.5	Kate Frances Lyon	<a href="mailto:kate.f.truman@gmail.com">kate.f.truman@gmail.com</a>	If approved provide a traffic management plan and a public transport plan.	Support	The relief sought will support a safe and efficient transport system.	Accept submission point
114.5	Riverhead Community Association (formerly Riverhead Residents and Ratepayers Association)	<a href="mailto:Mikerbrooke@outlook.com">Mikerbrooke@outlook.com</a>	Include provisions which require all required local and wider transport improvements to be in place prior to earthworks and related traffic impacts commencing.	Support	The relief sought will support the integration of land use and infrastructure provision.	Accept submission point
161.18	Auckland Transport	<a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a>	Amend Table IX.4.1 Activity table - Precinct-wide activities, (A4) and (A5), so that noncomplying activity status (rather than discretionary or restricted discretionary status) applies to 'Subdivision <b>and</b> development that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades (other than in relation to specific design requirements in Appendix 1: Road function and design elements table – Internal	Support	The relief sought will support the integration of land use and infrastructure provision.	Accept submission point

Submitter #	Name	Email or Post Address	Submission point	Position	Reasons	Relief sought
			roads within Precinct, and / or Appendix 2: Road function and design elements table - External roads to the Precinct'. Make consequential amendments to the matters of discretion and assessment criteria to reflect the removal of the restricted discretionary activity.			
161.23	Auckland Transport	<a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a>	Delete Standard IX.5 Notification (1) to enable the normal RMA notification tests to apply. Make a consequential amendment to IX.5(2) to delete reference to (1).	Support	This will enable the normal RMA notification tests to apply and enable participate of affected parties.	Accept submission point
161.25	Auckland Transport	<a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a>	Amend Standard IX.6.1 Staging of development with transport upgrades, so that it clearly links the requirements for transport upgrades with subdivision as well as development. This will require amendments to items (1) to (5) to require upgrades to be aligned with subdivision as well as the occupation of buildings. An example of appropriate drafting is provided in I451.6.2 of the AUP(OP).	Support	The relief sought will support the integration of land use and infrastructure provision.	Accept submission point

Submitter #	Name	Email or Post Address	Submission point	Position	Reasons	Relief sought
			The further amendments to Standard IX.6.1 set out later in this submission are subject to this overarching request.			
161.26	Auckland Transport	<a href="mailto:spatialplanning@at.govt.nz">spatialplanning@at.govt.nz</a>	<p>Amend the title and purpose statement of Standard IX.6.1 as follows:</p> <p>'IX.6.1. Staging of <u>subdivision and development</u> with transport upgrades</p> <p>Purpose:</p> <ul style="list-style-type: none"> <li>• To <del>manage</del> <u>mitigate</u> the adverse effects of traffic on the safety and efficiency of the surrounding <u>local and wider</u> road network for all modes of transport by ensuring subdivision and development is coordinated with transport infrastructure.</li> <li>• <u>To achieve the integration of land use and transport.</u></li> <li>• <u>To ensure that subdivision and development complies with Appendices 1 and 2 Road function and design elements tables.</u></li> </ul>	Support	The relief sought will support the integration of land use and infrastructure provision.	Accept submission point
202.6	Boric Food Market, Blossoms Café and tenants/residents	<a href="mailto:hannah@formeplanning.co.nz">hannah@formeplanning.co.nz</a>	Assessment criteria at IX.8.2(g) (in respect of an infringement to standards IX.6.1(2)-(4)) should	Support	This would ensure a comprehensive	Accept submission point



Submitter #	Name	Email or Post Address	Submission point	Position	Reasons	Relief sought
			require an assessment against the progress made towards the full suite of works within Stage 2, rather than simply the intersection of SH16 and Coatesville-Riverhead Highway.		assessment is undertaken.	
202.8	Boric Food Market, Blossoms Café and tenants/residents	<a href="mailto:hannah@formeplanning.co.nz">hannah@formeplanning.co.nz</a>	Update the Integrated Transport Assessment to make allowance in the traffic modelling for the pedestrian crossings proposed at the roundabout of SH16 and Coatesville-Riverhead Highway, as part of the Stage 2 works.	Support	The relief sought will support a safe and efficient transport system.	Accept submission point
205.13	Luxembourg Development Company Ltd; Riverhead	<a href="mailto:bnzakeri@gmail.com">bnzakeri@gmail.com</a>	The activity table at IX.4.1 should be amended to separate subdivision from development. Subdivision should have blanket RD status.	Oppose	NZTA consider that any subdivision and development that does not comply with Standard IX.6.1(1) should be a Non-Complying Activity. This is to ensure that the appropriate RMA gateway tests are applied to development that is out of sequence with the SH16/Coatesville Riverhead Road intersection upgrade.	Reject submission point

# Further Submission in support of, or opposition to, a notified proposed plan change or variation

Clause 8 of Schedule 1, Resource Management Act 1991  
FORM 6



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 16, 135 Albert Street  
Private Bag 92300  
Auckland 1142

For office use only

Further Submission No:

Receipt Date:

## Further Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

DESMOND JOHN REID.

Organisation Name (if further submission is made on behalf of Organisation)

N/A.

Address for service of Further Submitter

C/- 24 KARAWAI STREET, RUAKAKA 0116

Telephone:

(022) 139 4268

Email:

woodcraftbydesign@xtra.co.nz.

Contact Person: (Name and designation, if applicable)

## Scope of Further Submission

This is a further submission in support of (or opposition to) a submission on the following proposed plan change / variation:

Plan Change/Variation Number

PC 100

Plan Change/Variation Name

Riverhead (Private)

I support : ☐ Oppose ☐ (tick one) the submission of:

(Original Submitters Name and Address)

(Please identify the specific parts of the original submission)

Submission Number

Point-Number

REFER TO ATTACHED  
3 PAGES.

The reasons for my support / opposition are:

REFER TO ATTACHED.

Scope of Further Submission

Plan Change / Variation Number: PC 100		Plan Change / Variation Name: Riverhead (Private)		
Submitter:	Submission / Point #:	Support / Oppose	Reasons:	Decision Sought:
Bridget Hill bridget.mw@gmail.com	98.4	Support	The current assessments were completed prior to 22 Duke St being excluded from the proposed Urban Zone. Flood prone areas can be multi-purposed as Public Reserves / Parks.  Improve Public Amenity. Relying on each of the Property Owners to co-ordinate a cohesive green corridor is nonsensical. High Density urbanisation needs green infrastructure.	Allow
	98.5	Support		Allow
	98.7	Support		Allow
	98.12	Support		Allow
Riverhead Community Association Mikerbrooke@outlook.com	114.10	Support	PPC100 without the inclusion of 22 Duke Street, is an incomplete proposed plan change, in that it leaves too many unanswered questions related to stormwater management, parks and reserves, and community amenity.	Disallow
	114.9	Support	Good urban design, particularly for high density development requires supportive green spaces. Graduated density with the high density closest to amenity, filtering to lower density away from community amenity, is accepted urban design.	Allow
	114.10	Oppose	Some high density sites set aside for multistorey development will not allow for significant trees on site.	Disallow
	114.12	Support	High fencing denies community connection. Low fencing promotes passive security.	Allow
	114.13	Support	If 22 Duke St is zoned Mixed Rural, it is unlikely that the riparian margin will eventuate.	Allow
	114.14	Support		Allow
	114.17	Support		Allow
	114.18	Support	If 22 Duke St is zoned Mixed Rural, Natural connections for stormwater and fauna are unlikely to eventuate. Conversely, the Mixed Rural Zone confers rights on the land that allow it to be intensively farmed.eg. Pig or Poultry farming.	Allow
	114.19	Support	The current Future Urban Zone must be retained and planned holistically.	Allow

Riverhead Community Association (continued)	114.20	Support	Relying on each of the Property Owners to co-ordinate a cohesive green corridor is nonsensical. So do the owners of 22 Duke Street! The Plan Change Area should include 22 Duke Street. The green corridor will not complete to the Waitauti Stream without the inclusion of 22 Duke Street.	Allow
	114.21	Support		Allow
	114.22	Support		Allow
	114.23	Support		Allow
	114.24	Support		Allow
	114.25	Support		Allow
	114.26	Support		Allow
	114.27	Support		Allow
	114.28	Support		Allow
Aberdeen Adventures Limited. shanehartley@tnp.co.nz	114.31	Support	Consultation supports cohesive outcomes.	Allow
	141.1	Support	Zoning 22 Duke Street Mixed Housing Suburban, does not confer the right to build houses in a flood prone area. That activity is controlled by the Resource Management Act. Conversely, being zoned Mixed Housing Suburban, allows the opportunity for the property to be holistically planned with the remainder of the proposed PPC100.	Allow
Claire Walker claire@wla.net.nz	174.5	Oppose	22 Duke Street has road width access to the end of Duke Street. If this property is included in Plan Change 100 as was the intent of the current FUZ, then the green corridor and inferred walking paths would be developed on that property. Te Roera Place would not be required as a point of connectivity.	Disallow
	174.1	Support	Good urban design, particularly for high density development requires supportive green spaces. Graduated density with the high density closest to amenity, filtering to lower density away from community amenity, is accepted urban design.	Allow
	174.14	Support	High fencing denies community connection. Low fencing promotes passive security.	Allow
	174.15	Support	If 22 Duke Street is zoned Mixed Rural Zone, cohesive development to the open space reserve will be denied.	Allow
	174.18	Support		Allow
	174.19	Support	Relying on each of the Property Owners to co-ordinate a cohesive green corridor is nonsensical.	Allow
	174.21	Support		
	174.22	Support	So do the owners of 22 Duke Street!	Allow
	174.23	Support		Allow
	174.24	Support		Allow
	174.25	Support		Allow
	174.26	Support		Allow



Claire Walker (continued)	174.27	Support in part.	Being a proposed public open space, any environmental improvements to the perceived degraded margins should be managed by the public.	Allow
	174.28	Support	The green corridor will not complete to the Waitauti Stream without the inclusion of 22 Duke Street.	Allow
Auckland Council Craig Cairncross craig.cairncross@auckland.govt.nz	186.1	Oppose		Disallow
	186.2	Oppose		Disallow
	186.3	Oppose		Disallow
	186.4	Oppose		Disallow
	186.5	Oppose		Disallow
	186.6	Oppose		Disallow
	186.7	Oppose		Disallow
	186.8	Oppose		Disallow
	186.9	Oppose		Disallow
	186.10	Oppose		Disallow
Luxembourg Development Company Ltd bnzakeri@gmail.com	205.15	Oppose	The green corridor is a functional solution to stormwater management. It could also support the movement of people and fauna, connecting to the Waitauti stream, an ecological feature.	Disallow
	205.16	Oppose	The green corridor is a functional solution to stormwater management. It could also support the movement of people and fauna, connecting to the Waitauti stream, an ecological feature.	Disallow
	205.17	Oppose	Piecemeal development delivers piecemeal outcomes. This future urban zone demands an integrated development policy.	Disallow
	205.20	Support in part.	I agree with the Boman Submitters to a coordinated approach to stormwater management. Too much public amenity would be sacrificed if the green corridor were interfered with.	Disallow
Linda Barton-Redgrave. beezakiwi@gmail.com	248.5	Support	The proposed green corridor is a functional solution to support the movement of people and fauna, connecting to the Waitauti stream, an ecological feature.	Disallow
	248.6	Oppose	This submitter seems to be proposing a large detention pond. Such a requirement is not evident, and won't be, until completion of a revised stormwater plan for the FUZ north of Riverhead Road.	Disallow

(continue on a separate sheet if necessary)

I seek that:

the whole : ☐or part ☐ (describe precisely which part) \_\_\_\_\_of the original submission be **allowed** ☐**disallowed** ☐I wish to be heard in support of my submission ☒I do not wish to be heard in support of my submission ☐If others make a similar submission, I will consider presenting a joint case with them at a hearing ☒Signature of Further Submitter  
(or person authorised to sign on behalf of further submitter)

Date

**PLEASE COMPLETE THE FOLLOWING SECTION**

Please tick one

☐ I am a person representing a relevant aspect of the public interest. (Specify upon what grounds you come within this category)☒ I am a person who has an interest in the proposal that is greater than the interest that the general public has. (Specify on what grounds you come within this category)I AM THE OWNER OF ~~THE~~ ABERDEEN  
ADVENTURES LTD. THE PROPRIETOR OF  
22 DUKE STREET IN RIVERHEAD**Notes to person making submission:**

A copy of your further submission must be served on the original submitter within 5 working days after it is served on the local authority

If you are making a submission to the Environmental Protection Authority, you should use Form 16C.