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

Date: Wednesday 14 July 2021
Time: 9.30am
Meeting room: Totara Room
Venue: Level 2 Annex, Manukau Civic Centre
31-33 Manukau Station Road, Auckland

PRIVATE PLAN MODIFICATION 57
HEARING REPORT
57 GRANGE ROAD, PAPATOETOE
ROYAL AND GRANGE GOLF CLUB

COMMISSIONERS

Chairperson Janine Bell
Commissioner Trevor Mackie

Laura Ager
SENIOR HEARINGS ADVISOR

Telephone: 09 890 4021 or 027 247 2794
Email: laura.ager@aucklandcouncil.govt.nz
Website: www.aucklandcouncil.govt.nz

WHAT HAPPENS AT A HEARING

Te Reo Māori and Sign Language Interpretation

Any party intending to give evidence in Māori or NZ sign language should advise the hearings advisor at least ten working days before the hearing so a qualified interpreter can be arranged.

Hearing Schedule

If you would like to appear at the hearing please return the appearance form to the hearings advisor by the date requested. A schedule will be prepared approximately one week before the hearing with speaking slots for those who have returned the appearance form. If changes need to be made to the schedule the hearings advisor will advise you of the changes.

Please note: during the course of the hearing changing circumstances may mean the proposed schedule may run ahead or behind time.

Cross Examination

No cross examination by the applicant or submitters is allowed at the hearing. Only the hearing commissioners are able to ask questions of the applicant or submitters. Attendees may suggest questions to the commissioners and they will decide whether or not to ask them.

The Hearing Procedure

The usual hearing procedure is:

- **the chairperson** will introduce the commissioners and will briefly outline the hearing procedure. The Chairperson may then call upon the parties present to introduce themselves. The Chairperson is addressed as Madam Chair or Mr Chairman.
- **The applicant** will be called upon to present his/her case. The applicant may be represented by legal counsel or consultants and may call witnesses in support of the application. After the applicant has presented his/her case, members of the hearing panel may ask questions to clarify the information presented.
- **Submitters** (for and against the application) are then called upon to speak. Submitters' active participation in the hearing process is completed after the presentation of their evidence so ensure you tell the hearing panel everything you want them to know during your presentation time. Submitters may be represented by legal counsel or consultants and may call witnesses on their behalf. The hearing panel may then question each speaker.
 - Late submissions: The council officer's report will identify submissions received outside of the submission period. At the hearing, late submitters may be asked to address the panel on why their submission should be accepted. Late submitters can speak only if the hearing panel accepts the late submission.
 - Should you wish to present written evidence in support of your submission please ensure you provide the number of copies indicated in the notification letter.
- **Council Officers** will then have the opportunity to clarify their position and provide any comments based on what they have heard at the hearing.
- The applicant or his/her representative has the right to summarise the application and reply to matters raised by submitters. Hearing panel members may further question the applicant at this stage. The applicants reply may be provided in writing after the hearing has adjourned.
- **The chair** will outline the next steps in the process and adjourn or close the hearing.
- If adjourned the hearing panel will decide when they have enough information to make a decision and close the hearing. The hearings advisor will contact you once the hearing is closed.

Please note

- that the hearing will be audio recorded and this will be publicly available after the hearing
- catering is not provided at the hearing.

A NOTIFIED PLAN MODIFICATION TO THE AUCKLAND UNITARY PLAN BY ROYAL AND GRANGE GOLF CLUB

TABLE OF CONTENTS		PAGE NO.
Reporting officer's report		5-52
Appendix 1	Private Plan Change 57 request This appendix has not been reproduced in this agenda but can be found at: https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/unitary-plan/auckland-unitary-plan-modifications/Pages/details.aspx?UnitaryPlanId=91	53-54
Appendix 2	Information provided by the applicant to support PPC57	55-134
Appendix 3	Specialist Reports	135-146
Appendix 4	Submissions and Further Submissions	147-234
Appendix 5	Recommendation	235-238
Appendix 6	Open Space -Sport and Active Recreation Zone Activity Status	239-242
Appendix 7	Joint Evidence Report on submissions by Roger Eccles and Sisira Jayasinghe, South - Urban (Central and West) 26 January 2016	243-246
Appendix 8	Kāinga Ora Middlemore Precinct Report 2020, Jaxmax 2020	247-278
Appendix 9	Environment Court Oral Decision (Decision [2021] NZ EnvC 082)	279-288

Reporting officer, Roger Eccles, Planner

Reporting on a proposed private plan modification to change zone from Residential to Open Space – Sport and Active Recreation zone at 57 Grange Road, Papatoetoe.

APPLICANT: ROYAL AND GRANGE GOLF CLUB

SUBMITTERS:	
Page 149	Richard and Eleanor Brabant
Page 151	Michael Horton
Page 153	Ashlee Walsh
Page 155	Transpower New Zealand Ltd
Page 163	Nick Somerville
Page 165	Geoffrey Page
Page 167	Lisa Grant
Page 169	Cassandra Bahr
Page 171	Walter Hamer
Page 172	Pranaya Thaker
Page 174	Denise Dalziel
Page 176	Martin Burr
Page 178	Arthur McGregor
Page 180	Mark Thorn
Page 182	Rebecca Walker
Page 184	Margaret Briffett
Page 185	Auckland Transport
Page 192	Glenn McCutcheon

FURTHER SUBMITTERS:	
Page 193	Richard and Eleanor Brabant
Page 223	Royal Auckland Golf and Grange Club (RAGGC)



Hearing Report for Proposed (Private) Plan Change 57 (Royal Auckland and Grange Golf Club) to the Auckland Unitary Plan (Operative in part)

Section 42A Hearing Report under the Resource Management Act 1991

Report to: Hearing Commissioners

Hearing Date/s: 14 July 2021

File No: Hearings Report Proposed Plan Change 57

File Reference \\aklc.govt.nz\Shared\CPO\RLP\FC\LUP\UP MODIFICATIONS\PC057 - RAGGC\04 Hearings\Plan Change 57 S42A Report FINAL and attachments

Report Author Roger Eccles, Planner, Central and South Planning, Plans and Places

Report Approver Celia Davison, Planning Manager, Central and South Planning, Plans and Places, Chief Planning Office

Report produced 18 June 2021

Summary of Proposed Plan Change 57: (PPC57)

Plan subject to change	Auckland Unitary Plan (Operative in part), 2016
Number and name of change	Proposed Plan Change 57 – Royal Auckland And Grange Golf Club (RAGGC) to the Auckland Unitary Plan
Status of Plan	Operative in part
Type of change	Private Plan Change
Clause 25 decision outcome	Approve
Parts of the Auckland Unitary Plan affected by the proposed plan change	Planning maps only Rezone 57 Grange Road, Papatoetoe and Grange Road, 2 Grange Road and 69A Omana Road, Papatoetoe from Single House, Mixed House Urban and Terrace Housing and Apartment Building zones to Open Space – Sport and Active Recreation zone
Was clause 4A complete	Yes
Date of notification of the proposed plan change and whether it was publicly notified or limited notified	The private plan change was publicly notified on the 19 November 2020
Submissions received (excluding withdrawals)	Eighteen submissions
Date summary of submissions notified	12 March 2021 (Summary of Decisions Requested).
Number of further submissions received (numbers)	Two
Legal Effect at Notification	No
Main issues or topics emerging from all submissions	<ul style="list-style-type: none"> • Rezone to ensure that the zoning reflects the existing land use. • The subject site is located within a well-established area with excellent transport and community infrastructure and would be better suited for residential development. • Retaining the residential zoning would support future development and residential intensification close to good transport links • Retaining the residential zoning would align with the Auckland Unitary Plan and the National Policy Statement – Urban Development and Council climate change policy.

Contents

Hearing Report for Proposed (Private) Plan Change 57 (Royal Auckland and Grange Golf Club) to the Auckland Unitary Plan (Operative in part).....	1
EXECUTIVE SUMMARY	4
1. BACKGROUND, PLAN PROVISIONS AND REQUEST	5
2. SITE DESCRIPTION	5
3. EXISTING PLAN PROVISIONS	8
4. PROPOSED PLAN CHANGE REQUEST	9
5. HEARINGS AND DECISION-MAKING CONSIDERATIONS	11
8. CONSULTATION	37
9. NOTIFICATION AND SUBMISSIONS.....	39
10. ANALYSIS OF SUBMISSIONS AND FURTHER SUBMISSIONS	40
11. CONCLUSIONS.....	47
13. RECOMMENDATION	47
14. SIGNATORIES.....	48
RECOMMENDATION	53

Abbreviations

Abbreviations in this report include:

Abbreviation	Meaning
PPC57	Proposed Private Plan Change 57
RAGGC	Royal Auckland and Grange Golf Club
OS-SAR	Open Space -Sport and Active Recreation zone
RMA	Resource Management Act 1991
AUP(OP)	Auckland Unitary Plan (operative in Part)

Attachments

Attachments	
Appendix 1	Private Plan Change 57 Request
Appendix 2	Information provided by the applicant to support PPC57
Appendix 3	Specialist reports
Appendix 4	Submissions and Further Submissions
Appendix 5	Recommendation
Appendix 6	Open Space -Sport and Active Recreation Zone Activity Status
Appendix 7	Joint Evidence Report on submissions by Roger Eccles and Sisira Jayasinghe, South - Urban (Central and West) 26 January 2016
Appendix 8	Kāinga Ora Middlemore Precinct Report 2020, Jaxmax 2020.
Appendix 9	Environment Court Oral Decision (Decision [2021] NZ EnvC 082).

EXECUTIVE SUMMARY

1. The purpose of the proposed plan change by the Royal Auckland and Grange Golf Club (**RAGGC**) is to amend the zoning under Auckland Unitary Plan (Operative in Part) AUP(OP) for the properties listed below, which are currently used as a golf course:
 - 57 Grange Road, Papatoetoe from Residential-Single House zone to Open Space – Sport and Active Recreation zone,
 - Grange Road, Papatoetoe from Residential-Mixed Housing Urban and Residential-Terrace Housing and Apartment Building to Open Space-Sport and Active Recreation zone, and
 - 2 Grange Road and 69A Omana Road, Papatoetoe from Residential-Mixed Housing Urban to Open Space-Sport and Active Recreation zone as in the AUP(OP).
2. The normal private plan change process set out in Part 2 of Schedule 1 of the Resource Management Act 1991 ('RMA') has been adhered to in developing Private Plan Change 57 (PPC57).
3. PPC57 was publicly notified on the 19 November 2020 with submissions closing on the 17 December 2020. The summary of decisions requested was notified on 12 March 2021 with the period for further submissions closing on 26 March 2021.
4. Twenty submissions were received with one withdrawal for a total of 19. Two further submissions were received.
5. In preparing for hearing on PPC57, this hearing report has been prepared in accordance with section 42A of the RMA.
6. This report considers the private plan change request and the issues raised by submissions and further submissions on PPC57. The discussion and recommendation in this report are intended to assist the Hearing Commissioners, the requestor and those persons or organisations that lodged submissions in relation to PPC57. The recommendation contained within this report are not the decisions of the Hearing Commissioners.
7. This report also forms part of council's ongoing obligations, which is, to consider the appropriateness of the proposed provisions, as well as the benefits and costs of any policies, rules or other methods, as well as the consideration of issues raised in submissions on PPC57.
8. A report in accordance with section 32 of the RMA was prepared by the applicant as part of the private plan change request as required under clause 22(1) of Schedule 1 of the RMA. The information provided by the applicant in support of PPC57 (including the s32 report and an Assessment of Environmental Effects) is attached in **Appendixes 1 and 2.**
9. In accordance with the evaluation in this report, I consider that the provisions proposed by PPC57 are not the most appropriate way of achieving the objectives of the AUP(OP) and the purpose of the RMA.
10. It is recommended that PPC57 be declined in response to submissions.

1. BACKGROUND, PLAN PROVISIONS AND REQUEST

11. PPC57 was lodged with the Council on 12 September 2020 by the RAGGC (**Appendix 1**). The Auckland Unitary Plan (Operative in Part) AUP(OP) has established the Open Space – Sport and Active Recreation (OS-SAR) zone for active sport and recreation, including golfing courses and associated facilities. The applicant considers that the rezoning of the subject site is the most appropriate way of achieving the objectives of the Regional Policy Statement (RPS) and the Auckland Unitary Plan.
12. The RAGGC's proposed plan change (PPC57) seeks to rezone the golf course land from Residential - Single House, Mixed Housing Urban and Terrace Housing and Apartment Building zones to OS-SAR. No other changes to the AUP(OP) are proposed.

2. SITE DESCRIPTION

13. The land subject to the plan change request is located within a well-established area that borders the suburbs of Papatoetoe, Ōtāhuhu and Māngere (refer to Figure 1). The subject sites cover 80.9 hectares and the applicant for the plan change, the RAGGC, is the owner of the land. Manicured grass is the main ground cover. Mature trees and vegetation are planted between the fairways and in select locations around the boundary. Less than 10% of the land is impervious surface - comprising of buildings, paths, parking areas and driveways. Overland flow paths traverse the land and floodplains are located in low lying parts of the property.
14. The Tāmaki Estuary divides the property and finishes adjacent to the south-western corner of the subject site. There are a number Significant Ecological Areas (SEA) areas covering the upper reaches of the estuary and its banks. However the site is predominately flat with formed undulations.
15. To the north, the golf course adjoins King's College which is zoned Special Purpose School zone. To the west is 30 Hospital Road which was previously owned by the RAGGC. It has a Residential - Terrace Housing and Apartment Building zoning and Residential-Single House zoning. The site is currently under-going redevelopment for residential construction. Further to the south-west is Middlemore Hospital which has a Special Purpose Healthcare Facility and Hospital zone (refer to Figure 2).
16. North of the Tamaki Estuary inlet are residential properties having frontage to Baldwin Street and Jane Cowie Avenue. The area is zoned Residential Single House and Residential Mixed Housing Suburban. At the south western extremity of the tidal inlet, are properties having frontage to Middlemore Crescent. This land is zoned Residential - Mixed Housing Urban. Most properties in Middlemore Crescent are owned by Kāinga Ora with original 1940's and 1950's dwellings and infill housing at the rear. Kainga Ora have started the process of redeveloping this area with residential dwellings.
17. To the east of the golf course is Grange Road and Great South Road, Papatoetoe. The land on the northern side of Grange Road is zoned Residential - Mixed Housing Suburban and occupied by a mix of well-established and infill development. To the south is Omana Park which is zoned as OS - SAR zone and accessed off Omana and Shirley Roads. The park is the home of the Papatoetoe Amateur Athletics Club. Residential properties having frontage to Omana Road and Troon Place are zoned Residential – Mixed House Urban. These properties are a mix of well-established and infill development. Transpower's National Grid Corridor overlay crosses the properties.

18. To the west of the subject site is Middlemore Railway Station and the southern railway corridor. The subject site is located within a well-established urban area with three secondary schools (Kings College, Otahuhu College and De La Salle College), Middlemore Hospital and two major transport nodes, the southern railway corridor and Great South Road.

Figure 1 'The Royal Auckland and Grange Golf Club (marked in yellow outline)

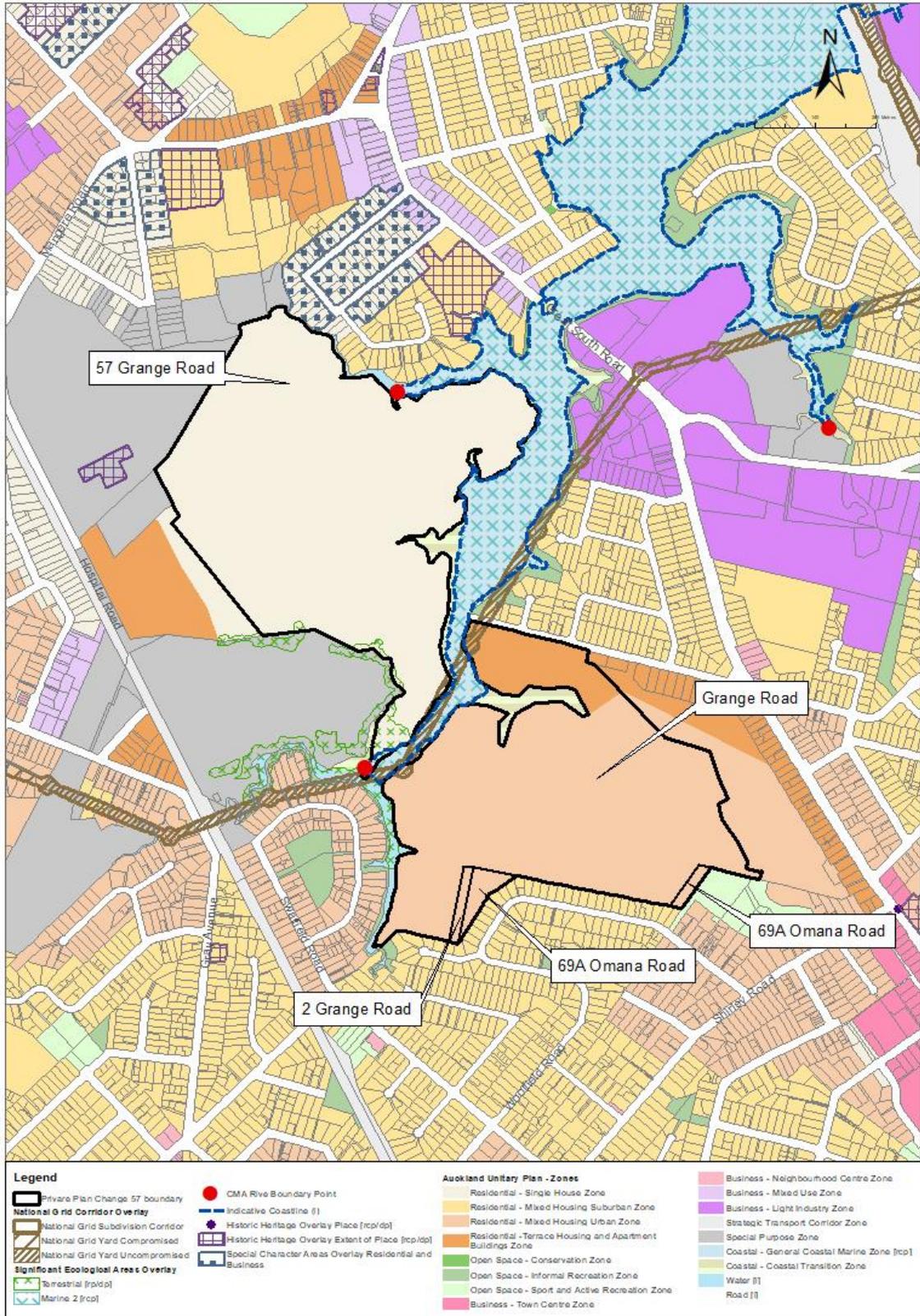


19. Following amalgamation of the Royal Auckland and Grange golf clubs in 2016, the RAGGC commenced a significant works programme to achieve the amalgamation objectives, including construction of:

- A bridge connecting both courses on either side of the Tāmaki Estuary.
- A new centrally located clubhouse; and
- A premier 27-hole golf course that can be played as 9, 18 and 27 rounds.

This has been a significant investment on the part of the golf club.

Figure 2 The Royal Auckland and Grange Golf Club – AUP Zonings and Overlays.



3. EXISTING PLAN PROVISIONS

20. The AUP(OP) became operative in 2016 and established the current residential zonings of the subject site. As part of the AUP(OP) submissions process these zoning were reviewed and by the Auckland Unitary Plan Independent Hearings Panel in 2016.
21. In considering whether to change the existing zoning it is necessary to review these zonings within the strategic policy and legal framework of the AUP (OP) Regional Policy Statement, the National Policy Statement - Urban Development, Auckland Plan and other policy documents. These documents provide a basis to assess the merits of the proposed RAGGC plan change.
22. The private plan change request from the RAGGC to change the Auckland Unitary Plan (Operative in Part) (AUP OP) zonings. The existing zoning, Overlays, Control and Designations for the subject sites, **57 Grange Road, Grange Road, 2 Grange Road and 69A Omana Road, Papatoetoe** are as follows:

57 Grange Road, Papatoetoe

Zoning

- Residential-Single House zone
- Coastal-General Coastal Marine zone

Overlays

- Natural Resources: Significant Ecological Areas Overlay – SEA-M2-2908DD, D D Marine 2
- Natural Resources: Significant Ecological Areas Overlay – SEA _T_4345 Terrestrial
- Infrastructure: National Grid Corridor Overlay - National Grid Yard Uncompromised
- Infrastructure: National Grid Corridor Overlay - National Grid Subdivision Corridor

Controls

- Control: Coastal Inundation 1 per cent AEP Plus 1 m Control 1 m sea level rise
- Control: Macroinvertebrate Community Index – Native
- Control: Macroinvertebrate Community Index – Urban

Designations

- Designations: Airspace Restriction Designations - ID 1102, Protection of aeronautical functions - obstacle limitation surfaces, Auckland International Airport Ltd

Grange Road, Papatoetoe

Zoning

- Residential - Mixed Housing Urban zone
- Residential - Terrace Housing and Apartment Building zone
- Coastal-General Coastal Marine zone

Overlays

- Natural Resources: Significant Ecological areas Overlay – SEA-M2-2908DD, D D Marine 2
- Natural Resources: Significant Ecological areas Overlay – SEA _T_4345 Terrestrial
- Infrastructure: National Grid Corridor Overlay - National Grid Yard Uncompromised

- Infrastructure: National Grid Corridor Overlay - National Grid Subdivision Corridor
- Controls
- Control: Coastal Inundation 1 per cent AEP Plus 1 m Control 1 m sea level rise
 - Control: Macroinvertebrate Community Index – Exotic
 - Control: Macroinvertebrate Community Index – Native
 - Control: Macroinvertebrate Community Index – Urban
- Designations
- Designations: Airspace Restriction Designations - ID 1102, Protection of aeronautical functions - obstacle limitation surfaces, Auckland International Airport Ltd

2 Grange Road, Papatoetoe

Zoning

- Residential - Mixed House Urban zone

Overlay

- Natural Resource: Significant Ecological Areas overlay – Sea _T_4345 Terrestrial

Controls

- Controls Coastal Inundation 1 per cent AEP Plus 1m Control 1m sea level rise
- Controls Macroinvertebrate Community Index - Exotic
- Controls Macroinvertebrate Community Index - Native
- Controls Macroinvertebrate Community Index - Urban

Designations

- Designation: Airspace Restricted Designation – ID 1102, Protection of aeronautical functions – obstacle limitation surfaces, Auckland International Airport Ltd

69A Omana Road

Zone

- Residential – Mixed Housing Urban zone

Controls

- Controls Macroinvertebrate Community Index - Exotic
- Controls Macroinvertebrate Community Index - Urban

Designations

- Designation: Airspace Restricted Designation – ID 1102, Protection of aeronautical functions – obstacle limitation surfaces, Auckland International Airport Ltd.

23. The proposed Private Plan Change will impact solely on the zoning of the subject site by changing the AUP (OP) zoning from its current mix of residential zonings to an OP-SAR zone.

4. PROPOSED PLAN CHANGE REQUEST

24. PPC57 was lodged with the Council on 12 September 2020 by the RAGGC (**Appendix 1**). The Auckland Unitary Plan (Operative in Part) AUP(OP) has established the Open Space

- Sport and Active Recreation (OS-SAR) zone for active sport and recreation, including golfing courses and associated facilities. The applicant considers that the rezoning of the subject site is the most appropriate way of achieving the objectives of the Regional Policy Statement (RPS) and the Auckland Unitary Plan.
25. The RAGGC’s proposed private plan change (PPC57) seeks to rezone the golf course land from Residential - Single House, Mixed Housing Urban and Terrace Housing and Apartment Building zones to OS-SAR. No other changes to the AUP(OP) are proposed.
 26. The private plan change request from the RAGGC seeks the following changes to the AUP (OP) zoning of:
 - 57 Grange Road, Papatoetoe from Residential - Single Housing zone to Open Space – Sport and Active Recreation zone,
 - Grange Road, Papatoetoe from Residential - Mixed Housing Urban zone and Residential - Terrace Housing and Apartment Building zone to Open Space - Sport and Active Recreation zone, and
 - 2 Grange Road and 69A Omana Road, Papatoetoe from Residential - Mixed Housing Urban zone to Open Space - Sport and Active Recreation zone.
 27. The purpose of the plan change is to apply a zone that reflects current and foreseeable use of the land as a golfing facility.
 28. While the proposed PPC57 will result in a slight reduction on the amount residential zoned land available in the AUP, it is the applicant’s view that there is no actual effect overall on the land available for residential development as the RAGGC has used the land as a golf course since 1910 and has no plans for using the land for anything other than its current use as a golf course.
 29. The **RAGGC** has provided the following specialist documents to support their private plan change application.

Table 1: Information provided by the requestor for Private Plan Change 57

Document title	Specialist	Date
Request for private plan change Royal Auckland and Grange Golf Club Section 32 Evaluation Report and Planning Assessment (Appendix 2)	Richmond Planning Limited	August 2020
Assessment of noise effects: Royal Auckland and Grange Golf Club (RAGGC) private plan change request	Styles Group	29 June 2020

30. The Styles Group assessment considered that the fundamental changes to noise effects the plan change would authorise would be as follows:
 - 1) There would be no change to the noise levels and effects at any receiving sites if the use remains as is currently (low intensity golfing); and

2) The report then went on to state that if the use of the site was to change to allow for a more intense level of recreational activity, such as organised football, rugby or netball in close proximity to residential boundaries, the noise level from that activity (predominantly voices) could be up to 5dB higher (55dB LAeq) than the current noise limits, and 10dB higher (60dB LAeq) for up to 2 hours per week.

31. Overall, the Style Group’s assessment considered that the difference in noise effects between a relatively high-density residential environment and organised/formal recreation with higher noise limits during the day would only be different in character, owing simply to the different noise sources involved rather than in actual effect.
32. No further information was requested by Council under Part two section 23 of the RMA. The information provide was considered appropriate to the scale and significance of the actual or potential environmental effects anticipated from the implementation of the change or plan.

5. HEARINGS AND DECISION-MAKING CONSIDERATIONS

33. Clause 8B of Schedule 1 of RMA requires that a local authority shall hold hearings into submissions on its proposed plan.
34. Auckland Council’s Combined Chief Executives’ Delegation Register delegates to hearing commissioners all powers, duties and functions under the Resource Management Act 1991. This delegation includes the authority to determine decisions on submissions on a plan change, and the authority to approve, decline, or approve with modifications, a private plan change request. Hearing Commissioners will not be recommending a decision to the council, but will be issuing the decision directly
35. In accordance with s42A (1), this report considers the information provided by the applicant and summarises and discusses submissions received on PPC57. It makes recommendations on whether to accept, in full or in part; or reject, in full or in part; each submission. This report also identifies what amendments, if any, can be made to address matters raised in submissions. This report makes a recommendation on whether to approve, decline, or approve with modifications PPC57. Any conclusions or recommendations in this report are not binding to the Hearing Commissioners.
36. The Hearing Commissioners will consider all the information submitted in support of the proposed plan change, information in this report, and the information in submissions, together with evidence presented at the hearing.
37. This report has been prepared by the following author(s) and draws on technical advice provided by the following technical experts:

Table 2: Specialist input to s42A report

Area of expertise	Author’s name/s titles and companies
Planning	Roger Eccles, Planner Central South unit, Plans and Places
Technical expert. – Acoustics	Andrew Gordon, Specialist, Resource Consents, Auckland Council
Technical expert – Open Space	Ezra Barwell, Senior Policy Advisor, Community & Social Policy, Auckland Council

38. The technical reports provided by the above experts are attached in **Appendix 3** of this report.

STATUTORY AND POLICY FRAMEWORK

39. Private plan change requests can be made to the Council under clause 21 of Schedule 1 of the RMA. The provisions of a private plan change request must comply with the same mandatory requirements as Council initiated plan changes, and the private plan change request must contain an evaluation report in accordance with section 32 and clause 22(1) in Schedule 1 of the RMA.
40. Clause 29(1) of Schedule 1 of the RMA provides “except as provided in subclauses (1A) to (9), Part 1, with all necessary modifications, shall apply to any plan or change requested under this Part and accepted under clause 25(2)(b)”.
41. The RMA requires territorial authorities to consider a number of statutory and policy matters when developing proposed plan changes. There are slightly different statutory considerations if the plan change affects a regional plan or district plan matter.
42. The matters raised in PPC57 are district plan related. The following sections summarise the statutory and policy framework, relevant to PPC57.

5.1. Resource Management Act 1991

5.1.1 Plan change matters – regional and district plans

43. There are mandatory considerations to be taken into account in the development of a proposed plan change relating to regional matters. Table 3 below summarises regional matters under the RMA, relevant to PPC57.

Table 3: Sections of the RMA relevant to private plan change decision making

RMA Section	Matters
Part 2	Purpose and principles of the RMA.
Section 10	Land may be used in a manner that contravenes a rule in a district plan or proposed district plan
Section 31	Outlines the functions of territorial authorities in giving effect to the Resource Management Act 1991
Section 32	Requirements preparing and publishing evaluation reports. This section requires councils to consider the alternatives, costs and benefits of the proposal
Section 67	Contents of regional plans – sets out the requirements for regional plan provisions, including what the regional plan must give effect to, and what it must not be inconsistent with

RMA Section	Matters
Section 72	Sets out that the purpose of district plans is to assist territorial authorities to carry out their functions in order to achieve the purpose of this Act.
Section 73	Sets out Schedule 1 of the RMA as the process to prepare or change a district plan
Section 74	Matters to be considered by a territorial authority when preparing a change to its district plan. This includes its functions under section 31, Part 2 of the RMA, national policy statement, other regulations and other matter
Section 75	Contents of district plans – sets out the requirements for district plan provisions, including what the district plan must give effect to, and what it must not be inconsistent with
Section 76	Outlines the purpose of district rules, which is to carry out the functions of the RMA and achieve the objective and policies set out in the district plan. A district rule also requires the territorial authority to have regard to the actual or potential effect of activities in the proposal, on the environment
Section 80	Enables a 'combined' regional and district document. The Auckland Unitary Plan is in part a regional plan and district plan to assist Council to carry out its functions as a regional council and as a territorial authority
Section 85	Reasonable use -any person having an interest in land to which any provision or proposed provision of a plan or proposed plan applies, and who considers that the provision or proposed provision would render that interest in land incapable of reasonable use, may challenge that provision or proposed provision
Schedule 1	Sets out the process for preparation and change of policy statements and plans by local authorities. It also sets out the process for private plan change applications

44. The mandatory requirements for plan preparation are comprehensively summarised by the Environment Court in *Long Bay-Okura Great Park Society v North Shore City Council*, Environment Court Auckland A078/2008, 16 July 2018 at [34] and updated in subsequent cases including *Colonial Vineyard v Marlborough District Council* [2014] NZEnvC 55 at [17]. When considering changes to district plans, the RMA sets out a wide range of issues to be addressed. The relevant sections of the RMA include sections 31-32 and 72-76 of the RMA.
45. The tests are the extent to which the objective of PPC57 is the most appropriate way to achieve the purpose of the Act (s32(1)(a)) and whether the provisions:

- accord with and assist the Council in carrying out its functions (under s 31) for the purpose of giving effect to the RMA.
- accord with Part 2 of the RMA (s 74(1)(b)).
- give effect to the AUP regional policy statement (s 75(3)(c)).
- give effect to any national policy statement (s 75(3)(a)).
- have regard to the Auckland Plan 2050 (being a strategy prepared under another Act (s 74(2)(b)(i))).
- have regard to the actual or potential effects on the environment, including, in particular, any adverse effect (s 76(3)).
- are the most appropriate method for achieving the objectives of the AUP, by identifying other reasonably practicable options for achieving the objectives (s 32(1)(b)(i)); and by assessing their efficiency and effectiveness (s 32(1)(b)(ii)); and:
 - identifying and assessing the benefits and costs of environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—
 - (i) economic growth that are anticipated to be provided or reduced (s 32(2)(a)(i)); and
 - (ii) employment that are anticipated to be provided or reduced (s 32(2)(a)(ii)).
 - if practicable, quantifying the benefits and costs (s 32(2)(b)); and assessing the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions (s 32(2)(c)).

46. Section 31(a) of the RMA states that a function of territorial authorities is the establishment, implementation, and review of objectives, policies, and methods to achieve integrated management of the effects of the use, development, or protection of land and associated natural and physical resources. This review of the AUP objectives and policies is fundamental to the consideration of the RAGGC plan change request.
47. Under section 74(1)(e) the decision maker must also have particular regard to the section 32 evaluation report prepared in accordance with s 32 (s 74(1)(e)). The applicant's section 32 report for PPC57 considers that the change of zoning to OS - SAR is the best way to achieve the purposes of the RMA and the objectives of Part 2 of the Act.
48. The applicant, as part of the section 32 report (**Appendix 2**), provides an analysis of three options including a base line option of retaining the current status. The analysis determines that the preferred option is to rezone the land to OS-SAR. This is also seen as best meeting the purpose of the RMA.
49. Under section 10 (1) and (2) certain existing use rights in relation to the land are protected. This means the use was lawfully established before the rule became operative or the proposed plan was notified; and are the same or similar in character, intensity, and scale can be continue. This section operates in conjunction with section 10B which allows for certain existing building work. The RAGGC continues to operate (successfully) under these existing uses provisions, as do other golf clubs such as the Pakuranga Golf Club which operates under a Residential-Mixed House Urban zoning.

50. I have considered the extent to which these existing activities are likely to enjoy existing use rights under section 10 of the RMA. Reliance on existing use rights can be problematic for a range of activities which have been established over a significant period of time. However, here these activities are of a similar character, scale and intensity to that which existed prior to the proposed plan being notified and would provide for reasonable use.
51. In my opinion, relying on existing use rights would be appropriate for activities where they can be proven to be of a similar character, scale and intensity as already exists. Where these activities exceed this effects envelope, it is appropriate that they be considered under a Discretionary Activity consent process as aspects of these activities may generate adverse effects requiring avoidance, remediation, or mitigation.
52. Section 85 of the RMA provides an opportunity for the Environment Court to determine whether an owner has “reasonable use” of the land. Any person having an interest in land to which any provision of a plan or proposed plan applies, and who considers that the provision would render that interest in land incapable of reasonable use, may challenge that provision.
53. However, in considering “reasonable use” the Environment Court noted in *Hastings v Auckland City Council*¹ that the test for reasonable use is not a question of private rights but of public interest and that the reasonable use is not synonymous with optimum financial return.

5.2. National Policy Statements

54. Pursuant to Sections 74(1)(e) and 75(3)a of the RMA the relevant national policy statements (NPS) must be given effect to in the preparation, and in considering submissions on PPC57. There are four NPS of relevance to PPC57.

5.2.1 National Policy Statement on Urban Development 2020 (‘NPS-UD’)

55. The National Policy Statement on Urban Development 2020 (NPS-UD) took effect on the 20 August². The NPS-UD relates to spatial strategy and land use planning. It requires local authorities to provide development capacity in locations that meet the diverse needs of communities and encourages well-functioning, liveable urban environments. The AUP is required to give effect to any national policy statements³, however, at this point the NPS-UD has not been included in the AUP(OP) through a plan change.
56. Guidance on the relationship between the AUP(OP) and the NPS-UD has recently been given by Judge Newhook in an Environmental Court Oral Decision (Decision [2021] NZ EnvC 082) dated 15 June 2021. ⁴ **(Appendix 9)**
57. Judge Newhook outlined in his oral judgement that that:
“Clause 1.3 is titled "Application" and subclause (6) provides that "[the NPS applies to] planning decisions by any local authority that affect an urban environment".

¹ Hastings v Auckland City Council Decision A68/01.

² National Policy Statement – Urban Development 2020, Ministry for the Environment

³ RMA s67(3) and s75(3)(a)

⁴ Environmental Court Oral Decision (Decision [2021] NZ EnvC 082).

58. The reference made to "planning decisions" among the eight Objectives and 11 Policies is quite limited, being found in only Objectives 2, 5, and 7, and Policies 1 and 6. In my opinion these particular Objectives and Policies do not apply to PCC57.
59. While Council is not required for most part to "give effect" to the NPS-UD unless its objectives and policies are incorporated into its planning documents, the NPS-UD still provides strategy guidance about future urban development. In this consideration can be given to the strategic view of the NPS-UD. Table 4 below summarises the sections of the NPS-UD that can be considered in relation to PPC57.

Table 4: National Policy Statement relevant to PPC57

Theme	Sections
Well-functioning urban environments	<p>Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.</p> <p>Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:</p> <ul style="list-style-type: none"> (a) have or enable a variety of homes that: (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and (d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and (e) support reductions in greenhouse gas emissions; and (f) are resilient to the likely current and future effects of climate change.
Well-functioning urban environments	<p>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.</p> <ul style="list-style-type: none"> (b) the area is well-served 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. <p>Policy 3: In relation to tier 1 urban environments, regional policy statements and district plans enable:</p> <ul style="list-style-type: none"> (d) in all other locations in the tier 1 urban environment, building heights and density of urban form commensurate with the greater of: (i) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or (ii) relative demand for housing and business use in that location.
Changing urban environments	<p>Objective 4: New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.</p> <p>Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:</p> <ul style="list-style-type: none"> (a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement (b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes: <ul style="list-style-type: none"> (i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future

Theme	Sections
	generations, including by providing increased and varied housing densities and types; and (ii) are not, of themselves, an adverse effect.
Integration of land use and infrastructure	Objective 6: Local authority decisions on urban development that affect urban environments are: (a) integrated with infrastructure planning and funding decisions;
Responsiveness to development capacity	Objective 6: Local authority decisions on urban development that affect urban environments are: (c) responsive, particularly in relation to proposals that would supply significant development capacity. Policy 8: Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning documents; or (b) out-of-sequence with planned land release.
Climate change	Objective 8: New Zealand's urban environments: (a) support reductions in greenhouse gas emissions; and (b) are resilient to the current and future effects of climate change. Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters: (e) the likely current and future effects of climate change.

The National Policy Statement – Objective 1: Well-functioning urban environments

60. The National Policy Statement on Urban Development 2020 (NPS-UD) took effect on the 20 August⁵. The NPS-UD relates to spatial strategy and land use planning. It requires local authorities to provide development capacity in locations that meet the diverse needs of communities and encourages well-functioning, liveable urban environments. The AUP is required to give effect to any national policy statements⁶ - although at this point the NPS-UD has not been included in the AUP(OP) through a plan change.
61. The Auckland Region is recognised under the NPS-UD as a 'Tier 1' authority. Tier 1 authorities are directed to cater for greater growth than lower tier authorities. This includes greater intensification in areas of high demand, a walkable distance of a city centre, metropolitan centres and rapid transit stops.
62. The NPS-UD is of relevance under S75(3)(a) (National Policy Statements). However, many of the objectives and the policies in the NPS-UD require local authorities to prepare and change plans to implement the NPS, with councils allowed up to two years to do so. Auckland Council has not yet notified any such plan changes and it would be inappropriate to speculate about what such plans might ultimately contain until the relevant statutory process have been completed.

⁵ National Policy Statement – Urban Development 2020, Ministry for the Environment

⁶ RMA s67(3) and s75(3)

63. The purpose of the NPS-UD is the establishment of well-functioning urban environments that enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety. The NPS-UD encourages urban intensification within well-established areas and in proximity to transport nodes. This is seen as the best means to promote the sustainable management of natural and physical resources.
64. In planning for urban development and intensification the NPS-UD provides for 'qualifying matters and set out a series of directives in relation to these qualifying matters – and this includes open space that is provided for public use.⁷ At this stage it remains unclear how councils will apply and utilise qualifying matters in practice.
65. In the case of a proposed plan change to the AUP(OP) weight needs to be given to the strategic direction of the NPS-UD. Of pertinence to this plan change are Objectives 1 and 3, (plans enable more people to live in areas well serviced by existing or planned public transport) and Policies 1 and 3. Objective 1 in respect of tier 1 urban environments such as Auckland, requires district plans to enable intensification in areas which are well-serviced by existing or planned public transport.
66. Failing to consider the NPS-UD's strategic direction when considering these matters would be a failure to administer both the NPS-UD and the AUP(OP). While I have given considered and taken direction from the NPS-UD, I do not consider that at this stage it should be accorded primacy over the existing objectives and policies of the AUP(OP).

NPS-UD – Objective 6: Integration of Urban Infrastructure

67. Objective 6(a) of the NPS-UD seeks that decisions on urban development are integrated with infrastructure planning this includes development infrastructure as network infrastructure for water supply, wastewater and stormwater, and land transport as defined in the Land Transport Management Act 2003,
68. Additional infrastructure is defined in the NPS-UD as including public open space, community infrastructure as defined under section 197 of the Local Government Act 2002, land transport not controlled by local authorities, social infrastructure (schools and hospitals etc), and telecommunications and electricity/gas networks.
69. From this perspective, the subject site is supported by well-established infrastructure that includes two major transport corridors (the southern commuter rail system and Great South Road) and community infrastructure and social infrastructure.

NPSUD – Objective 8: Climate Change and Urban Environments

70. The urban intensification supported by the availability of public transport and active modes will facilitate a more efficient land use system that results in fewer emissions per capita compared with urban development not served by public transport. Climate change impacts related to the Tamaki Estuary coastal marine area can be mitigated and therefore considered the area is resilient to the effects of climate change.

Conclusion

71. In my view the rezoning proposed by PPC57 does not align with the strategic direction of the NPS-UD as required by s75(3)(a) of the RMA, since the rezoning would compromise future development and intensification of the area provided by the strategic policy document.

⁷ National Policy Statement – Urban Development 2020, Ministry for the Environment

5.2.2 National Policy Statement on Electricity Transmission

72. The National Policy Statement on Electricity Transmission (NPSET) provides guidance to local authorities on how to manage the National Electricity Grid, (the electricity transmission network) and the need to incorporate into regional and district planning documents. The objective and policies are intended to guide decision-makers in drafting plan rules, in making decisions on the notification of the resource consents and in the determination of resource consent applications, and in considering notices of requirement for designations for transmission activities⁸. The National Grid Corridor crosses the Royal Auckland and Grange Golf Club land, however, proposed PPC57 would not result in any change to the National Grid Corridor overlay in the AUP(OP). The proposed plan change is not in conflict with the NPSET.

5.2.3 National Coastal Policy Statement

73. The National Coastal Policy Statement (NCPS)⁹ provides objectives and policies in relation to coastline management. This includes preserving the natural character of the coastline, maintaining coastal water quality and protecting the natural features and landscapes. Objective 4 also provides policies on the management of the coastal environment including public open space. In respect to the PPC57 subject site and the Tamaki estuary there is no public open space.

74. The subject site adjoins the upper reaches of the Tamaki Estuary and incorporates General Coastal Marine zones and is impacted by two Significant Ecological Area Overlays both Marine and Terrestrial. The proposed plan change to an OS-SAR zoning does allow for a range of activities, but these can be managed under AUP(OP) controls. A more likely scenario is that the change of zoning would maintain the environment status quo and is in keeping of the NCPS Objectives 1 and 2:

- To safeguard the integrity, form, functioning and resilience of the coastal environment and sustain its ecosystems, including marine and intertidal areas, estuaries, dunes and land.
- To preserve the natural character of the coastal environment and protect natural features and landscape values.

75. However the PPC57 request does not align with the NCPS Objective 4:

- To maintain and enhance the public open space qualities and recreation opportunities of the coastal environment by recognising that the coastal marine area is an extensive area of public space for the public to use and enjoy.

76. Development under the existing residential zoning is more likely to achieve NCPS Objective 4 as an esplanade reserve may be required when land is subdivided, when land is reclaimed, or when land is developed. While residential development and construction may place more stress on the estuary and tidal environment this can be mitigated through the use of consent conditions.

5.2.4 National Policy Statement on Freshwater Management 2020

⁸ National Policy Statement on Electricity Transmission, March 2008

⁹ National Coastal Policy Statement, Ministry for the Environment 2010

77. Since lodgement of PPC57 the Ministry for the Environment released the National Environmental Standards for Freshwater (“**NESF**”) which came into force 3 September 2020. The NPS-FM seeks that natural and physical resources are managed in a way that prioritises the health and well-being of water bodies and freshwater ecosystems, the health needs of people, and the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.
78. In my view, PPC57 as proposed is not germane to the NPS-FM. The water body located at the subject site comprises of the upper reaches of the Tamaki Estuary and is tidal by nature. It connects with the Otaki Creek in the vicinity of Middlemore Crescent. The rezoning of the subject site to OS-SAR would not result in a disturbance of this water body. The adverse effects of the Plan Change on the freshwater systems will be less than minor given the small scale of the site relative to the wider catchment.

5.3. National environmental standards and regulations

79. Under section 44A of the RMA, local authorities must observe national environmental standards in their district/ region. No rule or provision may duplicate or be in conflict with a national environmental standard or regulation.
80. Table 5 below summarises the national environmental standards or regulations relevant to PPC57.

Table 5: National environmental standards and regulation relevant to PPC57

Relevant Act/ Policy/ Plan	Section	Matters
Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009	Regulations apply only to certain activities relating to existing transmission lines	These regulations apply only to an activity that relates to the operation, maintenance, upgrading, relocation, or removal of an existing transmission line,

5.4. Auckland Unitary Plan

81. The AUP(OP) 2016 was prepared in accordance with Part 2 of the RMA and is operative in part. As this plan change request is limited to rezoning, the focus of the consideration is on the suitability of the subject site for the proposed zoning under the AUP(OP).
82. Section 75(3)(c) of the RMA requires that a district plan must give effect to any regional policy statement. Section 75(4)(b) of the RMA requires that a district plan must not be inconsistent with a regional plan for any matter specified in s 30(1) RMA.
83. Zoning is a key method to give effect to the objectives and policies of the Regional Policy Statement (**RPS**) as zones manage the way in which areas of land and the coastal marine area are to be used, developed or protected. The RPS is the key strategic instrument for determining planning and land use within the Auckland area.
84. The relevant policy statement and plans must be considered in the preparation of the plan change and in the consideration of submissions. When preparing or changing a district plan, the Council must give effect to the RPS and have regard to a proposed RPS. The RPS identifies issues of regional significance, and those relevant to this plan change are listed in Table 6.

85. This is followed by an evaluation of the AUP provisions for the two options (retain the existing zoning or rezone to OS-SAR) against a set of evaluation criteria as set out in Table 7. The table also includes a recommendation.

Table 6: AUP(OP) matters relevant to PC57

Relevant Policy/ Plan	Section	Matters
Regional Policy Statement	B2.2	Urban growth and form
Regional Policy Statement	B2.3	A quality-built environment
Regional Policy Statement	B2.4	Residential growth
Regional Policy Statement	B2.7	Open space and recreational facilities
Regional Policy Statement	B3.3	Transport, integrates with and supports a quality compact urban form
Regional Policy Statement	B10.2	Natural hazards and climate change
District Plan -. Land disturbance	E12	Management of the adverse effects of land disturbance
District Plan -Zoning	H5	Residential zoning, Open Space zoning
District Plan	E27	Transport

86. The applicant has provided an assessment against the objectives and policies of the AUP(OP) Regional Policy Statement ('RPS') in Section 7.0 of the Private Plan Change Request and Appendix 4 to the application. PPC57 is, in my opinion, not consistent with a number of aspects of the RPS and Auckland Unitary Plan as discussed below.

87. In assessing this proposed rezoning it is necessary to consider whether the change of zoning is the most appropriate way of meeting the objectives of the AUP RPS and whether it is the most appropriate way of meeting the purpose of the RMA which is to promote the sustainable management of natural and physical resources as defined in section 5(2) of the RMA and achieve economic and efficient sustainable management.

88. RPS – B2 Urban growth and form seeks a quality and compact urban form that can provide for residential intensification that utilises transport corridors effectively and maximises resource and infrastructure efficiency.

B2: Urban growth and form

89. Chapter B2 sets out the strategic objectives and policies for growth and form in the Auckland region. The chapter states that a quality-built environment is one which

enhances opportunities for people's wellbeing in ways that promote the plan's objectives and maintain and enhance the amenity values of an area.

90. The relevant objectives and policies provide direction on urban growth and form. A clear and underlying theme of these objectives and policies is to achieve a quality compact urban form through integrated land use close to existing or planned infrastructure and transport. The aim is to promote urban growth and intensification within the urban area "close to public transport, social facilities (including open space) and employment opportunities."¹⁰
91. This is the most appropriate way to give effect to the RPS and achieve the purpose of Part 2 of the RMA as it will achieve economic and efficient sustainable management. This is because the current residential zoning would allow for residential intensification in proximity to transport hubs within a highly desirable development area, retain the higher economic value of the land (both current and potential), and provide for a sustainable and resilient urban solution to climate change.

B3.3 Transport

92. Transport B3.3.1. Objective 1 seeks to provide an effective and efficient transport system for Auckland that integrates with and supports a quality compact urban form and supports the movement of people, goods and services.
93. Policies managing transport infrastructure (B3.3.2.) seek to ensure that transport infrastructure is designed, located and managed to integrate with adjacent land uses, taking into account their current and planned use, intensity, scale, character and amenity. These policies also encourage land use development patterns that reduce the rate of growth in demand for private vehicle trips and facilitates transport choices.
94. I consider that improving the integration of land use development and transport is a major strategic imperative within the RPS and needs to be given effect to when practicable. In my view I consider this as a strong argument to retain the existing residential zoning of the subject site as it meets the objectives and policies of the RPS in particular Transport B3.3.1. Objective 1.

E27.2 Transport

95. The transport provisions highlight that provisions of the AUP seek that land use and all modes of transport work together in an integrated manner. Objectives (1) seeks that land use, and all modes of transport are integrated in a manner that enables: (a) the benefits of an integrated transport network to be realised; and (b) the adverse effects of traffic generation on the transport network to be managed. It is my view that the existing zoning will be more likely to support an integrated transport network.

E12 Land Disturbance

96. The management of the adverse effects of land disturbance focuses on both large and small disturbance areas, as the cumulative adverse effects from a number of small earthwork sites can be as significant as single large areas of exposed earth.

¹⁰ AUP (2016), RPS B2.2.2. Policies 5 (c), Auckland Council 2016.

97. Policy E 12.3.3 seeks to enable land disturbance necessary for a range of activities undertaken to provide for people and communities' social, economic and cultural well-being.
98. Table E12.4.1 Activity table – all zones indicates that general earthworks for up to 500m² is a permitted activity in all residential zones. It is my view that together these policies and rules would allow for the day-to-day management of a golf course such as the establishment or disestablishment of a bunker. In my view this provides for the RAGGC to continue the high standard of maintenance and upkeep of the golf club.

H Zones - Auckland Unitary Plan

99. Chapter H3: Residential provides for the Residential -Single House; H4: Residential Mixed House Urban and the Residential – Terrace Housing and Apartment Building zones. The purpose of these zones is to provide for residential accommodation and to make efficient use of land and infrastructure, increase the capacity of housing and ensure that residents have convenient access to services, employment, education facilities, retail and entertainment opportunities, public open space and public transport. The residential zones promote walkable neighbourhoods and increase the vitality of centres.
100. Chapter H7 Open Space; - The majority of land zoned as open space is vested in the Council or is owned by the Crown. However some areas zoned open space are privately owned. While the open space zones generally provide for public use, some privately owned, or Crown-owned sites may restrict public use and access.
101. The objectives for all open space zones recognise the importance of recreational needs being met through the provision of a range of quality open space areas. Policies supporting these general objectives focus on the design, development and management of the spaces as well as reflecting mana whenua values where appropriate.
102. Chapter H7 also includes specific objectives and policies for each of the five-open space zones. Those applying to OS-SAR are at H7.6.2.
- (1) Indoor and outdoor sport and active recreation opportunities are provided for efficiently, while avoiding or mitigating any significant adverse effects on nearby residents, communities and the surrounding areas.*
- (2) Activities accessory to active sport and recreation activities are provided for in appropriate locations and enhance the use and enjoyment of areas for active sport and recreation.*
103. The golfing facility and supporting uses are permitted activities in H7.9.1. Activity Table – Open Space Zones. For the RAGGC this is a more efficient and less expensive way of operating. Under the current Residential zones applying to the land golf is a non-complying activity, the applicant is concerned about any requirement making for ancillary or supporting activities. This is not considered economic or efficient by the applicant. The golf club considers that the magnitude of any adverse effects on the nearby residents, communities and the surrounding areas will remain unchanged. This approach is supported by Council Open Space Specialist, Mr Ezra Barwell in *paragraph 162* who considers that any adverse effects on the OP-SAR zoning can be managed through standards and controls of AUP(OP).
104. The anticipated effects of permitted recreation activities that are more intensive than golf, are managed by various standards to ensure effects such as high levels of traffic, noise, glare and scale of buildings are managed.

105. The RAGGC considers that rezoning the land OS-SAR will be the most appropriate way to achieve the objectives of the club. A list of activities provided for in H7.9.1 Activity Table, is shown in **Appendix 6**.

106. Table 7 provides an analysis of the AUP and RPS in relation to the two zoning options; that is retention of the existing residential options or a change to an OS-SAR zone.

Table 7: AUP - Regional Policy Statement Analysis of Rezoning Change

AUP Consideration	Option 1: Retain Existing Residential zoning	Option 2: Rezone to OS-SAR
Appropriateness in achieving policy outcomes	<p>Aligns with RPS <i>Urban Growth and Form</i></p> <ul style="list-style-type: none"> • Current zoning promotes residential development and possibility of quality compact urban form <ul style="list-style-type: none"> ○ residential development associated with transport hubs ○ integrated and more effective public transport ○ greater productivity and economic value ○ reduced environmental effects and CO2 emissions. <p><i>Infrastructure, transport and energy</i></p> <ul style="list-style-type: none"> • Location of site next to Middlemore Station and Great South Road transport hubs provides for effective, efficient and safe transport that <ul style="list-style-type: none"> ○ integrates with and supports a quality compact urban form ○ locate high trip-generating activities so that they can be efficiently served by key public transport services and routes. <ul style="list-style-type: none"> • Aligns with Auckland Plan and NPS-UD 	<p>Aligns with RPS <i>Urban Growth and Form</i></p> <ul style="list-style-type: none"> • The RAGGC provides for open space and recreation facilities. In doing this the club. In this the RAGGC meets RPS – B2.7 <ul style="list-style-type: none"> ○ in that it meets recreational needs of communities are met through the provision quality open spaces and recreation facilities. ○ However, it only meets the recreational needs for a small group (2,000 members). ○ There is no provision public access to Auckland coastline, in this case the Tamaki Estuary.
Effectiveness	<p><i>Urban Growth and Form</i></p> <ul style="list-style-type: none"> • The current zoning promotes growth and intensification within the urban area. • Enables higher residential intensification close to public transport, social facilities (including open space) and employment opportunities. 	<p><i>OS-SAR zoning</i></p> <ul style="list-style-type: none"> • Change of zoning best provides for the ongoing existence of long-standing golf club. • The open space remains in private hands and is not used by the public or other activities. • Not part of the Local Board's Open Space network.
Efficiency	<p><i>Urban Growth and Form</i></p> <ul style="list-style-type: none"> • Optimises the efficient use of the existing urban area • Supports the efficient provision of infrastructure • More efficient in responding and adapting to the effects of climate change. • Improved and more effective public transport. 	<p><i>OS-SAR zoning</i></p> <ul style="list-style-type: none"> • Club's activity no longer non-complying under AUP zoning • Allows for better management of a long-standing recreational facility, • Possible reduction of ongoing compliance costs. • Club no longer required to base activity on existing use provisions.
Cost	<p><i>Urban Growth and Form</i></p> <ul style="list-style-type: none"> • Greater productivity, economic 	<p><i>OS-SAR zoning</i></p> <ul style="list-style-type: none"> • Possible reduction of ongoing

	<p>growth and more efficient use of natural resources.</p> <ul style="list-style-type: none"> • Loss of private and long-standing recreation facility • Loss of local neighbourhood amenity. (See submission 4) • 	<p>compliance costs for managing golf course</p> <ul style="list-style-type: none"> • Loss of well-located residential development areas close to transport corridors
Benefits	<p><i>Urban Growth and Form</i></p> <ul style="list-style-type: none"> • Reduced adverse environmental effects. • Provides for urban intensification and housing supply. 	<p><i>Urban Growth and form/OS-SAR zoning</i></p> <ul style="list-style-type: none"> • greater social and cultural vitality • Long standing Auckland recreational facility maintained and developed. • High quality amenity and (urban form) retained. • Protects SEA areas including upper reaches of the Tamaki estuary.
Summary	Recommended option	Not Recommended

5.5. Other relevant management plans prepared under any other act

107. Section 74(2)(b)(i) of the RMA requires that, in considering a plan change, a territorial authority must have regard to management plans and strategies prepared under other Acts.

5.6. The Auckland Plan 2050 (2018)

108. The Auckland Plan, prepared under section 79 of the Local Government (Auckland Council) Act 2009 is a strategy document that council needs to have regard to in considering PC57, pursuant to section 74(2)(b)(i) of the RMA.¹¹

109. The Auckland Plan 2050 is the Council's long-term spatial plan that aims to ensure Auckland grows in a way that will best meet the opportunities and challenges of the future city. The Auckland Plan 2050 is required by legislation to contribute to Auckland's social, economic, environmental and cultural well-being. It seeks to make Auckland a place where people want to live and to work and have an opportunity to succeed.

110. Table 8 summarises the relevant sections of the Auckland Plan to PPC57.

Table 8: Relevant sections of the Auckland Plan

Section	Matters
Outcome: Belonging and Participation	<p>Direction 1 Foster an inclusive Auckland where everyone belongs</p> <p>Focus Area 2 Provide accessible services and social and cultural infrastructure that are responsive in meeting people's evolving needs</p> <p>Focus Area 6 Focus investment to address disparities and serve communities of greatest need</p> <p>Focus Area 7 Recognise the value of arts, culture, sport and recreation to quality of life</p>
Outcome: Homes and Places	<p>Direction 1: Develop a quality compact urban form to accommodate Auckland's growth</p> <p>Direction 4: Provide sufficient public places and spaces that are inclusive, accessible and contribute to urban living</p> <p>Focus Area 1: Accelerate quality development at scale that improves housing choices</p>
Outcome: Transport and Access	<p>Direction 1: Better connect people, places, goods and services</p> <p>Direction 2: Increase genuine travel choices for a healthy, vibrant and equitable Auckland</p> <p>Focus area 1: Make better use of existing transport networks</p> <p>Focus area 4: Make walking, cycling and public transport preferred choices for many more Aucklanders</p> <p>Focus area 5: Better integrate land-use and transport decisions</p> <p>Focus Area 7: Develop a sustainable and resilient transport system</p>
Development Strategy	<p>Future Auckland</p> <p>Managed expansion into future urban areas</p> <p>Anticipated growth - where and when</p>

¹¹ Auckland Plan 2050 (2018) Auckland Council.

111. The Auckland Plan 2050 at its core provides a strategic framework for the development of a 'quality compact urban form' to accommodate the city's growth. For this expected urban 'intensification' to function properly it needs to be supported by transport corridors and the existence of well-functioning and well-established urban infrastructure.

112. The city's population growth and demographic change will increasingly put pressure on existing services and facilities. The Auckland Plan promotes varied and accessible services and facilities which includes open spaces that are essential for people to participate in society and create a sense of belonging. However, in this instance the open space provides for a relatively small number of 2000 club members (**Appendix 1**, page 13)

113. How Auckland's urban form develops is central to this long-term spatial plan. The Outcomes: Home and Place, and Transport and Access seek the development of a quality compact urban form to accommodate Auckland's growth. This involves making better use of the existing residential zoning in this location so that efficient use can be made of existing transport networks servicing established housing in the area which is required by the Auckland Plan:

"While investment in new infrastructure is required, existing transport corridors will need to accommodate much of the increase in travel as Auckland's population grows."¹²

Development strategy - Auckland Plan

114. The Development Strategy promotes a quality compact approach to growth and development in Auckland. Broadly speaking, this means that most growth will occur in existing areas rather than rural areas; and in places accessible to public transport and active transport, within walking distance to centres, employment and other amenities, and in a manner that maximises the efficient use and is supported by necessary infrastructure.

115. The Auckland Plan promotes varied and accessible services and facilities which includes open spaces are essential for people to participate in society and create a sense of belonging. However, in this instance the open space provides for a relatively small set of 2000 of club members (**Appendix 1**, page 13).

116. In preparing the Development Strategy for the Auckland Plan the *Development Strategy evidence report June 2018*, was commissioned.¹³ The study looked at the mapping of development consents in the previous year (2017). The report showed a concentration of consents for attached dwellings around the city centre, and along the western and southern rail corridors.

117. This trend indicates an increasing preference for new housing in areas close to dedicated public transport routes; effectively bringing homes closer to major employment areas. Monitoring shows in the 12 months to May 2018, a disproportionately large number of dwellings were consented in the catchment areas for rapid transit networks. These figures underscore the desirability for residentially zone close to transport hub or corridors and provide an indication of the future development pattern of the city.

118. While only 2.6 per cent of Auckland's land area falls within a 1.5km walk of a rapid transit station (train or Northern Busway), 42 per cent of all attached dwelling developments consented were in the rapid transit station catchment areas. In the future, the completion of the City Rail Link is anticipated to increase this trend. The data from this study indicate that residential development is increasingly likely to occur around transport nodes such as at Middlemore and Great South Road, Papatoetoe.

¹² Auckland Plan 2050 – Auckland Council 2018

¹³ Development Strategy evidence report June 2018, Auckland Plan 2050

119.I consider that PPC57 is inconsistent with the outcomes set in the Auckland Plan, because:

a. In relation to Homes and Places:

- i. The proposed plan change does not support a compact urban form to accommodate Auckland’s growth as expressed in the Direction 1 or Focus area 1, accelerate quality development at scale that improves housing choices.

b. In relation to Transport and access:

- i. PPC57 does not align or support Direction 2; Increase genuine travel choices for a healthy, vibrant and equitable Auckland
- ii. In relation to Focus Area 4; the plan change does not support public transport services and walking/cycling a preferred transport choice
- iii. In relation to Focus Area 5, the plan change does not support the integration of land-use and transport.

5.7. Relevant management plans and strategies prepared under any other Act

120.Plans and strategies considered under PPC57 are summarised below.

5.7.1.Otara-Papatoetoe Local Board Plan

Table 9: Ōtara-Papatoetoe Local Board Plan 2020 Outcomes and Objectives

Ōtara-Papatoetoe Local Board Plan 2020	
Outcome 2: Prosperous local economy	Objective: lively town centres drive sustainable economic development and attract investors and visitors.
Outcome 4: Parks and facilities that meet our people’s needs	Objective: parks and facilities are fit for purpose and reflect the communities they serve, building a sense of identity, ownership and pride in the area while boosting participation and promoting a healthy lifestyle.
Outcome 6: Connected area and easy to get around	Objective: Everyone can easily and safely get around on foot, bicycle, bus, train and car.

121.The Ōtara-Papatoetoe Local Board Plan objectives seek to promote a prosperous and sustainable economic development for the area while promoting community identity and healthy life styles.

122. Outcome 4 of the Local Board plan focus on “the parks and facilities that meets the needs of our people”. There is recognition that sport and recreation are seen as key ways to strengthen communities and improve public health. In relation to this sports clubs are seen as key hubs in the community offering a place for recreation and belong.

123. The Ōtara-Papatoetoe Local Board has been consulted on the plan change and their views are outlined below, however, it suffices to say at this point that the Local Board did not support PPC57 and the rezoning of the subject site to OP-SAR.

5.7.2. Auckland Council – The Māori Plan

124. The Auckland Council Māori Plan provides for Rangatiratanga that is enhancement leadership and participation. In terms of Regional Planning and Development Māori are recognised as playing an important role in the development of the Auckland region. The plan encourages development processes that recognise the values, interests and aspirations of Māori for Auckland Unitary Plan changes. The document does not raise issues that relate specifically to PPC57. Mana whenua have been directly engaged as part of the consultation and notification process on PPC57.

5.7.3. Ōtara-Papatoetoe Greenways Local Paths Plan 2017

125. The Ōtara-Papatoetoe Greenways Plan is a long-term strategic plan aimed at 'greatly improving walking, cycling and ecological connections' within the local board area and connecting with greenways identified by other local boards in Auckland. The plan identifies proposed greenway connections, in terms of both long-term aspirational greenways, and proposed priority routes to be delivered and/or advocated for over the next 3-5 years. Ōtara-Papatoetoe Greenways Plan in the Middlemore area includes cycle pathways along Hospital Road and Middlemore Crescent. The PPC57 subject site is not included in the Greenways Plan.

5.7.4. Ōtara-Papatoetoe Area Plan 2014

126. The Ōtara-Papatoetoe Area Plan 2014 is a non-statutory Auckland Council document providing a framework to support growth and development in the area over the next 30 years.

127. Key move 7 sets out to ensure Ōtara-Papatoetoe has safe, accessible and high-quality parks and community facilities. This includes the development of Ōtara-Papatoetoe Open Space Network Plan to identify future opportunities and priorities to improve parks and open spaces and establish new walking and cycling connections between key destinations. The RAGGC is not included as part of the plan.

128. Key move 8 addresses making transport (modes) more accessible, with particular emphasis on walking, cycling and public transport. No mention is made of the Middlemore railway station although it is proposed that improvements could be made to Middlemore bus service. In summary Ōtara-Papatoetoe Area Plan 2014 does not focus on Middlemore.

5.7.5. Ōtara-Papatoetoe Open Space Network Plan 2018 and the Auckland Council Open Space Provision Policy 2016

129. Neither the Royal Auckland nor the Grange Golf clubs are included as part of the Ōtara-Papatoetoe Open Space Network Plan. The Network Plan also does not refer to the nearby Otaki creek. The Open Space Network Plan is discussed further by the council's open space specialist Mr Ezra Barwell (paragraph 160).

6. ANALYSIS OF THE SECTION 32 REPORT AND ANY OTHER INFORMATION PROVIDED BY THE APPLICANT

130. In accordance with section 32(1)(a) the requestor has stated that the objective of PPC57 is that the change of zoning to OS-SAR would reflect the current and future use of the subject site, ensure that the activities undertaken on the site were not non-complying and

dependant on existing use rights and that the change of zoning to OS-SAR best meets the purposes of the RMA. The requestor also considers that the change of zoning to OS-SAR would align them with other privately held golf courses in the Auckland urban area.

131. Under section 74(1)(e) the decision maker must also have particular regard to the section 32 evaluation report prepared in accordance with s 32 (s 74(1)(e)). The applicant's section 32 report for PPC57 considers that the change of zoning to OS-SAR is the best way to achieve the purposes of the RMA and Part 2, in particular, section 7 and the efficient use and development of natural and physical resources.
132. The section 32 report states that zoning to OS-SAR gives effect to the Regional Policy Statement with the Open Space zones giving effect to the RPS in B2.7.2 (1) as it enables the development and use of a wide range of open spaces and recreational activities, experiences and functions that are provided for in the AUP.
133. The applicant as part of the section 32 report provided an analysis of three options including a base line option of retaining the status quo. The analysis determines that the preferred option is to rezone the land to OS-SAR.
134. The applicant states the change of zoning would allow for the recreational needs of the 'golfing community' to be supported by an appropriate zoning and mean that the RAGGC would no longer need to rely on existing use rights of the golfing activity and be required to obtain non-complying activity resource consent for ancillary and supporting activities.
135. It would also mean rates would reflect the Open Space value of the land reducing the financial burden for RAGGC, while the long-standing and foreseeable activity is afforded permitted activity status.¹⁴ Proposed PPC57 would provide certainty for the adjoining neighbours that the current amenity would be retained.
136. The RAGGC is correct in asserting that a golf course is not a permitted activity under the current three residential zonings which contravene the district plan and so it is dependent on existing use rights pursuant to Section 10 of the RMA. This confers a right to continue existing land uses which otherwise would contravene a rule in a district plan where the land use was lawfully established before the rule became operative or the proposed plan was notified, and the effects of the land use are the same or similar in character, intensity, and scale to those before the rule became operative or the proposed plan was notified.
137. The non-complying activity status also requires the club to apply for a resource consent for ancillary and supporting activities. When dealing with non-complying activities, before granting an application a council must be satisfied that either the adverse effects of the activity on the environment will be minor (s104D(1)(a)), or the proposed activity will not be contrary to the objectives and policies of the plan.
138. The section 32 report also outlines how many of the golf courses in the Auckland region are zoned OS-SAR. This includes both publicly own and privately courses. The report provides a table (Table 4: Examples of zoning of golf courses in the Auckland region) listing ten golf courses within Auckland¹⁵. Of the five privately owned golf courses two do not have an open space zoning.

¹⁴ Request for private plan change Royal Auckland and Grange Golf Club, Richmond Planning Limited August 2020 Option 3 page 22

¹⁵ Request for private plan change Royal Auckland and Grange Golf Club, Richmond Planning Limited August 2020

139. In all there are 25 private golf courses within the Auckland region. A number of these courses especially in the more rural areas such as the Pukekohe golf course and Windross Farm golf course in Ardmore and the Formosa golf course in Bucklands Beach do not have open space zonings. However there are a number of examples where privately held golf clubs, particularly within the urban areas such as the Akarana Golf Club, the Titirangi Golf Club and Maungakiekie Golf Club do have an OP-SAR zoning. The applicant has argued that adopting PPC57 would be consistent with the approach applied to these golf clubs.
140. The section 32 report for PPC57 considers that the change of zoning to Open Space – Sport and Active Recreation is the best way to achieve the purpose and the objectives of Part 2 of the Act. The applicant also considers that the AUP Open Space zoning would give effect to RPS Policy B2.7.2(1) as “they enable the development and use of a wide range of open spaces and recreation facilities to provide a variety of activities, experiences and functions”.
141. The RAGGC proposal therefore to rezone the site to OS-SAR would allow for the golfing facility to operate as a permitted activity and in this regard the plan change should assist the council to carry out what is the most appropriate way to achieve the purpose of the RMA namely to promote the sustainable management of natural and physical resources.
142. The section 32 report also notes that the OS-SAR zone would provide for a range of land use activities not provided for under the current residential zones. This includes grandstands as a permitted activity and light towers of 15 metres or higher, as a Restricted Discretionary activity. These activities can create potential adverse effects on the neighbouring residential properties. A full list of the OS-SAR Activity Status is provided in **Appendix 6**.
143. As well as the issues with the Activity Status, there are other significant rules controlling activities within the OS-SAR zoning. This includes H7.11.5. Gross floor area threshold the purpose of which is intended to limit the size of buildings within open spaces to retain their open space character and to maintain a reasonable standard of amenity for adjoining sites. For the OS-SAR zone this limit is 150m² and larger structures on the subject site would require a consent.
144. The purpose of the plan change is to apply a zoning to the RAGGC property that reflects the current and foreseeable use of the land as a golfing facility. The requestor has set out their analysis under s32(1)(a) in paragraphs 10.1 to 10.52¹⁶ This is supported by an assessment of the environmental effects of the plan change.¹⁷
145. Section B2.7 sets out the RPS objectives and policies for open spaces and recreation facilities and their importance in achieving a quality urban environment that can enhance the social, and cultural well-being of the community and the urban environment. Clearly there is a balancing act in weighing up the management of urban form and the advancement of a quality compact city. Guidance on how this can be achieved is provided by the RPS Section B2.7 which sets out three objectives and criteria for open space: These are:
- (1) Recreational needs of people and communities are met through the provision of a range of quality open spaces and recreation facilities.
 - (2) Public access to and along Auckland’s coastline, coastal marine area, lakes, rivers, streams and wetlands is maintained and enhanced

¹⁶ Paras 10.1 – 10.51, RAGGC, Section 32 Evaluation Report, prepared by Richmond Planning Limited, August 2020 (Appendix 2)

¹⁷ Ibid

(3) Reverse sensitivity effects between open spaces and recreation facilities and neighbouring land uses are avoided, remedied or mitigated.¹⁸

146. The proposed OS-SAR zoning only partially meets the first objective with a limited membership of two thousand members. The proposed OS-SAR zoning does not meet criteria two with regards to public access to and along Auckland's coastline and coastal marine area.

147. The applicant states that PPC57 does not constrain urban growth as the RAGGC will continue to operate the subject site as a golf course so that it does not make good sense to deem the land as potentially available for residential development. On the other hand the proposed zoning will maintain the existing open space and the amenity of the neighbouring area (a point raised by a neighbouring submitter).

148. Nevertheless, the proximity of the RAGGC course to the existing transport network is a unique feature. It gives effect to the RPS objectives and policies to achieve a compact urban form and provides a strong argument for retention of the current zoning of the subject site.

149. RPS B2.2.2. Policies¹⁹ relating to "quality compact urban" form states that the council should enable higher residential intensification in and around centres; along identified corridors; and close to public transport, social facilities (including open space) and employment opportunities.

150. This view is supported by the fact that the AUP was made operative in part in 2016 after an extensive consultation process and a review by the AUP Independent Hearings Plan. As part of this the Grange Golf Club submitted in support of the current zoning²⁰ (**Appendix 7**). No submissions were received from the Royal Auckland Golf Club on the Proposed Auckland Unitary Plan. Hence the current residential zoning cannot be seen as an oversight.

151. It is my view the merit in providing the proposed OS-SAR zoning is not sufficiently justified to warrant overturning the existing residential zoning in terms of giving effect to the RPS. The residential zones for the RAGGC property best align and are consistent with the RPS objectives and policies including B2.2.2 and are the most appropriate way to achieve the purpose of the Act. What distinguishes the RAGGC club from other golf clubs in the Auckland urban area is its relative proximity to two major transport nodes and the areas well-established existing social infrastructure such as schools (Otahuhu and De La Salle Colleges and Middlemore Hospital a significant employer in the south Auckland).

152. While the applicant's report states that the subject site is not within a walkable catchment of rapid transit stops, the Kāinga Ora Middlemore Precinct Report 2020 prepared by Jaxmax²¹ indicates that a significant amount of the subject site is within an 800m walking radius of Middlemore train station (refer to Figure 3 below and **Appendix 8**).

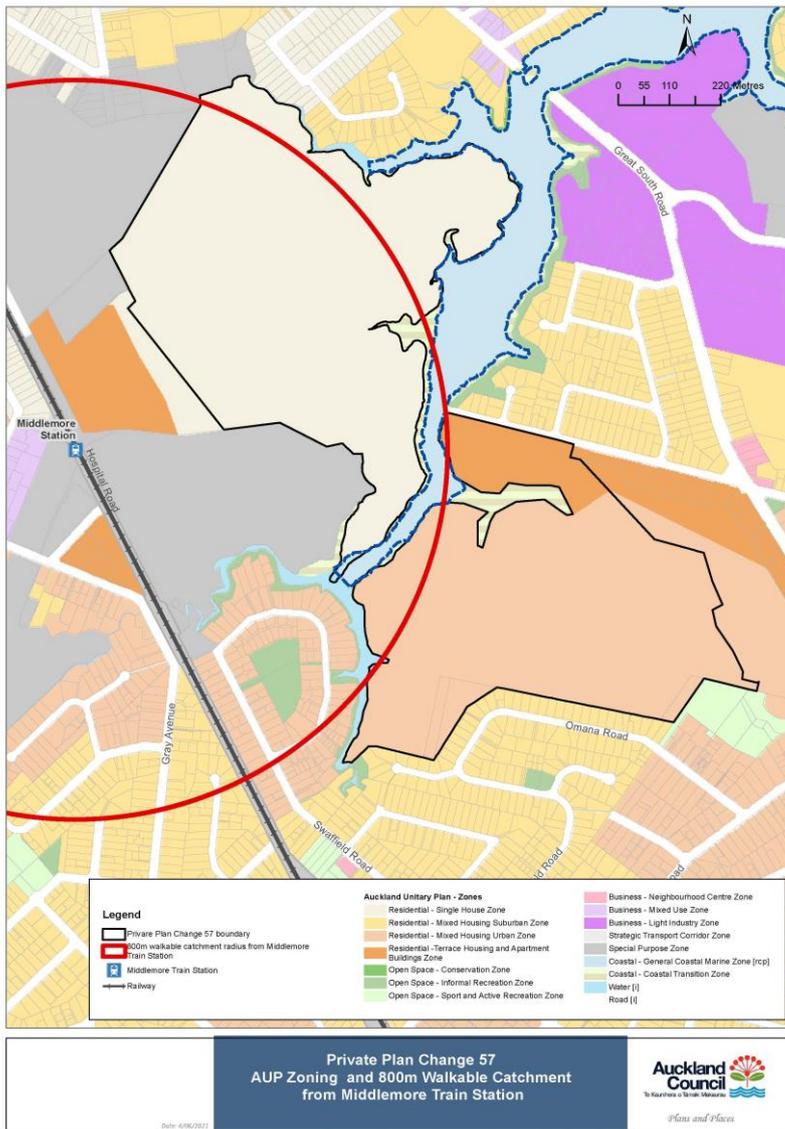
¹⁸ AUP, RPS Objectives B2.7.1(3)

¹⁹ AUP, RPS B2.2.2. Policies

²⁰ Evidence to AUP Independence Hearing Panel Joint Evidence Report on submissions by Roger Eccles and Sisira Jayasinghe, South -Urban (Central and west) 26 January 2016

²¹ Kāinga Ora Middlemore Precinct report 2020, Jaxmax 2020.

Figure 3: Middlemore train station and 800m walkability circle



153. An Auckland Council study was undertaken in 2013 relating to Walkable Catchments to a number of Auckland train stations.²² Sixteen train stations were surveyed in the study. A walkable catchment is the area covered by the walking distance that an average person will walk to get to meaningful destinations before considering other modes of transport

- more than 50 per cent of respondents walked further than 800 metres to get to a train station.
- more than 15 per cent of respondents walked further than 1500 metres to get to a train station: and
- walking is the most significant mode of travel for trips of less than 2000 metres.

The study indicates that train stations such as Middlemore can have a sizeable walkable catchment.

²² Walkable Catchment Analysis at Auckland Train and Bus Stations 2013, December 2013 RIMU, Auckland Council

154. While RAGGC has no current intention of using the land for any other purpose than golf, rezoning the land to open space would appear to be in conflict with the strategic direction of the NPS-UD along transport corridors and transport nodes.

155. The Auckland Plan sets out development areas where housing and business development capacity is supported by the AUP zones and Council and/or Government agencies led initiatives. The RAGGC in their section 32 report indicate that the subject site is located between the development areas Ōtāhuhu, Māngere and Papatoetoe, but not within those development areas. This would not preclude the site from future development and in my view underlines the “attractiveness” of development in the area.

156. Retaining the existing residential zoning on the RAGGC property aligns with this trend and the strategic direction set out in the RPS, the Auckland Plan and the NPS-UD.

157. In summary, I disagree with the applicant’s conclusions for the following reasons:

- A review of the zoning of the subject site was undertaken as part of the PAUP process and considered by the Independent Hearings Panel. The zoning of the subject site under the previous legacy plan, the Auckland District Plan (Manukau Section)²³ had also been residential. It is therefore my contention that current zoning cannot be classified as a mistake that needs to be remedied.
- The RAGGC site is distinctive in that it is located close to two major transport corridors and in particular close to Middlemore station with much of the subject site within 800m pedestrian shed of the station.
- The AUP Regional Policy Statement seeks to provide for a quality compact urban form which enable development to take advantage of existing urban infrastructure and provide for integrated transport and land use development. In relation to the RAGGC golf course site this necessitates the retention of the residential zoning.
- The strategic direction of a quality compact urban form focused along transport corridors and transport nodes is supported both by the Auckland Plan 2050 and the Nation Policy Statement on Urban Development. In relation to the RAGGC golf course site this necessitates the retention of the residential zoning.

7. ASSESSMENT OF EFFECTS ON THE ENVIRONMENT

158. Clause 22 of Schedule 1 to the RMA requires private plan changes to include an assessment of environmental effects that are anticipated by the plan change, taking into account clauses 6 and 7 of the Fourth Schedule of the RMA.

159. An assessment of actual and potential effects on the environment (“AEE”) is included in the report titled, Request for private plan change Royal Auckland and Grange Golf Club (Section 32 Evaluation Report and Planning Assessment) by Richmond Planning Limited dated 13 August 2020 and lodged with PPC57.

160. In my view, the applicant’s AEE covers many of the positive and adverse effects. Where I agree with the AEE, I have stated so and not repeated the assessment. There are effects where I disagree with the conclusions of the AEE, and I have given reasons why. There are also additional effects which, in my opinion, need consideration.

161. The submitted AEE identifies and evaluates the following actual and potential effects.. The assessment of effects by the applicant considered specific areas where adverse effects could be generated:

²³ Auckland District Plan (Manukau Section) 2010

- Effects on character and amenity
- Effects on historic sites and archaeology
- Effects on bulk and location
- Effects on noise
- Effects on transport/traffic
- Effects on loss of land zoned for residential activities.

162. I have adopted the assessments and conclusions in relation to character and amenity values, historic sites and archaeology, and bulk and location in accordance with s42(1B) and do not repeat that assessment.

163. There are also additional effects which, in my opinion, need consideration. I have categorised my assessment of effects using the headings below rather than the applicant's headings. In this section I firstly set out the applicant's assessment, then secondly, the council's expert views and lastly my own conclusions on each effect. In my view, the following headings cover the environmental effects relevant to the proposed private plan change.

Transport/Traffic

164. The applicant states the current zoning of the land gaining access from Grange Road enables the two highest intensity forms of residential development in the AUP. Conservatively this would mean over 2,400 vehicles could be accommodated on the land. The council therefore accepts the road network can accommodate this demand. Traffic and parking effects associated with the golf activity and other recreation activities that are permitted by the zone are anticipated by the applicant to be considerably less.

165. Auckland Transport in its submission to the plan change (submission 19) considered this analysis of the potential change of zoning to OS-SAR as not being comprehensive enough in discussing the 'potential' impact of a change of zoning on the roading network. This is discussed in full in the analysis of Auckland Transport's submission 19 to the plan change. Suffice to say at this point I consider that under the AUP(OP) there are a matrix of standards and controls to manage any potential impacts on the traffic network of a change of zoning to OS-SAR.

Open Space

166. Council's Open Space specialist Mr Ezra Barwell has provided an analysis report for PPC57. Mr Barwell considers that the applicant has made a coherent case for rezoning the land from a mix of residential zones to one that reflects its current and proposed future use as a golfing facility.

167. Mr Barwell goes on to say that the applicant's section 32 report identifies ten Auckland golf courses, five of which are privately owned and are zoned OP-SAR, so that the proposed zoning is not without precedent.

168. Mr Barwell states that he agrees that generally the Open - Space Sport and Recreation Zone rules will provide surrounding properties with protection from undue adverse effects.

169. In summary Mr Barwell supports the change of zoning of the subject site to OP-SAR. In summarising his evidence Mr Barwell states that there are three themes:

- He agrees with the applicant and concurs that the proposed plan change is appropriate as:
 - it reflects the current and proposed future use of the land as a golf course
 - It is consistent with zoning of other private golf courses in Auckland as OS-SAR.
- Whether housing is a better use of the land sits outside his area of expertise, and it would be inappropriate for him to comment on the relative merits of either land use.
- Similarly, rating/financial considerations fall outside his area of expertise and it would be also be inappropriate for him to provide comment.

170.Mr Barwell also comments there are no implications for the council meeting its open space provision targets in the Ōtara-Papatoetoe Local Board area outlined in the Open Space Provision Policy (2016) as the status quo is being maintained.

171.In the case that any of the RAGGC land was developed for residential purposes in the future, open space could be provided in the development to help meet the recreational needs of the residents.

172.As Mr Barwell states,
 “determining the relative merits of land use sits outside his area of expertise”

In this instance I have decided not to follow Mr Barwell’s advice as the final consideration of the plan change is based on a broader suite of strategic planning imperatives.

Effects on the loss of land zoned for residential activities

173.The private plan change subject site covers an area of 80 hectares and reduces the potential land available for housing supply within Auckland. The applicant’s report noted, when discussing the NPS-UD, that the land has not been available for residential use for over 80 years and there is no intention of making it available in the foreseeable future. The report goes on to argue that on this basis there is no loss of available land for housing.

174.Auckland Council’s research and evaluation unit (RIMU) has provided an analysis and breakdown of the percentage of land zoned for residential activities lost to the region should the Royal Auckland and Grange Golf Club Private Plan Change be approved. It indicates that only a small percentage of residential land zoned (Single House, Mixed Housing Urban and Terrace Housing and Apartment Building) would be lost and replaced by the Open Space-Sport and Active Recreation zone (refer To Table 10).²⁴

Table 10: Percentage residential zone land lost (in hectares)

Zoning	RIMU (Auckland Council) Residential zones modelled by all AU(OP)	RAGGC residential zoning lost	% of the total zone	Total zone redevelopment capacity
SH	8,206.58h	44.86%	0.55%	0.06%
MHU	6,962.23h	36.66%	0.53%	0.24%
THAB	2,294 00h	4.02 %	0.18%	NA

²⁴ RIMU Auckland Council, Residential Land Model by Zone, Correspondence, 21 October 2012

175. While the extent of the residential zoned land lost in this location may not be large in relation to the total amount of land available for residential development within Auckland, in this instance there is a wider public interest in the land. This is that the subject site is located between two major transport corridors (the southern rail corridor and Great South Road) and that a significant part of the subject site is within 800 metres walking distance of Middlemore train station.²⁵

176. I accept that in general terms the loss of the specific area of residential zoning may not be large, however a recommendation, has to give effect to:

- The AUP Regional Policy Statement
- the Auckland Plan 2050, and
- the NPS-UD.

These are discussed under paragraphs 6.2, 6.4 and 6.6 of this report.

8. CONSULTATION

177. PPC was publicly notified on the 19 November 2020. The plan change received 19 submissions and two further submissions.

178. Section 12 of the RAGGC section 32 report provides detail on the consultation process and a record of consultation undertaken is attached as **Appendix 2** to this report. The Section 32 evaluation report was provided to Iwi and no feedback was received.

9.1 Mana Whenua

179. RAGGC engaged with seventeen iwi authorities on the Auckland Council contact list seeking their views. Two iwi authorities responded to the initial information supplied by the applicant:

- Ngāti Tamaoho (email received 13 March 2020) expressed support for the proposed private plan change
- Te Ahiwaru Waiohua (email received 18 March 2020), in their response identified the benefits from the plan change and do not oppose the proposed private plan change.

180. As part of the public notification process (19 November 2020) the iwi groups listed below were notified of the PPC57 proposal:

- Ngāti Whātua Ōrākei
- Ngāti Tamaoho
- Ngāti Whātua o Kaipara
- Waikato - Tainui
- Ngāi Tai ki Tāmaki
- Ngāti Maru
- Ngāti Pāoa (Ngāti Paoa Iwi Trust)
- Ngāti Pāoa (Ngāti Paoa Trust Board)
- Ngāti Tamaterā
- Ngāti Te Ata
- Ngāti Whanaunga

²⁵ Kāinga Ora Middlemore Precinct report 2020, Jaxmax 2020.

- Te Ahiwaru – Waiohua
- Te Ākitai Waiohua
- Te Kawerau a Maki
- Te Patukirikiri
- Te Rūnanga o Ngāti Whātua

181.No submission was received from any mana whenua on full notification of the plan change.

9.2 Ōtara-Papatoetoe and Māngere-Ōtāhuhu Local Boards

182.I presented PPC57 to the Ōtara-Papatoetoe Local Board at a workshop on 2 February 2021 following the close of submissions. At that workshop I outlined the nature of submissions and the main themes in contention.

183.The Ōtara-Papatoetoe Local Board provided its views via resolution number OP/2021/13 on 16 February 2021. These are listed in italics below.

- *Auckland Council is obliged to adhere to the Auckland Unitary Plan and overarching government direction through the National Policy Statement on Urban Development. The Ōtara-Papatoetoe local board area is an urban area marked for residential growth.*
- *There were extensive processes during the public consultation for the Unitary Plan that resulted in the current land zoning. This planning regulatory tool must be recognised as the primary reference and given due weight, rather than be taken lightly to serve private interests.*
- *The National Policy Statement on Urban Development has only just come into effect in August 2020 to “support productive and well-functioning cities, it is important that there are adequate opportunities for land to be developed to meet community business and housing needs”.*
- *As the local arm of Auckland Council, the Ōtara-Papatoetoe Local Board is committed to place making that serves local communities. There is sufficient evidence of conditions of deprivation and need for housing in the local area. The benefit of retaining current residential zone far outweighs the reasons for the request for a plan change.*
- *The board is not in support of private plan change – 57 by the Royal Auckland and Grange Club, 57 Grange Road, 2 Grange Road and 69A Omana Road, Papatoetoe.*

184.**The Māngere-Ōtāhuhu** Local Board which although outside the Local Board area, is located adjacent to the Royal Auckland and Grange Golf Club and provided its views via resolution number MO/2021/13 on 25 February 2021. These are listed in italics below.

185.

- *The local board oppose the proposed Plan Change 57 and support the major share of the public submissions in objecting to, the plan change application from the Royal Auckland and Grange Golf Club to rezone the sites from Residential status, to Open Space – Sport and Active Recreation.*
- *The board fully supports the provision of public open space in the local board area; however, this plan change won’t maximise public open space as the land remains private, exclusive and unavailable to the vast majority of our residents*
- *Many locals aspire to become homeowners however this is difficult due to many factors including the availability of affordable land parcels for development. The local board will strongly advocate for cost-effective housing provision for locals to become successful homeowners if the residential zoning remains*

- *The local board's position to retain residential zoning aligns with the Auckland Unitary Plan – Homes and Places outcome, highlights Maori housing aspirations, and the National Policy Statement on Urban Development which prioritises adequate land for development opportunities that meet the community, business, and housing needs*
- *Place-making contributes to wellbeing and supports the way we live. The board acknowledges the PC area as a prime location for future development and residential intensification that is nearby to transport links, medical services, education institutes, and shopping options. A successful PC will drastically remove these opportunities in supporting community objectives in our local board plans*
- *The local board's views resonate with the Ōtara-Papatoetoe local board's opposition to the zone change and favour opportunities to construct affordable and equitable housing options for our local communities*

186. In summary both the Ōtara-Papatoetoe and Māngere-Ōtāhuhu Local Boards are opposed to PPC57. It is, however, worth noting the Māngere-Ōtāhuhu Local Board's support for the provision of public open space but that in this case the land remains private, exclusive and unavailable for the use and access by the vast majority of local residents.

9. NOTIFICATION AND SUBMISSIONS

9.1. Notification details

187. Details of the notification timeframes and number of submissions received are outlined below:

Table 11: Dates and numbers of submissions received

Date of public notification for submissions	Friday 19 November 2020
Closing date for submissions	Thursday 17 December 2020
Number of submissions received	18
Date of public notification for further submissions	Friday 12 March 2021
Closing date for further submissions	Friday 26 March 2021
Number of further submissions received	2

188. All submissions were received on time, however two submissions, namely 3 and 17 were withdrawn. Copies of the submissions are attached as **Appendix 4** to this report.

10. ANALYSIS OF SUBMISSIONS AND FURTHER SUBMISSIONS

189. The following sections address the submissions received on PPC57. It discusses the relief sought in the submissions and makes recommendations to the Hearing Commissioners.

190. Submissions that address the same issues and seek the same relief have been grouped together in this report under the following topic headings:

- Submissions supporting PPC57 in its entirety
- Submissions opposing PPC57 in its entirety
- Submissions (add other topics)

10.1.1. Submissions supporting PPC57 in its entirety

Table 12: Submissions supporting PPC57 in its entirety

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions	Planners Recommendation
1	Richard and Eleanor Brabant	1.1 Approve the plan change without any amendments 1.2 This plan change is remedying an omission in the review process.	Richard & Eleanor Brabant FS01 RAGGC FS02 Support RAGGC FS02 Support	Reject
4	Ashlee Walsh	4.1 Approve the plan change without any amendments	RAGGC FS02 Support	Reject

Discussion

191. Two submissions were received in support of PPC57. Submissions 1 and 4 both sought approval of PPC57 without amendment. Submission 1 considered that adopting the plan change would correct an oversight in the PAUP process as the zoning did not reflect the ongoing use of the land. The zoning for the subject sites was reviewed by the Independent Hearing Panel as part of the PAUP process. This process took place prior to the amalgamation of the two golf courses. A submission was received in support of the PAUP zoning from the Grange Golf Club and no submission was received from the Royal Auckland Golf Club. Prior to the PAUP both golf courses were zoned Main Residential in the Auckland Council District Plan (Manukau Section). This was the main residential zoning in this plan.

192. Further submissions 01 and 02 state that most other private golf course in the Auckland urban area are zoned OS-SAR. In most instances this was done as part of the PAUP process, In considering the zoning, the RAGGC property remains unique in its proximity to the main rail line and Middlemore railway station. Indeed much of the golf course is within an 800m pedestrian shed of Middlemore Station and therefore retaining the residential zoning is the best way of achieving the Objectives 1 and 3 of the Auckland Unitary Plan RPS.

193. Submitters sought to approve the plan change without any amendments as the submitters considered the change of zone to OS-SAR zoning the best to protect the amenity of the property. This was not considered a strong enough case to change the zoning from the current status quo and the existing zoning is the best way of meeting Auckland Unitary Plan RPS Objectives 1 and 3.

Recommendations on submissions

194. That submissions **1 and 4** be rejected for the following reasons:

- The zonings of the subject sites were reviewed as part of the PAUP process.
- The Grange Golf Club submitted in support of the proposed residential zoning on the previous Grange Golf club site as part of the PAUP process and
- The amenity of the area can be retained with the existing residential zonings for the RAGGC property.
- The existing zoning is the best way of achieving the objectives of the RPS and aligns with the objectives 1 and 3 of NPS-UD.

195. There are no amendments associated with this recommendation.

10.1.2. Submissions Opposing PPC57 in its entirety

Table 13: Submissions opposing PPC57 in its entirety

Sub No	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions	Planners Recommendation
2.	Michael Horton	2.1 Decline the plan change	RAGGC FS02 Oppose	Reject – the submission provides a public open space remedy that is not covered in PPC57.
3	Withdrawn			
6	Nick Somerville	6.1 Decline the plan change (Efficient use of land)	Richard & Eleanor Brabant FS01 Oppose RAGGC FS02 oppose	Accept Loss of residential zoning n transport corridors and infrastructure
7	Geoffrey Page	7.1 Decline the plan change (Housing best use of land)	Richard & Eleanor Brabant FS01 Oppose RAGGC FS02 Oppose	Accept Housing most efficient use of land.
8	Lisa Grant	8.1 Decline the plan change (Housing best use of land)	Richard & Eleanor Brabant FS01 Oppose RAGGC	Accept in part – part out of scope of the submission addresses the ratings issue.

			FS02 oppose	
9	Cassandra Bahr	9.1 Decline the plan change	Richard & Eleanor Brabant FS01 Oppose RAGGC FS02 Oppose	Reject (out of scope) Out of scope in that the submission addresses the ratings issue and club membership.
10	Walter Hamer	10.1 Decline the plan change (Demand for housing)	Richard & Eleanor Brabant FS01 Oppose RAGGC FS02 oppose	Accept in part – More housing and green space. Part out of scope in that the submission addresses the ratings issue.
11	Pranaya Thaker	11.1 Decline the plan change (NPS and climate change)	Richard & Eleanor Brabant FS01 Oppose RAGGC FS02 oppose	Accept in part – land near transport corridors and infrastructure (schools) Part out of scope in that the submission addresses the ratings issue.
12	Denise Dalziel	12.1 Decline the plan change	Richard & Eleanor Brabant FS01 Oppose RAGGC FS02 oppose	Reject (out of scope) Out of scope as the submission focuses on the ratings issues.
13	Martin Burr	13.1 Decline the plan change (Land for housing development and intensification)	Richard & Eleanor Brabant FS01 Oppose RAGGC FS02 Oppose	Accept Housing shortage and site should be for possible urban intensification
14	Arthur McGregor	14.1 Decline the plan change (Prime residential land)	Richard & Eleanor Brabant FS01 Oppose RAGGC FS02 Oppose	Accept in part – prime residential land, no current public access to land Part out of scope as the submission addresses the ratings issue
15	Mark Thorn	15.1 Decline the plan change	Richard & Eleanor Brabant FS01	Reject (out of scope) Out of scope as the

			Oppose RAGGC FS02 Oppose	submission focuses on the ratings issues.
16	Rebecca Walker	16.1 Decline the plan change	Richard & Eleanor Brabant FS01 Oppose RAGGC FS02 oppose	Reject (out of scope) Out of scope as the submission focuses on the ratings issues.
18	Margaret Briffett	18.1 Decline the plan change	Richard & Eleanor Brabant FS01 Oppose RAGGC FS02 oppose	Reject (out of scope) Out of scope as the submission focuses on the ratings issues.
19	Auckland Transport	19.1 Decline the plan change AT does not consider that there has been sufficient assessment of the OS-SAR activities and potential effects	Richard & Eleanor Brabant FS01 Oppose RAGGC FS02 Oppose	Reject It is argued there are sufficient controls within the AUP to manage traffic network issues resulting from the proposed change of zoning
20	Glenn McCutcheon	20.1 Decline the plan change 20.2 Enable residential capacity and efficient use of the existing transport infrastructure.	Richard & Eleanor Brabant FS01 Oppose RAGGC FS02 oppose	Accept Loss of residential zoning located close in rail corridor and to well-established infrastructure. Does not align with NPS-UD and RPSs on urban intensification.

Discussion

196. A number of the submitters seeking to have PPC57 declined, commented on issues outside the scope of the proposed plan change request for a change of zoning. In particular there was concern about council land rating issues and the select nature of the membership of the golf club.

197. Questions relating to the scope of a number of submissions were raised by further submissions FS01 and FS02. It was considered both by Further Submitters FS01 (Richard and Eleanor Brabant) and FS02 (RAGGC) that a number of submitters went beyond remedy sought, that is a change of zoning and commented on other issues such the provision of public open space and the council's rating system.

- Submission 2 was considered to be within scope as it discusses questions of open space and public open space zoning that relate to PPC57. The submission suggested a remedy in relation to public open space in South Auckland. While the discussion was considered in scope the proposed solution was outside the context of PPC57.
- Submissions 9, 12, 15, 16 and 18 were considered out of scope as they addressed the issue of rating and in some case the membership of the club. This was judged to be beyond the issue of the proposed change of zoning.
- Submissions 8, 10, 11 and 14 were rejected in part, as aspects of the submission were considered out of scope as they focused on the “rates issue” which was outside the discussion on rezoning. However, these submissions also sought the retention of the existing residential zoning. For example, submission 11 referred to the NPS-UD and that housing intensification should occur near major public transport corridors to reduce road congestion.
- Submissions, 6, 7, 13, and 20 were accepted and sought the residential zoning to be retained. Submission 20 also referred to the NPS-UD 2020 with both of these submissions considering the most efficient and economic use of this land is for residential development and that it aligns with the “National Policy Statement on Urban Development and the Auckland Unitary Plan Regional Policy Statement which both aim to develop a well-connected compact urban form”. There were also similar comments in submission 6.

198. Submission 19 by Auckland Transport requested a more detailed traffic assessment be undertaken in response to the proposed change of zoning and the full and potential OS-SAR zoning be considered. Auckland Transport opposed PPC57 as it does not consider that it sufficiently assesses the activities enabled through the plan change and does not contain mechanisms to appropriately mitigate effects on the wider transport network.

199. The submission by Auckland Transport was considered ‘fanciful’ by the Further Submissions FS01 and FS02 as the purpose of the change of zoning was to ensure the continued activity of the subject site as a golf course. The OS-SAR zone allows for a range of activities that impact on the existing traffic network and park facilities. However, it is considered that the potential impact of the change of zoning can be managed through the AUP(OP) rules and the consenting process.

200. The OS-SAR zone provides for a number of permitted activities. These include clubrooms, organised sport and recreation, recreation facilities, and new buildings that comply with the standards. New buildings that do not comply with one or more standards are a discretionary activity.

201. One such standard, Standard H7.11.5 – Gross floor area threshold applies to the gross floor area of individual buildings, including any external additions or alterations. The threshold for the OS-SAR zone is 150 sqm. This enables small buildings such as clubrooms or toilets/changing facilities as a permitted activity. Any building exceeding 150 sqm is a discretionary activity. Therefore recreation facilities which includes recreation centres, aquatic facilities, fitness centres and gymnasiums, and indoor sports centres would be discretionary activities (as they would invariably exceed 150 sqm in area).

202. Rule A1.7. Activity status states:

A1.7.4. Discretionary activity

resource consent is required for a discretionary activity and may be granted or refused for any relevant resource management reason. An application for resource consent for a discretionary activity will be fully assessed in terms of the relevant provisions of the Plan, including all relevant objectives and policies, and the Resource Management Act 1991, including in particular Part 2.

203. Activities are classed as discretionary where they are not generally anticipated to occur in a particular environment, location or zone or where the character, intensity and scale of their environmental effects are so variable that it is not possible to prescribe standards to control them in advance. A full assessment is required to determine whether the activity, subject to any conditions, would be appropriate in terms of the provisions of the Plan, the effects of the activity on the environment and the suitability of the proposed location. A traffic assessment can therefore be required (and assessed) for discretionary activities.

204. Under Table E27.4.1 Activity table and standard E27.6.1. Trip generation, any activity or subdivision which exceeds the trip generation standards set out in standard E27.6.1 is a restricted discretionary activity.

E27.6.1. Trip generation

Where a proposal (except where excluded in Standard E27.6.1(2)) exceeds one of the following thresholds:

100 v/hr (any hour) for activities not specified in Table E27.6.1.1 requiring a controlled or restricted discretionary land use activity consent in the applicable zone where there are no requirements for an assessment of transport or trip generation effects. This standard does not apply to development activities provided for as permitted in the applicable zone.

205. Under E27.8.1. Matters of discretion, the Council will restrict its discretion to the following matters when assessing a restricted discretionary resource consent application. (4) any activity or subdivision which exceeds the trip generation thresholds under Standard E27.6.1: (a) effects on the transport network.

206. A large netball facility or several sports fields would likely require significant earthworks. Under standard E12 – Land disturbance – District the following applies:

E12 - Land disturbance – District

General earthworks not otherwise listed in this table

Greater than 1000m² up to 2500m² = Restricted discretionary

Greater than 1000m³ up to 2500m³ = Restricted discretionary

207. The activity status is determined under standard C1.6 as follows:

C1.6. Overall activity status

(1) The overall activity status of a proposal will be determined on the basis of all rules which apply to the proposal, including any rule which creates a relevant exception to other rules.

(2) Subject to Rule C1.6(4), the overall activity status of a proposal is that of the most restrictive rule which applies to the proposal.

208. Large scale sports fields or courts would therefore trigger the 100 v/hr (any hour) for activities, threshold. This will enable an assessment of the traffic effects under E27.8.1 and E27.8.2.

209. Given this matrix of standards and controls that are available within the AUP(OP) that would require a traffic assessment for any future development under the OS-SAR zoning, it is not considered necessary that a wide traffic assessment is required for the proposed change of zoning at this stage.

Recommendations on submissions

210. Submitters who sought to have the PPC57 declined:

- That submissions 6, 7, 13 and 20 be accepted. These submitters expressed a position that the residentially zoned land be retained as the area is well serviced by infrastructure, in particular transport infrastructure.
- That submissions 8, 10, 11 and 14 be accepted in part. Part of these submissions were out of scope; however they supported the retention of the existing residential zoning for the subject sites.
- That submissions 2, 9, 12, 15, 16 and 18 be rejected as they addressed public open space and economic and social that did not relate to the PPC57 itself.
- That submission 19 (Auckland Transport) is rejected for the reasons indicated above. There are a series of standards and controls that are available within the AUP(OP) that would require a traffic assessment for any sizeable future development under the OS-SAR zoning. On this basis it is not considered necessary that a wide traffic assessment is required for the proposed change of zoning at this stage.

211. There are no amendments associated with this recommendation.

10.1.3. Submissions in relation to PPC57 and the National Grid Corridor Overlay

Table 14: Submissions supporting PPC57 and the National Grid Corridor Overlay

Sub. No.	Name of Submitter	Summary of the Relief Sought by the Submitter	Further Submissions	Planners Recommendation
5	Transpower NZ	5.1 Accept the proposed plan change	RAGGC FS02 Support RAGGC FS02 Support RAGGC FS02 Support RAGGC FS02 Support	Accept

Discussion

212. Transpower New Zealand’s submission (submission 5) is neutral regarding the plan change. PPC57 proposes that there will be no changes to any of the AUP overlays (paragraph 7.2 of s32 Evaluation Report and Planning Assessment, and page 1 of Plan Change Request). This means that the National Grid Corridor overlay will continue to apply to the plan change site regardless of the zoning.

213. The Auckland Unitary Plan (Operative in part) has given effect to the NPSET Policies 10, 11 and 12 by including a “National Grid Corridor Overlay” as identified in the AUP maps and associated objectives, policies and rules within Chapter D26 that regulate land use, development and subdivision near the National Grid. Transpower supports the operative provisions and seeks that they continue to apply to the plan change site.

Recommendations on Submissions

214. That submission 5 be accepted for the following reasons:

- the National Grid Corridor overlay will continue to apply to the plan change site regardless of the zoning.
- PPC57 proposes that there will be no changes to the AUP National Grid Corridor Overlay.

215. There are no amendments associated with this recommendation.

11. CONCLUSIONS

216. Having considered all the information provided by the requestor, carried out an assessment of effects, reviewed all relevant statutory and non-statutory documents and made recommendations on [themed] submissions, I recommend that PPC57 should not be approved.

217. In summary I consider that declining PPC57 will:

- assist the council in achieving the purpose of the Resource Management Act 1991
- assist the council to give effect to the Auckland Unitary Plan Regional Policy Statement
- assist the council to give effect to the Auckland Plan 2050.
- assist the council to align with the National Policy Standards – Urban Development 2020.

POTENTIAL CHANGES WITHIN THE SCOPE OF SUBMISSIONS

218. There are no recommended potential changes

12. SECTION 32AA ANALYSIS OF RECOMMENDED CHANGES

219. The changes recommended above **do not** require an additional assessment in accordance with S32AA of the RMA.

220. The existing AUP zoning best gives effect to the AUP Regional Policy Statement as opposed to the **OP-SAR** zoning proposed by the plan change requestor. The existing AUP(OP) zoning is the most efficient and effective means of meeting the purposes of the RMA.

13. RECOMMENDATION

221. That, the Hearing Commissioners accept submissions (and associated further submissions) as outlined in this report.

222. That, as a result of the recommendations on the submissions, the Auckland Unitary Plan **is not** amended by:

- The zoning changes proposed by PPC57, to the Auckland Unitary Plan

14. SIGNATORIES

	Name and title of signatories
Authors	Roger Eccles, Planner, Central and South Planning, Plans and Places 
Reviewer / Approver	Celia Davison, Planning Manager, Central and South Planning, Plans and Places, Chief Planning Office 

APPENDIX 1

PRIVATE PLAN CHANGE 57 REQUEST

**This appendix has not been reproduced
in this agenda but can be found at:**

<https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/unitary-plan/auckland-unitary-plan-modifications/Pages/details.aspx?UnitaryPlanId=91>

APPENDIX 2

INFORMATION PROVIDED BY THE APPLICANT TO SUPPORT PPC57

**Request for private plan change
Royal Auckland and Grange Golf Club**

Rezoning land from residential to open space

Section 32 Evaluation Report and Planning Assessment

**Prepared by
Richmond Planning Limited
August 2020**

Table of contents

1. EXECUTIVE SUMMARY	4
2. INTRODUCTION	5
3. THE APPLICANT AND PROPERTY DETAILS	6
Applicant details	6
Property details and Proposed Auckland Unitary Plan summary	6
4. ROYAL AUCKLAND AND GRANGE GOLF CLUB.....	9
Club history.....	9
Amalgamation of clubs	9
Implementing amalgamation objectives	9
5. SITE AND LOCALITY DESCRIPTION	11
Land included in the plan change	11
Current and foreseeable use.....	13
Surrounding locality – north side of golf course	14
Surrounding locality – south side of golf course.....	14
6. ZONING HISTORY	15
7. THE PLAN CHANGE REQUEST	16
Scope of the plan change.....	16
Purpose of and reasons for the plan change	16
8. PROCEDURES FOR PRIVATE PLAN CHANGES.....	17
9. SECTION 32 EVALUATION	18
The most appropriate way to achieve the purpose of the RMA	18
Development of options.....	20
Evaluation of options	20
Risk of acting or not acting.....	23
Reasons for the preferred option.....	23
10. STATUTORY ASSESSMENT.....	24
Relevant sections of the RMA.....	24
Part 2 of the Resource Management Act 1991	24
National Policy Statements	25
National Environmental Standards.....	27
National Planning Standards.....	27
Auckland Plan.....	27
Auckland Unitary Plan	28
Local Board Plans	31
Parks policy plans	31
11. ENVIRONMENTAL EFFECTS OF THE PLAN CHANGE.....	32
Character and amenity values.....	32
Infrastructure	33
Transport	33

Noise	33
Loss of residential zoned land	34
Historic sites and archaeology	34
12. CONSULTATION ON THE PLAN CHANGE.....	36
13. NOTIFICATION	37
14. CONCLUSION	38
APPENDICES	39
Appendix 1 Certificates of title	
Appendix 2 Operative and proposed rule comparison	
Appendix 3 Acoustic assessment	
Appendix 4 Record of consultation	

1. EXECUTIVE SUMMARY

- 1.1 This section 32 evaluation report and planning assessment has been prepared and is submitted in support of the private plan change request to the Auckland Unitary Plan – Operative in Part (**AUP**) by Royal Auckland and Grange Golf Club (**RAGGC**).
- 1.2 The plan change is to rezone the golf course land from Residential Single House, Mixed Housing Urban and Terrace Housing and Apartment Building zones to Open Space – Sport and Active Recreation (**OS-SAR**). No other changes to the AUP are proposed. The purpose of the plan change is to apply a zone that reflects current and foreseeable use of the land as a golfing facility.
- 1.3 An evaluation of the plan change has been undertaken in accordance with section 32 of the Resource Management Act 1991 (**RMA**) and concludes that rezoning the land OS-SAR is the most appropriate way to achieve the purpose of the RMA. The AUP has established the OS-SAR zone for active sport and recreation, including golfing greens and associated facilities. The rezoning is therefore the most appropriate way of achieving the objectives of the Regional Policy Statement and the AUP.
- 1.4 There is no impact on residential intensification through AUP enabled capacity as RAGGC has no intention of using the land for any purpose other than what it has been used for in the last 80+ years. There is sufficient plan enabled capacity elsewhere in Auckland to meet short to medium term (30 year) demands.
- 1.5 As no change in use is anticipated, adjoining residents and nearby property owners are not expected to experience any difference in effects.
- 1.6 This section 32 evaluation will continue to be refined in relation to any further consultation that occurs, and in relation to any new information that may arise during the course of the Council process.

2. INTRODUCTION

2.1 Clause 21 of Schedule 1 to the RMA provides for any person to make a request to change to a district or regional plan. This request shall:

- Explain the purpose of and reasons for the plan change;
- Contain an evaluation report assessing the extent to which the proposal is the most appropriate way to achieve the purpose of the RMA and the most appropriate way of achieving the AUP objectives; and
- Include an assessment of environmental effects.

2.2 In accordance with section 32(6) of the RMA and for the purposes of this evaluation:

- The 'proposal' means this private plan change request;
- The 'objectives' means the purpose of the plan change; and
- The 'provisions' means the policies, rules or other methods that implement, or give effect to the objectives of the plan change.

3. THE APPLICANT AND PROPERTY DETAILS

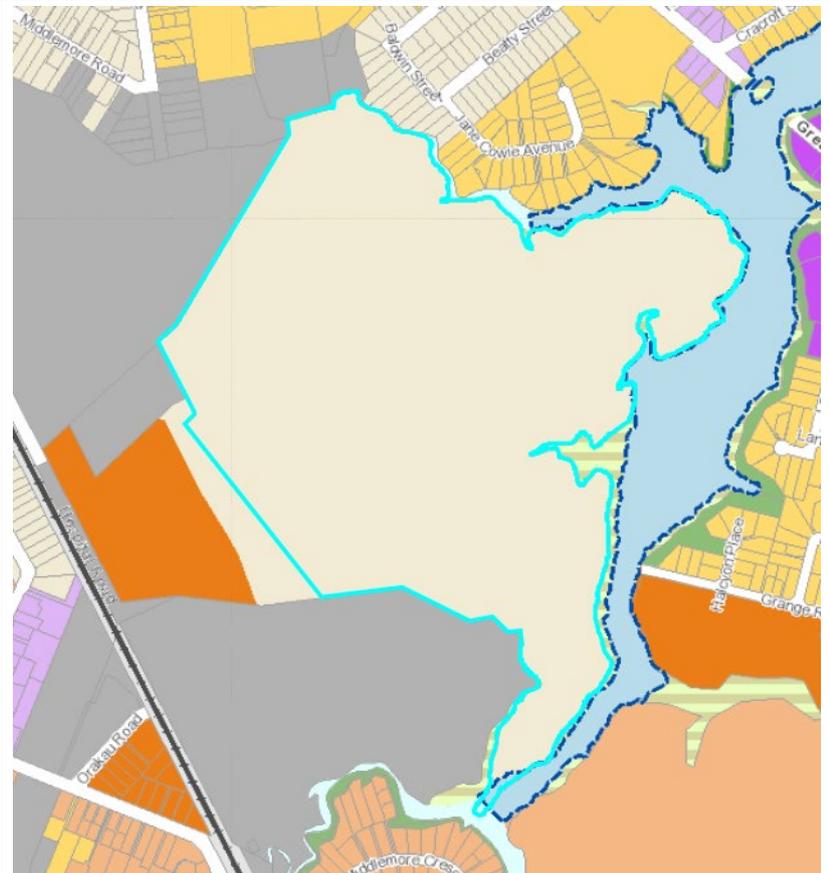
Applicant details

Table 1: Applicant and address for service

Applicant	Royal Auckland and Grange Golf Club
Address for service	Tania Richmond Richmond Planning Limited PO Box 25734 St Heliers Auckland 1740 tania@richmondplanning.co.nz

Property details and Proposed Auckland Unitary Plan summary

Table 2: Property summary

Property details – north side of golf course	
Address	57 Grange Road, Papatoetoe (previously 26 Hospital Road)
Legal description	Lot 4, DP 513036
Site area	44.8617 hectares
Auckland Unitary Plan	
Current zone	Residential - Single House
	

Overlays	<ul style="list-style-type: none"> • Natural Resources: Significant Ecological Areas Overlay - SEA-M2-2908DD, DD, Marine 2 • Natural Resources: Significant Ecological Areas Overlay - SEA_T_4345, Terrestrial • Infrastructure: National Grid Corridor Overlay - National Grid Yard Uncompromised • Infrastructure: National Grid Corridor Overlay - National Grid Subdivision Corridor
Controls	<ul style="list-style-type: none"> • Coastal Inundation 1 per cent AEP Plus 1m Control - 1m sea level rise • Macroinvertebrate Community Index – native and urban
Designations	<ul style="list-style-type: none"> • Airspace Restriction Designations - ID 1102, Protection of aeronautical functions - obstacle limitation surfaces, Auckland International Airport Ltd
Property details – south side of golf course	
Address	Grange Road Papatoetoe, including 2 Grange Road and 69A Omana Road
Legal description	Lot 2, DP 510763; Part Allot 14 Parish of Manurewa; Lot 32 DP 36608; Lot 103, DP86715; and Lot 104, DP 56577
Site area	34.6180 hectares + 0.4366 hectares + 1.0310 hectares
Auckland Unitary Plan	
Current zone	<ul style="list-style-type: none"> • Residential - Terrace Housing and Apartment Building (THAB) • Residential - Mixed Housing Urban (MHU)

Overlays	<ul style="list-style-type: none"> • Natural Resources: Significant Ecological Areas Overlay - SEA-M2-2908DD, DD, Marine 2 • Natural Resources: Significant Ecological Areas Overlay - SEA_T_4345, Terrestrial • Infrastructure: National Grid Corridor Overlay - National Grid Yard Uncompromised • Infrastructure: National Grid Corridor Overlay - National Grid Subdivision Corridor
Controls	<ul style="list-style-type: none"> • Coastal Inundation 1 per cent AEP Plus 1m Control - 1m sea level rise • Macroinvertebrate Community Index – exotic, native and urban
Designations	<ul style="list-style-type: none"> • Airspace Restriction Designations - ID 1102, Protection of aeronautical functions - obstacle limitation surfaces, Auckland International Airport Ltd

4. ROYAL AUCKLAND AND GRANGE GOLF CLUB

Club history

- 4.1 The Auckland Golf Club was founded in February 1894 with play initially occurring on courses in Greenlane and One Tree Hill. In 1907 the Auckland Golf Club purchased 58 hectares of land on the north side of Tāmaki Estuary, Middlemore. The first course opened in 1910 and since then the course has been modified, extensive planting undertaken and a clubhouse constructed.
- 4.2 In 1931, the Grange Golf Club (formerly the Ōtāhuhu Golf Club) leased and then later bought 33 hectares of land on the southern side of the Tāmaki Estuary, Papatoetoe. Over the years, the course has been modified, planting undertaken and the Grange Clubhouse opened in 1974.
- 4.3 While primarily catering for members, both clubs hosted national and international golfing events. On 14 September 2010, Her Majesty Queen Elizabeth II advised the Auckland Golf Club should be known as Royal Auckland Golf Club Incorporated.

Amalgamation of clubs

- 4.4 On 11 May 2015, the Royal Auckland Golf Club and the Grange Golf Club amalgamated and subsequently changed its name to Royal Auckland and Grange Golf Club. The amalgamation provides for the long-term future of the premier golf club and golfing facility. This is achieved by the following objectives:
- The Course – a top quality golf course and practice facilities which meet present and likely future needs of members and which will provide enduring challenge and pleasure to golfers of all ages and talents;
 - Membership – continuance of a strong sustainable and compatible membership with on-going inflows of new and younger members consistent with maintaining reasonable course access; and
 - Values – long-term financial prudence and stability, first class governance and management and maintaining unified and continuing club spirit and standards.

Implementing amalgamation objectives

- 4.5 Following amalgamation, RAGGC commenced a significant works programme to achieve the amalgamation objectives, including construction of:
- A bridge connecting both courses on either side of the Tāmaki Estuary;
 - A new centrally located clubhouse; and
 - A premier 27 hole golf course that can be played as 9, 18 and 27 rounds.

- 4.6 To provide long-term financial stability, RAGGC sold some land around the periphery. This included 1.5 hectares adjoining King's College and 9.3 hectares off Grange Road. The land adjoining King's College, which included a former clubhouse, has since been re-zoned under Private Plan Change 8 from Single House Zone to Special Purpose School Zone. Land off Grange Road has been subdivided and infrastructure works undertaken for THAB development. Part of this land included the Grange Golf Clubhouse, which continued to be used until the opening of the current clubhouse.

5. SITE AND LOCALITY DESCRIPTION

Land included in the plan change

- 5.1 Land included in the plan change is made up of four separate titles. Certificates of title for the 80.94 hectares are attached at Appendix 1. Interests on the land are fencing agreements, easements, encumbrances and a statutory land charge (rating). None of these are relevant to the plan change.
- 5.2 Royal Auckland and Grange Golf Club Incorporated is the owner of the land. Unless otherwise stated, references to the 'property' or 'site' include all the land forming part of the plan change outlined in blue Figure 1 below.
- 5.3 The land is located within a well-established area on the borders of Papatoetoe, Ōtāhuhu and Māngere.

Figure 1: Location plan



Base source: Geomaps

- 5.4 As a golf facility the land is predominately flat with formed undulations. Manicured grass is the main ground cover. Mature trees and vegetation are planted between fairways and in selected locations around the boundary. Overland flow paths traverse the land and floodplains are in low lying parts of the property.
- 5.5 The Tāmaki Estuary, which divides the property, terminates adjacent the south-western corner of the land. The ecological value of the Tāmaki Estuary is the mangroves and intertidal flats providing habitat and feeding ground for wading birds.¹ Ecological values extend to the landward side and include a small portion of RAGGC property. These values are the presence of indigenous vegetation supporting a wetland and diversity of species.²
- 5.6 Less than 10% of the RAGGC land is impervious surface comprising buildings, paths, parking area and driveways. Buildings on the property are limited to:
- Clubhouse;
 - Green Keeper's accommodation;
 - Maintenance buildings;
 - Bridges over streams; and
 - Transpower National Grid overhead lines and two support towers.
- 5.7 The clubhouse and associated carparking was completed in April 2020. This is accessed from the northern end of Grange Road, via a bridge over the Tāmaki Estuary.³ Additional vehicle access, used for service vehicles, is via an easement over 28 Hospital Road. This easement also provides rights to convey services.

Figure 2: Detailed location plan



Base source: Google maps

¹ AUP, Schedule 4 Significant Ecological Areas – Marine Schedule

² AUP, Schedule 3 Significant Ecological Areas – Terrestrial Schedule

³ The bridge was constructed in 2018 - resource consent references 51948; 52929 (regional consent); and 52026 (coastal consent)

Figure 3: Course plan



Current and foreseeable use

- 5.8 The use of the land for golfing purposes has remained unchanged for over 80 years. Recent organisational changes, capital works and the sale of land secure the current and foreseeable future of the land for golfing purposes. No change in use will occur as a result of the plan change.
- 5.9 Presently, RAGGC has around 2,000 members. Minor fluctuations in membership has occurred over the years and membership is expected to increase in line with population growth. Around 45 staff are employed in maintenance, administration and the clubhouse.
- 5.10 The numbers of players on the course is controlled by the requirement to book a tee off time and the low intensity nature of the activity. For example, even if four persons are playing in group and all fairways on the course are in use, this is 108 players at any one time. Infrequently, national or international tournaments may attract spectators. In the last five years, only four such events have occurred. Golf is played during daylight hours. The only evening activity occurs within the clubhouse.

- 5.11 Private vehicle is the main form of transport for members and is unlikely to change due to the equipment needed for play. Grange Road is located directly off Great South Road, an arterial route. Access to the Southern Motorway is approximately 1km away.
- 5.12 Public transport (bus and rail) routes are accessible for staff. Middlemore train station is over 3km from the main entrance to the clubroom and carpark, although within 350m of the service access.

Surrounding locality – north side of golf course

- 5.13 The north side of golf course adjoins:
- King's College – Special Purpose School zone;
 - Vacant land previously owned by RAGGC – Residential Single House and THAB zones;
 - Middlemore Hospital – Special Purpose Healthcare Facility and Hospital zone; and
 - Tāmaki Estuary – Water zone.
- 5.14 On the opposite side of the tidal inlet are residential properties having frontage to Baldwin Street and Jane Cowie Avenue, zoned Residential Single House and Residential Mixed Housing Suburban. These properties are separated from the north side of the golf course by the tidal inlet/Tāmaki Estuary and are well screened by a combination of densely planted trees and mangroves.

Surrounding locality – south side of golf course

- 5.15 The southern side of the land adjoins:
- Vacant land previously owned by RAGGC - Residential Mixed Housing Urban and THAB zones;
 - Omana Park, accessed off Omana and Shirley Roads - Open Space – Sport and Active Recreation zone and home of the Papatoetoe Amateur Athletics Club;
 - Residential properties having frontage to Omana Road and Troon Place - zoned Residential Mixed Housing Suburban. These properties are a mix of well-established and infill development. Many enjoy an outlook over the golf course.
- 5.16 Land on the opposite side of Grange Road is zoned Residential Mixed Housing Suburban and occupied by a mix of well-established and infill development.
- 5.17 To the west, on the opposite side of the tidal inlet, are properties having frontage to Middlemore Crescent. This land is zoned Residential Mixed Housing Urban. Most properties are owned by Kāinga Ora and contain original 1940's dwellings with infill at the rear.

6. ZONING HISTORY

Table 3: Recent zoning history

Planning document	Zone	Location
Proposed Auckland Unitary Plan 2013 (PAUP)	Residential Single House	North side
	Residential Mixed Housing Urban	South side
Manukau Operative District Scheme 2002	Main Residential	North & south side
City of Tāmaki: Ōtāhuhu Ward District Scheme 1989	Identified Use ⁴ “Auckland Golf Course” with an underlying zone of Residential 1	North side
City of Manukau District Schedule third review 1984	Identified Use “Golf Club Grange”	South side

6.1 Both sides of the golf course were zoned Main Residential under the Manukau Operative District Scheme 2002. The Auckland Council therefore made a deliberate decision to apply different zones to each side of the golf course under the PAUP. At the time of the notification of PAUP, the two sides were owned by separate clubs but there is no indication this was a factor.

6.2 Using the Council’s PAUP zoning principles⁵, potential reasons for the current zoning of the land could be:

- Zone compatibility – adjoining land or a portion of adjoining land has the same zone;
- Infrastructure constraints – public stormwater connection is available on the north side of the course, but not on the subject site; and
- Natural hazards – overland flow paths and flood plains traverse the property.

6.3 Other sites with a higher-intensity zone have limitations on access to public connections and contain overland flow paths and floodplains. Infrastructure and natural hazards are therefore not seen as significant constraints to warrant zoning 44.8 hectares Residential Single House.

6.4 In response to a submission from the Grange Golf Club (#2304) land fronting onto Grange Road was rezoned THAB. The reasons provided for accepting the submission was ‘Support change of zoning of that part of the Papatōetoe Golf Course fronting Grange Road from MHU to THAB - This property is located close to a main arterial road with good public transport access and adjoining the existing THAB zone next to Hunters Corner Town Centre. This change of zone meets with the objectives of the THAB zone.’⁶ RAGGC has since sold most of this land when the clubs amalgamated.

⁴ Status under the Town and Country Planning Act is equivalent to a designation.

⁵ Auckland Unitary Plan Independent Hearings Panel, Topic 080 Rezoning and Precincts, Statement of Primary Evidence of John Duguid, 3 December 2015.

⁶ Auckland Unitary Plan Independent Hearings Panel, Topic 081f Rezoning and Precincts (Geographic Areas, Joint Evidence Report on Submissions by Roger Eccles and Sisira Jayasinghe, 26 January 2016).

7. THE PLAN CHANGE REQUEST

Scope of the plan change

- 7.1 The plan change request by RAGGC is to rezone its land from Residential – Single House, Residential Mixed Housing Urban, and Residential Terrace Housing and Apartment Building Zones to Open Space – Sport and Active Recreation. This change applies to the AUP Planning Maps. The land to be rezoned is detailed in Table 2 and is confirmed as:

North side of the Tāmaki estuary

- 57 Grange Road, Papatoetoe (previously 26 Hospital Road), legally described as Lot 4, DP 513036

South side of the Tāmaki estuary

- Grange Road Papatoetoe legally described as Lot 2, DP 510763;
- 2 Grange Road, legally described as Part Allot 14 Parish of Manurewa; and
- 69A Omana Road, legally described as Lot 32 DP, 36608, Lot 3 DP 86715 and Lot 104, DP 56577

- 7.2 No changes are proposed to other AUP provisions including overlays, designations and controls applying to the land.

Purpose of and reasons for the plan change

- 7.3 The purpose of the plan change is to apply a zone to RAGGC property that reflects the current and foreseeable use of the land as a golfing facility.

8. PROCEDURES FOR PRIVATE PLAN CHANGES

8.1 Schedule 1 of the RMA sets out the procedures for making a private plan change request. This provides for any person to make a request to change a district or regional plan.⁷ The request shall:

- Explain the purpose of, and reasons for, the proposed change.⁸ This is in sections 4, 6 and 7 of this report.
- Contain an evaluation report prepared in accordance with section 32 of the RMA.⁹ This is in section 9 of this report.
- Where environmental effects are anticipated, include an assessment of the actual or potential environmental effects anticipated from the implementation of the plan change.¹⁰ This in section 10 of this report.

8.2 On receipt of the plan change request and having particular regard to the evaluation report prepared¹¹ the Council must make decisions about whether to:

- Request further information;¹²
- As a result of the further information modify the request with the agreement of the person making the request¹³; and
- Consider the request¹⁴ and:
 - i. adopt the private plan change as a public plan change; or
 - ii. accept the request in whole or part and proceed to notify the request; or
 - iii. reject the plan change request (on limited grounds only)¹⁵.

8.3 Notification (full or limited service) of the plan change will occur if the Council decides to adopt or accept the request¹⁶. Any submissions will be considered by the Council at a hearing (if required)¹⁷.

⁷ RMA, Schedule 1 Clause 21(1)

⁸ RMA, Schedule 1 Clause 22(1)

⁹ RMA, Schedule 1 Clause 22(1)

¹⁰ RMA, Schedule 1 Clause 22(2)

¹¹ RMA, Schedule 1 Clause 25(1A)

¹² RMA, Schedule 1 Clause 23

¹³ RMA, Schedule 1 Clause 24

¹⁴ RMA, Schedule 1 Clause 25

¹⁵ RMA, Schedule 1 Clause 25(4)

The local authority may reject the request in whole or in part, but only on the grounds that—

(a) the request or part of the request is frivolous or vexatious; or

(b) within the last 2 years, the substance of the request or part of the request—

(i) has been considered and given effect to, or rejected by, the local authority or the Environment Court; or

(ii) has been given effect to by regulations made under section 360A; or

(c) the request or part of the request is not in accordance with sound resource management practice; or

(d) the request or part of the request would make the policy statement or plan inconsistent with Part 5; or

(e) in the case of a proposed change to a policy statement or plan, the policy statement or plan has been operative for less than 2 years.

¹⁶ RMA, Schedule Clauses 5, 5A, 25(2)

¹⁷ RMA, Schedule 1 Clauses 8B and 8C

9. SECTION 32 EVALUATION

The most appropriate way to achieve the purpose of the RMA

- 9.1 A section 32 evaluation must examine the extent to which the purpose of the plan change is the most appropriate way to achieve the purpose of the RMA.¹⁸
- 9.2 The AUP is a recently operative planning document that has been properly prepared in accordance with Part 2 of the RMA. As this plan change is limited to rezoning, the focus of this examination is on the suitability of the zoning of the land in the context of the AUP framework.
- 9.3 Zoning is a key method to give effect to the objectives and policies of the Regional Policy Statement (**RPS**) as zones manage the way in which areas of land and the coastal marine area are to be used, developed or protected.¹⁹
- 9.4 The AUP provides for a regionally consistent zoning approach through:
- Six Residential zones;
 - Five Open Space zones;
 - Ten Business zones;
 - Seven Rural zones;
 - Eight Special Purpose zones;
 - Seven Coastal zones;
 - The Strategic Transport Corridor Zone;
 - The Future Urban Zone.
- 9.5 The five public open space zones are Conservation, Informal Recreation, Sports and Active Recreation, Civic Spaces and Community. These five zones give effect to RPS Policy B2.7.2(1) as they enable the development and use of a wide range of open spaces and recreation facilities to provide a variety of activities, experiences and functions.
- 9.6 The AUP acknowledges that while most open space zoned land is vested in the Council or is owned by the Crown, some areas are privately owned and may restrict public use and access.²⁰
- 9.7 Clause H7.6.1 describes the Open Space – Sport and Active Recreation Zone as applying to open spaces used for indoor and outdoor organised sports, active recreation and community activities. It includes facilities such as sports fields, hard-court areas and greens, recreational

¹⁸ RMA, s32(1)(a)

¹⁹ AUP, A.6.4 Zones

²⁰ AUP H7.1 Open Space zones

and multi-sport facilities, and marine-related activities such as ramps, jetties, slipways, hardstand areas.

- 9.8 Most golf courses in the Auckland region are zoned Open Space – Sport and Active Recreation Zone as this meets the definition of organised sport and recreation²¹ and requires a greens facility.

Table 4: Examples of zoning of golf courses in the Auckland region

Name	Address	Ownership	Zone
Chamberlain Park	46A Linwood Avenue, Mount Albert	Crown / Local Government	Open Space - Sport and Active Recreation Zone
Titirangi Golf Club	11 Links Road, New Lynn	Private	Open Space - Sport and Active Recreation Zone
Takapuna Golf Club	27 Northcote Road, Hillcrest	Local Government	Open Space - Sport and Active Recreation Zone
Pupuke Golf Club	231 East Coast Road, Campbells Bay	Local Government	Open Space - Sport and Active Recreation Zone
North Shore Golf Club	52 Appleby Road, Albany	Private	Open Space - Sport and Active Recreation Zone
Pakuranga Golf Club	199 Botany Road, Golflands	Private	Residential – Mixed Housing Suburban
Howick Golf Club	4 Clovelly Road, Bucklands Beach,	Crown	Open Space - Sport and Active Recreation Zone
Formosa Golf Club	110 Jack Lachlan Drive, Beachlands	Private	Coastal - General Coastal Marine Zone Rural - Countryside Living Zone
Remuera Golf Club	Winstone Drive, Remuera	Local Government	Open Space - Sport and Active Recreation Zone
Akarana Golf Club	1388 Dominion Road, Mount Roskill	Private	Open Space - Sport and Active Recreation Zone

- 9.9 This proposal adopts an existing open space zone that anticipates a golfing facility as permitted activity. In this regard, the plan change should assist the Council to carry out what it has already established is the most appropriate way to achieve the purpose of the RMA, being to promote the sustainable management of natural and physical resources.

²¹ AUP J1 Definitions, Organised sport and recreation "Activities that require physical effort and skills, are competitive, occur on a regular basis, have formal rules, referees and officials, and are organised within formal structures".

Development of options

- 9.10 Section 32 requires an examination of whether the plan change is the most appropriate way to achieve the purpose of the proposed plan change by identifying other reasonably practical options. In the preparation of this plan change, the following options have been identified:

Option 1 – do nothing/retain the status quo

Option 2 – plan change to apply a precinct plan

Option 3 – plan to rezone the land Open Space – Sport and Active Recreation

Evaluation of options

- 9.11 In accordance with sections 32(1)(b) and 32(2) of the RMA, the options have been assessed on their appropriateness, efficiency, effectiveness, costs, benefits and risks. The results of this evaluation are included in Table 4.

Table 5: Summary of analysis under section 32 of the RMA

Options	Appropriateness	Efficiency and effectiveness	Benefits	Costs
<p>Option 1 do nothing/retain the status quo</p>	<p>The current zone is not the most appropriate way to achieve the objectives and policies of the RPS as it fails to recognise and provide for the long-standing use and future use of the land for recreational activity.</p>	<p>The 'do nothing' option is not an effective or efficient option to achieve the objectives of the plan change as this option retains the land with a residential zoning.</p>	<p>There would be no costs to RAGGC in making this plan change. Existing residential land value and opportunity cost is retained. The ability to sell the land and develop for residential use is retained. If the land is used for residential activity this would support the RPS objectives of providing for growth within the urban area.</p>	<p>Recreational needs of people are not supported by an appropriate zoning. They currently rely on existing use rights. Rates reflect the residential value of the land. This is an additional financial burden for RAGGC. Rates deferral off-sets only a portion of the rates and remains an on-going debt. RAGGC needs to rely on existing use rights for the golfing activity and making non-complying activity resource consents for ancillary or supporting activities. This is costly and time consuming for an activity that has been in continuous use on the land for over 80 years.</p>
<p>Option 2 plan change to apply a precinct plan</p>	<p>The outdoor activity and supporting uses are anticipated and provided for as permitted activities in the OP-SAR zone. A precinct is therefore not appropriate as the purpose of a precinct is to enable local differences to be recognised by providing detailed place-based provisions which can vary the</p>	<p>Applying a precinct when provisions of a zone achieve the purpose of the plan change is not efficient or effective.</p>	<p>Site specific provisions can be applied to address potential effects that could occur if the land is used for a recreation activity other than golf.</p>	<p>This adds an unnecessary administrative layer to the AUP when existing provisions provide for the activity. Costs in preparing, assessing and the Council determining the plan change would be met by RAGGC.</p>

Options	Appropriateness	Efficiency and effectiveness	Benefits	Costs
<p>Option 3 plan change to rezone the land Open Space – Sport and Active Recreation</p>	<p>outcomes sought by the zone or Auckland-wide provisions and can be more restrictive or more enabling.²²</p> <p>It is appropriate and consistent with the RPS and AUP structure to apply a zone that reflects the function carried out and intended to be carried for the foreseeable future on this privately owned land.</p>	<p>It is efficient and effective to apply an existing zone to achieve the purpose of the plan change.</p>	<p>Recreational needs of the community are supported by an appropriate zoning.</p> <p>The rates will reflect the Open Space value of the land reducing the financial burden for RAGGC.</p> <p>The long-standing and foreseeable activity is afforded permitted activity status.</p> <p>There is greater visibility and certainty for adjoining residents that the land is for open space purposes (i.e. as indicated on the planning maps).</p> <p>High levels of amenity for the local community are assured as the OS-SAR has a lower ratio of building to open space ratio than the residential zones.</p>	<p>Costs in preparing, assessing and the Council determining the plan change would be met by RAGGC.</p> <p>Land value is reduced to reflect reduction in residential development potential.</p> <p>The opportunity cost of developing the land for residential activity, particularly the high intensity THAB zoning, is foregone.</p> <p>Chapter E16 Trees in Open Space would apply. This would incur additional time and cost for RAGGC obtaining resource consent for works relating to trees.</p>

²² AUP, A1.6.5

Risk of acting or not acting

9.12 There is sufficient information to analyse the appropriateness of acting or not acting as:

- This plan change does not introduce new objectives, policies or methods;
- It uses an existing zoning that applies to the majority of golf courses in the Auckland region;
- The expected outcomes are well understood and anticipated by the zone; and
- No changes to the environment are anticipated as the existing use will continue as it has for over 80 years.

Reasons for the preferred option

9.13 The AUP uses zones to manage activities and development. Privately owned land would generally only be zoned open space where supported by the landowner otherwise the zoning could be considered an unreasonable restriction on the use of the land.²³

9.14 RAGGC own the land and seek to apply a zone that reflects the long-standing and foreseeable use of the land for outdoor recreation. Golf is an activity within the definition of 'organised sport and recreation', which is a permitted activity in the zone. Under the current residential zones applying to the land, golf is a non-complying activity.

²³ RMA, s85(2)

10. STATUTORY ASSESSMENT

Relevant sections of the RMA

Section 31 Functions of territorial authorities

- 10.1 Section 31(a) of the RMA states that a function of territorial authorities is the establishment, implementation, and review of objectives, policies, and methods to achieve integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district.
- 10.2 This plan change assists the Council to carry out its functions as set out in section 31 of the RMA. It uses an appropriate method to manage the effects of an outdoor sporting activity, i.e. an existing zone and its objectives, policies and rules.

Section 74 Matters to be considered by territorial authority

- 10.3 Section 74 of the RMA sets out the matters to be considered by a territorial authority when preparing or changing its district plan and this includes its functions under section 31. A district plan must give effect to national planning documents and the RPS. A plan change must also be prepared and changed in accordance with Part 2 and its obligation to have particular regard to the section 32 evaluation report. Other matters it shall have regard to include management plans or strategies prepared under other legislation relevant to the resource management issues of the district.
- 10.4 Other matters set out in section 74 are not considered relevant to this plan change. For completeness it is noted that:
- There is no proposed RPS and proposed regional plan;
 - There is no entry on the New Zealand Heritage List/Rārangī Kōrero applying to the land;
 - Regulations relating to fisheries resources do not apply to the land;
 - There are planning documents recognised by an iwi authority applying to the area, but these are not considered to have a direct bearing on the rezoning; and
 - Trade competition is not a factor relevant to this plan change.

Section 75 Content of district plans

- 10.5 Section 75 of the RMA outlines the content of district plans. Section 75(3) requires that a district plan must give effect to any national policy statement, any New Zealand Coastal Policy Statement any regional policy statement and must not be inconsistent with a regional plan.

Part 2 of the Resource Management Act 1991

- 10.6 The overarching purpose of the RMA is to promote the sustainable management of natural and physical resources, as defined in section 5(2) of the RMA. The plan change is the most appropriate method to manage the protection, use and development of an open space

resource. Open space provides for people and communities by providing for social wellbeing and health.

- 10.7 There are no matters of national importance in section 6 directly relevant to this plan change. The natural character of the coastal environment and significant ecological area overlays (marine and terrestrial), which are sections 6(a) and 6(c) matters, remain unaffected by this plan change.
- 10.8 Section 7 sets out other matters that all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to. Rezoning the land open space confirms what is an efficient use and development of natural and physical resources (in this case outdoor recreation).²⁴ It also maintains and enhances amenity values of open space and amenity values of the local area.²⁵
- 10.9 Section 8 requires that all persons exercising functions and powers under it shall take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi). In preparing this plan change, mana whenua were advised of the proposed plan change and invited to comment. The two iwi who responded support this plan change.

National Policy Statements

- 10.10 The AUP is required to give effect to any national policy statements.²⁶ Three national policy statements are relevant to this plan change.

New Zealand Coastal Policy Statement 2010 (NZCPS)

- 10.11 This plan change does not include the coastal marine environment but the site is intrinsically linked to the coast as it shares boundaries with the Tāmaki tidal inlet. Changing the zoning of the land to open space is not contrary to any of the NZCPS provisions. Natural resources overlays (SEA's) remain unchanged.
- 10.12 Objective 4 of the NZCPS is to maintain and enhance public open space and recreational opportunities. Policy 18 relates directly to public open space. While the land remains in private ownership, it nonetheless allows for club members and surrounding residential property owners who enjoy an outlook over the golf course an appreciation of the tidal inlet. It also provides for active recreation compatible with the natural character, natural features and amenity values of the coastal environment.

National Policy Statement on Electricity Transmission (NPSET) 2008

- 10.13 NPSET recognises the need to operate, maintain, develop and upgrade the electricity transmission network as a matter of national importance. In achieving the purpose of the RMA, decision-makers must recognise and provide for electricity transmission.
- 10.14 The AUP recognises the National Grid is important to the social and economic well-being of Aucklanders and New Zealanders.²⁷ This is provided for in the AUP by Infrastructure: National Grid Corridor Overlay. As high voltage transmission lines can pose a risk of electrical hazard

²⁴ RMA, s7(b)

²⁵ RMA, s7(c)

²⁶ RMA s67(3) and s75(3)

²⁷ AUP, D26.1 National Grid Corridor Overlay description

and development in close proximity to the National Grid can pose risks to the National Grid, some activities within the corridor are not encouraged. This includes establishing activities sensitive to the national grid²⁸ in an existing building or a new building, which is a non-complying activity.²⁹ Outdoor recreation is not an activity sensitive to the national grid.

- 10.15 Transpower lines and two supporting towers are located on the subject site, near the boundary with the tidal inlet. These do not pose any obstruction to the current use and the plan change does not compromise the provision of the nationally important supply of electricity. If anything, by making activities sensitive to the National Grid noncomplying activities, it supports the NPSET.

National Policy Statement on Urban Development

- 10.16 At the time of preparing this section 32 assessment the National Policy Statement on Urban Development Capacity 2016 (**NPSUDC**) is in effect. On 20 August 2020, it will be replaced by the National Policy Statement on Urban Development 2020 (**NPS-UD**). Both documents have been considered.
- 10.17 The NPSUDC sets out the objectives and policies for providing development capacity under the RMA. It recognises the national significance of urban environments and the need to enable them to develop and change, and the provision of sufficient development capacity to meet the needs of people and communities and future generations in urban environments.
- 10.18 Auckland Council's reporting on the implementation of the NPSUDC is that the Auckland Unitary Plan provides sufficient plan enabled capacity to meet short to medium term demands (i.e. next 30 years).³⁰ Longer term (after 2047) currently feasible supply is less than demand.
- 10.19 Land included in the plan change is not part of the Auckland Plan sequencing and timing of growth within the next 30 years. This is sufficient time for the Council to identify how plan enabled reduction in residential capacity from rezoning the land can be accommodated elsewhere.
- 10.20 Under the NPS-UD, the land is not subject to directives to realise as much development capacity as possible.³¹ It is also not within a walkable catchment of rapid transit stops, city centre zones and metropolitan zones where building height of at least 6 storeys should be enabled by the AUP.³²
- 10.21 It is also important to emphasise that while the land has a plan enabled capacity for residential development, RAGGC has no intention of using the land for any other purpose than what it has been used for in the last 80+ years. This plan change would be not be progressed if this were the case.

²⁸ AUP, Chapter J1 Definitions

Activities sensitive to the National Grid

Any dwellings, papakāinga, visitor accommodation, boarding houses, integrated residential development, retirement villages, supported residential care, education facilities, hospitals and healthcare facilities and care centres.

²⁹ AUP, D26.4.1 Activity table – within the National Grid

³⁰ Auckland Council, National Policy Statement on Urban Development Capacity 2016: Housing and business development capacity assessment for Auckland, December 2017

³¹ NPS-UD, Policy 3(a) and (b) applying to city centre and metropolitan centre zones.

³² NPS-UD, Policy 3(c)

National Environmental Standards

10.22 There are currently six National Environmental Standards in force as regulations. Two are referenced but this plan change does not affect the implementation of NES.

- National Environmental Standards for Electricity Transmission Activities supports implementing the NPSET by setting out a national framework of permissions and consent requirements for activities on existing electricity transmission lines.
- National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health is a nationally consistent set of planning controls and soil contaminant values. Activities on the Hazardous Activities and Industries List (HAIL) are subject to this NES. On this list are sport turfs where it involves persistent pesticide bulk storage or use.

National Planning Standards

10.23 The purpose of the National Planning Standards is to improve consistency in plan and policy statement structure, format and content so they are easier to prepare, understand, compare and comply with.

10.24 Section 8 of the Standards, November 2019, set out a discretionary direction on zone names and descriptions of zones. The AUP OP-SAR zone is consistent with the Sport and Active Recreation zone in the Standard.

Auckland Plan

10.25 The Auckland Plan 2050 is the Council's long-term spatial plan to ensure Auckland grows in a way that will meet the opportunities and challenges of the future. It is required by legislation to contribute to Auckland's social, economic, environmental and cultural well-being.³³

10.26 Six important areas are identified so that Auckland can continue to be a place where people want to live, work and visit. One of the outcomes is Aucklanders live in secure, healthy, and affordable homes, and have access to a range of inclusive public places.³⁴

10.27 The Auckland Plan sets out development areas where housing and business development capacity is supported by the AUP zoning and Council or Government led initiatives. Located between development areas in Ōtāhuhu, Māngere and Papatoetoe, the subject site is outside those areas.

10.28 Population growth and demographic change will put pressure on existing services and facilities. Varied and accessible services and facilities which support the needs of communities are essential in helping people to participate in society and create a sense of belonging. This includes provision of open spaces.³⁵ While it is expected the provision of open space will largely be public, privately owned open space supports the needs of the golfing community and nearby residents who benefit from the visual amenity provided by the greens.

³³ Auckland Plan 2050 June 2018, page 5

³⁴ Auckland Plan 2050 June 2018, page 6

³⁵ Auckland Plan 2050 June 2018, page 54

Auckland Unitary Plan

Auckland Regional Policy Statement

10.29 When preparing or changing a district plan, the Council must give effect to any RPS and have regard to any proposed RPS. The RPS identifies issues of regional significance, and the following are relevant to this plan change.

B2: Tāhuhu whakaruruhau ā-taone - Urban growth and form

10.30 Chapter B2 sets out the objectives and policies for growth and form in the region. The chapter states that a quality built environment is one which enhances opportunities for peoples' well-being by ensuring that new buildings respond to the existing built and natural environment in ways that promote the plan's objectives and maintain and enhance the amenity values of an area. Relevant objectives and policies provide direction on urban growth and form, a quality built environment, residential growth, and commercial and industrial growth.

10.31 B2.7 contains objectives and policies specifically for open space and recreation facilities. Directly relevant to this plan change are objectives that:

- Recreational needs of people and communities are met through the provision of a range of quality open spaces and recreation facilities;³⁶ and
- Reverse sensitivity effects between open spaces and recreation facilities and neighbouring land uses are avoided, remedied or mitigated.³⁷

10.32 Supporting policies are:

- Enable the development and use of a wide range of open spaces and recreation facilities to provide a variety of activities, experiences and functions;³⁸
- Provide a range of open spaces and recreation facilities in locations that are accessible to people and communities;³⁹
- Avoid, remedy or mitigate significant adverse effects of land use or development on open spaces and recreation facilities;⁴⁰ and
- Avoid, remedy or mitigate significant adverse effects from the use of open spaces and recreational facilities on nearby residents and communities.⁴¹

10.33 The plan change does not constrain urban growth and impact on land capacity as the land is not available for residential intensity. The proposed zoning will maintain and enhance the existing open space amenity values of an area. The OS-SAR reflects an appropriate and well-established recreational activity. An assessment of effects of the plan change on nearby residents and communities is discussed in section 11 of this report.

³⁶ AUP, RPS objective B2.7.1(3)

³⁷ AUP, RPS objective B2.7.1(3)

³⁸ AUP, RPS policies B2.7.2(1)

³⁹ AUP, RPS policies B2.7.2(3)

⁴⁰ AUP, RPS policies B2.7.2(7)

⁴¹ AUP, RPS policies B2.7.2(8)

B6 Mana Whenua

- 10.34 Mana whenua were consulted early in the development of this plan change. Feedback received was positive.

Chapter H7 Open Space

- 10.35 Objectives for all open space zones recognise the importance recreational needs are met through the provision of a range of quality open space areas⁴² and adverse effects of use and development of open space on residents, communities and the environment are avoided, remedied or mitigated.⁴³

- 10.36 Policies supporting these general objectives focus on the design, development and management of the spaces as well as reflecting mana whenua values where appropriate and enabling infrastructure located on open spaces.

- 10.37 Chapter H7 also includes specific objectives and policies for each of the five open space zones. Those applying to OS-SAR are at H7.6.2.

(1) Indoor and outdoor sport and active recreation opportunities are provided for efficiently, while avoiding or mitigating any significant adverse effects on nearby residents, communities and the surrounding areas.

(2) Activities accessory to active sport and recreation activities are provided for in appropriate locations and enhance the use and enjoyment of areas for active sport and recreation.

(3) Larger scale, or clusters of land-based marine-related recreation facilities, are recognised and provided for while maintaining and enhancing public access to and along the coast.

- 10.38 The golfing facility and supporting uses will be permitted activities in H7.9.1. Activity Table – Open Space Zones. This is more efficient than requiring a non-complying activity application for these uses, as required under the current zone. The magnitude of any adverse effects on the nearby residents, communities and the surrounding areas remains unchanged. Anticipated effects of plan enabled permitted recreation activities that are more intensive than golf are managed by various standards to ensure effects such as high levels of traffic, noise, glare and scale of buildings are managed.

- 10.39 Rezoning the land OS-SAR is the most appropriate way to achieve the objectives of Chapter H7, particularly those of the OS-SAR zone.

- 10.40 The following existing uses on the land would be permitted activities in H7.9.1 Activity Table – Open Space, which is further support for this plan change:

- (A3) A single workers' accommodation;
- (A10) Clubrooms;
- (A15) Organised sport and recreation;
- (A23) Retail accessory to a permitted activity;

⁴² AUP, H7.2(1)

⁴³ AUP, H7.2(2)

- (A25) Parks depot, storage and maintenance;
- (31) Accessory buildings;
- (A37) Buildings for public amenities;
- (A46) Parks infrastructure;
- (A47) Sport and recreation structures;
- (A48) Parks maintenance; and
- (A49) Recreational trails.

- 10.41 There is an additional worker's accommodation on site, i.e. more than the one as a permitted activity. Any substantial changes to this activity will require resource consent.
- 10.42 Appendix 2 is a comparison of development standards under each zone. This shows less building envelope can be obtained through the rezoning, with one exception. The exception relates to a 1.5m height difference between the Residential – Single House zone and the Open Space – Sport and Active Recreation zone on the northern part of the property. Given the physical separation and other standards that would apply,⁴⁴ the difference in height is not considered of any consequence.

Chapter E Auckland-wide

- 10.43 Appendix 2 also includes a comparison of Auckland-wide standards where the rules vary by zone,⁴⁵ and in summary:
- In all open space zones, tree trimming, works in protected rootzone and removal over thresholds are a restricted discretionary activity. There is no equivalent rule in the residential zones;
 - There is no difference in Auckland-wide lighting standards (illuminance and lux) between the zones. The OS-SAR permits structures up to 18m high to support artificial lighting⁴⁶ and the effects of this are discussed in section 11 of this report;
 - The OS-SAR provides a higher noise standard than the residential zone. This is to accommodate the higher noise levels often generated by active sport and recreation. The main difference in the standard is:
 - up to 5dB higher during the day (55dB LAeq)
 - up to 10dB higher (60dB LAeq) for up to 21 hours per week during the day
- 10.44 An assessment of the effects of this difference is provided by Styles Group at Appendix 3.

⁴⁴ AUP, H7.11.2 Yards - 25m Coastal Protection Yard and 10m Riparian yard.

⁴⁵ The table does not include Chapter E12 Land disturbance and this is not considered of any consequence given the area of land included in the plan change.

⁴⁶ AUP, H7.11.8 Non-security floodlighting, fittings and supports and towers up to 18m high.

Local Board Plans

- 10.45 RAGGC is located within the Ōtara-Papatoetoe Local Board.
- 10.46 The Ōtara-Papatoetoe Local Board Area Plan 2014 is a non-statutory plan that provides a flexible framework to support the growth and development in the Ōtara-Papatoetoe Local Board area over the next 30 years. The golf club is identified in this plan as a significant local landmark.⁴⁷ RAGGC is not mentioned further, but it is part of an area identified as relevant to the long term strategic action plan for the restoration of Ōtara Lake and Waterways.⁴⁸ Rezoning the land open space will contribute towards improving water quality as stormwater discharge and overland flows are considerably less with open space activity compared to residential development.
- 10.47 The Ōtara-Papatoetoe Local Board Plan 2017 is not directly relevant to this plan change.

Parks policy plans

- 10.48 Auckland Council has plans and strategies for parks, sport, open space and reserves. Most apply to land and facilities owned or administered by the council so are not directly relevant to this plan change. Three documents are referenced as they apply to sport and recreation regardless of land ownership.
- 10.49 The Parks and Open Spaces Strategic Action Plan is an overarching document. It recognises open space not owned by the Council makes up a big part of the open space network in Auckland. Auckland Council's role in relation to this part of the network is as an advocate, enabler and partner.⁴⁹
- 10.50 Auckland Sport and Recreation Strategic Action Plan 2014-2024 (refreshed 2017) recognises that sport and recreation can make a major contribution to our quality of life, health and wellbeing. It provides opportunities for fun and entertainment and contributes to making Auckland a place that Aucklanders are proud of, they want to stay or return to and that other people want to visit, move to, or invest in.⁵⁰
- 10.51 Auckland Sport Sector: Facilities Priorities Plan 2017 sets out a co-ordinated and integrated approach for future sport facility provision in Auckland. The plan considers the challenges, current gaps in provision and future demand for investment in sport facilities in Auckland. Included in the plan is golf, which is within the category of 'bespoke outdoor sporting facilities'. It does not set priorities specifically for golf, but it does list an outcome of this plan is to support the development of a hierarchy and network of facilities.⁵¹
- 10.52 RAGGC is a local, sub-regional, regional, national and international facility. One of the means to help the sporting sector deal with future growth is to utilise existing assets. In this regard, RAGGC is an existing facility providing for a recognised demand.

⁴⁷ Ōtara-Papatoetoe Local Board Area Plan 2014, page 5

⁴⁸ Ōtara-Papatoetoe Local Board Area Plan 2014, Appendix 2: Natural Environment, page 49

⁴⁹ 10.20 The Parks and Open Spaces Strategic Action Plan, page 14

⁵⁰ Auckland Sport and Recreation Strategic Action Plan 2014-2024, page 18

⁵¹ Auckland Sport Sector: Facilities Priorities Plan 2017, page 17

11. ENVIRONMENTAL EFFECTS OF THE PLAN CHANGE

Character and amenity values

- 11.1 The RMA defines amenity values as those natural or physical qualities and characteristics of an area that contribute to people's appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes.⁵²
- 11.2 There is no effect on the amenity of non-residential zoned properties in the vicinity i.e. Special Purpose School Zone, and Special Purpose Healthcare Facility and Hospital Zone as:
- These zones and the current activities occurring on these properties have a greater level of intensity than the OS-SAR zone;
 - The OS-SAR zone is compatible with these zones and has less reverse sensitivity risk than residential zones; and
 - The vegetation (SEA and tree rules) and yard rules provide a physical and visual buffer between the properties.
- 11.3 Potential effects on amenity values from the plan change are limited to the residential properties that adjoin and are opposite the golf course. These properties are afforded a high level of amenity from the open spaciousness of the golf course and low intensity activity. The plan change applies rules that maintains the amenity afforded by this open space.
- 11.4 The OS-SAR zoning does provide the opportunity for more intensive recreation facilities as a permitted activity. These activities could generate more intensive effects than currently occurring or are anticipated in a residential zone. The OS-SAR zone provides for the following as a permitted activity:
- Aquatic facilities, swimming pools, both indoor and outdoor;
 - Fitness centres and gymnasiums;
 - Indoor sports centres; and
 - Playing fields.
- 11.5 These activities would only occur if the land or part of the land is not used for a golfing facility. Amenity effects of these more intensive activities remain limited to the residential locality. Assuming compliance with rules designed to protect residential amenity, amenity effects from more intensive activities on the residential properties would be less than minor. This includes the lighting structures sometimes associated with outdoor activities such as sports fields. At 18m these structures are above the permitted height for light poles the Single House and MHU zone⁵³. Despite this they are slender elements occupying far less building to open space ratio than could occur with the current zone.

⁵² RMA, section 2 Interpretation

⁵³ Using the allowance provided for in Chapter J1 for height, this is 10.6m in the Single House Zone; 14.6m in the MHU and 21.3 in the THAB zone.

11.6 While these more intensive activities would be plan enabled, RAGGC has made significant financial investment to improve facilities and has no intention of using the land for any activity other than a golfing facility, which has no adverse effects on the amenity values of the area. Compared to what could occur with residential development, particularly at the intensity of the MHU and THAB zones, the amenity provided for local residents by the rezoning is positive. On this basis, there are no adverse amenity effects arising for the plan change as:

- Overall, the plan change provides a reduced scale of buildings when compared to the current zoning;
- The primary activity occurring on the land is low intensity when compared to what could occur with the residential zoning;
- Buildings and other uses on the land are ancillary to the primary activity and could never be more than that without compromising the primary activity; and
- The ratio of landscaping, including mature trees, is far higher than required under the residential zones, particularly the MHU and THAB zones.

Infrastructure

11.7 There are no adverse effects on infrastructure, e.g. stormwater, wastewater, water, as the demand generated by open space activities is far less than residential activity, particularly the MHU and THAB zones.

11.8 Transpower infrastructure remains unaffected and there are no reverse sensitivity effects arising from the plan change.

Transport

11.9 Vehicle access is primarily from Grange Road. The current zoning of the land gaining access from Grange Road enables the two highest intensity forms of residential development in the AUP. Conservatively this could mean over 2,400 vehicles would be accommodated on the land.⁵⁴ The Council therefore accepts the road network can accommodate this demand. Traffic and parking associated with the golfing activity and other recreation activities that are permitted by the zone is considerably lower. The carpark adjacent the clubrooms accommodates 140 vehicles. Traffic generation by private vehicles entering the site peaks mid-morning i.e. after the commuter demand and leaves late afternoon.

11.10 Chapter 27 of the AUP addresses issues relating to numbers of parking, on-site parking and manoeuvring. Any changes to the existing use or if the land is used for another recreational activity would be subject to these provisions, which are intended to manage transport effects.

Noise

11.11 In the assessment by Styles Group, the fundamental changes to noise effects that plan change would authorise can be summarised as:

⁵⁴ Using the Comparison to Capacity for Growth Study (RIMU, Auckland Council) where plan-enabled capacity is calculated on an individual site basis at a ratio of 150m² per m² for MHU.

- 1) No change to the noise levels and effects received at any receiving site if the use remains as is currently (low intensity golfing); and
- 2) If the use of the site was to change to allow for a more intense level of recreational activity, such as organised football, rugby or netball in close proximity to residential boundaries, the noise level from that activity (predominantly voices) could be up to 5dB higher (55dB LAeq) than the current noise limits, and 10dB higher (60dB LAeq) for up to 2 hours per week.⁵⁵

- 11.12 Mr Styles also notes that the night-time A-weighted noise limits (40dB LAeq and 75dB LAFmax) do not change, although the plan change would introduce specific low frequency noise limits applying at night which provides a more restrictive regime than the current zoning.⁵⁶
- 11.13 Mr Styles confirms the plan change does not authorise any change to the Special Purpose – Healthcare Facility and Hospital Zone and Special Purpose- School Zone.⁵⁷
- 11.14 A change in use to more intensive recreational activity is a hypothetical scenario, but nonetheless, requires assessment as it relates to the residential boundaries. Mr Styles identifies that whilst the plan change would authorise higher noise limits for recreational activities, it is important to recognise that the noise ‘effects’ arising from the plan change may be quite different.⁵⁸
- 11.15 In other words, the difference in noise effects between a relatively high density residential environment and organised / formal recreation with higher noise limits during the day only would be appreciable in terms of nature and character, owing simply to the different noise sources involved.⁵⁹
- 11.16 Under this scenario, residents would experience long periods of virtually no noise, punctuated by intense recreation activity, such as football or rugby, where noise would be dominated by the voices of those involved.

Loss of residential zoned land

- 11.17 The rezoning reduces potential available land for housing supply to meet current and future needs of the people of Auckland. As noted, when discussing the NPS on urban development, this land has not been available for residential use for over 80 years and there is no intention of making it available in the foreseeable future. In real terms there is no loss of available land for housing.

Historic sites and archaeology

- 11.18 Auckland Council’s Cultural Heritage Inventory (**CHI**) records places of heritage interest or value. It does not afford formal protection to places. RAGGC contains two CHI records and these are highlighted in Figure 4 below with dashed blue circles.

⁵⁵ Styles, page 9

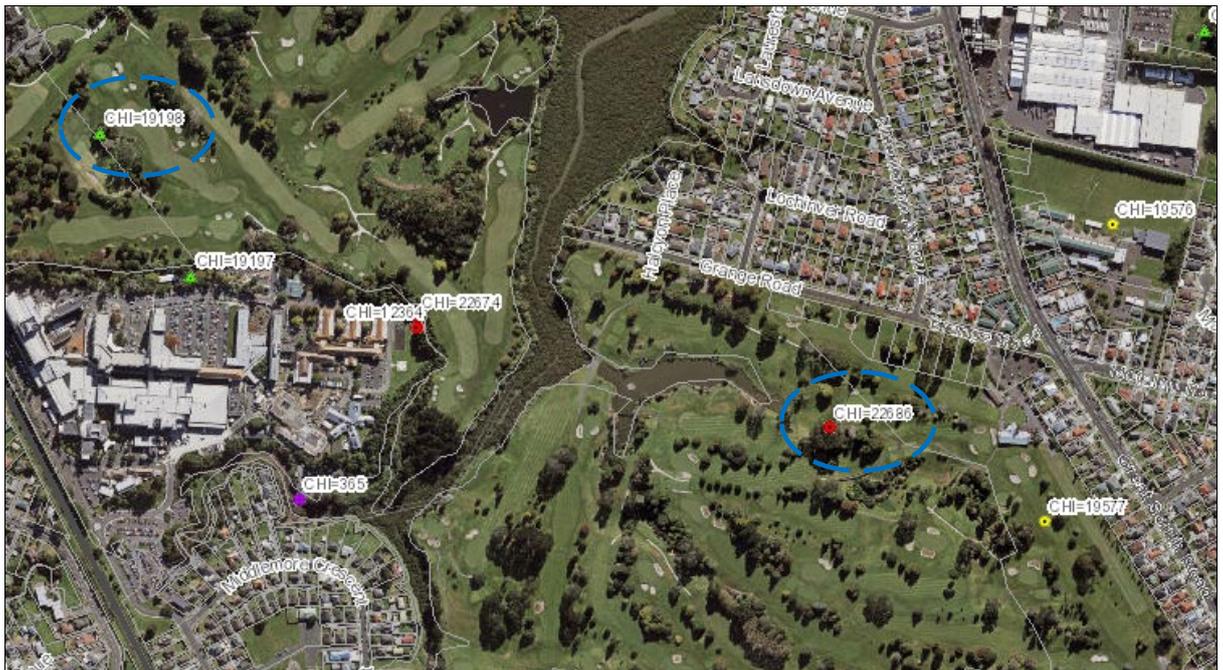
⁵⁶ Styles, page 10

⁵⁷ Styles, page 6

⁵⁸ Styles page 9

⁵⁹ Styles, page 10

Figure 4: Cultural heritage inventory map



19198	Historic Botanical Site	(green triangle)
22686	Archaeological Site	(red circle)
365	Maritime Site	(purple circle)
12364	Archaeological Site	(red circle)
19197	Historic Botanical Site	(green triangle)
19577	Reported Historic Site	(yellow pentagon)
22674	Archaeological Site	(red circle)

- 11.19 CHI 19198 is a Swamp Cypress tree that was scheduled under the Manukau District Plan 2002 and not carried through to the AUP notable tree schedule. The rezoning affords protection to this tree by Activity Table E16.4.1 making trimming or removal trees over 4m in height in the open space zones a restricted discretionary activity.
- 11.20 CHI 22686 is New Zealand Archaeological Association (NZAA) site number R11_3073. This records evidence of midden/oven within a copse of trees.⁶⁰ The Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) administered by Heritage New Zealand Pouhere Taonga (HNZPT) requires an Authority for any works that affect archaeological sites.
- 11.21 The rezoning does not increase the potential for loss or modification of the archaeological site. However, given that R11_3073 is located within trees and outside the fairways, it has potentially greater opportunity to be retained than if the land was developed for residential purposes.
- 11.22 Figure 4 also identifies other items of interest or value in the locality. None of these are affected by the plan change as they are outside the plan change area and the rezoning neither supports nor diminishes their value.

⁶⁰ The 2016 NZAA record describes the site as deposit consists[ing] of mostly broken and some whole cockle (*Austrovenus stutchburyi*) as well as a few noticeable cat's-eye (*Turbo/Lunella smaragdus*). There were no other inclusions in any of the areas observed, such as charcoal, stone (hangistone), or bone. The midden extends over an area of approximately 8 m x 4 m.

12. CONSULTATION ON THE PLAN CHANGE

- 12.1 As part of the preparation of this plan change consultation was undertaken. Appendix 4 is a list of those consulted, responses received and the actions in relation to the response. This includes consultation with all adjoining landowners, mana whenua and key stakeholders. No concerns were raised about the rezoning during the consultation.

13. NOTIFICATION

- 13.1 If the Council accepts this request (and there is no reason why it should not), it must publicly notify the plan change or give limited notification on persons directly affected by the proposed change, as provided for in clause 5A of Schedule 1. 'Directly affected persons' is not defined in the RMA and is a different test to determining affected persons under section 95 for resource consents.
- 13.2 Identifying affected persons under clause 5A of Schedule 1 requires an assessment of potential environmental impacts. The plan change provides for the primary activity that occurs on the land, organised sport and recreation, as a permitted activity. The effects of applying an existing zone are therefore able to be identified to a high level of certainty.
- 13.3 As the long-standing use of the land remains the same, there is no change in effects on persons who would usually be affected by rezoning that enables a different and often more intensive activity i.e. adjoining and adjacent property owners and occupants.
- 13.4 It is acknowledged that the plan change does enable other recreation activities to occur as a permitted activity, e.g. team sports such as cricket, football and rugby. Compared to golf, these sporting activities can be more intensive over shorter periods of time - generating additional vehicles, higher volumes of noise and the use of artificial lighting. Clubrooms for other recreational activities, where located close to residential activities, can also generate additional noise. These buildings can also be larger than single dwellings but compared to the level of development provided by the zoning on the southern side of the property, they would prove of lesser scale and occupy far lesser coverage over the site.
- 13.5 If the land were to be used for outdoor sporting activities other than golf, it is expected this would only occur if the land is sold to the Council to increase the supply of sportsfields in the Auckland region. Under this scenario, the option of shared or multiple sporting uses of the land is not feasible as a specialised green is required for golf. Council purchase of the land would be subject to the consultation requirements under the Local Government Act and it is expected residents would have the opportunity to comment.
- 13.6 Given the level of investment undertaken by RAGGC, there is no intention of selling the land or using the land for other sporting activities. The effects that could arise from other sporting uses are highly unlikely to eventuate and are not credible in the foreseeable future. On this basis, adjoining and adjacent property owners and occupants are unaffected by the plan change. This is reinforced by consultation, which assists in identifying how residents, mana whenua or specialist stakeholders consider they may be affected. In this case, no concerns were raised during the consultation.
- 13.7 Transpower, who has interest in what occurs on the land is considered directly affected and should be served notice of the application.

14. CONCLUSION

14.1 The private plan change by RAGGC is to rezone land OS-SAR. The purpose of the proposed plan change is to reflect and provide for the long-standing use of the land as a golfing facility. The analysis provided in this section 32 evaluation and planning report is that the rezoning:

- Is the most appropriate way to achieve the purpose of the RMA and is consistent with the principles in Part 2 of the RMA;
- Assists the Council in carrying out its functions of the RMA;
- Is consistent with the objectives and policies of the RPS and Chapter H7 Open Space; and
- Is the most appropriate means of achieving the objective of the plan change.

APPENDICES



**RECORD OF TITLE
UNDER LAND TRANSFER ACT 2017
FREEHOLD
Search Copy**




R. W. Muir
Registrar-General
of Land

Identifier **791541**
Land Registration District **North Auckland**
Date Issued 15 December 2017

Prior References

NA328/62

Estate Fee Simple
Area 44.8617 hectares more or less
Legal Description Lot 4 Deposited Plan 513036

Registered Owners

Royal Auckland and Grange Golf Club Incorporated

Interests

Subject to an electricity transmission right (in gross) over the within land in favour of The Auckland Electric Power Board created by Transfer 683541 - 24.7.1962 at 9:42 am

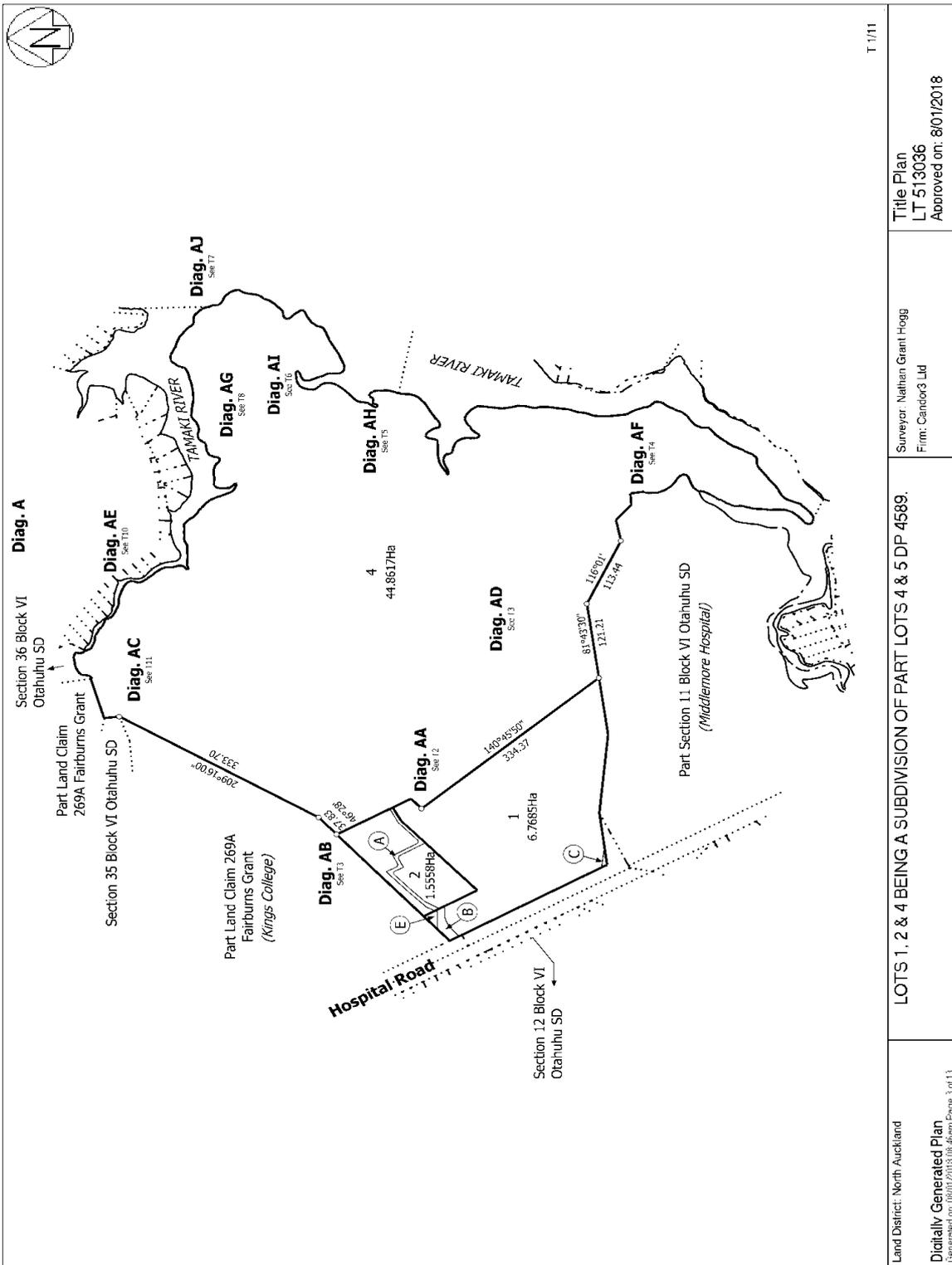
Land Covenant in Easement Instrument 10917234.5 - 3.10.2017 at 3:00 pm

Appurtenant hereto is a right of way and a right to convey water, electricity, gas, telecommunications and computer media and right to drain water and sewage created by Easement Instrument 10989255.3 - 15.12.2017 at 12:08 pm

Some of the easements created by Easement Instrument 10989255.3 are subject to Section 243 (a) Resource Management Act 1991 (See DP 513036)

Land Covenant in Easement Instrument 10989255.3 - 15.12.2017 at 12:08 pm

11740934.1 CAVEAT BY VECTOR LIMITED - 5.5.2020 at 9:38 am



T 1/11

<p>Land District: North Auckland Digitally Generated Plan Generated on: 08/01/2018 08:46am Page 3 of 13</p>	<p>LOTS 1, 2 & 4 BEING A SUBDIVISION OF PART LOTS 4 & 5 DP 4589.</p>	<p>Surveyor: Nathan Grant Hogg Firm: Candor3 Ltd</p>	<p>Title Plan LT 513036 Approved on: 8/01/2018</p>
---	--	--	--



**RECORD OF TITLE
UNDER LAND TRANSFER ACT 2017
FREEHOLD
Search Copy**




R. W. Muir
Registrar-General
of Land

Identifier **789468**
Land Registration District **North Auckland**
Date Issued 23 June 2017

Prior References

NA39A/332 NA41D/185

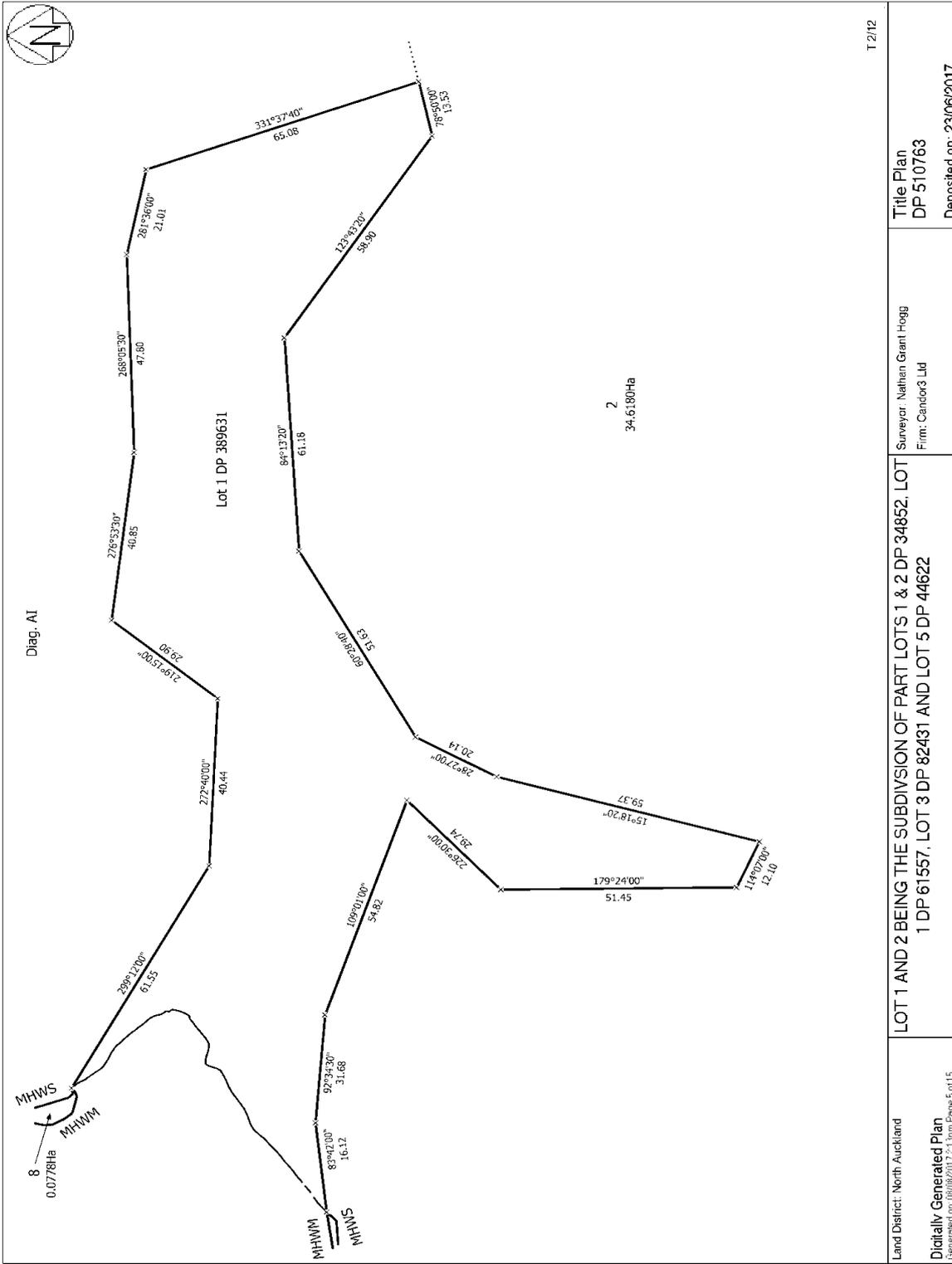
Estate Fee Simple
Area 34.6180 hectares more or less
Legal Description Lot 2 Deposited Plan 510763

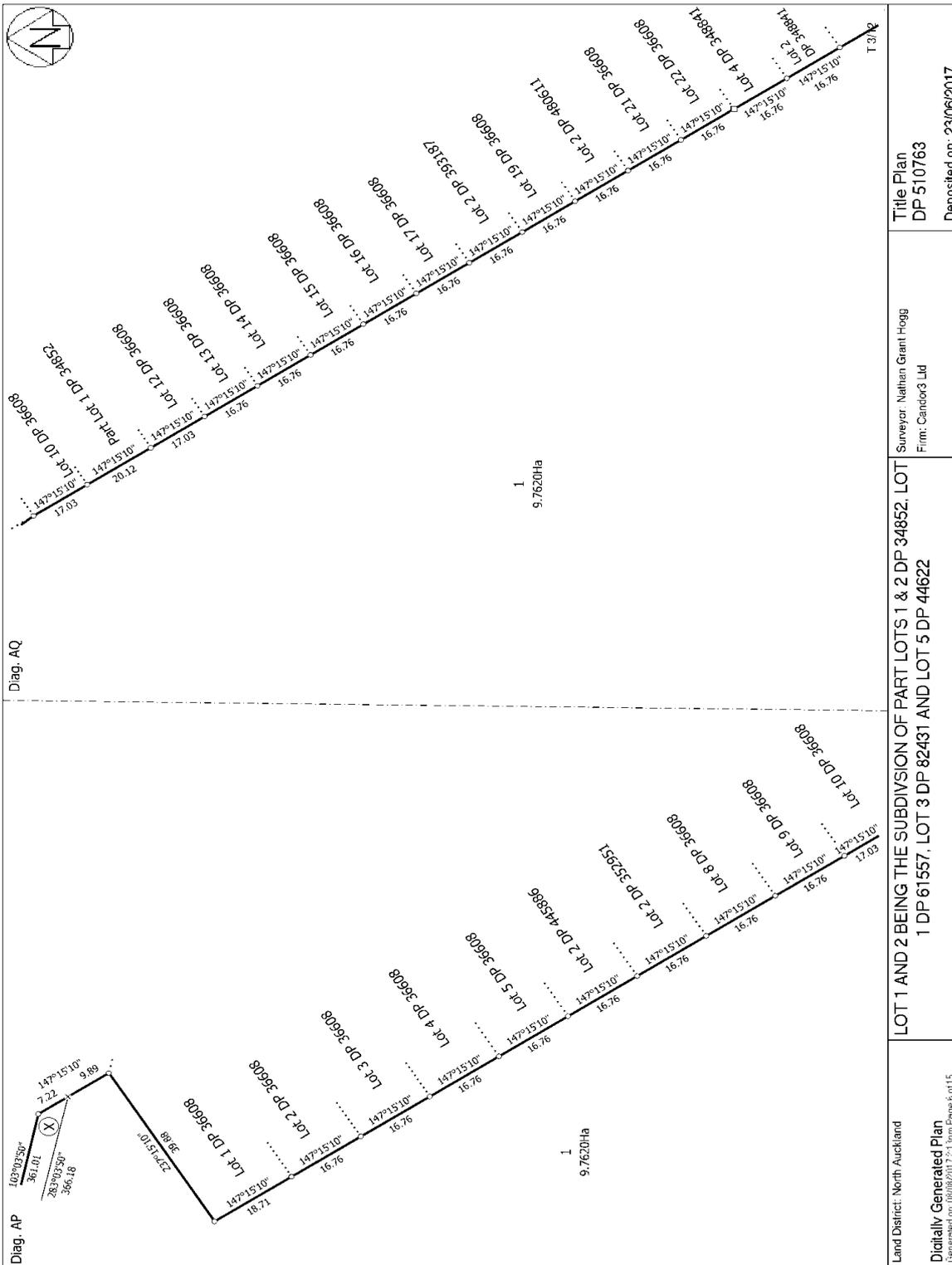
Registered Owners

Royal Auckland and Grange Golf Club Incorporated

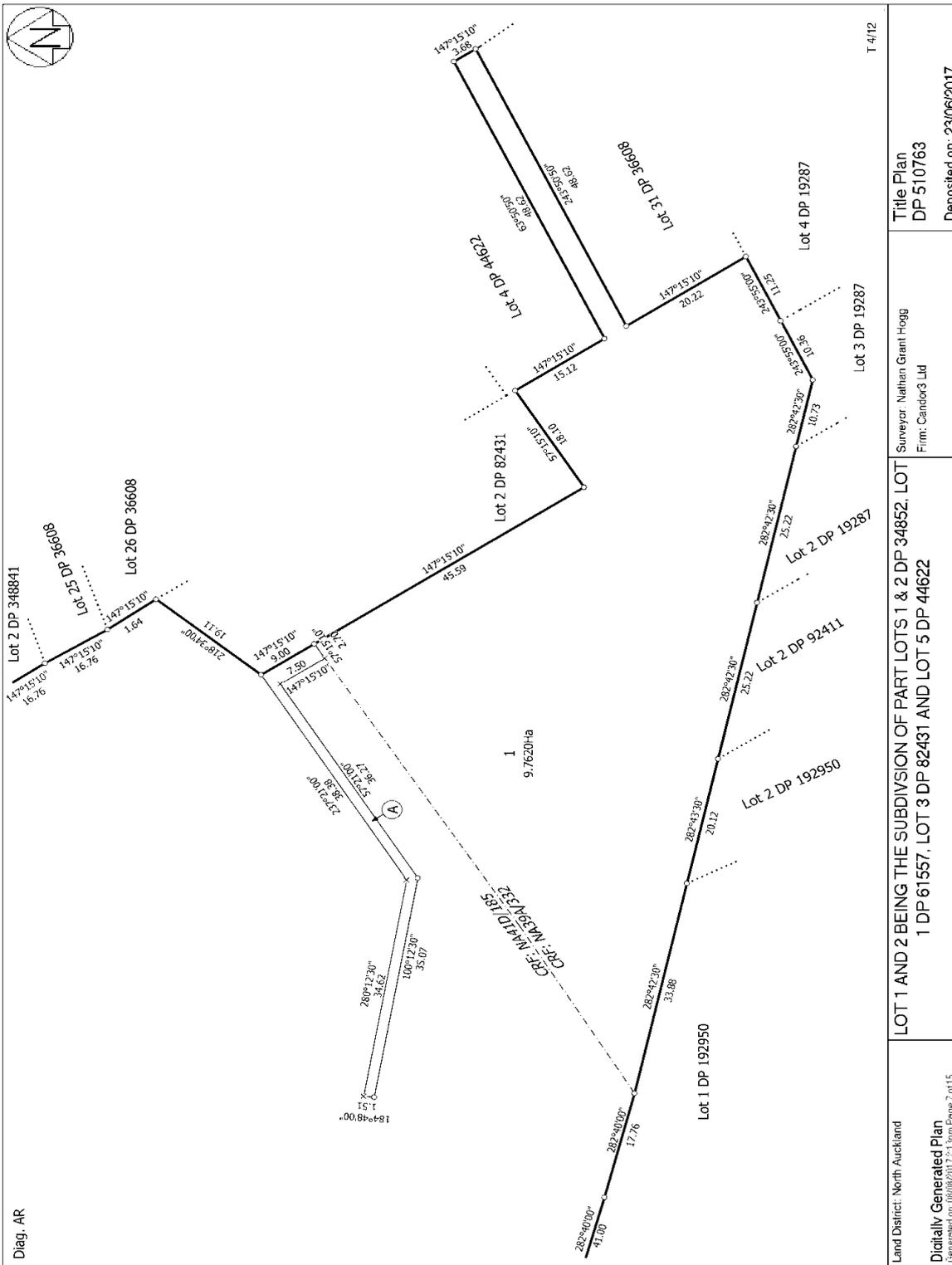
Interests

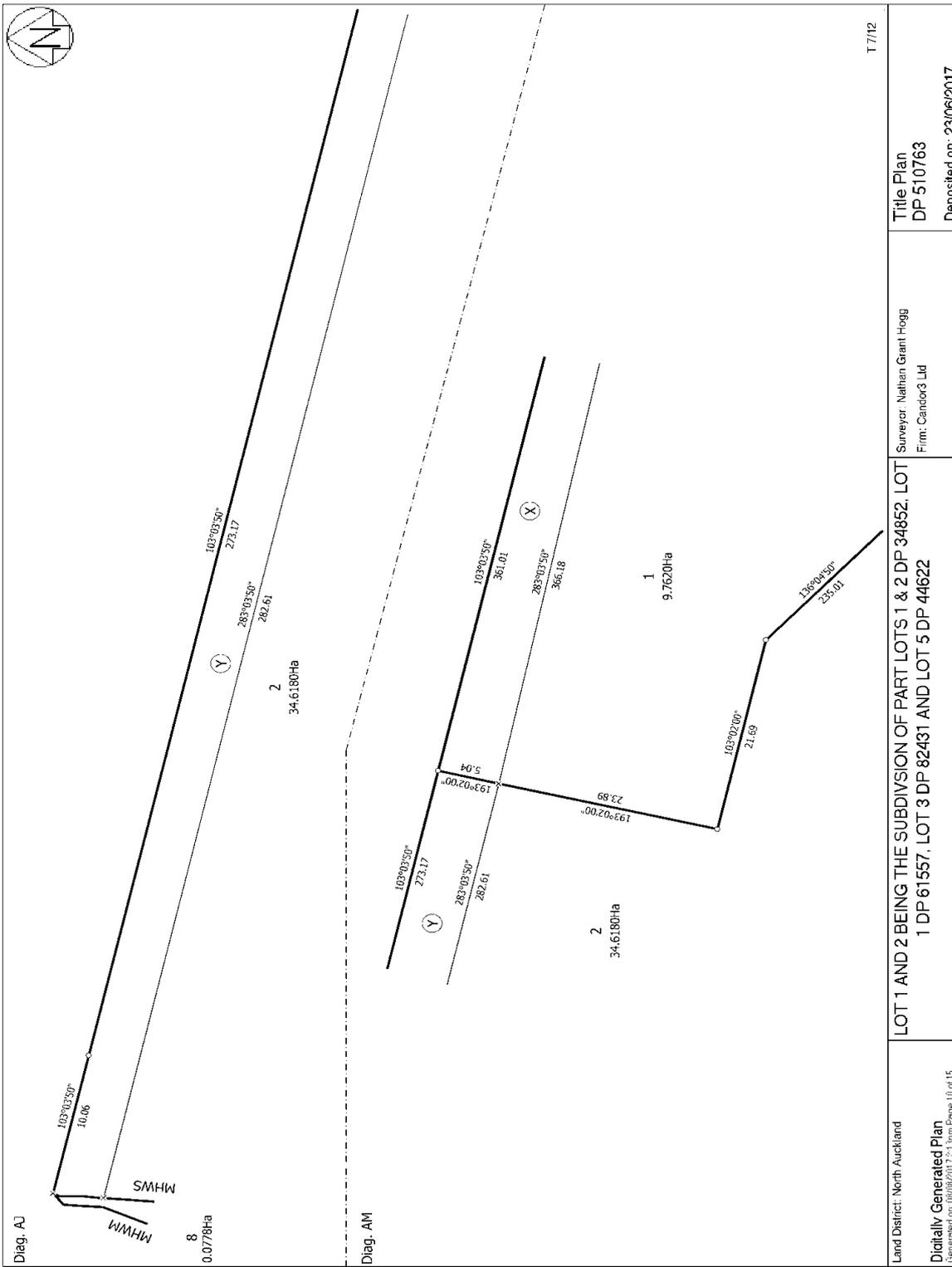
K60234 Building Line Restriction - 13.2.1957 at 2:15 pm (affects part formerly Part Lot 1 DP 34852)
8779154.2 STATUTORY LAND CHARGE PURSUANT TO SECTION 87(1) LOCAL GOVERNMENT (RATING) ACT 2002 - 31.5.2011 at 7:00 am
10829297.4 Consent Notice pursuant to Section 221 Resource Management Act 1991 - 23.6.2017 at 5:20 pm
Subject to a right to drain sewage over part marked B on DP 510763 created by Easement Instrument 10829297.6 - 23.6.2017 at 5:20 pm
The easements created by Easement Instrument 10829297.6 are subject to Section 243 (a) Resource Management Act 1991
10917234.4 Variation of the conditions of the easement created by Easement Instrument 10829297.6 - 3.10.2017 at 3:00 pm
Land Covenant in Easement Instrument 10917234.5 - 3.10.2017 at 3:00 pm
10917234.7 Encumbrance to Royal Auckland and Grange Golf Club Incorporated - 3.10.2017 at 3:00 pm
10917234.8 Encumbrance to Royal Auckland and Grange Golf Club Incorporated - 3.10.2017 at 3:00 pm
11740934.1 CAVEAT BY VECTOR LIMITED - 5.5.2020 at 9:38 am



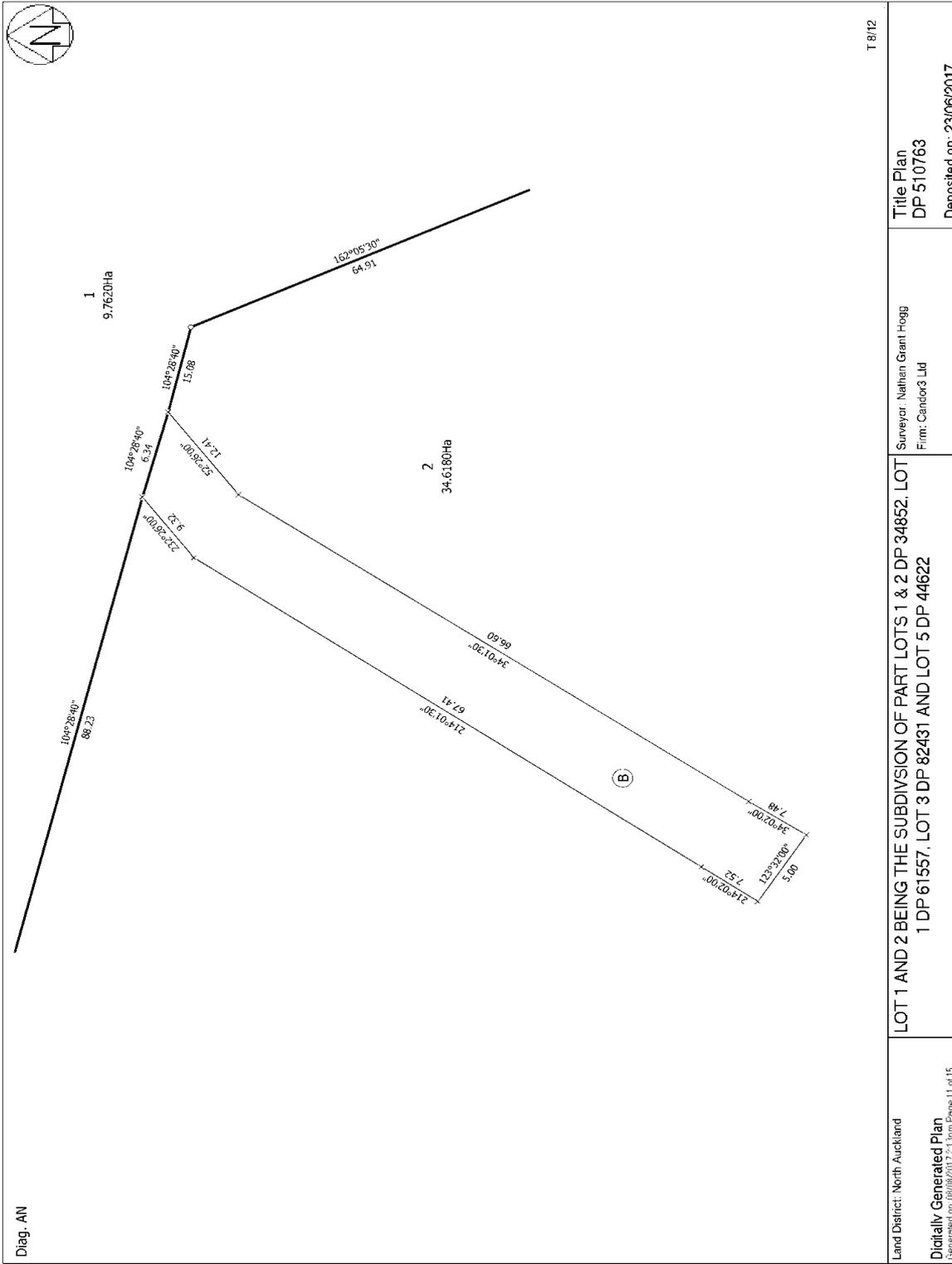


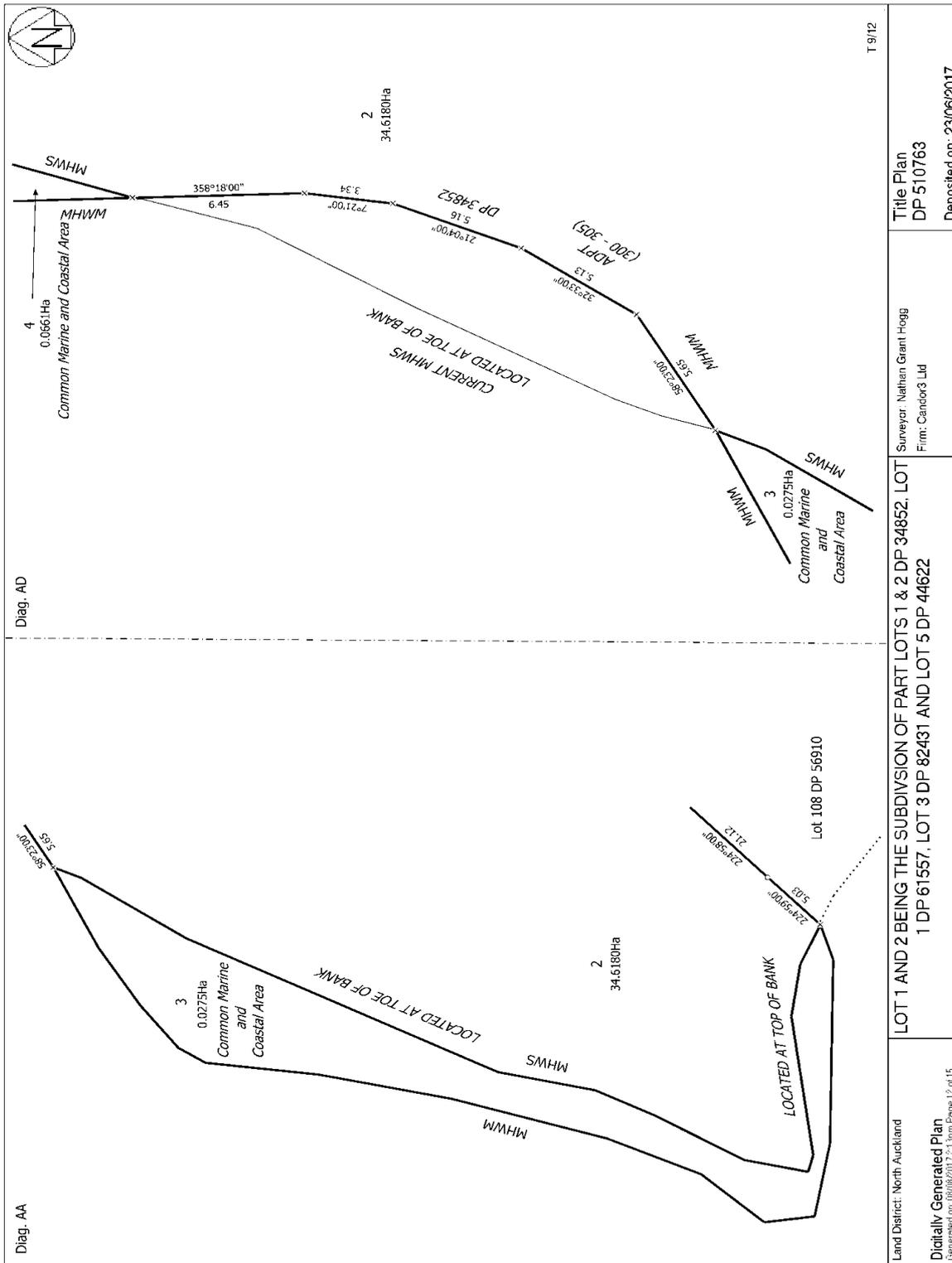
<p>Land District: North Auckland</p>	<p>Surveyor: Nathan Grant Hogg Firm: Candor3 Ltd</p>	<p>Title Plan DP 510763</p>
<p>LOT 1 AND 2 BEING THE SUBDIVISION OF PART LOTS 1 & 2 DP 34852, LOT 1 DP 61557, LOT 3 DP 82431 AND LOT 5 DP 44622</p>		
<p>Deposited on: 23/06/2017</p>		





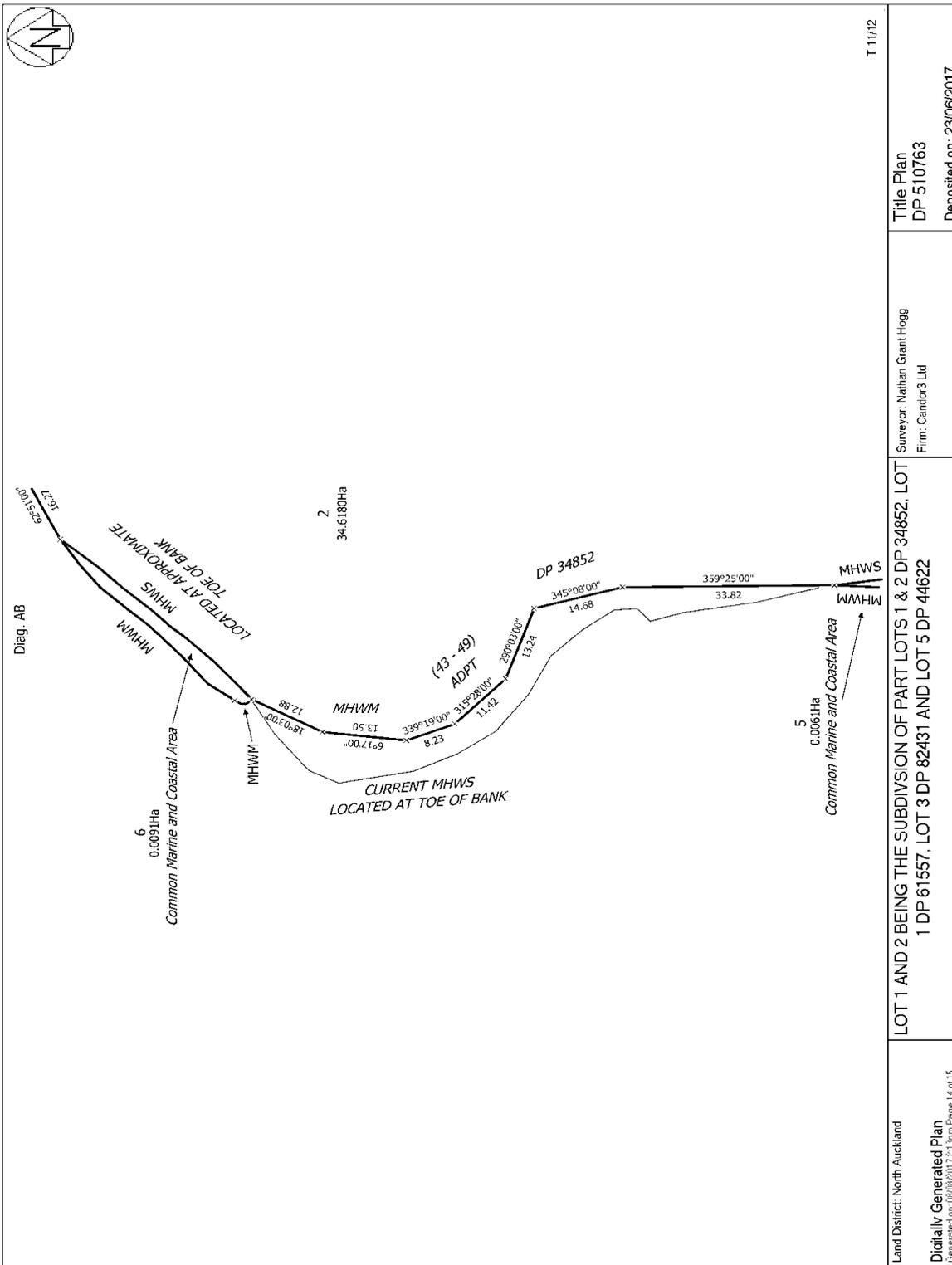
Land District: North Auckland	Surveyor: Nathan Grant Hogg Firm: Candor3 Ltd	Title Plan DP 510763
Digitally Generated Plan Generated on: 08/08/2017 11:38am Page 10 of 15	LOT 1 AND 2 BEING THE SUBDIVISION OF PART LOTS 1 & 2 DP 34852, LOT 1 DP 61557, LOT 3 DP 82431 AND LOT 5 DP 44622	
		Deposited on: 23/06/2017



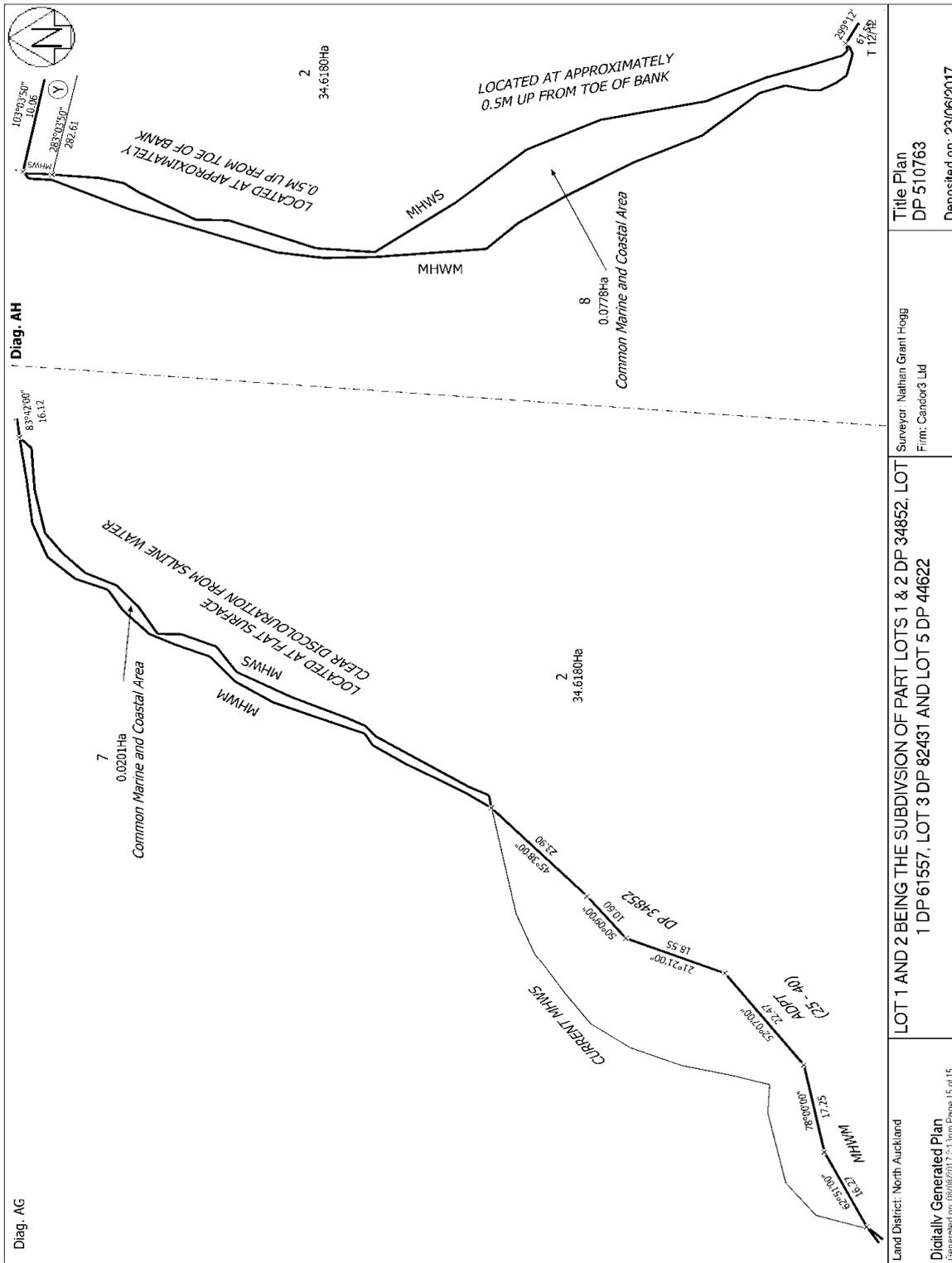


T 9/12

<p>Land District: North Auckland</p>	<p>Surveyor: Nathan Grant Hogg Firm: Candor3 Ltd</p>	<p>LOT 1 AND 2 BEING THE SUBDIVISION OF PART LOTS 1 & 2 DP 34852, LOT 1 DP 61557, LOT 3 DP 82431 AND LOT 5 DP 44622</p>
<p>Digitally Generated Plan Generated on: 08/08/2017 11:38am Page 12 of 15</p>		<p>Title Plan DP 510763 Deposited on: 23/06/2017</p>



T 11/12	Title Plan DP 510763	Surveyor: Nathan Grant Hogg Firm: Candor3 Ltd	Deposited on: 23/06/2017
Land District: North Auckland	LOT 1 AND 2 BEING THE SUBDIVISION OF PART LOTS 1 & 2 DP 34852, LOT 1 DP 61557, LOT 3 DP 82431 AND LOT 5 DP 44622		
Digitally Generated Plan Generated on: 08/08/2017 11:30am Page 14 of 15			





**RECORD OF TITLE
UNDER LAND TRANSFER ACT 2017
FREEHOLD
Search Copy**




R. W. Muir
Registrar-General
of Land

Identifier NA1081/292
Land Registration District North Auckland
Date Issued 28 August 1953

Prior References

NA928/132

Estate Fee Simple
Area 4047 square metres more or less
Legal Description Part Allotment 14 Parish of Manurewa

Registered Owners

Royal Auckland and Grange Golf Club Incorporated

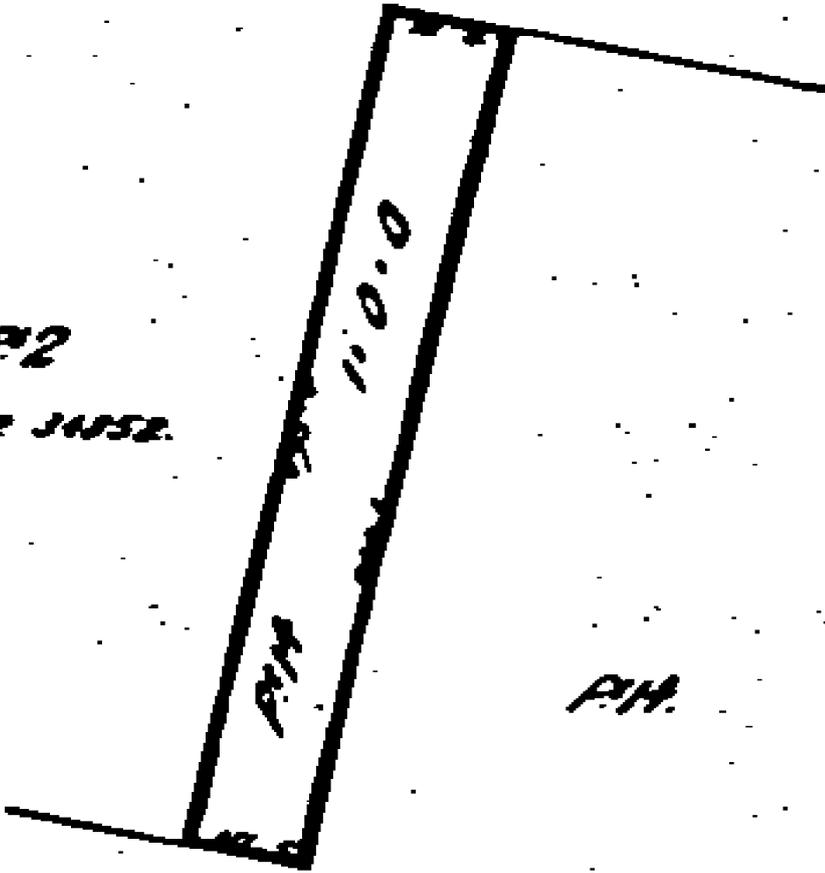
Interests

Fencing Agreement in Transfer 56051

Image Quality due to Condition of Original

P2

27 JUL 52.



P.H.



**RECORD OF TITLE
UNDER LAND TRANSFER ACT 2017
FREEHOLD
Search Copy**




R. W. Muir
Registrar-General
of Land

Identifier NA5C/256
Land Registration District North Auckland
Date Issued 17 March 1965

Prior References

NA913/113

Estate Fee Simple
Area 3035 square metres more or less
Legal Description Lot 32 Deposited Plan 36608

Registered Owners

Royal Auckland and Grange Golf Club Incorporated

Interests

Fencing Agreement in Transfer 443965

Fencing Agreement in Transfer 56051

8779154.4 STATUTORY LAND CHARGE PURSUANT TO SECTION 87(1) LOCAL GOVERNMENT (RATING)
ACT 2002 - 31.5.2011 at 7:00 am

Identifier

NA5C/256

138.87
32
581.31
0:3:00
574.73
141.34



**RECORD OF TITLE
UNDER LAND TRANSFER ACT 2017
FREEHOLD
Search Copy**



R. W. Muir
R. W. Muir
Registrar-General
of Land

Identifier **NA44B/678**
Land Registration District **North Auckland**
Date Issued 29 October 1981

Prior References

NA47A/108 NA47A/1468

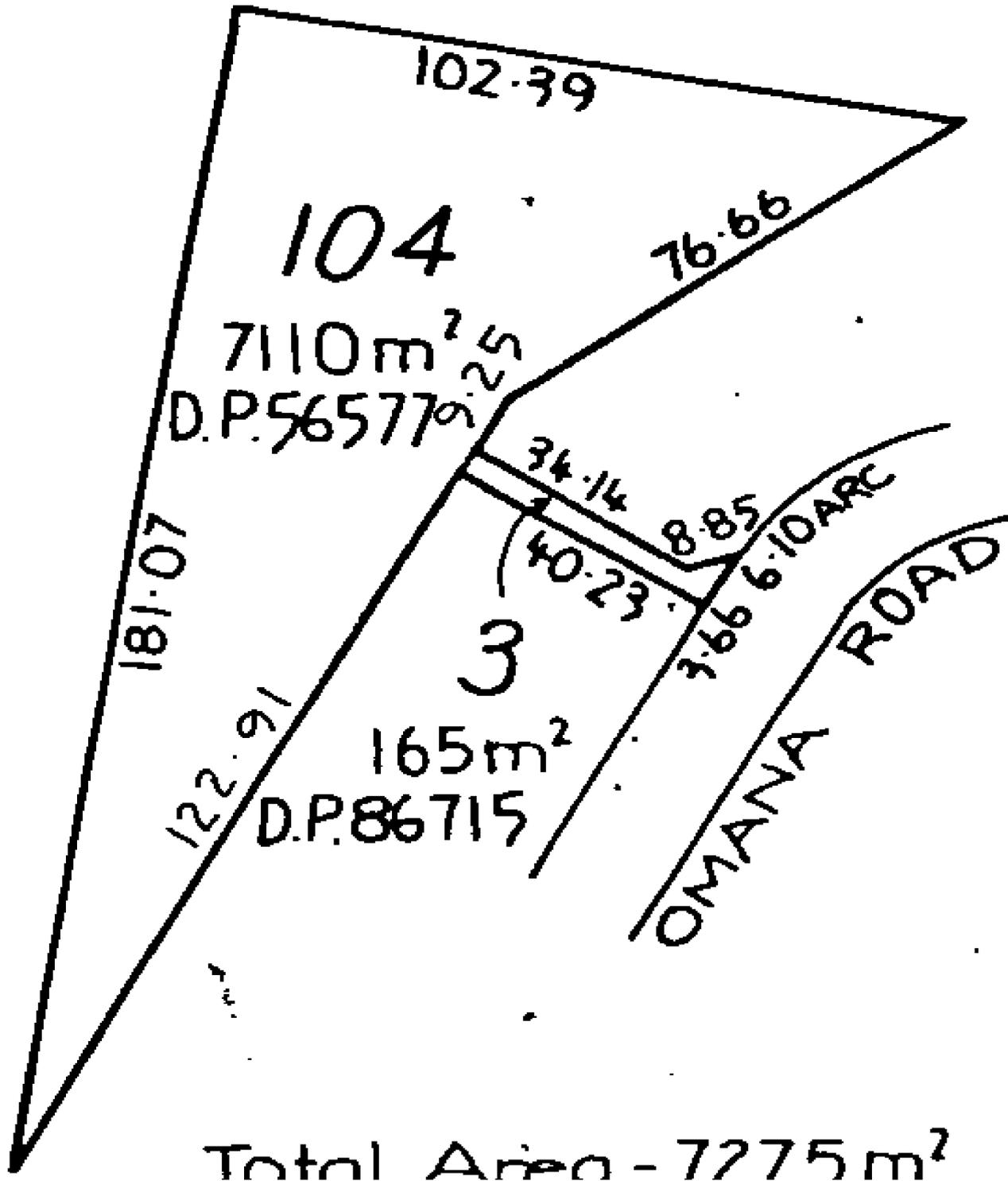
Estate Fee Simple
Area 7275 square metres more or less
Legal Description Lot 104 Deposited Plan 56577 and Lot 3
Deposited Plan 86715

Registered Owners

Royal Auckland and Grange Golf Club Incorporated

Interests

Subject to Section 351D (3) Municipal Corporations Act 1954
8779154.3 STATUTORY LAND CHARGE PURSUANT TO SECTION 87(1) LOCAL GOVERNMENT (RATING)
ACT 2002 - 31.5.2011 at 7:00 am



Auckland Unitary Plan Standards Equivalent Comparison (changes that are more liberal than the current zone are highlighted)				
Standard	Open Space - Sport and Active Recreation Zone	Residential - Single House Zone	Residential - Mixed Housing Urban Zone	Residential – Terrace Housing and Apartment Buildings Zone
H7.11.1 Building height	10m	H3.6.6 8m + 1m roof bonus ¹	H5.6.4 11m + 1m roof bonus	H6.6.5 16m
H7.11.2 Height in relation to boundary	Rule that applies in the adjoining zone	H3.6.7 2.5m + 45 degrees to residential boundary. Does not apply to open space where open space sites: (i) that are greater than 2000m ² ; (ii) where that part of the site in (i) is greater than 20 metres in width, when measured perpendicular to the shared boundary; and (iii) where an open space comprises multiple sites but has a common open space zoning, the entire zone will be treated as a single site for the purpose of applying the standards.	H5.6.5 3m + 45 degrees on side and rear boundaries Does not apply to open space where open space sites: (i) that are greater than 2000m ² ; (ii) where that part of the site in (i) is greater than 20 metres in width, when measured perpendicular to the shared boundary; and (iii) where an open space comprises multiple sites but has a common open space zoning, the entire zone will be treated as a single site for the purpose of applying the standards H5.6.6 Alternative Height in relation to boundary Any buildings or parts of buildings within 20m of the site frontage must not exceed a height of 3.6m measured vertically above ground level at side and rear boundaries. Thereafter, buildings must be set back 1m and then 0.3m for every additional metre in height (73.3 degrees) up to 6.9m and then 1m for every additional metre in height (45 degrees) Does not apply to open space where open space sites: (i) that are greater than 2000m ² ; (ii) where that part of the site in (i) is greater than 20 metres in width, when measured perpendicular to the shared boundary; and (iii) where an open space comprises multiple sites but has a common open space zoning, the entire zone will be treated as a single site for the purpose of applying the standards H5.6.7. Height in relation to boundary adjoining lower intensity zones Rule that applies in the adjoining zone	H6.6.6 3m + 45 degrees on side and rear boundaries Does not apply to open space where open space sites: (i) that are greater than 2000m ² ; (ii) where that part of the site in (i) is greater than 20 metres in width, when measured perpendicular to the shared boundary; and (iii) where an open space comprises multiple sites but has a common open space zoning, the entire zone will be treated as a single site for the purpose of applying the standards H5.6.6 Alternative Height in relation to boundary Buildings or any parts of buildings further than 20m from the site frontage must not project beyond a 60 degree recession plane measured from a point 8m vertically above ground level, and 2m perpendicular to side and rear boundaries Does not apply to open space where open space sites: (i) that are greater than 2000m ² ; (ii) where that part of the site in (i) is greater than 20 metres in width, when measured perpendicular to the shared boundary; and (iii) where an open space comprises multiple sites but has a common open space zoning, the entire zone will be treated as a single site for the purpose of applying the standards H5.6.7. Height in relation to boundary adjoining lower intensity zones Rule that applies in the adjoining zone

¹ Adjoining land is considered not affected as it has more liberal height – Special Purpose Hospital 26m; Special Purpose School either 12m or 16m depending on distance to boundary; THAB 16m. Land fronting Baldwin Street and Jane Cowie Avenue is considered not affected as:

- it is on the opposite side of the estuary;
- a 10m coastal yard applies to the estuary resulting in buildings on opposite sides of the estuary being at least 20m apart;
- removal of the trees on the subject site would also be subject to resource consent under the proposed zoning.

Auckland Unitary Plan Standards Equivalent Comparison (changes that are more liberal than the current zone are highlighted)				
Standard	Open Space - Sport and Active Recreation Zone	Residential - Single House Zone	Residential - Mixed Housing Urban Zone	Residential – Terrace Housing and Apartment Buildings Zone
H7.11.3 Yards	5m front yard and 6m side and rear yards adjoining residential zone 10m from the edge of permanent and intermittent streams; and Mean High Water Springs	H3.6.8 3m front yard 1m side and rear yard 10m from the edge of permanent and intermittent streams; and Mean High Water Springs	H5.6.8 2.5m front yard 1m side and rear yard 10m from the edge of permanent and intermittent streams; and Mean High Water Springs	H6.9.1 1.5m front yard 1m side and rear yard 10m from the edge of permanent and intermittent streams; and Mean High Water Springs
H7.11.5 Gross floor area threshold	Maximum GFA of individual buildings 150m ²	-	-	-
H7.11.6 Maximum site coverage	30%	H3.6.9 35% net site area + H3.6.11 40% landscaping of net site area	H3.6.9 45% net site area + H3.6.11 35% landscaping of net site area	H3.6.9 50% net site area + H3.6.11 30% landscaping of net site area
H7.11.7 Maximum impervious area	40%	H3.6.10 60% of site area	H3.6.10 60% of site area	H3.6.10 70% of site area
H7.11.8 Non-security floodlighting, fittings and supports and towers up to 18m high	Lighting must meet the permitted activity standards for lighting in Chapter E24 Lighting	N/A	N/A	N/A
H7.11.9. Maimai	(1) A maimai must be no more than 10m ² in area. (2) A maimai must not exceed 3m in height above mean high water springs or ground level.	N/A	N/A	N/A
E16 Trees in open space zones	Table E16.4.1 Activity table Tree trimming, works in protected rootzone and removal over thresholds are a restricted discretionary activity.	N/A	N/A	N/A
E24 Lighting Table E24.6.1.1 Lighting category classifications	Lighting category 3	Lighting category 3	Lighting category 3	Lighting category 3
E25 Noise and vibration E25.6 Standards	E25.6.17 Open Space – Sport and Active Recreation Zone interface (1) The noise (rating) level and maximum noise level arising from any recreational activity in the Open Space – Sport and Active Recreation Zone measured within the boundary of a site in a residential zone or notional boundary of a site in a rural zone must not exceed the levels in Table E25.6.17.1 Noise levels at the Open Space – Sport and Active Recreation Zone interface below:	E25.6.2 Maximum noise levels in residential zones (1) The noise (rating) levels and maximum noise level arising from any activity in the Residential – Large Lot Zone, Residential – Rural and Coastal Settlement Zone, Residential – Single House Zone, Residential – Mixed Housing Suburban Zone, Residential – Mixed Housing Urban Zone and the Residential – Terrace Housing and Apartment Buildings Zone measured within the boundary of an adjacent site in these residential zones must not exceed the levels in Table E25.6.2.1 Noise levels in residential zones below:	E25.6.2 Maximum noise levels in residential zones (1) The noise (rating) levels and maximum noise level arising from any activity in the Residential – Large Lot Zone, Residential – Rural and Coastal Settlement Zone, Residential – Single House Zone, Residential – Mixed Housing Suburban Zone, Residential – Mixed Housing Urban Zone and the Residential – Terrace Housing and Apartment Buildings Zone measured within the boundary of an adjacent site in these residential zones must not exceed the levels in Table E25.6.2.1 Noise levels in residential zones below:	E25.6.2 Maximum noise levels in residential zones (1) The noise (rating) levels and maximum noise level arising from any activity in the Residential – Large Lot Zone, Residential – Rural and Coastal Settlement Zone, Residential – Single House Zone, Residential – Mixed Housing Suburban Zone, Residential – Mixed Housing Urban Zone and the Residential – Terrace Housing and Apartment Buildings Zone measured within the boundary of an adjacent site in these residential zones must not exceed the levels in Table E25.6.2.1 Noise levels in residential zones below:

Auckland Unitary Plan Standards Equivalent Comparison (changes that are more liberal than the current zone are highlighted)

Standard	Open Space - Sport and Active Recreation Zone	Residential - Single House Zone	Residential - Mixed Housing Urban Zone	Residential – Terrace Housing and Apartment Buildings Zone																																									
	<p>Table E25.6.17.1 Noise levels at the Open Space – Sport and Active Recreation Zone interface</p> <table border="1" data-bbox="617 457 1101 787"> <thead> <tr> <th>Time</th> <th>Noise level</th> </tr> </thead> <tbody> <tr> <td>Monday to Saturday 7am-10pm</td> <td>55dB LAeq Except that for a cumulative period of: (i) 3 hours per day between 7am and 9.30pm Monday to Friday; and (ii) 6 hours between 7am and 10pm on Saturdays. the noise level must not exceed 60dB LAeq</td> </tr> <tr> <td>Sundays and Public Holidays 9am to 6pm outside the daylight saving period</td> <td>55dB LAeq Except that for a cumulative period of 3 hours between 10am and 3pm on Sundays the noise level must not exceed 60dB LAeq</td> </tr> <tr> <td>Sundays and Public Holidays 8am to 7pm during the daylight saving period</td> <td>55dB LAeq Except that for a cumulative period of 3 hours between 10am and 3pm Sundays the noise level must not exceed 60dB LAeq</td> </tr> <tr> <td>All other times</td> <td>40dB LAeq 55dB LAeq at 63 Hz 50dB LAeq at 125 Hz 75dB LAFmax</td> </tr> </tbody> </table> <p>Note 1 Compliance with the lower noise limit of 40dB LAeq applying at all other times in Table E25.6.17.1 Noise levels at the Open Space – Sport and Active Recreation Zone interface may preclude intense, noisy activities or activities involving teams or groups from being undertaken where the receivers of noise are close to boundaries.</p> <p>(2) The noise (rating) level and maximum noise level from the use of any voice or music amplification system associated with recreational activity in the Open Space – Sport and Active Recreation Zone measured within the boundary of a site in a residential zone or notional boundary of a site in a rural zone must not exceed the levels in Table E25.6.17.2 Noise levels from any voice or music amplification system associated with recreational activity on land zoned Open Space – Sport and Active Recreation Zone below:</p> <p>Table E25.6.17.2 Noise levels from any voice or music amplification system associated with recreational activity on land zoned Open Space – Sport and Active Recreation Zone</p> <table border="1" data-bbox="617 1570 1139 1749"> <thead> <tr> <th>Time</th> <th>Noise level</th> </tr> </thead> <tbody> <tr> <td>Monday to Saturday 7am-10pm</td> <td rowspan="2">50dB LAeq(5min)</td> </tr> <tr> <td>Sunday and Public Holidays 9am-6pm</td> </tr> <tr> <td>All other times</td> <td>40dB LAeq(5min) 55dB LAeq(5min) at 63 Hz 50dB LAeq(5min) at 125 Hz 75dB LAFmax</td> </tr> </tbody> </table> <p>(a) No five minute measurement may exceed the stated limit.</p>	Time	Noise level	Monday to Saturday 7am-10pm	55dB LAeq Except that for a cumulative period of: (i) 3 hours per day between 7am and 9.30pm Monday to Friday; and (ii) 6 hours between 7am and 10pm on Saturdays. the noise level must not exceed 60dB LAeq	Sundays and Public Holidays 9am to 6pm outside the daylight saving period	55dB LAeq Except that for a cumulative period of 3 hours between 10am and 3pm on Sundays the noise level must not exceed 60dB LAeq	Sundays and Public Holidays 8am to 7pm during the daylight saving period	55dB LAeq Except that for a cumulative period of 3 hours between 10am and 3pm Sundays the noise level must not exceed 60dB LAeq	All other times	40dB LAeq 55dB LAeq at 63 Hz 50dB LAeq at 125 Hz 75dB LAFmax	Time	Noise level	Monday to Saturday 7am-10pm	50dB LAeq(5min)	Sunday and Public Holidays 9am-6pm	All other times	40dB LAeq(5min) 55dB LAeq(5min) at 63 Hz 50dB LAeq(5min) at 125 Hz 75dB LAFmax	<p>Table E25.6.2.1 Noise levels in residential zones</p> <table border="1" data-bbox="1181 415 1644 506"> <thead> <tr> <th>Time</th> <th>Noise level</th> </tr> </thead> <tbody> <tr> <td>Monday to Saturday 7am-10pm</td> <td>50dB LAeq</td> </tr> <tr> <td>Sunday 9am-6pm</td> <td>40dB LAeq</td> </tr> <tr> <td>All other times</td> <td>75dB LAFmax</td> </tr> </tbody> </table> <p>(2) The levels for the daytime hours in Table E25.6.2.1 Noise levels in residential zones may be exceeded by intermittent noise for reasonable periods where that noise is associated with normal household activities, such as lawn mowing or home handyman work.</p>	Time	Noise level	Monday to Saturday 7am-10pm	50dB LAeq	Sunday 9am-6pm	40dB LAeq	All other times	75dB LAFmax	<p>Table E25.6.2.1 Noise levels in residential zones</p> <table border="1" data-bbox="1724 415 2187 506"> <thead> <tr> <th>Time</th> <th>Noise level</th> </tr> </thead> <tbody> <tr> <td>Monday to Saturday 7am-10pm</td> <td>50dB LAeq</td> </tr> <tr> <td>Sunday 9am-6pm</td> <td>40dB LAeq</td> </tr> <tr> <td>All other times</td> <td>75dB LAFmax</td> </tr> </tbody> </table> <p>(2) The levels for the daytime hours in Table E25.6.2.1 Noise levels in residential zones may be exceeded by intermittent noise for reasonable periods where that noise is associated with normal household activities, such as lawn mowing or home handyman work.</p>	Time	Noise level	Monday to Saturday 7am-10pm	50dB LAeq	Sunday 9am-6pm	40dB LAeq	All other times	75dB LAFmax	<p>Table E25.6.2.1 Noise levels in residential zones</p> <table border="1" data-bbox="2267 415 2730 506"> <thead> <tr> <th>Time</th> <th>Noise level</th> </tr> </thead> <tbody> <tr> <td>Monday to Saturday 7am-10pm</td> <td>50dB LAeq</td> </tr> <tr> <td>Sunday 9am-6pm</td> <td>40dB LAeq</td> </tr> <tr> <td>All other times</td> <td>75dB LAFmax</td> </tr> </tbody> </table> <p>(2) The levels for the daytime hours in Table E25.6.2.1 Noise levels in residential zones may be exceeded by intermittent noise for reasonable periods where that noise is associated with normal household activities, such as lawn mowing or home handyman work.</p>	Time	Noise level	Monday to Saturday 7am-10pm	50dB LAeq	Sunday 9am-6pm	40dB LAeq	All other times	75dB LAFmax
Time	Noise level																																												
Monday to Saturday 7am-10pm	55dB LAeq Except that for a cumulative period of: (i) 3 hours per day between 7am and 9.30pm Monday to Friday; and (ii) 6 hours between 7am and 10pm on Saturdays. the noise level must not exceed 60dB LAeq																																												
Sundays and Public Holidays 9am to 6pm outside the daylight saving period	55dB LAeq Except that for a cumulative period of 3 hours between 10am and 3pm on Sundays the noise level must not exceed 60dB LAeq																																												
Sundays and Public Holidays 8am to 7pm during the daylight saving period	55dB LAeq Except that for a cumulative period of 3 hours between 10am and 3pm Sundays the noise level must not exceed 60dB LAeq																																												
All other times	40dB LAeq 55dB LAeq at 63 Hz 50dB LAeq at 125 Hz 75dB LAFmax																																												
Time	Noise level																																												
Monday to Saturday 7am-10pm	50dB LAeq(5min)																																												
Sunday and Public Holidays 9am-6pm																																													
All other times	40dB LAeq(5min) 55dB LAeq(5min) at 63 Hz 50dB LAeq(5min) at 125 Hz 75dB LAFmax																																												
Time	Noise level																																												
Monday to Saturday 7am-10pm	50dB LAeq																																												
Sunday 9am-6pm	40dB LAeq																																												
All other times	75dB LAFmax																																												
Time	Noise level																																												
Monday to Saturday 7am-10pm	50dB LAeq																																												
Sunday 9am-6pm	40dB LAeq																																												
All other times	75dB LAFmax																																												
Time	Noise level																																												
Monday to Saturday 7am-10pm	50dB LAeq																																												
Sunday 9am-6pm	40dB LAeq																																												
All other times	75dB LAFmax																																												

29 June 2020

Tania Richmond
Richmond Planning

P. 09 308 9015
E. info@stylesgroup.co.nz
W. www.stylesgroup.co.nz
Saatchi & Saatchi Building,
L2, 125 The Strand, Parnell
PO Box 37857, Parnell,
Auckland 1151

By email: Tania@richmondplanning.co.nz

Dear Tania,

Assessment of noise effects: Royal Auckland and Grange Golf Club (RAGGC) private plan change request

The Royal Auckland and Grange Golf Club (**RAGGC**) have engaged Styles Group to assess the noise effects arising from their private plan change request (**the PPC**) to Auckland Council.

The PPC proposes to re-zone approximately 80.94 Ha of land from Residential to the Open Space – Sport and Active Recreation Zone (**OS-SAR**). If the PPC is confirmed, noise generated from within the Site and received at the adjacent Residential zones will be controlled by E25.6.17 *Open Space – Sport and Active Recreation Zone interface*.

This advice identifies the existing noise environment, and provides an assessment of the noise effects arising from the PPC, taking into account maximum permitted noise levels that will be authorised by the OS-SAR zone noise performance standards of the Auckland Unitary Plan (**AUP**).

1.0 The PPC Site

The Site is occupied by the RAGGC and has been used for a golf facility for over 80 years. The PPC does not specifically seek to authorise a change in use, and the Site is intended to be retained as a golfing facility for the current and foreseeable future. The PPC Site and operation of the facility is described in detail in the PPC Request document prepared by Richmond Planning.

Figure 1 displays the PPC Site, and Figure 2 identifies the zoning of the Site and surrounding environment.

The Site is currently zoned Residential – Single House, Residential- Terrace Housing and Apartment Building and Residential- Mixed Housing Urban. The Tamaki Estuary bisects the property.

The land surrounding the Site is generally zoned Residential, with the exception of the land to the north-west of the Site, which adjoins Special Purpose Zones, occupied by King’s College and Middlemore Hospital.



Figure 1 The PPC Site (outlined in yellow)

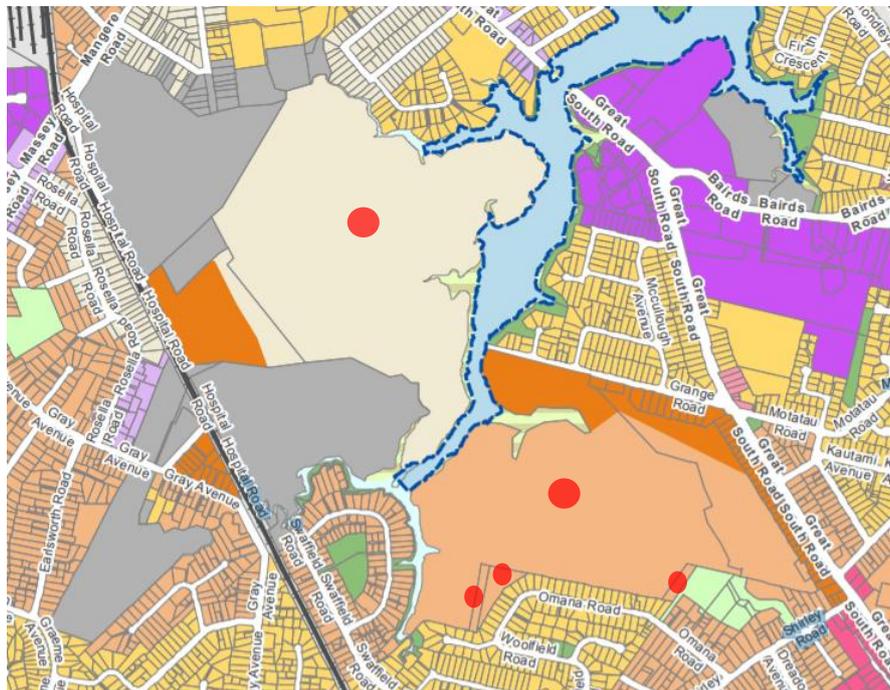


Figure 2 Zoning of PPC Site (individual parcels identified by red point) and surrounding area

<ul style="list-style-type: none"> Residential - Single House Zone Residential - Mixed Housing Suburban Zone Residential - Mixed Housing Urban Zone Residential - Terrace Housing and Apartment Buildings Zone 	<ul style="list-style-type: none"> Special Purpose Zone - Airports & Airfields Cemetery Quarry Healthcare Facility & Hospital Tertiary Education Māori Purpose Major Recreation Facility School
--	---

2.0 Existing noise environment and AUP noise performance standards

The PPC seeks to apply the OS-SAR zone across the Site as this zoning reflects the current and foreseeable use of the land as a golfing facility.

The PPC does not specifically seek to authorise a new or more intensive use of the Site that would be likely to change the existing noise environment, however the re-zoning from Residential to OS-SAR will introduce new noise performance standards that apply between the Site and adjacent land.

In order to assess the potential effects arising from the PPC, we have compared the existing noise performance standards that apply between the Site and surrounding sites, to the noise performance standards that will apply to the Site if the PPC is confirmed.

2.1 Noise received between Residential zones

Under Chapter E25 of the Auckland Unitary Plan, noise generated from the Site and received at the adjacent Residential zones is regulated by E25.6.2 *Maximum noise levels in Residential Zones*. This rule is reproduced below:

E25.6.2. Maximum noise levels in residential zones

- (1) The noise (rating) levels and maximum noise level arising from any activity in the Residential – Large Lot Zone, Residential – Rural and Coastal Settlement Zone, Residential – Single House Zone, Residential – Mixed Housing Suburban Zone, Residential – Mixed Housing Urban Zone and the Residential – Terrace Housing and Apartment Buildings Zone measured within the boundary of an adjacent site in these residential zones must not exceed the levels in Table E25.6.2.1 Noise levels in residential zones below:

Table E25.6.2.1 Noise levels in residential zones

Time	Noise level
Monday to Saturday 7am – 10pm	50 dB L _{Aeq}
Sunday 9am- 6pm	
All other times	40 dB L _{Aeq} 75 dB L _{AFmax}

These noise limits seek to ensure the amenity values of residential zones are protected from unreasonable noise, particularly in the night time period¹.

2.2 Noise received in the Special Purpose Zones

Noise generated from the Site (under its residential zoning) and received in the Special Purpose – Healthcare Facility and Hospital Zone (Middlemore Hospital) is controlled by E25.6.13 *Noise levels in the Special Purpose – Healthcare Facility and Hospital Zone*. This standard requires that noise from the Site does not exceed the levels in Table E25.6.13.1, reproduced below:

¹ See Objective E25.2(2) of the AUP

Table E25.6.13.1 Noise levels in the Special Purpose – Healthcare Facility and Hospital Zone

Time	Noise level
Monday to Saturday 7am – 10pm	55 dB L _{Aeq}
Sunday 9am- 6pm	
All other times	45dB L _{Aeq} 75 dB L _{AFmax}

Chapter E25 does not prescribe a specific noise standard to control the noise levels received in the Special Purpose- School Zone (King’s College), although it does prescribe noise standards for schools *not located* in the Special Purpose School Zone.

In the absence of a specific noise performance standard, the “catch-all” noise interface standard, E25.6.22 *All other interfaces*² would usually control the noise levels generated from the Site and received within the Special Purpose- School Zone. However, Chapter E25 does not prescribe a noise level for noise generated and received within the Special Purpose- School Zone. As such, there is currently no noise limit between the Site (in the Residential Zone) and the Special Purpose- School Zone.

3.0 OS-SAR Zone interface noise standards

3.1 Noise levels at the Residential interface

If the PPC is confirmed, noise generated from within the Site and received at the adjacent Residential zones will be controlled by E25.6.17 *Open Space – Sport and Active Recreation Zone interface*. The standards applying to recreational play and associated amplification systems within the OS-SAR are reproduced below:

- (1) The noise (rating) level and maximum noise level arising from any recreational activity in the Open Space – Sport and Active Recreation Zone measured within the boundary of a site in a residential zone or notional boundary of a site in a rural zone must not exceed the levels in Table E25.6.17.1 Noise levels at the Open Space – Sport and Active Recreation Zone interface below: Table E25.6.17.1 Noise levels at the Open Space – Sport and Active Recreation Zone interface below:

² This standard requires that where noise generated by any activity on a site in one zone is received by any activity on a site in a different zone, the activity generating the noise must comply with the noise limits and standards of the zone at the receiving site.

Table E25.6.17.1 Noise levels at the Open Space – Sport and Active Recreation Zone interface

Time	Noise level
Monday to Saturday 7am – 10pm	55 dB L_{Aeq} Except that for a cumulative period of: (i) 3 hours per day between 7am and 9.30pm Monday to Friday; and (ii) 6 hours between 7am and 10pm on Saturdays. the noise level must not exceed 60dB L_{Aeq}
Sundays and Public Holidays 9am- 6pm outside the daylight saving period	55dB L_{Aeq} Except that for a cumulative period of 3 hours between 10am and 3pm Sundays the noise level must not exceed 60dB L_{Aeq}
Sundays and Public Holidays 8am- 7pm during the daylight saving period	55dB L_{Aeq} Except that for a cumulative period of 3 hours between 10am and 3pm Sundays the noise level must not exceed 60dB L_{Aeq}
All other times	40dB L_{Aeq} 55dB L_{eq} at 63 Hz 50dB L_{eq} at 125 Hz 75dB L_{AFmax}

Note 1 Compliance with the lower noise limit of 40dB L_{Aeq} applying at all other times in Table E25.6.17.1 Noise levels at the Open Space – Sport and Active Recreation Zone interface may preclude intense, noisy activities or activities involving teams or groups from being undertaken where the receivers of noise are close to boundaries.

- (2) The noise (rating) level and maximum noise level from the use of any voice or music amplification system associated with recreational activity in the Open Space – Sport and Active Recreation Zone measured within the boundary of a site in a residential zone or notional boundary of a site in a rural zone must not exceed the levels in Table E25.6.17.2 Noise levels from any voice or music amplification system associated with recreational activity on land zoned Open Space – Sport and Active Recreation Zone below:

Table E25.6.17.2 Noise levels from any voice or music amplification system associated with recreational activity on land zoned Open Space – Sport and Active Recreation Zone

Time	Noise level
Monday to Saturday 7am – 10pm	50 dB $L_{Aeq(5min)}$
Sundays and Public Holidays 9am- 6pm	
All other times	40B $L_{Aeq(5min)}$ 55dB $L_{eq(5min)}$ at 63 Hz 50dB $L_{eq(5min)}$ at 125 Hz 75dB L_{AFmax}

- (a) No five minute measurement may exceed the stated limit.

These noise limits recognise that recreational activities occurring in the OS-SAR may at times, generate relatively high levels of noise. The noise limits have been set to allow this based on the fact that the land is set aside for indoor and outdoor sport and active recreation opportunities and that such land and facilities are in high demand in the Auckland region.

However, the noise limits applying at night time are numerically the same as those applying currently (40dB L_{Aeq} and 75dB L_{AFmax}). The OS-SAR noise controls add the requirement to comply with specific low frequency noise limits which make them even more restrictive than the standard residential zone noise limits.

3.2 Noise levels at the Special Purpose Zones

There is no specific noise performance standard for OS-SAR noise that is received in Special Purpose Zones. In the absence of a specific noise performance standard, the “catch-all” interface Standard E25.6.22 requires that the activity generating the noise must comply with the noise limits and standards of the zone at the receiving site.

This means that noise generated from the Site and received in the *Special Purpose – Healthcare Facility and Hospital Zone* will continue to be controlled by E25.6.13 *Noise levels in the Special Purpose – Healthcare Facility and Hospital Zone*.

As per the status quo, there is no noise performance standard applying to noise generated in the OS-SAR and received in the Special Purpose- School Zone (Kings College).

3.3 Summary of change in maximum permitted zone noise levels

The PPC does not specifically seek to authorise a change in use, and the Site is intended to be retained as a golfing facility for the current and foreseeable future. Notwithstanding, if the PPC is confirmed, the OS-SAR zoning will authorise an increase in the maximum permitted noise levels that could be generated from within the Site and received at the adjacent Residential Zones during the day only. There will be no change to the maximum permitted noise levels applying at night, other than the introduction of low frequency noise limits which provides for a more restrictive regime. The PPC will not authorise any change to the maximum permitted noise levels that may be generated between the Site and the adjacent Special Purpose Zones.

The table below compares the maximum permitted noise levels authorised under Chapter E25 at the adjacent Residential zones, under the current (Residential) and proposed (OS-SAR) zoning.

Noise levels generated from the Site and received at the Residential Zones under existing and proposed zoning

Time	Residential-Residential (current)	OS-SAR – Residential (proposed)	Net change in noise level
		55 dB L _{Aeq}	
Monday to Saturday 7am- 10pm	50dB L _{Aeq}	<p>Except that for a cumulative period of:</p> <p>(i) 3 hours per day between 7am and 9.30pm Monday to Friday; and</p> <p>(ii) 6 hours between 7am and 10pm on Saturdays. the noise level must not exceed 60dB L_{Aeq}</p>	<p>Increase by 5dB.</p> <p>Up to 10dB per day for 3 hours (weekdays) and 6 hours (Saturday).</p>
Sundays 9am- 6pm (outside the daylight saving period) 8am- 7pm during the daylight saving period	50dB L _{Aeq}	<p>55dB L_{Aeq}</p> <p>Except that for a cumulative period of 3 hours between 10am and 3pm Sundays the noise level must not exceed 60dB L_{Aeq}</p>	<p>Increase by 5dB, with up to a 10dB increase for 3 hours on a Sunday.</p>
All other times	40 dB L _{Aeq} 75 dB L _{AFmax}	<p>40dB L_{Aeq}</p> <p>55dB L_{eq} at 63 Hz</p> <p>50dB L_{eq} at 125 Hz</p> <p>75dB L_{AFmax}</p>	<p>No change to the A-weighted L_{Aeq} and L_{AFmax} limits, but introduction of new low frequency limits provides good control of noise in the night time period.</p>

3.4 Permitted noise sources and activity table comparison

The AUP activity tables for the Residential Zones and the OS-SAR Zone identify the status of land use activities that are anticipated and provided for as a permitted activity in the zones. If the site is included in the OS-SAR Zone, the permitted activities identified in Activity Table H7.9.1 will be permitted on the Site. These include:

- Residential** (A3) A single workers' accommodation
- Community** (A8) Education and research facilities directly related to the open space
- (A10) Clubrooms

	(A13) Informal recreation
	(A14) Information facilities accessory to a permitted activity
	(A15) Organised sport and recreation
	(A16) Public amenities
	(A17) Recreation facilities
	(A18) Gardens, including botanic and community gardens
	(A19) Coastal navigational aids
Commerce	(A21) Restaurants and cafes, excluding a drive-through facility, that are accessory to a permitted activity and are located further than 50m from a residential zone
	(A23) Retail accessory to a permitted activity
Industry	(A25) Parks depot, storage and maintenance
Mana Whenua	(A29) Customary use

In accordance with H7.6 *Open Space – Sport and Active Recreation Zone*, the permitted activities listed above seek to enable OS-SAR land to be used for indoor and outdoor organised sports, activity recreation and community facilities. The activity table also anticipates and provides for commercial activities ancillary to sport and active recreation facilities (such as providing food and beverage to support recreational use).

The activity table for the OS-SAR provides for a range of activities; however it is important to note that the maximum permitted noise levels authorised under E25.6.17 *Open Space- Sport and Active Recreation Zone* only apply to noise arising from a recreational activity. The nesting tables provided in Table J1.3.2 of the AUP identify that informal recreation and organised recreation are ‘Community’ activities. Therefore, if an activity was proposed on the Site that was not a recreational activity (under the range of Community uses listed above), the noise levels from the activity would be subject to E25.6.22 *All other zone interfaces*. This rule will require any non- recreational activity to comply with the noise limits applying at the receiving zone. This means that any non-recreational activity proposed on the Site would need to achieve compliance with the maximum permitted noise levels that are prescribed for the Residential Zone.

Under the current Residential Zoning, the 80.94 Ha Site can be used and developed in accordance with the permitted activities prescribed for the Residential zones which apply across the Site. These include the establishment of residential units (in accordance with the prescribed density levels), boarding houses, visitor accommodation and care centres for up to 10 people and home occupations.

The existing noise amenity enjoyed by the receivers surrounding the Site arises from the undeveloped nature of the Site, and its historical use for a low intensity recreational activity. This use is anticipated to prevail under the OS-SAR zoning. For the purpose of comparing the existing and proposed noise environment (under the AUP maximum permitted noise levels), it is important to recognise that if the current Residential zoning was retained, and the Site

developed for residential activity, the ambient noise levels would likely be significantly greater. Therefore, to understand the permitted noise environment, the noise effects arising from the OS-SAR zoning must be compared to the actual and potential noise effects that could arise from the use and development of the Site in accordance with the current Residential Zoning.

4.0 Assessment of effects

We have assessed the effects of the PPC with reference to the permitted noise levels that will be authorised under E25.6.17 *Open Space – Sport and Active Recreation Zone interface* at the adjacent Residential zones. The PPC will not authorise any change to the noise levels that are currently authorised at the adjacent Special Purpose zones.

The fundamental changes to noise effects that the PPC would authorise can be summarised as:

- 1) No change to the noise levels and effects received at any receiving site if the use remains as it currently (low intensity golfing);
- 2) If the use of the site was to change to allow for a more intense level of recreational activity, such as organised football, rugby or netball in close proximity to residential boundaries, the noise level from that activity (predominantly voices) could be up to 5dB higher (55dB L_{Aeq}) than the current noise limits, and 10dB higher (60dB L_{Aeq}) for up to 2 hours per week.

Whilst the PPC would authorise higher noise limits for recreational activities, it is important to recognise that the noise ‘effects’ arising from the PPC may be quite different.

The current Residential Zone noise limits do not apply to “*intermittent noise for reasonable periods where that noise is associated with normal household activities, such as lawn mowing or home handyman work*” provided it occurs during the day time period. It is not possible to calculate the noise levels that would arise from residential activity within certainty of the pattern of development, road network and vehicle movements. However, with the vehicle movements that would be associated with high density residential and the typical nature of residential activity including those activities exempted from the noise limits, it is likely that the current zoning would provide for a significant change in the noise environment over what is currently being experienced by the closest residential neighbours.

The difference in noise effects between a relatively high density residential environment and organised / formal recreation with higher noise limits during the day only would be considerable in terms of nature and character, owing to simply to the different noise sources involved. If the current residential zoning is maintained, the noise environment would be controlled by the noise of traffic movements, general residential activity, property maintenance, children playing etc. The PPC allows for reasonably intense formal / organised recreation activity which would be dominated by the voices of those involved.

In terms of noise levels, the PPC would authorise the noise level from organised / formal recreation activities to reach up to 55dB L_{Aeq} during the day, and up to 60dB L_{Aeq} for up to 21 daytime hours per week. The noise from general residential activity is likely to be less than this level of noise on any typical day.

5.0 Conclusion

Styles Group have assessed the noise levels arising from the PPC request to re-zone 80.94Ha of golf course land from Residential to a zoning of OS-SAR.

The PPC request seeks to apply a zoning which best reflects the current and foreseeable use of the Site as a golfing facility. The PPC does not seek to authorise a change in use, and the Site is intended to be retained as a golfing facility for the current and foreseeable future. Even if the zoning arrangement is changed by confirming the PPC, if the use of the site remains in the current use there will be no change in noise levels for the receiving environment.

Whilst the PPC would authorise higher noise limits for recreational activities, it is important to recognise that the noise 'effects' arising from the PPC may be quite different. The difference in noise effects between a relatively high density residential environment and organised / formal recreation with higher noise limits during the day only would be appreciable in terms of nature and character, owing to simply to the different noise sources involved. If the current residential zoning is maintained, the noise environment would be controlled by the noise of traffic movements, general residential activity, property maintenance, children playing etc. The PPC allows for reasonably intense formal / organised recreation activity which would be dominated by the voices of those involved.

The PPC would allow for higher noise levels from formal / organised recreational sport during the day. The daytime noise limit currently applying is 50dB L_{Aeq} . The PPC would authorise noise levels up to 5dB higher during the day (55dB L_{Aeq}) and up to 10dB higher (60dB L_{Aeq}) for up to 21 hours per week during the day. An increase of 5dB would be perceived subjectively as a clear and distinct increase, and an increase of 10dB would be perceived subjectively as 'double' the loudness of sound.

The night-time A-weighted noise limits (40dB L_{Aeq} and 75dB L_{AFmax}) do not change, although the PPC would introduce specific low frequency noise limits applying at night which provides a more restrictive regime than the current zoning.

The noise limit arrangements from the site to other zones (the Special Purpose – Healthcare Facility and Hospital Zone and Special Purpose- School Zone) do not change as a result of the PPC.

Please contact me if you require any further information.

Yours sincerely,



Jon Styles, MASNZ
Director and Principal

Private plan change Royal Auckland and Grange Golf Club

Consultation record August 2020

Name	Date of initial consultation	Response received	Action in relation to response
Mana whenua (17 from Council's contact list)	13 March 2020 email	Ngati Tamaoho email received 13 March 2020 Support re-zoning	No action required
		Te Ahiwaru Waiohau email received 18 March 2020. Identify quality benefits from the plan change and do not oppose.	No action required
Transpower	13 March 2020 email	Telephone discussion 25 March 2020 and email dated 6 April 2020. Transpower advised they are unlikely to have any concerns but consider are an affected party to the plan change and would appreciate an opportunity to comment on the draft before lodgement.	Draft of the plan change and supporting documents provided on 20 July 2020. Transpower confirm the National Grid transmission line (the Mangere-Otahuhu A 110kV line) crosses through the plan change area. They appreciate the opportunity to provide formal pre-notification input to the plan change. Based on the draft plan change documentation provided which confirms that there are no proposed changes to the National Grid Corridor overlay, Transpower does not have any concerns. However, as an affected party Transpower requests notification of the proposed plan change.

Appendix 4 – Consultation record

Name	Date of initial consultation	Response received	Action in relation to response
Kāinga ora	13 March 2020 email	Email of acknowledgement 16 March 2020. Advised would respond after seeking advice from wider team. Asked for any information on why northern side of the golf course is Residential – Single House Zone.	No action required Response provided.
Counties Health Board - Middlemore Hospital	13 March 2020 Posted letter	Email received from Meena Chandra 3 April 2020. Requested a draft of the plan change documents to understand implications.	Responded 3 April 2020 advising further contact will be made once draft documents are complete. Draft of the plan change and supporting documents provided on 20 July 2020. No further response received.
King's College	13 March 2020 Posted letter	Letter of support received 1 April 2020.	No action required
All adjoining and adjacent residents	10 May 2020 letter drop and mail for vacant land	Three residents telephoned seeking an explanation on what the plan change meant. Rob Selley Chief Executive RAGGC responded by explaining the purpose of the plan change. Mr Selley advised that with this explanation they were supportive of the plan change.	No action required

Record completed by Tania Richmond, 3 August 2020

APPENDIX 3
SPECIALIST REPORTS

From: [Andrew Gordon](#)
To: [Roger Eccles](#)
Subject: RE: Royal Auckland and Grange Golf Club PPC - Review of Noise effects
Date: Monday, 24 August 2020 5:46:00 PM

Hi Roger,

As requested I have reviewed: -

- Request for private plan change, Royal Auckland and Grange Golf Club, Rezoning land from residential to open space, Section 32 Evaluation Report and Planning Assessment, dated August 2020 prepared by Richmond Planning Limited
- Assessment of noise effects: Royal Auckland and Grange Golf Club (RAGGC) private plan change request dated 29 June 2020 prepared by Styles Group

The effects of changing the zoning from Residential to Open Space – Sport and Active Recreation have been adequately covered in an application of this scale and significance. In my view there are no issues as the fundamental facts are adequately presented and the information provided by the applicant contains sufficient detail.

Overall, the level of information provided for the proposed change in applicable numerical noise standards from the existing Residential zone (E25.6.2) to the proposed Open Space – Sport and Active Recreation zone (E25.6.17) is satisfactory.

I confirm no additional information is requested.

Regards

Andrew Gordon | Specialist
Contamination, Air & Noise Team | Specialist Unit
Ph 09 301 01 01 | Mobile 027 482 3527
Auckland Council, Level 2, 35 Graham Street, Private Bag 92300, Auckland 1142
Visit our website: www.aucklandcouncil.govt.nz

From: Andrew Gordon
Sent: Friday, 21 August 2020 12:35 PM
To: Roger Eccles <Roger.Eccles@aucklandcouncil.govt.nz>
Subject: RE: Royal Auckland and Grange Golf Club PPC - Review of Noise effects

Thanks.

I will review the documents and provide comments/s92 request by COB Monday 24 August.

Regards

Andrew Gordon | Specialist
Contamination, Air & Noise Team | Specialist Unit
Ph 09 301 01 01 | Mobile 027 482 3527
Auckland Council, Level 2, 35 Graham Street, Private Bag 92300, Auckland 1142
Visit our website: www.aucklandcouncil.govt.nz

From: Roger Eccles <Roger.Eccles@aucklandcouncil.govt.nz>
Sent: Friday, 21 August 2020 12:33 PM
To: Andrew Gordon <Andrew.Gordon@aucklandcouncil.govt.nz>
Subject: FW: Royal Auckland and Grange Golf Club PPC - Review of Noise effects

Hi Andrew –
Royal Auckland and Grange Golf Club PPC

Here is the a the Acoustics assessment

cheers

From: Roger Eccles
Sent: Thursday, 20 August 2020 3:29 PM
To: Andrew Gordon <Andrew.Gordon@aucklandcouncil.govt.nz>
Subject: Royal Auckland and Grange Golf Club PPC - Review of Noise effects

Hi Andrew

Re: Royal Auckland and Grange Golf Club PPC - Review of Noise effects

I understand that Nic Lau has been in contact with your Team Leader Jared Osman and yourself about review the Noise Component of the Royal Auckland and Grange Golf Club PPC and determine whether additional information is required under a Section 32 request. Are you able to that within the next few days.

I have included the application documents with this email

The WBS for this is D.002251 being

D.002251.01 – pre notification
D.002251.02 – notification to decision
D.002251.03 – decision to operative

Regards
Roger Eccles
Planner
Central South Planning

021 584 303

From: Andrew Gordon
Sent: Friday, 12 February 2021 4:11 PM
To: Roger Eccles
Subject: RE: Plan Change 57 –specialist comment on noise provisions of S32 report
Attachments: RE: Royal Auckland and Grange Golf Club PPC - Review of Noise effects

Hi Roger,

Further to my brief comments made on the 24/08/2020 (attached), I provide additional comments on noise effects from a plan change request (now withdrawn) to rezone golf course land from Residential – Single House, Residential Mixed Housing Urban, and Residential Terrace Housing and Apartment Building Zones to Open Space – Sport and Active Recreation.

I agree with the conclusion in the Styles Group report which essentially states:

- there will no change to noise levels and associated effects received at any adjacent site zoned residential given the current and expected future use of the land as a golfing facility
- in the event areas of the site in proximity to residentially zoned land was to change to provide for, say, team sports (e.g. football, rugby) the noise level from that activity (peoples voices) during the daytime period could be up to 5 dBA higher (55dB LAeq) than the current noise standard of 50 dB LAeq and, 10 dBA higher (60 dB LAeq) as highlighted below in Table E25.6.17.1:

Table E25.6.17.1 Noise levels at the Open Space – Sport and Active Recreation Zone interface

Time	Noise level
Monday to Saturday 7am-10pm	55dB L _{Aeq} Except that for a cumulative period of: (i) 3 hours per day between 7am and 9.30pm Monday to Friday; and (ii) 6 hours between 7am and 10pm on Saturdays. the noise level must not exceed 60dB L _{Aeq}
Sundays and Public Holidays 9am to 6pm outside the daylight saving period	55dB L _{Aeq} Except that for a cumulative period of 3 hours between 10am and 3pm on Sundays the noise level must not exceed 60dB L _{Aeq}
Sundays and Public Holidays 8am to 7pm during the daylight saving period	55dB L _{Aeq} Except that for a cumulative period of 3 hours between 10am and 3pm Sundays the noise level must not exceed 60dB L _{Aeq}
All other times	40dB L _{Aeq} 55dB L _{eq} at 63 Hz 50dB L _{eq} at 125 Hz

itary Plan Operative in part

15

E25 Noise and vibration

	75dB L _{AFmax}
--	-------------------------

In the event golf course areas immediately adjacent to residents were developed for sports fields, neighbours would experience higher noise levels when team training, practices and competitions were held. The most noticeable effects would be experienced on Saturday when noise up to the permitted standard of 60 dB LAeq is provided for a maximum duration of 6 hours (between 7am and 10pm) or 40% of the specified time period.

Otherwise, for the majority of time when the 55 dB LAeq applies compliance with this standard will ensure noise is reasonable and hence a good level of residential amenity. It is noted the 5 dBA higher limit (from 50 dB to 55 dB) does permit a noticeable increase in noise, but within the guideline limits for residential zones recommended in NZS 6802:2008 *Acoustics – Environmental noise*.

The night-time A-weighted noise standards (40dB LAeq and 75dB LAFmax) do not change. The proposed OS-SAR zone introduces low frequency noise standards applicable at night – this provides an additional control for residents specifically to control amplified music with a noticeable low frequency/bass component to ensure sleep is not disturbed.

Overall , I agree;

- applying a zone to the golf course that reflects the current and expected future use of the land as a golfing facility is appropriate
- most golf courses in the Auckland region are zoned Open Space – Sport and Active Recreation Zone (refer Table 4)
- provides a greater visibility and certainty for adjoining residents (in regard to future residential development)

- a good level of residential amenity will be maintained including the unlikely scenario of golf course land adjacent to site boundaries being developed with sports fields

The acoustic effects of changing the zoning from Residential to Open Space – Sport and Active Recreation have been adequately covered in the s32 report.

Regards

Andrew Gordon | Specialist
Contamination, Air & Noise Team | Specialist Unit
Ph 09 301 01 01 | Mobile 027 482 3527
Auckland Council, Level 2, 35 Graham Street, Private Bag 92300, Auckland 1142
Visit our website: www.aucklandcouncil.govt.nz

From: Roger Eccles <Roger.Eccles@aucklandcouncil.govt.nz>
Sent: Friday, 29 January 2021 2:28 PM
To: Andrew Gordon <Andrew.Gordon@aucklandcouncil.govt.nz>
Subject: RE: Plan Change 57 –specialist comment on noise provisions of S32 report

Thank you

From: Andrew Gordon <Andrew.Gordon@aucklandcouncil.govt.nz>
Sent: Friday, 29 January 2021 1:55 PM
To: CANconsents <canconsents@aucklandcouncil.govt.nz>
Cc: Roger Eccles <Roger.Eccles@aucklandcouncil.govt.nz>
Subject: FW: Plan Change 57 –specialist comment on noise provisions of S32 report

For allocation to Andrew G.

Roger, I will check and provide comments next week.

Regards

Andrew Gordon | Specialist
Contamination, Air & Noise Team | Specialist Unit
Ph 09 301 01 01 | Mobile 027 482 3527
Auckland Council, Level 2, 35 Graham Street, Private Bag 92300, Auckland 1142
Visit our website: www.aucklandcouncil.govt.nz

From: Roger Eccles <Roger.Eccles@aucklandcouncil.govt.nz>
Sent: Thursday, 28 January 2021 3:05 PM
To: Andrew Gordon <Andrew.Gordon@aucklandcouncil.govt.nz>
Subject: Plan Change 57 –specialist comment on noise provisions of S32 report

Hi Andrew

Re: Royal Auckland and Grange Golf Club Plan Change 57 –specialist comment on noise provisions of S32 report

Although the Grange Park Ltd submission on Plan Change 57 has been withdraw, I would still like your special opinion on the applicant's section 32 report if possible.

Would you be able to provide that for me?

Would the now process be to go to your team leader first or am I am I bale to go directly to you in the first instance?

Regards

Roger Eccles

Planner

Plans and Places

021 584 303

19 February 2021

To: Roger Eccles, Policy Planner, Auckland Council
From: Ezra Barwell, Senior Policy Advisor, Community and Social Policy

Subject: Open space assessment of Private Plan Change 57 that proposes to rezone Royal Auckland and Grange Golf Club land from Residential - Single House, Residential - Mixed Housing Urban, and Residential Terrace Housing and Apartment Building zones to Open Space - Sport and Active Recreation Zone

1.0 Introduction

1.1 I have undertaken a review of the private plan change, on behalf of Auckland Council in relation to open space and the Open Space - Sport and Active Recreation Zone.

I have a Bachelor of Parks, Recreation and Tourism Management degree from Lincoln University and a Master of Science in Environmental Science from the University of Auckland.

I have worked in local government since 2002 in the areas of parks and open space management, strategy, planning and land acquisition.

My current role entails strategic planning for current and future open space networks and acquisition of land for open space purposes.

One of my open space planning functions is providing advice on the appropriate zoning of open space land.

1.2 In writing this memo, I have reviewed the following documents:

- The applicant's Section 32 Evaluation Report and Planning Assessment (August 2020) prepared by Richmond Planning Limited
- Review of Adequacy of Information for a Private Plan Change Request (Noise Assessment) (8 November 2020) prepared by Andrew Gordon, Specialist, Auckland Council
- Auckland Council's Notification Assessment (5 November 2020) prepared by Roger Eccles, Planner, Auckland Council.

2.0 Key Open Space Issues

From an open space perspective, the key issues that must be considered by the council are whether the proposed rezoning has:

- any adverse effect on the operation of council's existing open space network in the immediate vicinity or beyond
- implications for the council meeting its open space provision targets outlined in its Open Space Provision Policy (2016).

3.0 Applicant's assessment

Having reviewed the applicant's Section 32 Evaluation Report and Planning Assessment I am satisfied that all relevant open space-related matters have been considered in relation to the subject land.

The applicant has made a coherent case for rezoning the land from a mix of residential zones to one that reflects its current and proposed future use as a golfing facility.

Ten Auckland golf courses are identified, five of which are privately-owned, that sit on Open Space - Sport and Active Recreation Zone land, so the proposed rezoning is not without precedent.

4.0 Submissions

I have reviewed the table in Appendix 4: Consultation Record in the applicant's Section 32 Evaluation Report and Planning Assessment. I consider that the matters raised by the submitters have been addressed adequately and have nothing to add with respect to open space.

5.0 Assessment of open space effects

To summarise Mr Eccles advice in Section 2.2: Character and Amenity Values of his Notification Assessment, the change of zoning to Open Space - Sport and Active Recreation Zone and associated potential for permitted intensification of recreational activity would result in:

- less than minor effect on the amenity of non-residential zoned properties in the vicinity; and
- less than minor effect on the amenity of residential zoned properties in the vicinity, including from lighting structures associated with outdoor recreational activities.

Specific comment on potential effects on non-recreational land in the vicinity are outside my purview as an open space specialist, but I concur that generally the Open Space - Sport and Active Recreation Zone rules will provide surrounding properties with protection from undue adverse effects.

With respect to the key open space issues identified in Section 2.0 above:

- The proposed rezoning would not have any adverse effect on the operation of council's existing open space network in the immediate vicinity or beyond:
 - the adjoining Omana Park is zoned Open Space - Sport and Active Recreation so the proposed rezoning would provide zoning consistency in the locality
 - there are no implications for the wider Auckland Council open space network.
- There are no implications for the council meeting its open space provision targets outlined in its Open Space Provision Policy (2016) as the status quo is being maintained:
 - if any of the Royal Auckland and Grange Golf Club land was rezoned and developed for residential purposes in the future, open space could be provided within the development to help meet the recreational needs of the new residents.

6.0 Conclusions and recommendations

In my view the applicant has adequately assessed the private plan change effects with respect to open space matters.

There are no clarifications or outstanding information gaps that impact on my ability to assess the proposed rezoning of the land to Open Space - Sport and Active Recreation Zone.

There are no discernible open space issues arising from the proposed rezoning.

The proposed rezoning is appropriate considering the recreational activity taking place on the land now and in the foreseeable future.

Should the applicant seek to undertake new activities on the land in the future they will be constrained by the proposed rezoning and only appropriate recreational or recreation-related activities will be permissible. This will protect properties in the vicinity from undue adverse effects.

In conclusion, I have no objection to the proposed plan change.

APPENDIX 4

SUBMISSIONS AND FURTHER SUBMISSIONS

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: richard and eleanor brabant

Organisation name:

Agent's full name: richard brabant

Email address: richard@brabant.co.nz

Contact phone number: 021975548

Postal address:
48 Ventnor Road
Remuera
Auckland
Auckland 1050

Submission details

This is a submission to:

Plan change number: Plan Change 57

Plan change name: PC 57 (Private): Royal Auckland and Grange Golf Club

My submission relates to

Rule or rules:
the whole of the plan change

Property address: all properties affected by the plan change

Map or maps: all the 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 zoning of the 2 (now 1 amalgamated) golf courses should have been proposed for open space zoning in the PAUP, or in a submission to the PAUP. This plan change is remedying an omission in the review process. The change of zoning proposed protects existing and what will be over time enhanced open space, water quality, biosecurity and amenity values. The re-zoning will provide benefits not just for the landowners and users of the course, but encompass other important public and private benefits for land outside the golf course boundaries, including the adjoining hospital, school and residential facilities and the Tamaki estuary.

1.2

I or we seek the following decision by council: Approve the plan change without any amendments

1.1

Details of amendments:

Submission date: 24 November 2020

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.

**Private Plan Change Request For Rezoning by The Royal Auckland and Grange Golf Club
Submission re Section Evaluation Report and Planning Assessment 2020.**

1. My name is Henry Michael Horton. I was a member of the Auckland Golf Club for 50 years and then of the combined Royal Auckland and Grange Golf Club for the last few years prior to retirement from the game of golf.
2. I have conducted business in South Auckland for a number of years and started Horton Media Ltd in East Tamaki before selling the business to Matthew Horton my eldest son. This business still operates at the address of Sir William Avenue East Tamaki Manukau 2013.
3. At any one time there are about 50 employees mostly domiciled in South Auckland who are employed at the business. I was well aware of the many issues affecting staff and their families in South Auckland and lack of mature recreational amenities.
4. The proposed 27 hole golf course at Grange Road for the Royal Auckland Grange Golf Club (hereinafter RAGGC) will occupy some 80 hectares of prime level land in a strategic and pivotal point in both Otahuhu and Papatoetoe districts.
5. I was a trustee of Cornwall Park for 29 years and chairman of the Trust Board for 5 years prior to my retirement at 72. This service gave me an understanding of park management and its powerful influence for the good of communities and the general public.
6. There are numerous public good reasons why the golf course should be confined to 18 holes and the membership adjusted accordingly by the RAGGC, at their choice.
7. There are said to be about 60 golf courses in and around Auckland City and its environs and several new courses exist in South Auckland where members can be drawn to.
8. The additional area available for public use were the extra 9 holes to be completed should instead be made available to residents who live in one of the country's most deprived and under resourced populations.
9. Public spaces as has often been observed at Cornwall Park can provide ideal environments for families, children and community groups to associate and undertake healthy recreation. The impact of COVID 19 has led to massive shifts in community behaviour as witnessed by park usage in Auckland and associated areas.
10. This is an unique opportunity and perhaps last opportunity to properly plan for the local South Auckland residents in a meaningful way. This would leave RAGGC with a fine championship 18 hole course and the public of South Auckland with a fascinating opportunity very much in their own backyard for normal public park activities. There are apparently very attractive estuary walks to be had involving Otaki Creek, Riparian and Thames Estuary.
11. I am not aware of any 27 hole courses in Auckland, the demand for which is a result of club mergers of the old Auckland Golf Club and the Grange Golf Club. There are very few 27 hole courses in this part of the world and South Auckland certainly does not need one.
12. The Club has announced to members that the current cost of the project is \$65 million and another 2 or 3 \$million is required. These sums have been financed by property sales to Kings College and Mansons.
13. In conclusion, I would like to think the Auckland Council could look seriously at providing a public amenity on the site to properly reflect the needs of the local community and not just "out of area" golfers with little or no connection to the area.
14. **I object to the proposal to impose a 27 hole golf course on the entire area proposed in the submission.**

| 2.1

**Private Plan Change Request For Rezoning by The Royal Auckland and Grange Golf Club
Submission re Section Evaluation Report and Planning Assessment 2020.**

Michael.horton@horton.co.nz



The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Ashlee Walsh

Organisation name:

Agent's full name: Ashlee Walsh

Email address: ajwalsh1991@gmail.com

Contact phone number:

Postal address:
54 Te Aroha Street
Hamilton
Hamilton 3216

Submission details

This is a submission to:

Plan change number: Plan Change 57

Plan change name: PC 57 (Private): Royal Auckland and Grange Golf Club

My submission relates to

Rule or rules:

Property address: 1/11 Troon Place Papatoetoe Auckland

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 don't want housing being built in front of my property or on the golf course.

I or we seek the following decision by council: Approve the plan change without any amendments

4.1

Details of amendments:

Submission date: 9 December 2020

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.

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 or post to :

Attn: Planning Technician
Auckland Council
Level 24, 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) _____

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

Transpower New Zealand Limited

Address for service of Submitter

Attention: Rebecca Eng, PO Box 17215, Greenlane, Auckland 1546

Telephone:

09 590 7072

Fax/Email:

environment.policy@transpower.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 57

Plan Change/Variation Name

Royal Auckland and Grange Golf Club

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

Or

Map

Or

Other (specify)

See attached submission

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 attached submission

(continue on a separate sheet if necessary)

I seek the following decision by Council:

- Accept the proposed plan change / variation 5.1
- 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.

See 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

15 December 2020

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.



Gate 1
 Gridco Road
 Otara, Auckland 2023
 P O Box 17 215
 Greenlane, Auckland 1546
 New Zealand
 P 64 9 590 6000
 F 64 9 589 2310
www.transpower.co.nz

15 December 2020

Auckland Council
 Private Bag 92300
 Auckland 1142

By email: unitaryplan@aucklandcouncil.govt.nz

Attn: Planning Technician

Submission on Private Plan Change 57: Royal Auckland and Grange Golf Club

Transpower New Zealand Limited (Transpower) is the State-Owned Enterprise that plans, builds, maintains, owns and operates New Zealand's electricity transmission network, the National Grid. The National Grid links generators to distribution companies and major industrial users and comprises around 12,000 kilometres of transmission lines and over 160 substations. Transpower's Mangere-Otahuhu A 110kV transmission line traverses part of the area affected by Private Plan Change 57 (PPC57). Attached as Appendix B is a map showing the plan change location and the transmission line.

The national significance of the National Grid is recognised, in the context of the RMA, by the National Policy Statement on Electricity Transmission (2008) (the NPSET). Section 75(3)(a) of the RMA requires district plans to "give effect to" the NPSET. The Auckland Unitary Plan (Operative in part) has given effect to the NPSET Policies 10, 11 and 12 by including a "National Grid Corridor Overlay" as identified in the AUP maps and associated objectives, policies and rules within Chapter D26 that regulate land use, development and subdivision near the National Grid. Transpower supports the operative provisions and seeks that they continue to apply to the plan change site.

PPC57 proposes that there will be no changes to any of the AUP overlays (paragraph 7.2 of s32 Evaluation Report and Planning Assessment, and page 1 of Plan Change Request). This means that the National Grid Corridor overlay will continue to apply to the plan change site regardless of the zoning. On this basis Transpower is **neutral** regarding the plan change. Please see **Appendix A** for relief sought by Transpower.

Should you require clarification of any matter, please contact Rebecca Eng at Transpower (09 590 7072), or on the following email: environment.policy@transpower.co.nz

Yours faithfully

Rebecca Eng
Senior Environmental Planner

Appendix A – Relief sought by Transpower New Zealand Limited
Appendix B - Map of the district and National Grid Assets

Appendix A – Relief sought by Transpower New Zealand Limited

Clause / Section	Title	Relief Sought	Amendment	Reason
Whole Plan Change	Proposed Plan Change 57 (Private) Royal Auckland and Grange Golf Club	Neutral	N/A	PC57 proposes that there will be no changes to any of the AUP overlays (paragraph 7.2 of s32 Evaluation Report and Planning Assessment, and page 1 of Plan Change Request). This means that the National Grid Corridor overlay will continue to apply to the plan change site regardless of the zoning and the National Policy Statement on Electricity Transmission 2008 has been given effect to insofar as it relates to the plan change site.

Appendix B - Map of plan change site and National Grid Assets

Legend

Structure

- ☒ Double Circuit Steel Tower

Transmission Line

- 110kV Overhead
- 220kV Overhead

National Grid Corridor Overlay

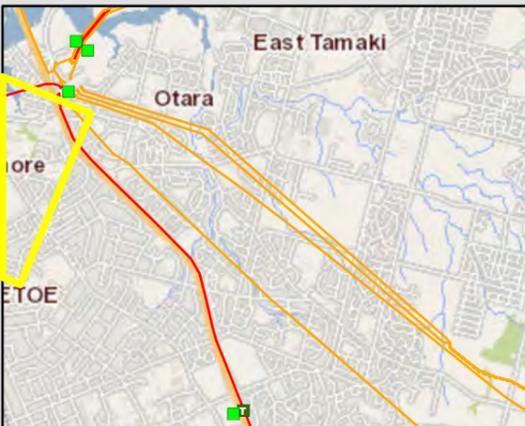
- ▭ National Grid Subdivision Corridor
- ▨ National Grid Substation Corridor
- ▧ National Grid Yard Compromised
- ▩ National Grid Yard Uncompromised

The PPC Site

- ▭ The PPC Site



Sheet 1 of 1



External Disclaimer

This document is produced for external release. Its conclusions are based on the information currently available to Transpower and may change as further information becomes available either internally or externally.
 CRS as per CoreLogic data supply May 2019.



**Proposed Plan Change 57 (Private) Royal Auckland and Grange Golf Club
 National Grid assets**

Projection: NZTM 2000 Scale: 1: Plan Size: A3L



COPYRIGHT © 2020 TRANSPOWER NEW ZEALAND LIMITED. ALL RIGHTS RESERVED
 This document is protected by copyright vested in Transpower New Zealand Limited ("Transpower"). No part of the document may be reproduced or transmitted in any form by any means including, without limitation, electronic, photocopying, recording or otherwise, without the prior written permission of Transpower. No information embodied in the documents which is not already in the public domain shall be communicated in any manner whatsoever to any third party without the prior written consent of Transpower. Any breach of the above obligations may be restrained by legal proceedings seeking remedies including injunctions, damages and costs.

Date: 15/12/2020 Prepared by: aldrichh

Path: T:\GIS\Projects\p20255_Proposed_Plan_Change_57_MNG_OTAA\p20255_Proposed_Plan_Change_57_MNG_OTAA.aprx

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Nick Somerville

Organisation name:

Agent's full name:

Email address: nickbhs@gmail.com

Contact phone number:

Postal address:

Submission details

This is a submission to:

Plan change number: Plan Change 57

Plan change name: PC 57 (Private): Royal Auckland and Grange Golf Club

My submission relates to

Rule or rules:

Proposed Private Plan Change 57

Property address: 57 Grange 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:

Auckland Council should turn down this proposed plan change as it will result in the loss of an area of residential zoning that is well located in relation to well-established community and transport infrastructure. Residential use is the most efficient and economic use of this land. This also aligns with the National Policy Standards on Urban Development and the Auckland Unitary Plan Regional Policy Statement, which aim to develop a well-connected compact urban form.

The change suggests that this land will be available for use to the public, which it will not. It will continue to only be available to the privileged few, who are unlikely to live in the surrounding area.

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

Submission date: 16 December 2020

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.

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Geoffrey Page

Organisation name:

Agent's full name:

Email address: geoffinthailand@yahoo.co.nz

Contact phone number:

Postal address:

Auckland

Submission details

This is a submission to:

Plan change number: Plan Change 57

Plan change name: PC 57 (Private): Royal Auckland and Grange Golf Club

My submission relates to

Rule or rules:

All land as part of the private plan change

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:

Housing is the best use of the land. Regardless of current use, the land's existing zoning should not be changed from residential.

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

Submission date: 16 December 2020

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.

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Lisa Grant

Organisation name:

Agent's full name: Lisa Grant

Email address: lisa_lost@yahoo.com

Contact phone number:

Postal address:
37 Churton Drive
Churton Park
Wellington
Wellington 6037

Submission details

This is a submission to:

Plan change number: Plan Change 57

Plan change name: PC 57 (Private): Royal Auckland and Grange Golf Club

My submission relates to

Rule or rules:
PC 57 (Private): Royal Auckland and Grange Golf Club

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:

Do not rezone the golf course. Why should the owners be subsidised by the tax payer for their private golf course? The land is not a park, it's a venue for an expensive, exclusive sport. It should be land for houses, but if they won't do that, at the very least they should contribute to the wellbeing of the city through rates.

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

Submission date: 16 December 2020

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.

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Cassandra Bahr

Organisation name:

Agent's full name:

Email address: cassandra@bahr.net.nz

Contact phone number:

Postal address:

Submission details

This is a submission to:

Plan change number: Plan Change 57

Plan change name: PC 57 (Private): Royal Auckland and Grange Golf Club

My submission relates to

Rule or rules:

Changing the zoning from Residential to Open Space – Sport and Active Recreation

Property address: Royal Auckland and Grange Golf Club

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 South Auckland public deserve more parks and public spaces. A public golf course certainly should pay residential rates, since it is not open to all.

I agree with the article on the Spinoff, <https://thespinoff.co.nz/society/16-12-2020/golf-clubs-rezoning-plans-to-cut-potential-houses-in-south-auckland/> and its suggestions.

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

Submission date: 16 December 2020

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.

To whom it may concern,

I am writing to express my concern that a private and privileged group is attempting to sustain a golfing course in the middle of an urban environment at a subsidised rate.

Golf requires a much larger land area than many other sports, and restricts participant access compared to many other sports, such as football, basketball, rugby, and so forth.

There is also substantial demand in Auckland for more housing and for green social spaces near that housing, neither of which a golf course allows for.

If the course wishes to continue using that space, it should pay for the privilege, at the very least covering the rates that the council would otherwise get from residential developments, if not more.

10.1

Indeed, if there were an alternative rate of 'Closed-Access Sports Spaces' (included and especially golf) with a rate system yet still higher than residential zoning, that would be a welcome addition to our rates system.

Regards
Walter Hamer
walter.hamer@gmail.com

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Pranaya Thaker

Organisation name:

Agent's full name:

Email address: baliwogs@gmail.com

Contact phone number:

Postal address:

Submission details

This is a submission to:

Plan change number: Plan Change 57

Plan change name: PC 57 (Private): Royal Auckland and Grange Golf Club

My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:

Rezoning the golf club land away from it's 'Residential' zoning to an 'Open Space' zoning.

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:

My issue is with them rezoning the land away from it's 'Residential' zoning to a zoning which allows them to pay cheaper rates. Just rezoning on it's own to 'Open Space' doesn't mean the land is any more accessible to the public to use (still a private gold club with inaccessible fees), and so doesn't actually increase the amenity for locals. All it seems to do is reduce the club's rates bill. If the private club wants this land to themselves, they and their members can pay 'Residential' zone rates to hold on to.

This land is near major transport corridors and other infrastructure (e.g. schools) so is perfect for residential development. The NPS on Urban Development details that there should be housing intensification near major public transport corridors (e.g. railway stations) to reduce road congestion, and enabling more use of public transport is also necessary for Aotearoa and specifically Auckland to reduce it's carbon emissions to combat climate change. After all, both central government and Auckland Council have declared a climate emergency, and Auckland now has Te Tāruke-ā-Tāwhiri:

Auckland's Climate Plan. Time to actually act on this emergency; rezoning would be negligent in this context.

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

| 11.1

Submission date: 16 December 2020

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.

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Denise Dalziel

Organisation name:

Agent's full name:

Email address: dr.denisedl@gmail.com

Contact phone number:

Postal address:
10 Weona Place
Westmere
Auckland 1022

Submission details

This is a submission to:

Plan change number: Plan Change 57

Plan change name: PC 57 (Private): Royal Auckland and Grange Golf Club

My submission relates to

Rule or rules:

Property address: Royal Auckland and Grange Golf Club

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 valuable land should not be zoned anything other than residential and should not have reduction in rates so that rich men can play golf here and exclude other members of the community. If they want to retain it as a golf course they should pay their dues to do so with land that could otherwise be used for residential and/or community use. Especially in this neighbourhood.

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

Submission date: 16 December 2020

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.

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Martin Burr

Organisation name:

Agent's full name:

Email address: martyburr@yahoo.com

Contact phone number:

Postal address:

Pt. England
Auckland 1072

Submission details

This is a submission to:

Plan change number: Plan Change 57

Plan change name: PC 57 (Private): Royal Auckland and Grange Golf Club

My submission relates to

Rule or rules:

Property address: 57 Grange Road, Lot 4 DP 513036 Papatoetoe; Grange Road Papatoetoe Lot 2 DP 510763;

Map or maps:

Other provisions:

Part Allot 14 Parish of Manurewa; Lot 32 DP 36608, Lot 104 DP 56577
and Lot3DP 86715 : Part Allot 14 Parish of Manurewa

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:

With Auckland remaining a rapidly growing city and continuing to face a housing shortage this land should remain zoned as residential in it's current forms. There should be further proposals to relocate the golf club to a more suitable location outside of the city boundaries and use this land for housing development and intensification.

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

13.1

Submission date: 16 December 2020

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.

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Arthur McGregor

Organisation name:

Agent's full name:

Email address: arthur.mcgregor@gmail.com

Contact phone number:

Postal address:

Submission details

This is a submission to:

Plan change number: Plan Change 57

Plan change name: PC 57 (Private): Royal Auckland and Grange Golf Club

My submission relates to

Rule or rules:
Plan change 57

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:

This is prime residential land and it should remain zoned residential. Changing the zone will not make this space publically accessible, so there is no benefit to the public. Instead it limits the opportunity to develop housing in this area in the future, and at the least the owners should continue to pay the opportunity cost for not having residential properties on these sites.

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

14.1

Submission date: 17 December 2020

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.

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Mark Thorn

Organisation name:

Agent's full name: Mark Thorn

Email address: m.thorn13@gmail.com

Contact phone number:

Postal address:
160A Main Highway
Ellerslie
Auckland 2025

Submission details

This is a submission to:

Plan change number: Plan Change 57

Plan change name: PC 57 (Private): Royal Auckland and Grange Golf Club

My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:
PC 57 (Private): Royal Auckland and Grange Golf Club

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:
Changing the zoning without allowing full public access allows the golf club to abuse the Zoning type. By not paying for the opportunity cost of the land as they currently do, all of Auckland, and in particular those people in Papatoetoe/Mangere/Otahuhu miss out. If this change goes through there will be no reasonable hope of anyone benefiting from this land beyond those golf club members

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

15.1

Submission date: 17 December 2020

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.

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Rebecca Walker

Organisation name:

Agent's full name:

Email address: rebecca.j.walker@gmail.com

Contact phone number:

Postal address:
82 Woolfield Road
Papatoetoe
Auckland 2025

Submission details

This is a submission to:

Plan change number: Plan Change 57

Plan change name: PC 57 (Private): Royal Auckland and Grange Golf Club

My submission relates to

Rule or rules:
The change in rating to public space

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 rest of Auckland ratepayers should not subsidise a private club which has archaic rules about joining and who fence off the entire area so members of the public cannot walk through it. It is very difficult for members of the public to join and indeed local people are not able to join easily.

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

16.1

Submission date: 17 December 2020

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.

To whom it may concern,

I think it would be appalling for the Unitary Plan to consent to a change to this area being zoned "Open Space and Sport and Recreation, when we know the general public will never have a hope of accessing this amenity for 'Sport and Recreation'.

The exclusivity of this club should require them to pay residential rates, for the privilege of taking up valuable land that would otherwise support much needed housing.

To let them benefit at all from a change to the unitary plan is a real slap in the face for this community, and detrimental to Auckland in meeting growing needs for improvements to infrastructure.

Regards

Margaret Briffett

margbriffett@gmail.com

18.1

17 December 2020

Plans and Places
Auckland Council
Private Bag 92300
Auckland 1142

Attn: Celia Davison

Email: unitaryplan@aucklandcouncil.govt.nz

SUBMISSION ON PROPOSED PRIVATE PLAN CHANGE 57: ROYAL AUCKLAND AND GRANGE GOLF CLUB

Please find attached Auckland Transport's submission on Proposed Private Plan Change 57 Royal Auckland and Grange Golf Club to the Auckland Unitary Plan (Operative in Part).

Should you have any queries in relation to this submission, please contact me on 021 589 286 or at rory.power@at.govt.nz.

Yours sincerely

Rory Power
Principal Planner, Land Use Policy and Planning

cc:
Richmond Planning Limited
C/- Tania Richmond
Via email: admin@richmondplanning.co.nz

SUBMISSION ON PROPOSED PRIVATE PLAN CHANGE 57: ROYAL AUCKLAND AND GRANGE GOLF CLUB

To: Auckland Council
Private Bag 92300
Auckland 1142

Submission on: Proposed Private Plan Change 57 to rezone land currently owned by Royal Auckland and Grange Golf Club from the current residential zones in the Auckland Unitary Plan to Open Space - Sport and Active Recreation zone.

From: Auckland Transport
Private Bag 92250
Auckland 1142

1. Introduction

1.1 The Royal Auckland and Grange Golf Club (RAGGC) has lodged a Private Plan Change ('PPC 57' or 'the Plan Change') to the Auckland Unitary Plan: Operative in Part ('AUP'). The Plan Change seeks to rezone:

- A 44.9 hectares site (57 Grange Road) from Residential - Single House zone to Open Space – Sport and Active Recreation zone (OS-SAR); and
- Three sites of 34.6 hectares (Grange Road), 0.4 hectares (2 Grange Road) and 1.0 hectares (69A Omana Road), from Residential - Terrace Housing and Apartment Building zone and Residential - Mixed Housing Urban zone to OS-SAR.

1.2 According to the documents provided with the application, the purpose of PPC57 is to apply a zone that reflects current and foreseeable use of the land as a golfing facility. H7.9.1. of the AUP provides for the following permitted activities relevant to the operation of a golf course, (which would not be provided for in the residential zones and default to discretionary activity status under C1.7 General rules in the AUP) including: clubrooms; restaurants and cafes; accessory retail; parks depot, storage and maintenance; and floodlights up to 18m high.

1.3 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'.¹ Auckland Transport is responsible for the planning and funding of most public transport; promoting alternative modes of transport (i.e. alternatives to the private motor vehicle); operating the local roading network; and developing and enhancing the local road, public transport, walking and cycling network for the Auckland region.

1.4 Auckland Transport is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

¹ Local Government (Auckland Council) Act 2009, section 39.

2. Specific parts of the Plan Change that this submission relates to:

- 2.1 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 include ensuring there is an appropriate assessment of the activities enabled through this Plan Change, and addresses the specific matters identified in **Attachment 1**.
- 2.2 Auckland Transport **opposes** PPC 57 for the reasons outlined in **Attachment 1** as it does not consider that it sufficiently assesses the activities enabled through this Plan Change and does not contain mechanisms to appropriately mitigate effects on the wider transport network.
- 2.3 Auckland Transport is available and willing to work through the matters raised in this submission with the applicant.

19.1

3. The decisions sought by Auckland Transport are:

- 3.1 The decisions which Auckland Transport seeks from the Council are set out in **Attachment 1**.
- 3.2 In all cases where amendments to the Plan Change are proposed, Auckland Transport would consider alternative wording or amendments which address the reason for Auckland Transport's submission. Auckland Transport also seeks any consequential amendments required to give effect to the decisions requested.

4. Appearance at the hearing:

- 4.1 Auckland Transport wishes to be heard in support of this submission at a hearing.
- 4.2 If others make a similar submission, Auckland Transport will consider presenting a joint case with them at the hearing.

Name: Auckland Transport

Signature: 

Christina Robertson
Group Manager, Strategic Land Use and Spatial Management

Date: 16 December 2020

Contact person: Rory Power
Principal Planner, Land Use Policy and Planning

Address for service: Auckland Transport
Private Bag 92250
Auckland 1142

Telephone: 021 589 286

Email: rory.power@at.govt.nz

Attachment 1

Issue / Provision	Support / Oppose	Reason for submission	Decision / relief sought
<p>Integrated transport assessment of the proposed Open Space – Sport and Active Recreation Zone</p>	<p>Oppose</p>	<p>The supporting Section 32 Evaluation Report and Planning Assessment provides a high-level assessment of the transport related effects.² This assessment is premised on a comparison of the current and proposed zoning, and an estimation of the number of vehicles that would be generated by a residential development of the site.</p> <p>The assessment makes the assumption that the estimated number of vehicles can be accommodated on the road network by virtue of zoning the land for residential activity. The zoning of land in the AUP to provide for more intensive forms of housing does not preclude the potential or need for effects on the transport network to be properly assessed and mitigated.³</p> <p>The Plan Change needs to ensure that the cumulative transport effects generated by the proposed OS-SAR zone are appropriately assessed.</p> <p>H7.6.1 identifies the OS-SAR zone as applying to open spaces used for indoor and outdoor organised sports, active recreation and community activities. H7.9.1. Activity Table – Open Space Zones provides for the following permitted activities that would enable the use of the site as a multifunctional recreational facility including recreation facilities (defined as including recreation centres, aquatic centres, fitness centres, gymnasiums and indoor sport centres), and sport and recreation structures (defined as including courts, artificial playing surfaces, and skate parks). The OS-SAR zone description notes that “the more intensive use of these open spaces can attract large numbers of people. This can generate high levels of traffic, noise, glare and other adverse effects that need to be managed.” The application</p>	<p>Request further information from the applicant confirming the following:</p> <ul style="list-style-type: none"> • Assumptions underpinning the high-level transport assessment provided by the applicant. • An assessment of transport effects based on a ‘worst case’ scenario given the activities that would be enabled by the proposed zone and the adequacy of the AUP provisions and mechanisms to assess effects / require mitigation. <p>Depending on the outcome of the request, to include amended and / or additional provisions or mechanisms to address any transport effects that are not adequately addressed by the AUP provisions and mechanisms.</p>

² Private Plan Change request for rezoning by Royal Auckland and Grange Golf Club Section 32 Evaluation Report and Planning Assessment, prepared by Richmond Planning Limited, August 2020, paragraphs 11.9 and 11.10.

³ For example: H6 Residential – Terrace Housing and Apartment Buildings Zone – H6.8.2(2)(l) Assessment Criteria
(i) the extent to which the activity avoids or mitigates adverse effects on the safe and efficient operation of the immediate transport network.

Issue / Provision	Support / Oppose	Reason for submission	Decision / relief sought
Wider transport network and access via public transport	Oppose in part	<p>H7.3 of the AUP sets out the policies that apply generally to open space areas (noting that these are in addition to the specific policies of each open space zone). H7.3(1)(a) states “design, develop, manage and maintain open spaces to provide for the needs of the wider community as well as the needs of the community in which they are located.”</p> <p>It is acknowledged that the site is currently not a publicly accessible recreational / open space asset but does provide an opportunity for additional publicly accessible open spaces and connections to existing esplanade reserves. If the golf course continues its current operation for the foreseeable future (as outlined in the application), the lack of public access to the site will limit opportunities to support and integrate surrounding residential growth with rapid transit infrastructure that is in the process of being upgraded.⁴ Although properties on Grange Road adjacent to the golf course are approximately 850m walking distance from Middlemore Station, the actual distance via publicly accessible footpaths is approximately 3.8km (refer to the figure below).</p>	<p>That the Plan Change considers opportunities to provide for public accessways for walking and cycling through the site and improve access to the Rapid Transit Network for the public and users of the site, such as through identification of any appropriate mechanisms.</p>

19.3

⁴ The capacity improvements along the rail corridor between Wiri and Quay Park include a third platform at Middlemore Station to accommodate the increase in train services / frequencies resulting from the City Rail Link. This project has approved funding through the New Zealand Upgrade Programme.

Issue / Provision	Support / Oppose	Reason for submission	Decision / relief sought
		 <p>Providing public accessways for walking and cycling through the site would assist in addressing the lack of connectivity between Grange Road and Middlemore Station as well as encouraging the use of public transport to travel to the site for activities enabled through this Plan Change. While the plan change application notes that private vehicles are the main form of transport for the 2000 members and that this is unlikely to change due to the equipment needed for play, consideration needs to be made for activities enabled by a change in zoning to OS-SAR.</p> <p>With the current residential zoning, access would have been provided with any development in line with that zoning.</p>	

unitaryplan@aucklandcouncil.govt.nz

**SUBMISSION ON PLAN CHANGE 57 (PRIVATE):
ROYAL AUCKLAND AND GRANGE GOLF CLUB**

Attn: Planning Technician
Auckland Council
Private Bag 92300
Auckland 1142

unitaryplan@aucklandcouncil.govt.nz

I am making this Submission on Plan Change 57 (Private): Royal Auckland and Grange Golf Club.

A Plan Change of the Auckland Unitary Plan has been made by the Golf Club to rezone parts of the Royal Auckland and Grange Golf Club from current Residential zoning to Sport and Active Recreation Zoning.

My submission relates to the entire Plan Change.

I oppose the entire Plan Change.

20.1

My reasons are:

- a. The proposed private plan change will result in the loss of an area of residential zoning that is well located in relation to well-established infrastructure (this includes community infrastructure such as schools and hospitals).
- b. The proposed private plan change will result in the loss of enabled residential capacity to positively affect the efficient use of the existing transport infrastructure (because the subject sites are located close to major transport routes with a significant part of the Royal Auckland and Grange Golf Club golf course being within 800 metres walking distance of Middlemore Station and to Great South Road. This provides the opportunity for the zoned residential land to have easy access to effective public transport).
- c. I consider that the most efficient and economic use of this land is for residential development. This aligns with the National Policy Standards on Urban Development and the Auckland Unitary Plan Regional Policy Statement which both aim to develop a well-connected compact urban form.

20.2

I seek the following decision by Council: Decline the proposed plan change.

I 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.

Glenn McCutcheon
3/22 Tennessee Avenue, Mangere East
nana_glenn@hotmail.com
022 648 4930

The following customer has submitted a Unitary Plan online further submission.

Contact details

Full name of person making a further submission: Richard and Eleanor Brabant

Organisation name:

Full name of your agent: Richard Brabant

Email address: richard@brabant.co.nz

Contact phone number: 021975548

Postal address:
48 Ventnor Road
Remuera
Auckland
Auckland 1050

Submission details

This is a further submission to:

Plan change number: Plan Change 57

Plan change name: PC 57 (Private): Royal Auckland and Grange Golf Club

Original submission details

Original submitters name and address:
Naomi Lange

Submission number: 3

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 1

The reasons for my or our support or opposition are:
Residential zoning of a long-established golf course is inappropriate. The land is privately owned and has been developed and used as a golf course for decades. All other golf courses in Auckland are zoned Open Space.

I or we want Auckland council to make a decision to: Allow the whole original submission

Submission date: 24 March 2021

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:
We are an original submitter

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.

The following customer has submitted a Unitary Plan online further submission.

Contact details

Full name of person making a further submission: Richard and Eleanor Brabant

Organisation name:

Full name of your agent: Richard Brabant

Email address: richard@brabant.co.nz

Contact phone number: 021975548

Postal address:
48 Ventnor Road
Remuera
Auckland
Auckland 1050

Submission details

This is a further submission to:

Plan change number: Plan Change 57

Plan change name: PC 57 (Private): Royal Auckland and Grange Golf Club

Original submission details

Original submitters name and address:
Geoffery Page

Submission number: 7

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 1

The reasons for my or our support or opposition are:
Residential zoning of a long-established golf course is inappropriate. The land is privately owned and has been developed and used as a golf course for decades. All other golf courses in Auckland are zoned Open Space.

I or we want Auckland council to make a decision to: Disallow the whole original submission

Submission date: 24 March 2021

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? 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:
We are original submitters

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.

The following customer has submitted a Unitary Plan online further submission.

Contact details

Full name of person making a further submission: Richard and Eleanor Brabant

Organisation name:

Full name of your agent: Richard Brabant

Email address: richard@brabant.co.nz

Contact phone number: 021975548

Postal address:
48 Ventnor Road
Remuera
Auckland
Auckland 1050

Submission details

This is a further submission to:

Plan change number: Plan Change 57

Plan change name: PC 57 (Private): Royal Auckland and Grange Golf Club

Original submission details

Original submitters name and address:
Nick Somerville

Submission number: 6

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 1

The reasons for my or our support or opposition are:
Residential zoning of a long-established golf course is inappropriate. The land is privately owned and has been developed and used as a golf course for decades. All other golf courses in Auckland are zoned Open Space.

I or we want Auckland council to make a decision to: Disallow the whole original submission

Submission date: 24 March 2021

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? 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:
We are original submitters

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.

The following customer has submitted a Unitary Plan online further submission.

Contact details

Full name of person making a further submission: Richard and Eleanor Brabant

Organisation name:

Full name of your agent: Richard Brabant

Email address: richard@brabant.co.nz

Contact phone number: 021975548

Postal address:
48 Ventnor Road
Remuera
Auckland
Auckland 1050

Submission details

This is a further submission to:

Plan change number: Plan Change 57

Plan change name: PC 57 (Private): Royal Auckland and Grange Golf Club

Original submission details

Original submitters name and address:

Lisa Grant
lisa_lost@yahoo.com

Submission number: 8

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 2
Point number 2

The reasons for my or our support or opposition are:

(1) Residential zoning of a long-established golf course is inappropriate. The land is privately owned and has been developed and used as a golf course for decades. All other golf courses in Auckland are zoned Open Space.

(2) It is an inappropriate and unlawful use of zoning to apply or retain zoning on land as a way of securing additional rates from the landowner. The rates payable by owners of the land zoned Open Space – Sport and Recreation reflects the demand of that land use for council services.

I or we want Auckland council to make a decision to: Disallow the whole original submission

Submission date: 24 March 2021

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? 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:

We are original submitters

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.

The following customer has submitted a Unitary Plan online further submission.

Contact details

Full name of person making a further submission: Richard and Eleanor Brabant

Organisation name:

Full name of your agent: Richard Brabant

Email address: richard@brabant.co.nz

Contact phone number: 021975548

Postal address:
48 Ventnor Road
Remuera
Auckland
Auckland 1050

Submission details

This is a further submission to:

Plan change number: Plan Change 57

Plan change name: PC 57 (Private): Royal Auckland and Grange Golf Club

Original submission details

Original submitters name and address:
Cassandra Bahr
cassandra@bahr.net.nz

Submission number: 9

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 1

The reasons for my or our support or opposition are:
Residential zoning of a long-established golf course is inappropriate. The land is privately owned and has been developed and used as a golf course for decades. All other golf courses in Auckland are zoned Open Space. The zoning of land is not determined by whether it is public or private land. All golf courses in Auckland are will will zoned Open Space. Rating of land is not an RMA issue; rates payable reflect the cost of Council services not zoning.

I or we want Auckland council to make a decision to: Disallow the whole original submission

Submission date: 24 March 2021

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? 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:

We are original submitters

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.

The following customer has submitted a Unitary Plan online further submission.

Contact details

Full name of person making a further submission: Richard and Eleanor Brabant

Organisation name:

Full name of your agent: Richard Brabant

Email address: richard@brabant.co.nz

Contact phone number: 021975548

Postal address:
48 Ventnor Road
Remuera
Auckland
Auckland 1050

Submission details

This is a further submission to:

Plan change number: Plan Change 57

Plan change name: PC 57 (Private): Royal Auckland and Grange Golf Club

Original submission details

Original submitters name and address:
Walter Hamer
walter.hamer@gmail.com

Submission number: 10

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 1

The reasons for my or our support or opposition are:
The land is privately owned and has been a golf course for over 60 years.
All other golf courses in Auckland have an Open Space zoning, reflecting their use.
The amount that is paid in rates to the local authority depends on the demand for services, and retaining an inappropriate zoning on land because there would be a higher rating charge is inappropriate and unlawful.

I or we want Auckland council to make a decision to: Disallow the whole original submission

Submission date: 24 March 2021

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? 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:
We are original submitters

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.

The following customer has submitted a Unitary Plan online further submission.

Contact details

Full name of person making a further submission: Richard and Eleanor Brabant will

Organisation name:

Full name of your agent: Richard Brabant

Email address: richard@brabant.co.nz

Contact phone number: 021975548

Postal address:
48 Ventnor Road
Remuera
Auckland
Auckland 1050

Submission details

This is a further submission to:

Plan change number: Plan Change 57

Plan change name: PC 57 (Private): Royal Auckland and Grange Golf Club

Original submission details

Original submitters name and address:
Pranaya Thaker

Submission number: 11

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 1

The reasons for my or our support or opposition are:
The land is privately owned and has been a golf course for over 60 years.
All other golf courses in Auckland have an Open Space zoning, reflecting their use.
The amount that is paid in rates to the local authority depends on the demand for services, and retaining an inappropriate zoning on land because there would be a higher rating charge is inappropriate and unlawful.

I or we want Auckland council to make a decision to: Disallow the whole original submission

Submission date: 24 March 2021

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? 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:
original submitters

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.

The following customer has submitted a Unitary Plan online further submission.

Contact details

Full name of person making a further submission: Richard and Eleanor Brabant

Organisation name:

Full name of your agent: Richard Brabant

Email address: richard@brabant.co.nz

Contact phone number: 021975548

Postal address:
48 Ventnor Road
Remuera
Auckland
Auckland 1050

Submission details

This is a further submission to:

Plan change number: Plan Change 57

Plan change name: PC 57 (Private): Royal Auckland and Grange Golf Club

Original submission details

Original submitters name and address:

Martin Burr
martyburr@yahoo.com will will

Submission number: Will13 will

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 1

The reasons for my or our support or opposition are:

The land is privately owned and has been a golf course for over 60 years.

All other golf courses in Auckland have an Open Space zoning, reflecting their use.

Zoning of land should reflect its existing and expected future use in this case as an established and recently upgraded golf course.

I or we want Auckland council to make a decision to: Disallow the whole original submission

Submission date: 24 March 2021

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? 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:
original submitters

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.

The following customer has submitted a Unitary Plan online further submission.

Contact details

Full name of person making a further submission: Richard and Eleanor Brabant will

Organisation name:

Full name of your agent: Richard Brabant

Email address: richard@brabant.co.nzWill

Contact phone number: 021975548

Postal address:
48 Ventnor Road
Remuera
Auckland
Auckland 1050

Submission details

This is a further submission to:

Plan change number: Plan Change 57

Plan change name: PC 57 (Private): Royal Auckland and Grange Golf Club

Original submission details

Original submitters name and address:

Denize Dalziel
dr.denisedl@gmail.com

Submission number: 12

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 1

The reasons for my or our support or opposition are:

The land is privately owned and has been a golf course for over 60 years.

All other golf courses in Auckland have an Open Space zoning, reflecting their use.

The amount that is paid in rates to the local authority depends on the demand for services, and retaining an inappropriate zoning on land because there would be a higher rating charge is inappropriate and unlawful.

I or we want Auckland council to make a decision to: Disallow the whole original submission

Submission date: 24 March 2021

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? 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:
original submitters

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.

The following customer has submitted a Unitary Plan online further submission.

Contact details

Full name of person making a further submission: Richard and Eleanor Brabant

Organisation name:

Full name of your agent: Richard Brabant

Email address: richard@brabant.co.nz

Contact phone number: 021975548

Postal address:
48 Ventnor Road
Remuera
Auckland
Auckland 1050

Submission details

This is a further submission to:

Plan change number: Plan Change 57

Plan change name: PC 57 (Private): Royal Auckland and Grange Golf Club

Original submission details

Original submitters name and address:

Mark Thom
m.thom13@gmail.com

Submission number: 15

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 1

The reasons for my or our support or opposition are:

The land is privately owned and has been a golf course for over 60 years.

All other golf courses in Auckland have an Open Space zoning, reflecting their use.

Zoning of land should reflect its existing and expected future use in this case as an established and recently upgraded golf course. Retaining a residential zoning would not result in the land being developed for residential use.

I or we want Auckland council to make a decision to: Disallow the whole original submission

Submission date: 24 March 2021

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? 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:
original submitters

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.

The following customer has submitted a Unitary Plan online further submission.

Contact details

Full name of person making a further submission: Richard and Eleanor Brabant

Organisation name:

Full name of your agent: Richard Brabant

Email address: richard@brabant.co.nz

Contact phone number: 021975548

Postal address:
48 Ventnor Road
Remuera
Auckland
Auckland 1050

Submission details

This is a further submission to:

Plan change number: Plan Change 57

Plan change name: PC 57 (Private): Royal Auckland and Grange Golf Club

Original submission details

Original submitters name and address:
Arthur McGregor
arthur.mcgregor@gmail.com

Submission number: 14

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 1

The reasons for my or our support or opposition are:

The land is privately owned and has been a golf course for over 60 years.

All other golf courses in Auckland have an Open Space zoning, reflecting their use.

Zoning of land should reflect its existing and expected future use in this case as an established and recently upgraded golf course. The reference to "opportunity cost" is presumably a reference to retaining a residential zoning on the land in order that there is a higher rates charge. This is inappropriate and unlawful as rates payable on a property reflects the cost of Council services to that land.

I or we want Auckland council to make a decision to: Disallow the whole original submission

Submission date: 24 March 2021

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? 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:
We are original submitters

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.

The following customer has submitted a Unitary Plan online further submission.

Contact details

Full name of person making a further submission: Richard and Eleanor Brabant

Organisation name:

Full name of your agent: Richard Brabant

Email address: richard@brabant.co.nz

Contact phone number: 021975548

Postal address:
48 Ventnor Road
Remuera
Auckland
Auckland 1050

Submission details

This is a further submission to:

Plan change number: Plan Change 57

Plan change name: PC 57 (Private): Royal Auckland and Grange Golf Club

Original submission details

Original submitters name and address:
Margaret Briffett
margbriffett@gmail.com

Submission number: 18

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 1

The reasons for my or our support or opposition are:

The zoning Open Space – Sport and Recreation is applied throughout Auckland to public and private land where the land is used for sporting and/or recreational use. This golf course is privately owned and golf has been played there by members of the club (an amalgamation of 2 clubs) for over 60 years. The incorrect zoning should have been changed during the Unitary Plan review. It is a misuse of the Unitary Plan to apply an inappropriate zoning to an established land-use as a way of recovering higher rates. Rates paid by a landowner should reflect the cost of providing services to that land.

I or we want Auckland council to make a decision to: Disallow the whole original submission

Submission date: 24 March 2021

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? 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:
original submitters

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.

The following customer has submitted a Unitary Plan online further submission.

Contact details

Full name of person making a further submission: Richard and Eleanor Brabant

Organisation name:

Full name of your agent: Richard Brabant

Email address: richard@brabant.co.nz

Contact phone number: 021975548

Postal address:
48 Ventnor Road
Remuera
Auckland
Auckland 1050

Submission details

This is a further submission to:

Plan change number: Plan Change 57

Plan change name: PC 57 (Private): Royal Auckland and Grange Golf Club

Original submission details

Original submitters name and address:
Rebecca Walker
rebecca.i.walker@gmail.com

Submission number: 16

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 1

The reasons for my or our support or opposition are:
The land is privately owned and has been a golf course for over 60 years.
All other golf courses in Auckland have an Open Space zoning, reflecting their use.
Zoning of land should reflect its existing and expected future use in this case as an established and recently upgraded golf course. The golf club does not receive any subsidy from Auckland ratepayers.

I or we want Auckland council to make a decision to: Disallow the whole original submission

Submission date: 24 March 2021

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? 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:
We are original submitters

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.

The following customer has submitted a Unitary Plan online further submission.

Contact details

Full name of person making a further submission: Richard and Eleanor Brabant

Organisation name:

Full name of your agent: Richard Brabant

Email address: richard@brabant.co.nz

Contact phone number: 021975548

Postal address:
48 Ventnor Road
Remuera
Auckland
Auckland 1050

Submission details

This is a further submission to:

Plan change number: Plan Change 57

Plan change name: PC 57 (Private): Royal Auckland and Grange Golf Club

Original submission details

Original submitters name and address:
Auckland Transport
ror.power@at.govt.nz

Submission number: 19

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 1

The reasons for my or our support or opposition are:

This privately owned golf course is an established recreational facility, now amalgamating 2 former golf courses (and golf clubs) into one facility which has been re-built with services and facilities including driveway access and car parking suitable for the activity of golf and the present and expected membership of the club. It is probably the only golf course in Auckland that is not zoned Open Space – Sport and Recreation. The use of the land as a golf course goes back over 60 years. It's present and expected future use (beyond the life of the Unitary Plan) is as a golf course. The land and the facilities have been developed for that single recreational use. To postulate as Auckland Transport does that if the zoning is changed from the (obviously incorrect and inappropriate) residential zoning currently applied, to a zoning that reflects the use of the land, that the applicant has to traverse a range of other potential opportunities for use of the site as itemised in Attachment 1 to the submission is fanciful. That same proposition could be applied to other privately owned facilities currently zoned Open Space – for example Auckland Tennis, or Auckland Badminton or netball facilities. Further, any change of recreational or sporting use as suggested in the AT submission would require changes to the sports facilities that would involve (at the least) earthworks and building

consents. A comparison of vehicle usage if the land was used for residential purposes as opposed to the land being used for its current purpose does not assist in determining what the appropriate zoning should be, as the correct approach in a case such as this to a choice of alternative zones is to apply a zone that reflects existing and future land use expected during the life of the Unitary Plan.

I or we want Auckland council to make a decision to: Disallow the whole original submission

Submission date: 24 March 2021

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? 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:
We are original submitters

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.

The following customer has submitted a Unitary Plan online further submission.

Contact details

Full name of person making a further submission: Richard and Eleanor Brabant

Organisation name:

Full name of your agent: Richard Brabant

Email address: richard@brabant.co.nz

Contact phone number: 021975548

Postal address:
48 Ventnor Road
Remuera
Auckland
Auckland 1050

Submission details

This is a further submission to:

Plan change number: Plan Change 57

Plan change name: PC 57 (Private): Royal Auckland and Grange Golf Club

Original submission details

Original submitters name and address:
Glen McCutcheon
nana.glenn@gmail.com

Submission number: 20

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 1

The reasons for my or our support or opposition are:
The land is privately owned and has been a golf course for over 60 years.
All other golf courses in Auckland have an Open Space zoning, reflecting their use.
Zoning of land should reflect its existing and expected future use in this case as an established and recently upgraded golf course.

I or we want Auckland council to make a decision to: Disallow the whole original submission

Submission date: 24 March 2021

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? 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:
We are original submitters

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.

Form 6

**Further submission on Proposed Plan Change 44 to the Auckland Unitary Plan
(Operative Part)**

Clause 8 of Schedule 1, Resource Management Act 1991

To:

Planning Technician
Plans and Places
Auckland Council
Private Bag 92300

AUCKLAND 1142

By email: unitaryplan@aucklandcouncil.govt.nz

Name of submitter:

Royal Auckland Golf and Grange Club (**RAGGC**)

1. RAGGC makes this further submission to Plan Change 57: Royal Auckland and Grange Golf Club to the Auckland Unitary Plan (Operative Part) (**AUP**) (**the plan change**).
2. RAGGC has an interest in the proposal that is greater than the interest the general public as the applicant of this private plan change.
3. Those submissions or parts of submissions opposed/supported are set out in Attachment A. This attachment also includes reasons for opposing/supporting those submissions and parts of submissions. RAGGC seeks that the submissions be allowed/disallowed as set out in Attachment A.
4. RAGGC as the applicant wishes to be heard in support of this further submission.
5. If others make a similar further submission, RAGGC will consider presenting a joint case with them at the hearing.

Rachael Russ

Royal Auckland Golf and Grange Club

Dated: 26 March 2021

Address for service of submitter:

Tania Richmond
Richmond Planning Limited
PO Box 25734, St Heliers, Auckland 1740
tania@richmondplanning.co.nz

Attachment A

Proposed private plan change 57 (Private): Royal Auckland and Grange Golf Club						
Summary of Decisions Requested						
Sub no	Sub point	Name	Council theme	Decision requested	Support or Oppose	Allow / Disallow in whole or in part
1	1.1	Richard and Eleanor Brabant	Accept the plan change	Accept the plan change without amendments	Support	Allow
	1.2		Accept the plan change to remedy an omission in the AUP review process. Accept OP-SAR as appropriate zoning for existing activity.	Accept the plan change without amendments	Support	Allow
2	2.1	Michael Horton	Significant section of the Plan Change 57 area needs to provide for public access and amenity	Decline the plan change	Oppose	Disallow
				<p>Reasons</p> <p>RAGGC agrees no amendments are necessary.</p> <p>Within the structure of the AUP zoning framework, the OP-SAR zone is the most appropriate zone for the land and to achieve the purpose of the RMA. This zone recognises the current and foreseeable use of the land.</p> <p>Re-zoning the land recognises and maintains the amenity for existing and future residents, and the environmental benefits of the golf course, including:</p> <ul style="list-style-type: none"> • Visual amenity for adjacent residents by the outlook to open space; • Low intensity activity with limited hours of use; • Opportunities to support native flora and fauna; • Managing overland flow and stormwater peak flows; and • Offsetting the accumulation of greenhouse gases in the atmosphere by high ratio of plants and trees to process and store carbon. <p>This plan change is about rezoning the land. The number of golf holes, which have been reduced from 36 to 27 with the recent amalgamation of the two clubs, is not relevant to the plan change. The amalgamation secured the long-term future of what</p>		

Proposed private plan change 57 (Private): Royal Auckland and Grange Golf Club

Summary of Decisions Requested

Sub no	Sub point	Name	Council theme	Decision requested	Support or Oppose	Allow / Disallow in whole or in part	Reasons
3	3.1	Naomi Lange	Opposes the plan change	Decline the plan change	Oppose	Disallow	<p>is a premier golf club and golfing facility of international standard.</p> <p>RAGGC members are from right across the Auckland region. Most suburbs are represented from Pokeno in the south to Omaha in the North. It includes members from the local area.</p> <p>It is the responsibility of the Auckland Council to provide sufficient open space for its residents, not private landowners. The rezoning does not prevent the land being made available to the public in the future, should it be sold to the Council. While not available for 'use' by the public, the golf course provides an important amenity and environmental benefit.</p> <p>The relief sought to reduce the golf holes 18 and make the balance of the land available for the public is not 'on' the plan change.</p>
	3.2		Enable residential capacity within 800 metres distance of Middlemore Station and Great South Road.	Decline the plan change	Oppose	Disallow	<p>Within the structure of the AUP zoning framework, the OP-SAR zone is the most appropriate zone for the land and to achieve the purpose of the RMA. This is consistent with the vast majority of golf courses in the Auckland region, both public and private, zoned OS-SAR.</p> <p>The land been used for active open space for over 80 years and will continue to be used for this purpose for the feasible future.</p> <p>RAGGC has no intention of selling or using the land for residential purposes as it has invested over \$66m in the redevelopment of the golf course and clubroom.</p>

Proposed private plan change 57 (Private): Royal Auckland and Grange Golf Club

Summary of Decisions Requested

Sub no	Sub point	Name	Council theme	Decision requested	Support or Oppose	Allow / Disallow in whole or in part	Reasons
4		Ashlee Walsh	Accept the plan change to retain open space amenity	Approve the plan change	Support	Allow	It is fanciful to suggest there is loss of residential capacity when the land is not available for this purpose. Rezoning the land recognises and maintains a significant amenity for adjacent residents. These properties are afforded a high level of amenity from the open spaciousness of the golf course and low intensity activity.
5	5.1	Transpower	Accept the plan change without amendments	Accept the plan change without amendments	Support	Allow	The plan change does not include amendments to the National Grid Corridor Overlay applying to the land, or any provisions in Chapter D26 National Grid Corridor Overlay of the Auckland Unitary Plan.
	5.2		Neutral provided the National Grid Corridor overlay will continue to apply to the plan change site.	Neutral provided the National Grid Corridor Overlay continues to apply to the land.	Support	Allow	The National Grid Corridor overlay will continue to apply to the plan change site regardless of the zoning.
6		Nick Sommerville	Retain residential zoning in area of established transport and community infrastructure	Decline the plan change	Oppose	Disallow	Within the structure of the AUP zoning framework, the OP-SAR zone is the most appropriate zone for the land and to achieve the purpose of the RMA. The land been used for active open space for over 80 years and will continue to be used for this purpose for the feasible future. RAGGC has no intention of selling or using the land for residential purposes as it has invested over \$66m in the redevelopment of the golf course and clubroom. It is fanciful to suggest there is loss of residential capacity when the land is not available for this purpose.

Proposed private plan change 57 (Private): Royal Auckland and Grange Golf Club

Summary of Decisions Requested

Sub no	Sub point	Name	Council theme	Decision requested	Support or Oppose	Allow / Disallow in whole or in part	Reasons
7		Geoffrey Page	Residential zoning most efficient use of the land	Decline the plan change	Oppose	Disallow	<p>The plan change does not suggest the land is available for use to the public. The OS-SAR zone applies to public or privately owned land.</p> <p>The plan change describes the benefits of the open space zone for residents in the surrounding area and the natural environment. The benefits are recognised by submitter #4 who lives in Troon Place.</p> <p>Within the structure of the AUP zoning framework, the OP-SAR zone is the most appropriate zone for the land and to achieve the purpose of the RMA. This is consistent with the vast majority of golf courses in the Auckland region, both public and private, zoned OS-SAR.</p> <p>The land been used for active open space for over 80 years and will continue to be used for this purpose for the feasible future.</p> <p>RAGGC has no intention of selling or using the land for residential purposes as it has invested over \$66m in the redevelopment of the golf course and clubroom.</p> <p>It is fanciful to suggest there is loss of residential capacity when the land is not available for this purpose.</p>
8	8.1	Lisa Grant	Rezoning does not provide for public access	Decline the plan change	Oppose	Disallow	<p>Within the structure of the AUP zoning framework, the OP-SAR zone is the most appropriate zone for the land and to achieve the purpose of the RMA.</p> <p>The zone description recognises the land may be public or privately owned.</p>

Proposed private plan change 57 (Private): Royal Auckland and Grange Golf Club

Summary of Decisions Requested

Sub no	Sub point	Name	Council theme	Decision requested	Support or Oppose	Allow / Disallow in whole or in part	Reasons
9	9.1	Cassandra Bahr	Rezoning does not provide for public access	Decline the plan change	Oppose	Disallow	Rating of the land is a separate and unrelated matter to the plan change. Within the structure of the AUP zoning framework, the OP-SAR zone is the most appropriate zone for the land and to achieve the purpose of the RMA. The zone description recognises the land may be public or privately owned. Rating of the land is a separate and unrelated matter to the plan change.
10	10.1	Walter Hamer	Rezoning does not provide for public access and there is a need for housing in the area	Not specified	Oppose	Disallow	Within the structure of the AUP zoning framework, the OP-SAR zone is the most appropriate zone for the land and to achieve the purpose of the RMA. The Council has applied the OP-SAR zone to the vast majority of golf courses in the Auckland region, both public and private as the zone description recognises the land may be public or privately owned.
11	11.1	Pranaya Thaker	Rezoning does not provide for public access and does not align with the NPS-UD or climate change policy	Decline the plan change	Oppose	Disallow	Within the structure of the AUP zoning framework, the OP-SAR zone is the most appropriate zone for the land and to achieve the purpose of the RMA. The Council has applied the OP-SAR zone to the vast majority of golf courses in the Auckland region, both public and private as the zone description recognises the land may be public or privately owned. Rating of the land is a separate and unrelated matter to the plan change.

Proposed private plan change 57 (Private): Royal Auckland and Grange Golf Club

Summary of Decisions Requested

Sub no	Sub point	Name	Council theme	Decision requested	Support or Oppose	Allow / Disallow in whole or in part	Reasons
12	12.1	Denise Dalziel	Residential zoning most efficient use of the land	Decline the plan change	Oppose	Disallow	<p>It is fanciful to suggest there is loss of residential capacity when the land is not available for this purpose.</p> <p>There are significant benefits to the natural environment with an open space zoning including offset the accumulation of greenhouse gases in the atmosphere by almost 80 hectares of land being in vegetation.</p> <p>Within the structure of the AUP zoning framework, the OP-SAR zone is the most appropriate zone for the land and to achieve the purpose of the RMA. This is consistent with the vast majority of golf courses in the Auckland region, both public and private, zoned OS-SAR.</p> <p>The most efficient use of the land is to apply a zoning is one that reflects RAGGC investment in the land as a premier golf club and golfing facility of international standard.</p> <p>Rating of the land is a separate and unrelated matter to the plan change.</p> <p>RAGGC has been in this location for over 80 years and well before the surrounding residential activity.</p> <p>The club has both men and women members.</p>
13	3.1	Martin Burr	Residential zoning most efficient use of the land, use for residential intensification	Decline the plan change	Oppose	Disallow	<p>Within the structure of the AUP zoning framework, the OP-SAR zone is the most appropriate zone for the land and to achieve the purpose of the RMA. This is consistent with the vast majority of golf courses in the Auckland region, both public and private, zoned OS-SAR.</p>

Proposed private plan change 57 (Private): Royal Auckland and Grange Golf Club

Summary of Decisions Requested

Sub no	Sub point	Name	Council theme	Decision requested	Support or Oppose	Allow / Disallow in whole or in part	Reasons
14	14.1	Arthur McGregor	Rezoning does not provide for public access	Decline the plan change	Oppose	Disallow	<p>The most efficient use of the land is to apply a zoning is one that reflects RAGGC investment in the land as a premier golf club and golfing facility of international standard.</p> <p>RAGGC has been in this location for over 80 years and at the time of establishment, was on the outskirts of the city. Development has occurred around the golf course.</p> <p>It is fanciful to suggest there is loss of residential capacity when the land is not available for this purpose.</p> <p>Within the structure of the AUP zoning framework, the OP-SAR zone is most appropriate zone for the land and to achieve the purpose of the RMA. It is for this reason the vast majority of golf courses in the Auckland region are zoned OP-SAR.</p> <p>The zone description recognises the land may be public or privately owned. There is no requirement to provide public access to the land and it would not be safe to do so.</p> <p>Rating of the land is a separate and unrelated matter to the plan change.</p> <p>It is fanciful to suggest there is loss of residential capacity when the land is not available for this purpose.</p>
15	15.1	Mark Thorne	Rezoning does not provide for public access	Decline the plan change	Oppose	Disallow	<p>Within the structure of AUP zoning framework, the OP-SAR zone is most appropriate zone for the land and to achieve the purpose of the RMA. This is the reason the vast majority of golf courses in the Auckland region are zoned OP-SAR.</p>

Proposed private plan change 57 (Private): Royal Auckland and Grange Golf Club

Summary of Decisions Requested

Sub no	Sub point	Name	Council theme	Decision requested	Support or Oppose	Allow / Disallow in whole or in part	Reasons
16	16.1	Rebecca Walker	Rezoning does not provide for public access	Decline the plan change	Oppose	Disallow	<p>The zone description recognises the land may be public or privately owned. For health and safety, it is not appropriate to provide public access through this privately owned land.</p> <p>Rating of the land is a separate and unrelated matter to the plan change.</p> <p>Within the structure of AUP zoning framework, the OP-SAR zone is most appropriate zone for the land and to achieve the purpose of the RMA. This is the reason the vast majority of golf courses in the Auckland region are zoned OP-SAR.</p> <p>The zone description recognises the land may be public or privately owned. For health and safety, it is not appropriate to provide public access through this privately owned land.</p> <p>Rating of the land is a separate and unrelated matter to the plan change.</p> <p>The notion of "open public space" in the zoning framework does not mean the facility has to be open to the general public. The zone notation describes the physical nature of the land and Council can't impose rules on how private clubs should run their facilities.</p>
18	18.1	Margarete Briffett	Rezoning does not provide for public access	Decline	Oppose	Disallow	<p>For over 80 years the land has been used for active recreation and will continue to be used for this purpose in the foreseeable future. The OS_SAR is the most appropriate zone for the land within the structure of the AUP zoning framework. This is reflected in the vast majority of golf courses being zoned OP-SAR.</p>

Proposed private plan change 57 (Private): Royal Auckland and Grange Golf Club

Summary of Decisions Requested

Sub no	Sub point	Name	Council theme	Decision requested	Support or Oppose	Allow / Disallow in whole or in part	Reasons
19							<p>The zone description recognises the land may be public or privately owned. There is no requirement to provide public access to the land and it would not be safe to do so.</p> <p>Rating of the land is a separate and unrelated matter to the plan change.</p> <p>Recent investment in the complete redevelopment of the course and new clubhouse make it fanciful to suggest the land is available for residential purposes. Accordingly, there is no loss of residential capacity.</p> <p>Through the recent PAUP hearing process, the Council has enabled intensification of residential use to provide for short to medium term demand, including in locations close to rapid transit and public transport.</p>
	19.1	Auckland Transport	Oppose the plan change	Decline the plan change	Oppose	Disallow	<p>Within the structure of the AUP zoning framework, the OP-SAR zone is most appropriate zone for the land and to achieve the purpose of the RMA. This is reflected in the vast majority of golf courses being zoned OP-SAR.</p>
	19.2		Seeking detailed assessment of the activities enabled through this Plan Change and does not contain mechanisms to mitigate the effects on the wider transport network.	Decline the plan change	Oppose	Disallow	<p>This plan change is not based on a desire for there to be a change to the activity carried out on the land. This application is intended to regularise the zoning of the land to make it consistent with the actual use of the land, now and into the future.</p> <p>A consideration of a 'worst-case' transport effects scenario enabled by the re-zoning is unnecessary</p>

Proposed private plan change 57 (Private): Royal Auckland and Grange Golf Club

Summary of Decisions Requested

Sub no	Sub point	Name	Council theme	Decision requested	Support or Oppose	Allow / Disallow in whole or in part	Reasons
	19.3		Consider and provide public accessways for walking and cycling through the site and improve access to the Rapid Transit Network	Decline the plan change	Oppose	Disallow	as this is so unlikely to occur in the foreseeable future as to be fanciful. For security, health and safety, RAGGC to unable to provide public accessways for walking and cycling through the site.
20	20.1	Glenn McCutcheon	Oppose the plan change	Decline the plan change	Oppose	Disallow	Recent investment in the complete redevelopment of the course and new clubhouse make it fanciful to suggest the land is available for residential purposes. Accordingly, there is no loss of residential capacity.
	20.2		Enable residential capacity within 800 metres distance of Middlemore Station and Great South Road	Decline the plan change	Oppose	Disallow	There is plan enabled intensification of residential use to provide for short to medium term demand, including in locations close to rapid transit and public transport. The NPS-UD objective is to well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Provision of recreational activity is necessary to achieve this objective.

APPENDIX 5
RECOMMENDATION

Appendix 5 – Recommendation

RECOMMENDATION

That, the Hearing Commissioners accept submissions (and associated further submissions) as outlined in this report.

That, as a result of the recommendations on the submissions, the Auckland Unitary Plan **is not** amended by:

- The zoning changes proposed by PPC57, to the Auckland Unitary Plan

APPENDIX 6

OPEN SPACE – SPORT AND ACTIVE RECREATION ZONE ACTIVITY STATUS

**Appendix 6 –
AUP Open Space – Sport and Active Recreation Zone: Activity Status**

Activity	Activity Status Sport and Active Recreation Zone
Use	
(A1) Activities not provided for	NC
Residential	
(A2) Camping grounds	NC
(A3) A single workers' accommodation	P
(A4) Visitor accommodation - huts and lodges	NC
Community	
(A5) Visitor centres	NC
(A6) Community centres and halls	D
(A7) Early childhood learning services	D
(A8) Education and research facilities directly related to the open space	P
(A9) Art galleries, arts and cultural centres	D
(A10) Clubrooms	P
(A11) Libraries	NC
(A12) Grandstands	RD
(A13) Informal recreation	P
(A14) Information facilities accessory to a permitted activity	P
(A15) Organised sport and recreation	P
(A16) Public amenities	P
(A17) Recreation facilities	P
(A18) Gardens, including botanic and community gardens	P
Coastal	
(A19) Coastal navigational aids	P
Commerce	
(A20) Markets	RD
(A21) Restaurants and cafes, excluding a drive-through facility, that are accessory to a permitted activity and are located further than 50m from a residential zone	P
(A22) Restaurants and cafes, excluding a drive-through facility, that are accessory to a permitted activity and located within 50m of a residential zone	RD
(A23) Retail accessory to a permitted activity	P
(A24) Retail not otherwise provided for	D
Industry	
(A25) Park's depot, storage and maintenance	P
Rural	
(A26) Conservation planting	
(A27) Farming or grazing as part of a management programme for the open space	
(A28) Forestry	
Mana whenua	
(A29) Customary use	P
(A30) Marae complex	D
Development	

APPENDIX 7

JOINT EVIDENCE REPORT ON SUBMISSIONS BY ROGER ECCLES AND SISIRA JAYASINGHE, SOUTH – URBAN (CENTRAL AND WEST) 26 JANUARY 2016

**Appendix 7
Evidence to PAUP Independence Hearing Panel –**

**Joint Evidence Report on submissions by Roger Eccles and Sisira Jayasinghe, South
-Urban (Central and west) 26 January 2016**

Sub No	Submitter	Topic	Summary	Properties subject to the submission	Planner position	Reasons
2304-1	The Grange Golf Club Incorporated (Atten Marc D Stuart)	Urban (Central and West)	Rezone the Grange Golf Course fronting Grange road, Papatoetoe from Mixed House Urban to the Terraced Housing and Apartment Building zone (refer to map 35 of the submission)	The area of the Grange Golf course fronting Grange Road	Support in full change of zone	Support change of zoning of that part of the Papatoetoe Golf Course fronting Grange Road from MHU to THAB - This property is located close to a main arterial road with good public transport access and adjoining the existing THAB zone next to Hunters Corner Town Centre. This change of zone meets with the objectives of the THAB zone.
5716-3422	Auckland Council	Urban (Central and West)	Rezone the rea of the Papatoetoe Golf Course fronting Grange road to THAB (refer to Ōtara _ Papatoetoe Local board views, Volume 25 page 10 and map on page 11	They are of the Papatoetoe Golf course Road fronting Grange Road	Support in full change of zone	Support change of zoning of that part of the Papatoetoe Golf Course fronting Grange Road from MHU to THAB - This property is located close to a main arterial road with good public transport access and adjoining the existing THAB zone next to Hunters Corner Town Centre. The proposed zoning is the most

						appropriate way to achieve the objectives of the THAB zone and gives effect to the RPS.
--	--	--	--	--	--	--

APPENDIX 8

KAINGA ORA MIDDLEMORE PRECINCT REPORT 2020, JAXMAX 2020

Kāinga Ora

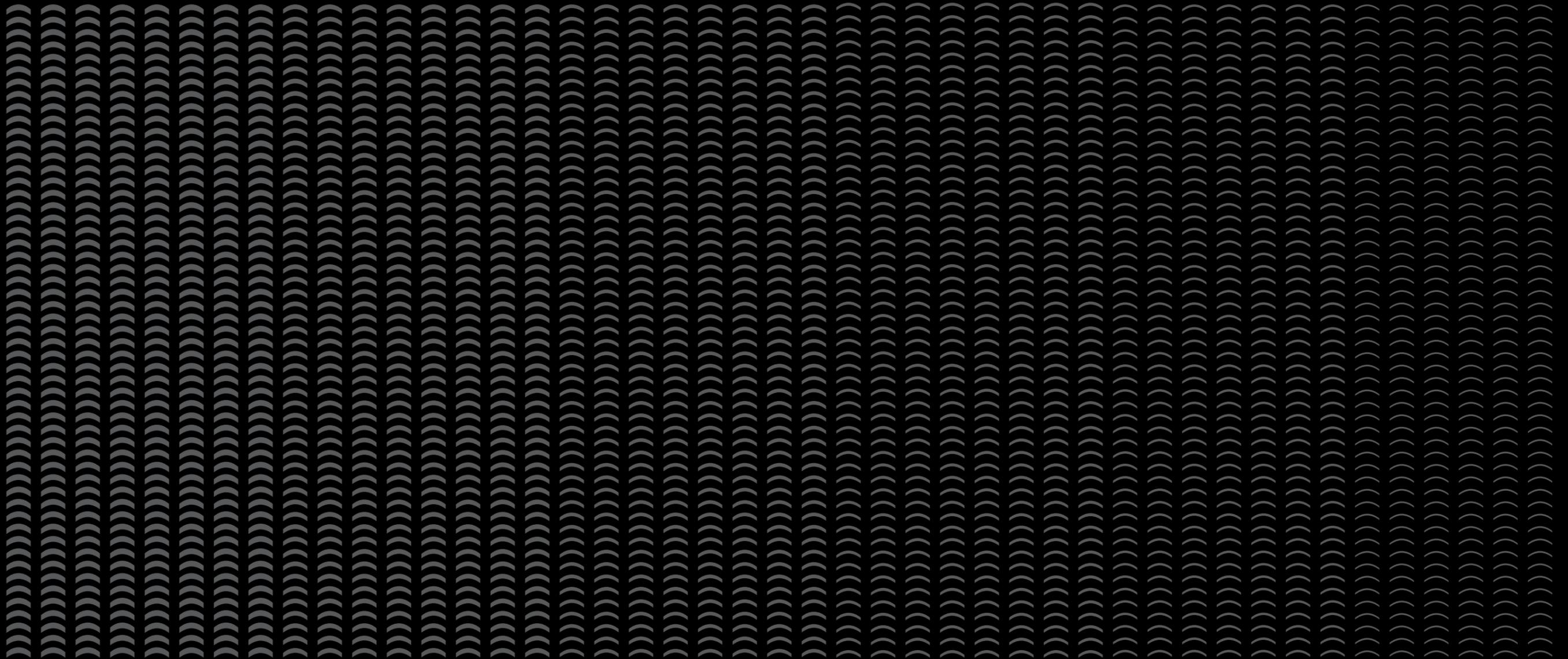
Document Prepared by Jasmax for
Kāinga Ora.

Rev A

Middlemore Precinct - AC Presentation

15th May 2020

JASMAX





Middlemore Precinct Auckland Council Presentation

- Project Origin
- Establishing the Opportunity
- Precinct Context
- Precinct Proposal

DRAFT

Project Origin

DRAFT

2.1 A Shared Opportunity



- 1 Kings College - Existing R.O.W access and proposed connections.
- 2 Royal Auckland Golf Course - required pedestrian connection to train station.
- 3 CMDHB - Potential connections to Hospital Road, connections to Middlemore Hospital campus.
- 4 Kiwi Rail / AT - 3rd and 4th line development. Redevelopment of train station. Potential new road connection to south of hospital below tracks.
- 5 CMDHB / Kāinga Ora - Potential new service road connection.
- 6 Kāinga Ora / AT - Potential new road connections.
- 7 Ministry of Education / Kāinga Ora / AT - Potential new urban school, connections to Swaffield Road & Middlemore Crescent.

Ngāi Tai Ki Tāmaki & M.H.U.D

Counties Manukau Health

Kāinga Ora & H.N.Z

Royal Auckland & Grange Golf Club

Auckland Council Parks

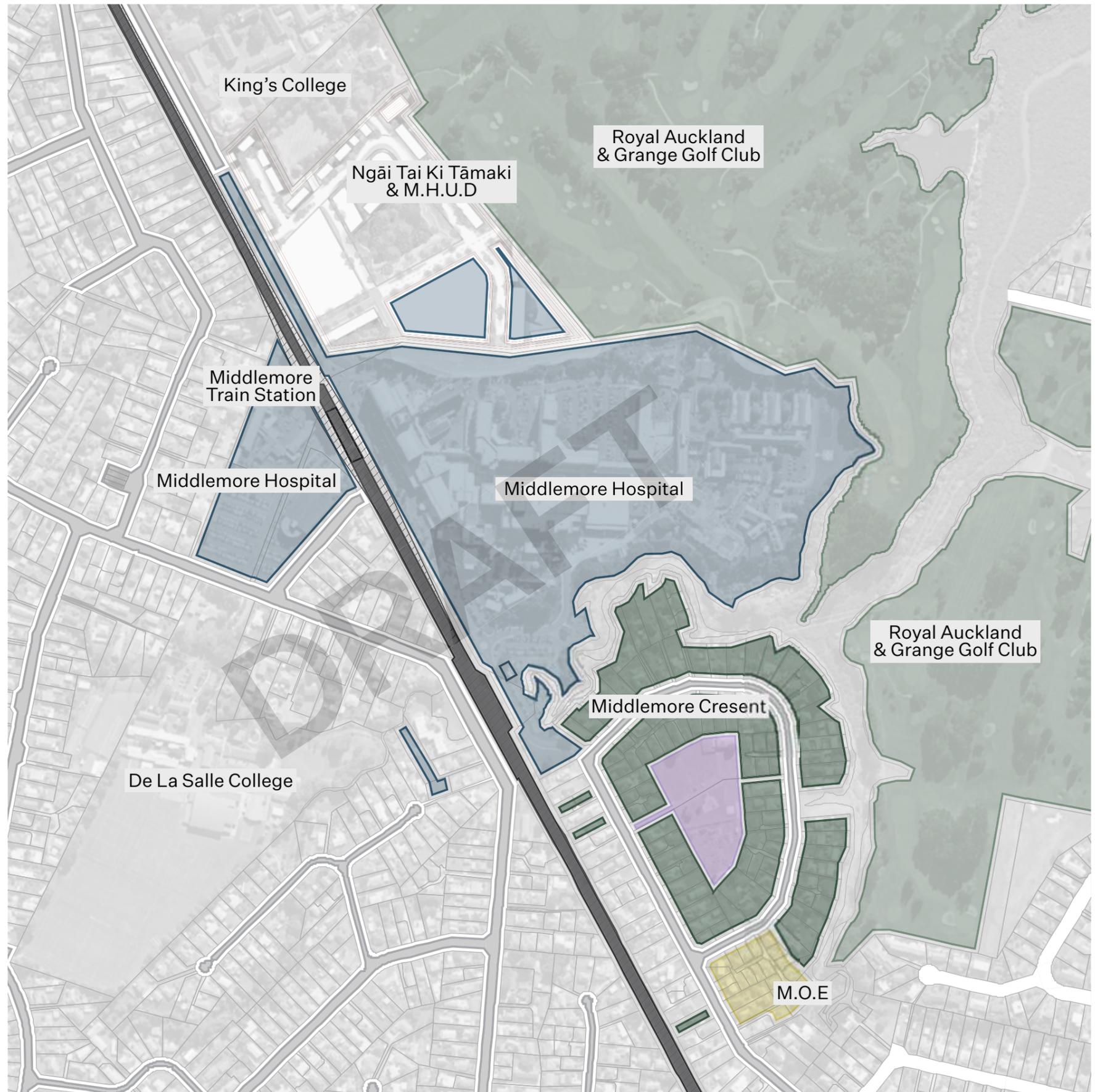
Ministry of Education

King's College

Auckland Transport

Kiwi Rail

Kiwi Rail Future Expansion



Establishing the Opportunity

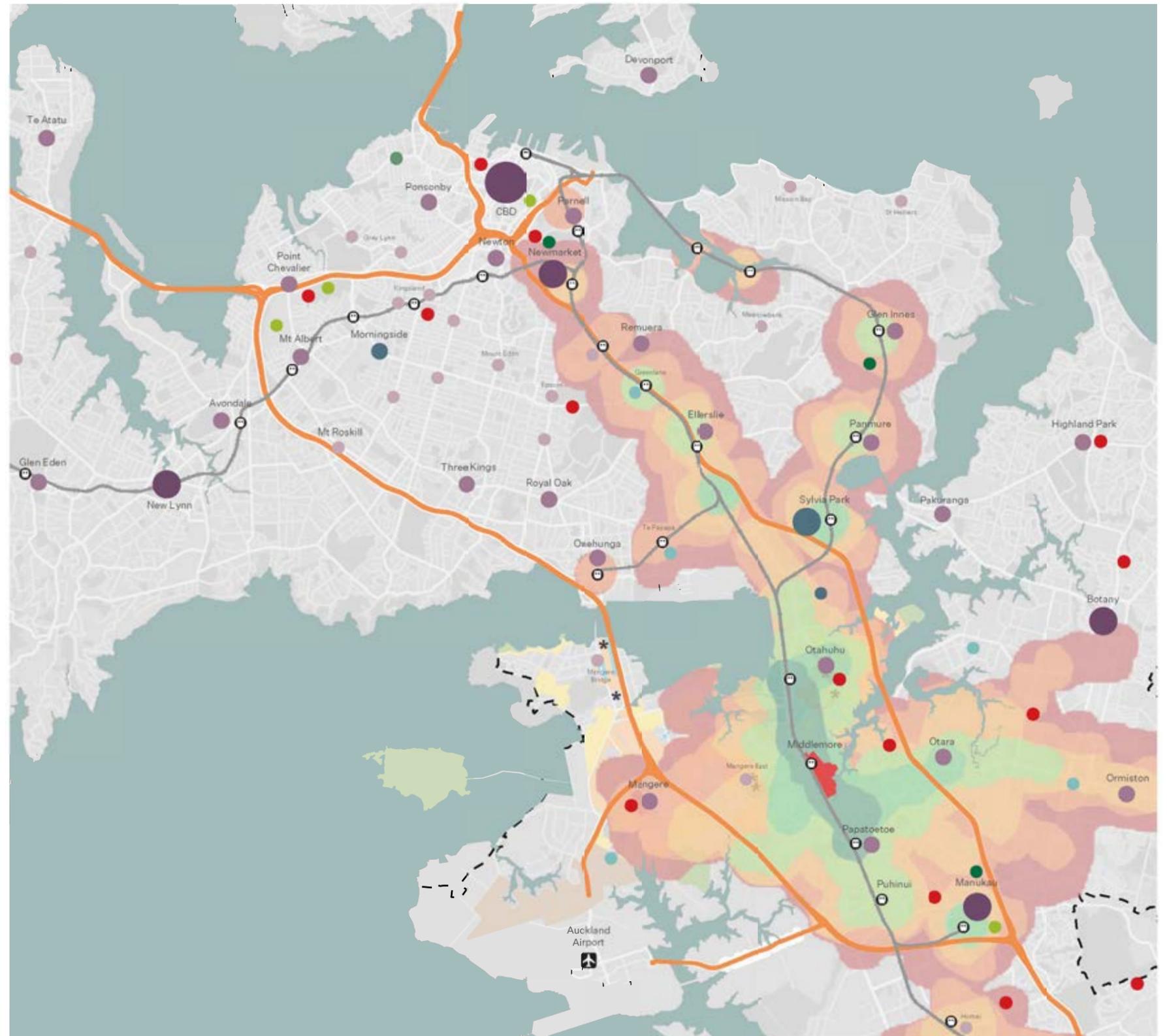
DRAFT

2.2 Nearby centre typologies

Drawing upon the work undertaken by other cities and in identifying stop typologies, the map to the right provides an overview of centres that relate to Middlemore, both along the Heavy Rail corridor and in nearby surroundings. These typologies are classified in a hierarchy which has been customised to suit the Auckland context.

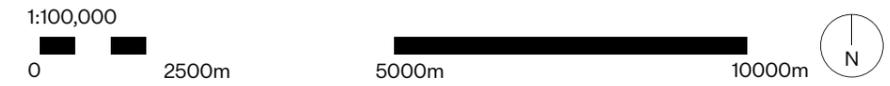
The different roles played by these centres in relation to each other and their spatial arrangement is a critical part of understanding what future land uses and activities could thrive and positively contribute to the city as part of development at Middlemore.

- City Centre
- Metropolitan Centre
- Town Centre
- Local Centre
- Retail Centre
- Business Park/ Industrial
- DHB Facilities
- Universities
- Medical Schools
- 5 Minutes by Public Transport
- 10 Minutes by Public Transport
- 15 Minutes by Public Transport
- 20 Minutes by Public Transport
- 25 Minutes by Public Transport
- 30 Minutes by Public Transport
- Train Stations
- Train Line
- Motorway

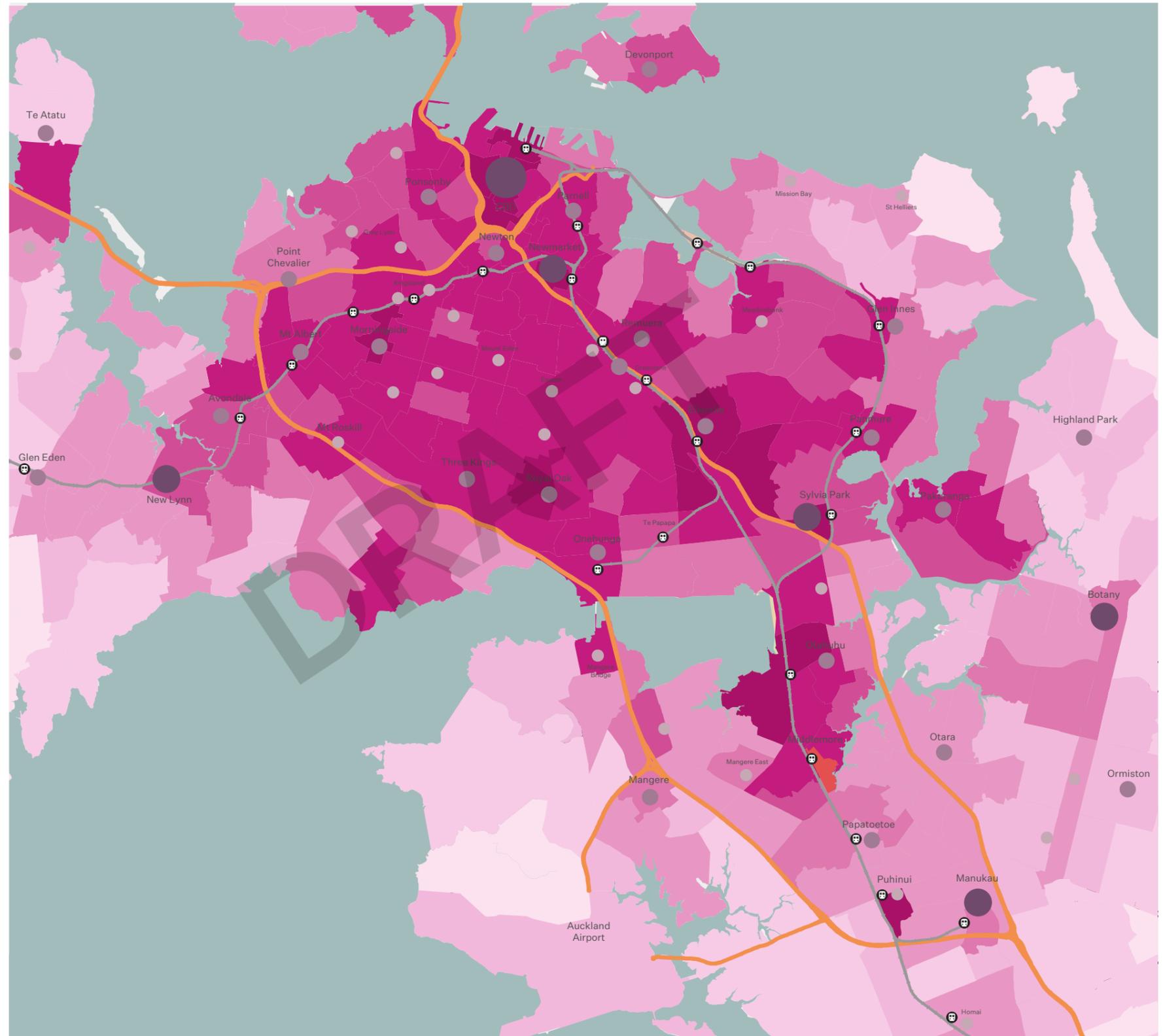


2.3 Existing Access to Employment

The hospital provides a large employment anchor to the Middlemore precinct, however through its location and the rail network the precinct has some of the best access to employment. This suggests that the precinct would warrant a significant residential catchment.



- City Centre
- Metropolitan Centre
- Town Centre
- Local Centre
- Train Stations
- Train Line
- Motorway
- High Population (approx. 500,000)
- Low Population (approx. 60,000)



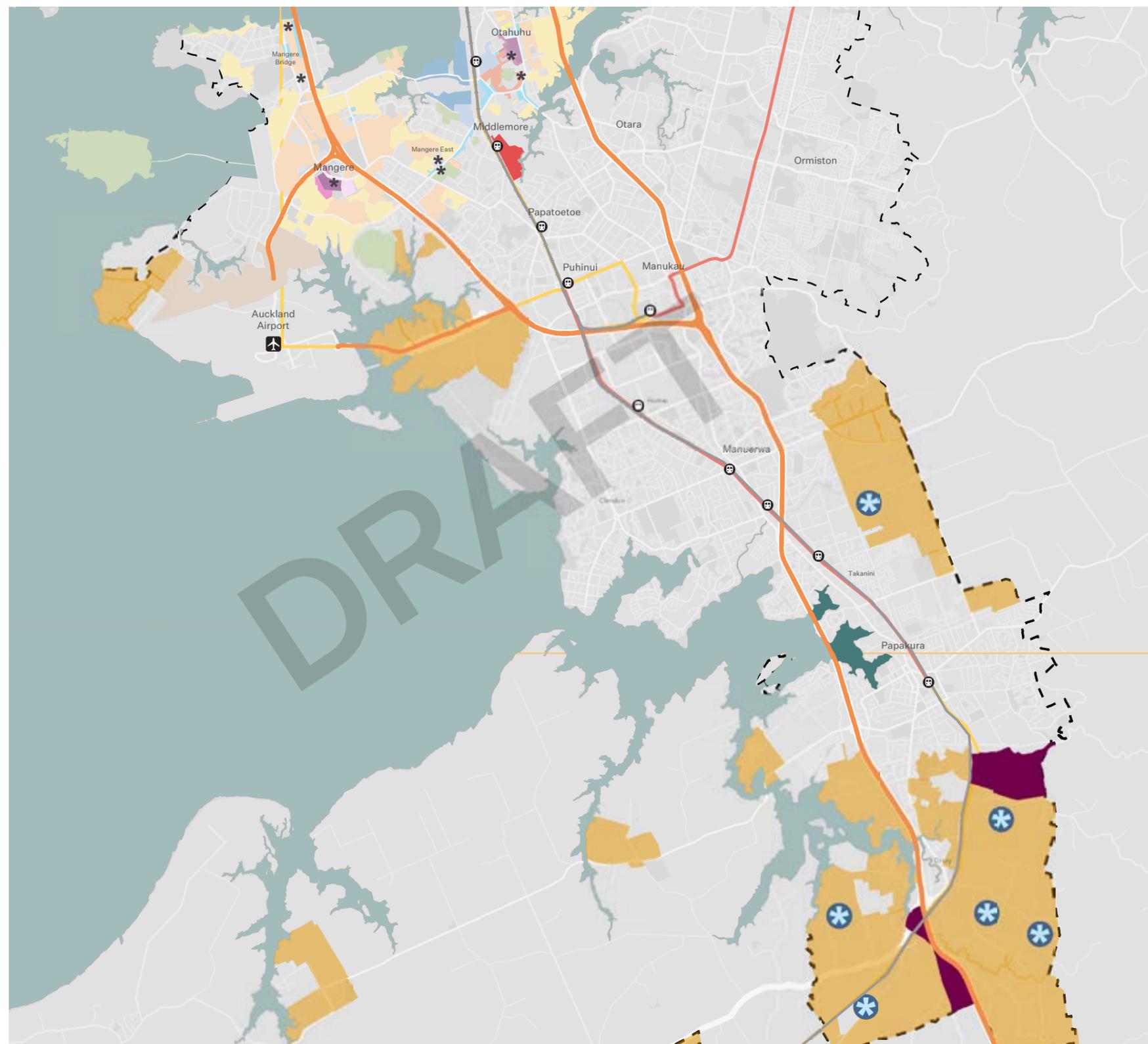
2.4 Proposed Growth and Transport



Proposed development to the west in Mangere and north in Otahuhu will strengthen those town centres. Significant development is planned south in Drury which will include 6 new centres. The current opportunities for development within the Middlemore Precinct suggest that the centre will not have the potential growth to complete with the surrounding centres and will largely serve its own catchment.

Mangere / Otahuhu 10 Year Prioritisation Plan

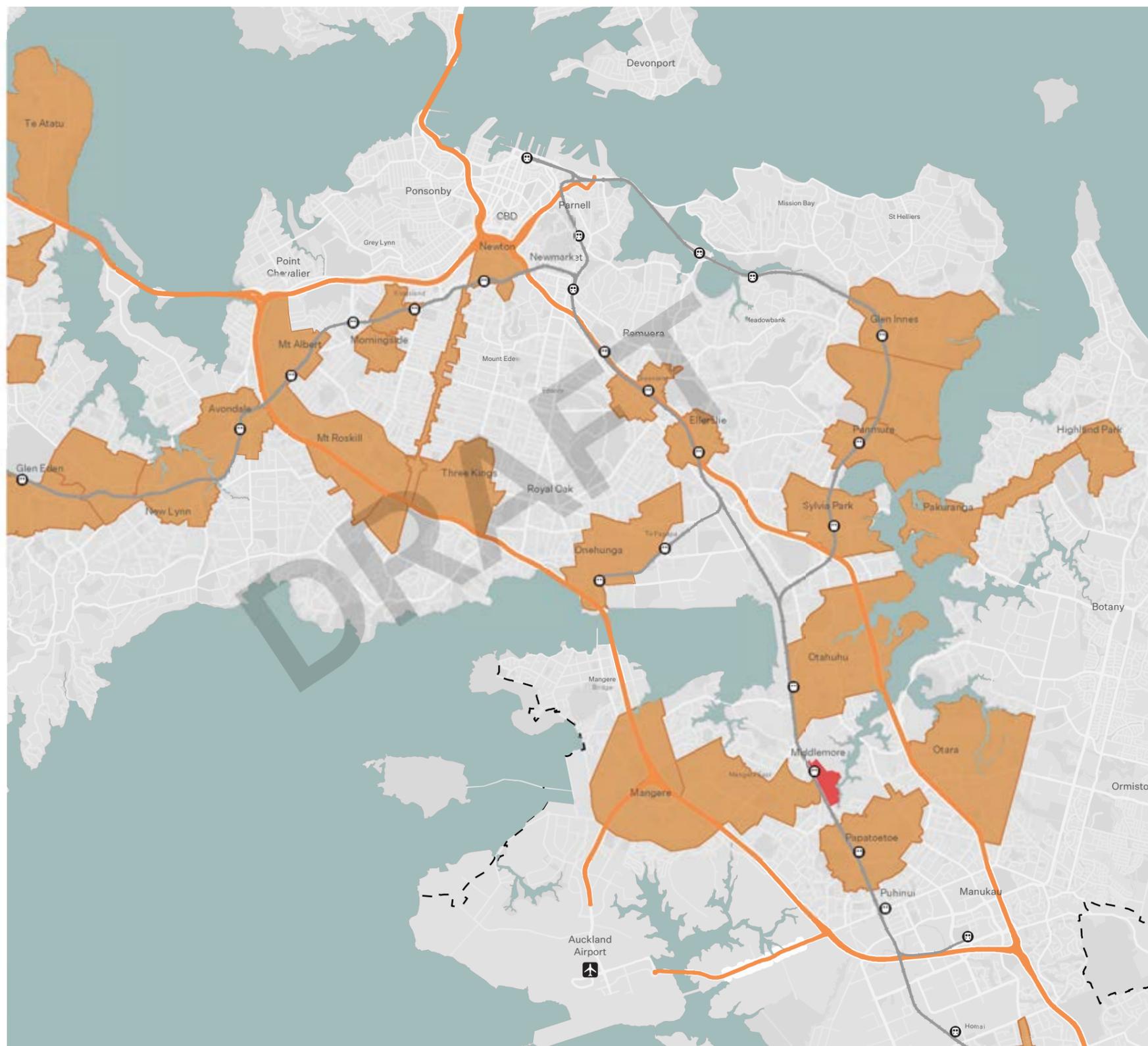
- New / Upgraded Park
- Town Centre
- Residential to Town Centre
- Residential to Business/ Mixed Use
- Residential Some Change
- Residential Moderate Change (up to 4 storeys)
- Residential Moderate Change (5-8 storeys)
- Heavy Industrial to Light Industrial/ Business
- Business to Town Centre
- Business to Mixed Use
- Approved Development Area
- Rural Urban Boundary
- Proposed New Centre
- Future Urban Area
- Future Business Area within Future Urban Area
- Decade 1 - Strategic Public Transport Network Improvement
- Decade 2 - Strategic Public Transport Network Improvement
- Decade 3 - Strategic Public Transport Network Improvement
- Train Stations
- Existing Train Line
- Motorway



2.5 Existing Development Context



Kāinga Ora's current development west of the Middlemore Precinct will provide a great residential catchment adjacent to the precinct.



- - Rural Urban Boundary
- Development Area
- Train Stations
- Existing Train Line
- Motorway

2.6 Leveraging the Transport Network

“A compact development, with moderate to higher densities, located within an easy walk of a transit station, generally with a mix of residential, employment, and shopping opportunities designed for pedestrians [and cyclists] without excluding the car.”

Transit-Oriented Communities and Transit-Oriented Developments are terms that indicate scales or components of this planning approach:

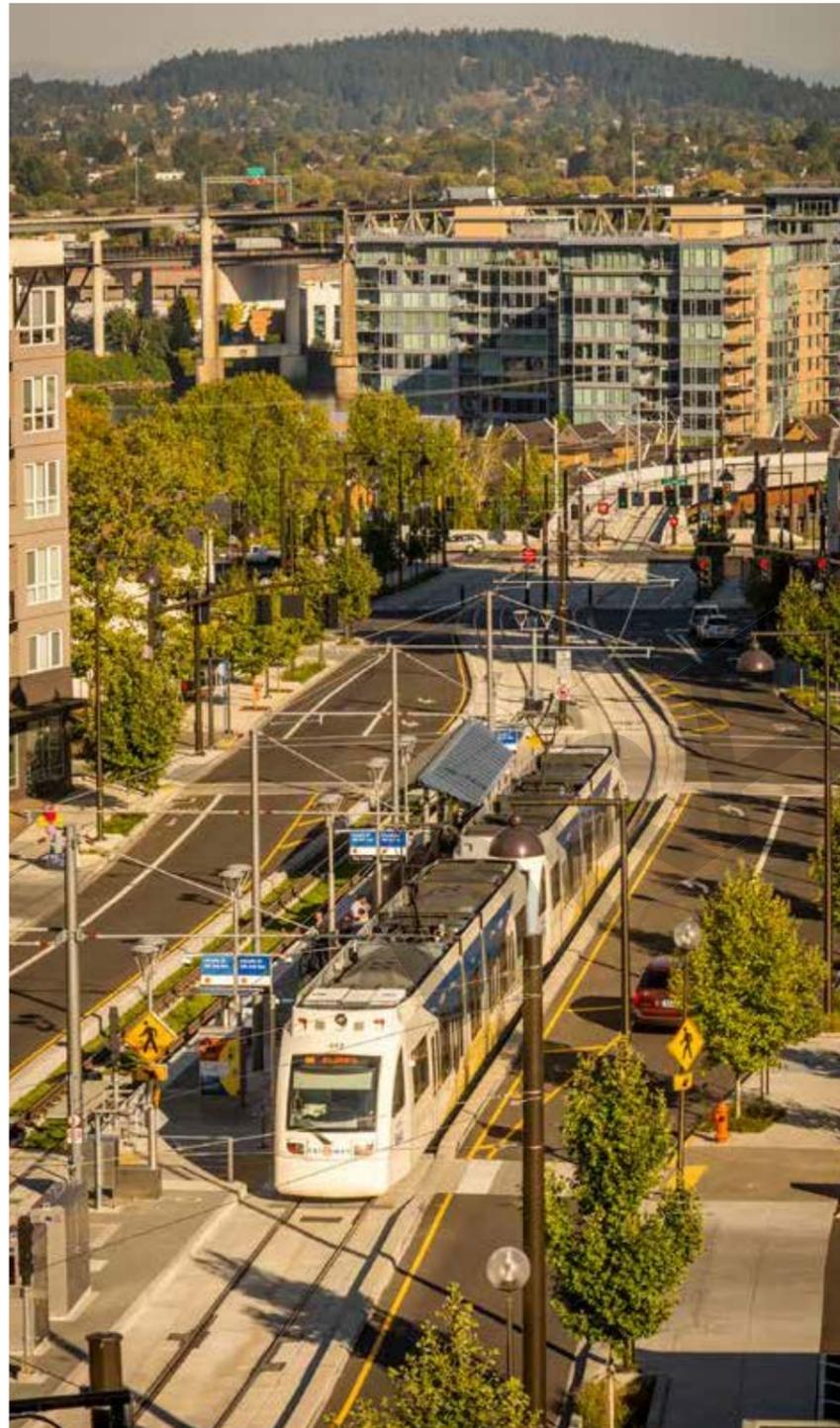
- **“Transit-Oriented Community” (TOC) describes a neighbourhood which forms around a transit stop.**
- **“Transit-Oriented Development” (TOD) describes site projects that particularly respond to transit, or which form the key elements that enable a neighbourhood to successfully relate to transit.**

TOC neighbourhoods can be very diverse and different dependent on their location within a city and the land uses and communities that occupy and use them, ranging from very residentially focused to commercially focused, with a spectrum of different use mixes in between.

The extent of a TOC neighbourhood is typically defined by the distance that people are willing to walk to access the transit stop. Within that walking catchment, development usually aims to achieve higher densities than areas without transit services, to optimise both opportunities for potential residents and businesses and the potential patronage of the transit service.

In the context of Middlemore, the potential TOC supported by the existing train stop includes the 30 Hospital Rd site, CMDHB land and Kāinga Ora’s Middlemore Crescent development scope boundaries. Immediately adjacent residential areas will also form part of the TOC area, but in general are restricted through zoning controls and therefore will contribute very little to increasing people’s access to transit.

The proposed third and fourth freight main lines which will require upgrades to the existing rail station, concurrently constraints on Hospital Rd and CMDHB land require urgent attention. Ngai Tai Ki Tāmaki Whenua Ltds agreement with MHUD to deliver significant housing on 30 Hospital Rd and Kāinga Ora intention of regenerating their existing land and assets at Middlemore Crescent provide a significant opportunity to deliver a series of TOD sites adjacent to the existing rail corridor to deliver a TOC neighbourhood.



The idea of Transit-Oriented models are driven by a range of positive outcomes that are possible from this model of development. There is now an extensive body of theoretical concepts and empirical research examining this field, which produces a common set of outcomes or objectives associated with Transit-Oriented models:

Transit and land uses are integrated, not just adjacent:

Centres that are destinations

The ability to live, work and play in the same neighbourhood

More efficient, sustainable transport for people:

- Increased transport choices and access to transport
- Greater use of transit; reduced reliance on vehicles
- Shorter commutes
- Lower transport and housing costs
- Less traffic and air pollution

Better urban centres for people:

- Transport corridors that are not just efficient for movement but attractive as places
- Greater diversity of amenities and services that satisfy daily needs
- Greater housing choice
- Better health and public safety

These outcomes provide the key “performance” considerations which should drive the design and formulation of both transit and land use development in a TOC / TOD area. However, there are a great many ways in which these targets may be met through different urban forms and scales, as demonstrated by diverse projects around the world, and in different places within the same city.

Therefore an important question for this Middlemore area is - What kind of place could and might this be shaped to become?

1. CTOD. (2010). Performance-Based Transit-Oriented Development Typology Guidebook
2. CTOD. (2007). Station Area Planning Manual. California, USA: Metropolitan Transportation Commission
3. Denver City Council. (2014). Transit Oriented Denver. Denver, USA: Denver City Council
4. Growth Management Queensland. (2010). Transit Oriented Development Guide. Queensland, Australia: Queensland Government.

2.7 Setting a TOC / TOD framework

Different typologies of TOC / TOD

While Transit-Oriented development models tend to share the objectives identified above, the individual places which result from this form of urban planning vary in different cities and locations within cities, and dependent on the characteristics of property markets and community dynamics at the time they develop.

The location of a transit stop within the broader city and region is one key factor in the type of place that will emerge. Allied to this is the mix of uses which is sought by people. In the most simple representation, the relative mix of residential and commercial uses is useful to inform the type of place that is being created. This mix is often based on the existing spatial distribution of these uses and on the emerging demand for new accommodation of either type within a city.

One recent guide (CTOD, 2010)¹ to assessing the performance of different TOD typologies provided an initial differentiation of TOC / TOD based on three categories within the spectrum of residential to commercial use mix. The boundaries between these categories are relatively arbitrary, but provide a starting point for assessing the type of place that would emerge at Middlemore (see Table 1).

Beyond this simple spectrum, a number of cities or project programmes have attempted to further categorise the nature of individual TOC / TOD areas in

relation to their location and role within an overall city or region. Examples of categories for TOC / TOD typologies developed by different regions or cities are set out in Table 2. These are based on their particular regional and city patterns, which relate in varying degrees to Auckland's city form, but their identification of varying types of urban place are all helpful to the discussion of the future potential for creating a TOC centre at Middlemore. Highlighted in bold for each column is the typology or typologies which most closely approximate to the characteristics of the Middlemore area.

As an example, the Queensland "Specialist" typology is described as "Major public and institutional uses, such as hospitals and universities, which generate significant levels of activity and demand for transit from a wide range of destinations."

This contrasts with a higher classification of "Activity Centre" described as "traditional town centres undergoing renewal; major regional shopping centres adapting to become more mixed use and transit oriented; infill opportunities to expand existing centres; or new activity centres in green field areas."

The "Suburban" classification is described as "generally support(ing) a significant residential population and a mix of other uses. Suburban precincts may act as a hub for surrounding suburbs and should provide a range of shops, employment opportunities and community services and facilities."

Key benchmark metrics

The Queensland guidance is one of the most recent (2010) and the closest in geographical proximity to Auckland.

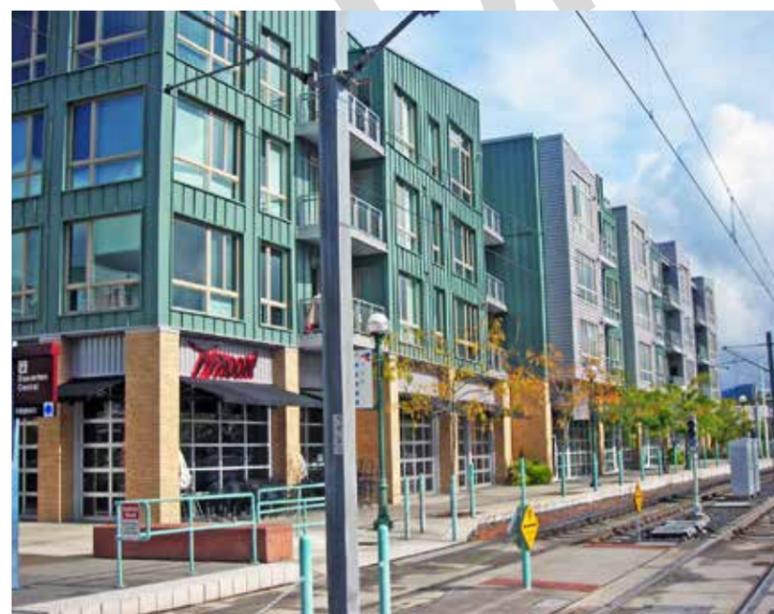
This guidance address some of the core structural and quantitative measures that should be considered for the layout of a TOC area. The following table illustrates the parameters advised for an "Specialist Activity Centre" TOC.

	Core 200m around transit stop	400m primary walking catchment	800m secondary walking catchment
Development scale	4-10 storeys	4-10 storeys	Up to 3 storeys
Block sizes	<6,000m ²	<8,000m ²	<10,000m ²
Street lengths	80-160m	100-180m	120-200m
Floor Area Ratio	Minimum 2.0		
Mix of uses	Residential: >20%, Retail, Commercial, Community: >10%		
Maximum Parking	0.75 spaces/dwelling and 1 per 150 m ² commercial & retail		

Residential	Balanced	Employment
>66% residential	33-66% residential	<33% residential



Hammarby Sjostad, Stockholm, Sweden



The Round, Portland, USA

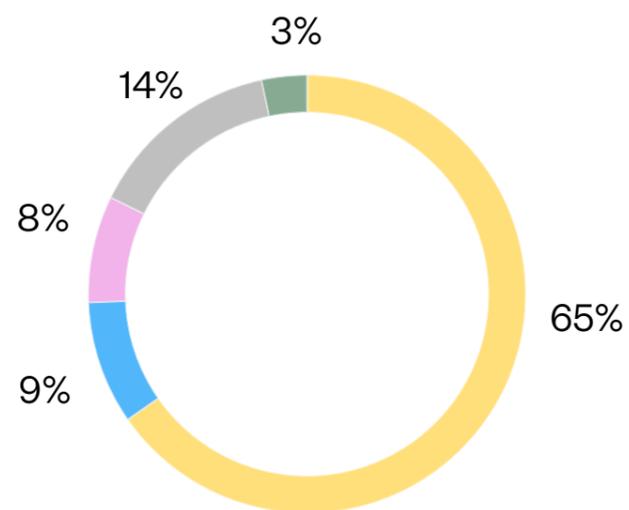


A commercial avenue, central Barcelona, Spain

3.8 Land-use Within Catchment Analysis

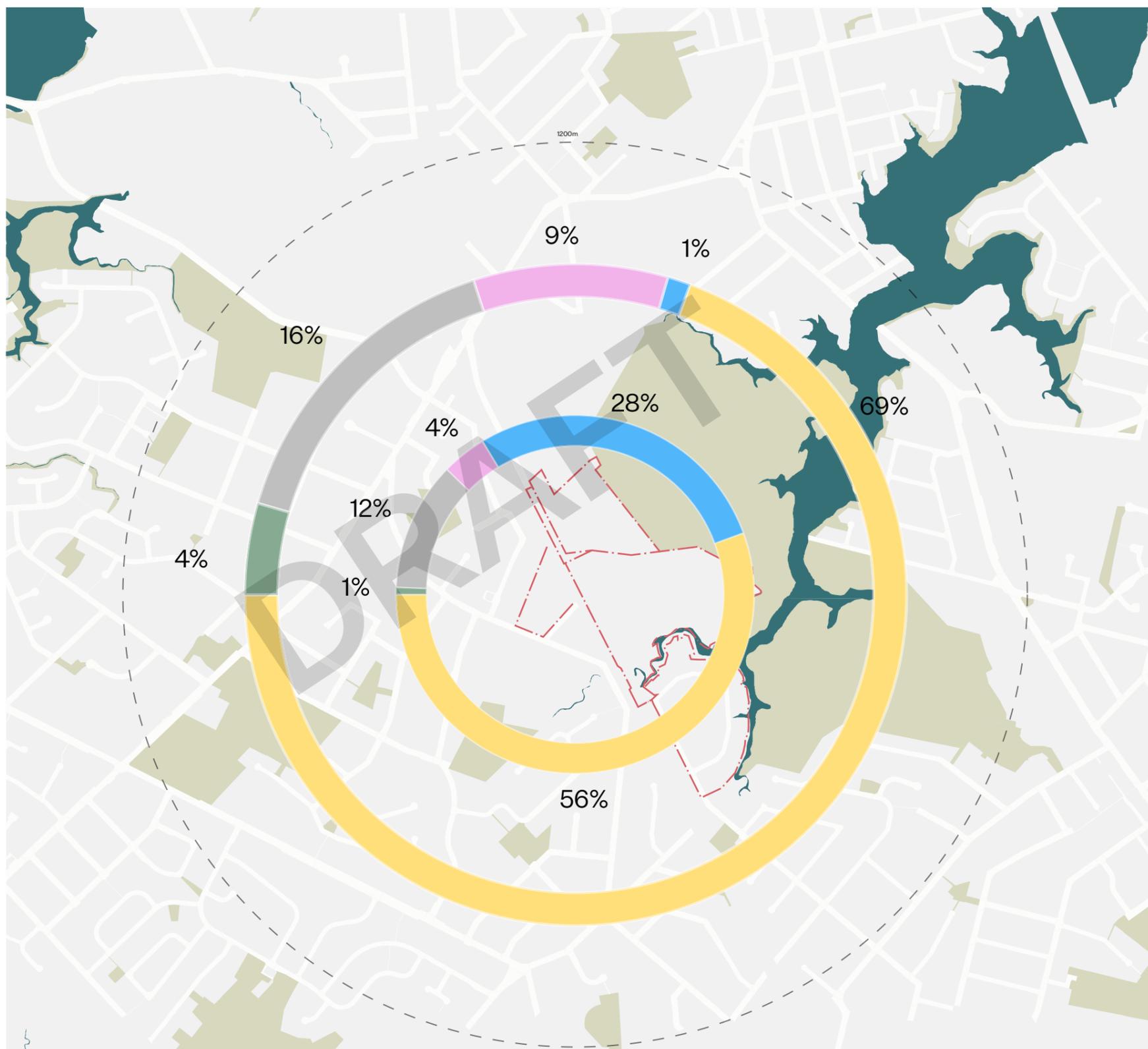


- Within a 400m (5 mins walk) catchment of the rail station almost a 3rd of land-use by area is medical. The majority of the catchment however is residential
- Within 400m - 800m (10 mins walk) catchment of the rail station the land-use by area becomes predominantly residential with a small amount of mixed use along Mangere Rd and Kings and De Le Salle colleges making up 16%
- The below graph illustrates the overall 10 min walk catchment analysis. When comparing with the research quoted early this shows the weighting within the precinct is heavily towards residential with a specialist employment component in the hospital.
- This analysis excludes the golf course land and estuary and is based on area of land-use. Analysis into population or demand by land-use would be an interesting comparison



Overall Land-use Mix Within 10mins Walk of Train Station

- Residential Zoning
- Commercial / Mixed Use Zoning
- Existing Schools Land
- CMDHB Land
- Reserve Zoning



2.9 Designing for Health - Current Context

Health Auckland Together - a coalition of public and private agencies committed to improving Auckland so that it is a place where all people can live full and healthy lives - issues a scorecard annually to monitor Auckland's progress in key metrics - obesity, nutrition and physical activity. the following excerpts provide a context for the health environment this precinct is being developed in:

- Adult Obesity is increasing as is child obesity
- Childrens physical activity is decreasing
- CMDHB has the highest levels of childhood obesity across the Auckland DHBs
- Childhood obesity levels increase with deprivation

Further data and analysis can be found here: <http://www.healthyaucklandtogether.org.nz/assets/Uploads/Resources/HAT-scorecard-2019.pdf>

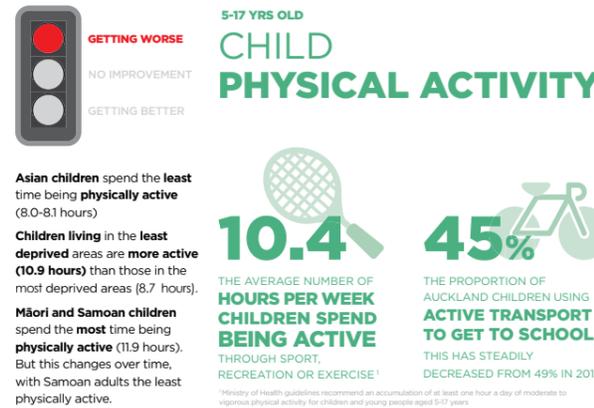


Figure 6: BMI distribution of Auckland children aged two to 14 years old by DHB in 2017

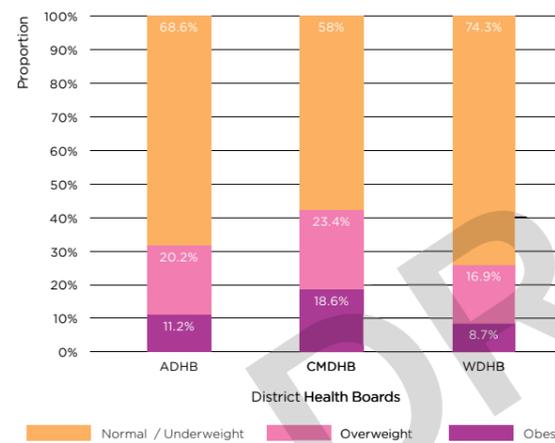
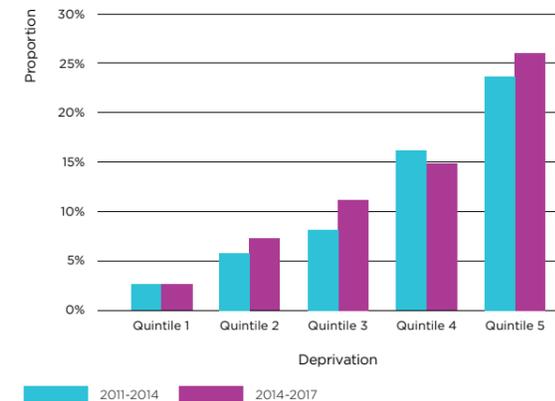


Figure 7: Proportion of two- to 14-year-olds with obesity by socioeconomic deprivation quintiles



Data and info-graphics from Healthy Auckland Together - 2019 HAT Scorecard

Determinants of Health and Wellbeing

When considered from a health determinants perspective, the role of the urban environment in health becomes increasingly apparent. In the case of TODs, their design can influence:

- Health-related behaviours (e.g. by being walkable, thus increasing ease and amount of physical activity)
- Access to services and amenities (e.g. by considered selection of retail premises, thus increasing convenient access to healthy food choices)
- Psychosocial factors that increase social support, esteem and mutual respect (e.g. by providing community spaces that encourage interaction for happy and healthy communities).
- Exposure to environmental pollutants (e.g. by decreasing car use, thus decreasing air or noise pollution)

TODs have the dual role of being a destination in their own right as well as an access point to the wider public transport network.



Figure 2: Heart disease—complex determinants and health impact pathway2

Heart Disease - Complex determinates and health impact pathway.

Diagrams above area referenced from "Transit-Oriented developments through a health lens. A Guide for Healthy Urban Developments A Collaborative Health Lens Project". Government of South Australia. September 2011.

2.10 Vision and Principles

The over-riding goal for this collaborative development project is to support iwi aspirations for Ngāi Tai Ki Tāmaki Whānau Ora by growing safe, warm, happy communities and attain excellence in community developments.

The development partners share the following key aspirations that will underpin enduring relationships and unite energies towards a common ambition to improve community health and wellbeing.

Tika

Engagements, communications and exchanges conducted with professional and cultural integrity at all times.

Pono

All engagements to be honest, accurate and considerate at all times.

Aroha

All exchanges are conducted with patience, courtesy and respect for each participant at all times.

The vision for this project is to create a healthy, inclusive, affordable community, incorporating the following design principles:

- To include a range of facilities to help improve health, social and cultural wellbeing for all residents, encouraging and providing opportunities for an active lifestyle
- Improving safe access to Middlemore rail station, to encourage use of public transport and to minimise car trips
- To create a sense of place – a heart and centre of gravity for the Middlemore neighbourhood
- Creating slow speed streets, conducive to walking and cycling
- Provide a range of warm, dry homes that achieve excellence in energy efficiency and impact on the environment
- Provide a range of high quality, practical, safe and attractive community open spaces

“An intensive high quality urban neighbourhood with access to mass rapid transport and anchored by a key employer in the Hospital. A walkable network of streets and openspace that support and attribute its communities physical, mental and cultural health.”



Slow speed streets, conducive to walking and cycling



Warm, dry homes that achieve excellence in energy efficiency and impact on the environment

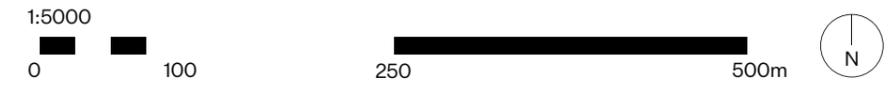


Safe and attractive community open spaces

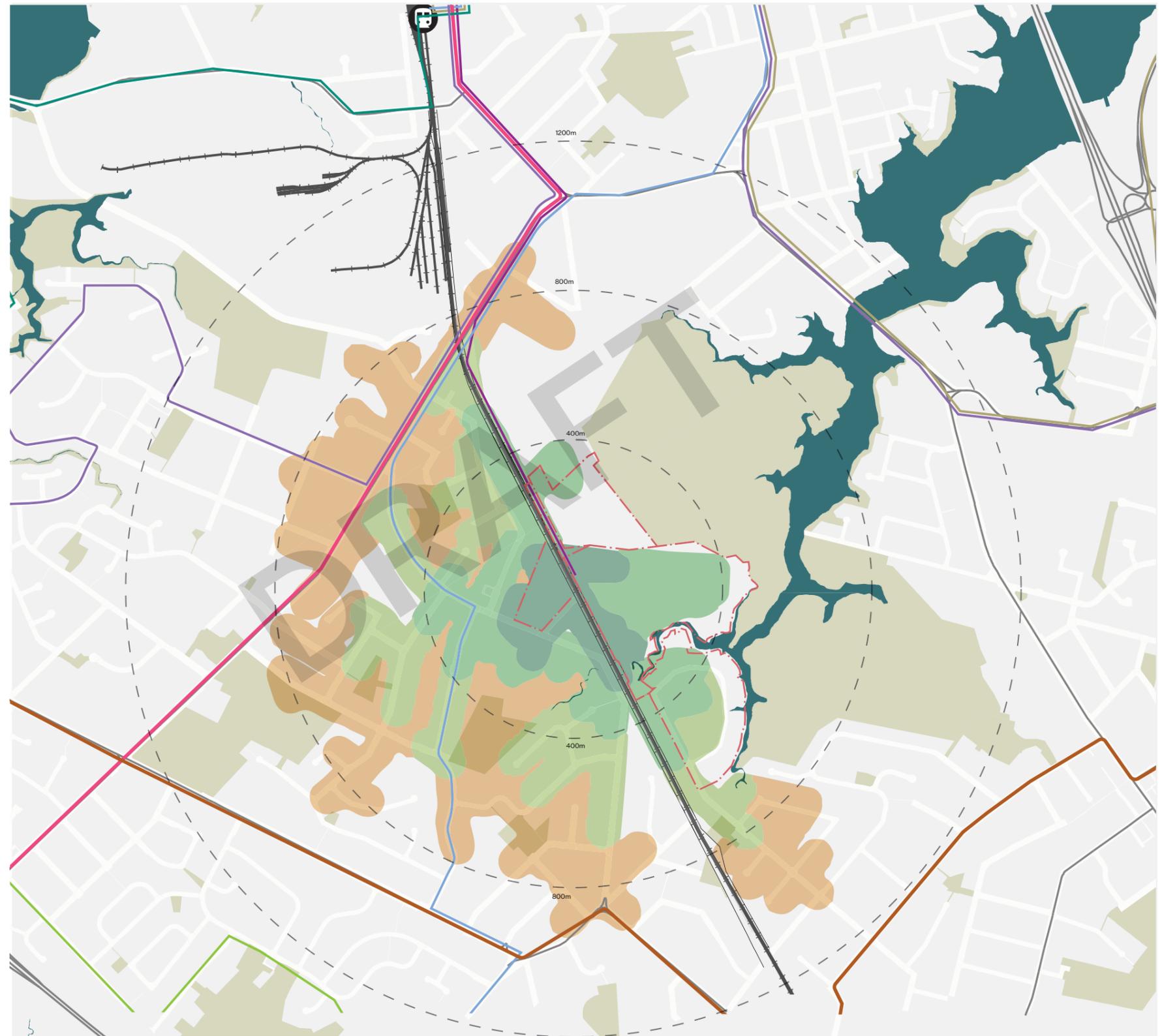
Precinct Context

DRAFT

3.1 Existing Access Diagram

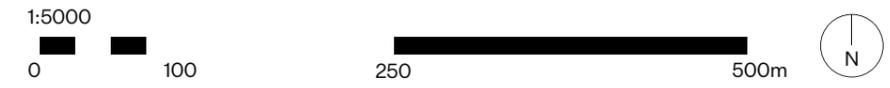


- Southern Rail line
- Proposed 3rd and 4th freight lines
- 321 Bus to hospital
- 326 bus west of train station
- Pedestrian catchment largely single sided to west due to land ownership and rail line
- Theoretical catchment compared to model suggests street network not particularly permeable
- Bus and rail interchange north at Otahuhu and south at Puhinui - Middlemore not considered an interchange
- No vehicular east west connection along Hospital Rd corridor causing Hospital Rd to become a rat run
- Emergency traffic access only from Hospital Rd



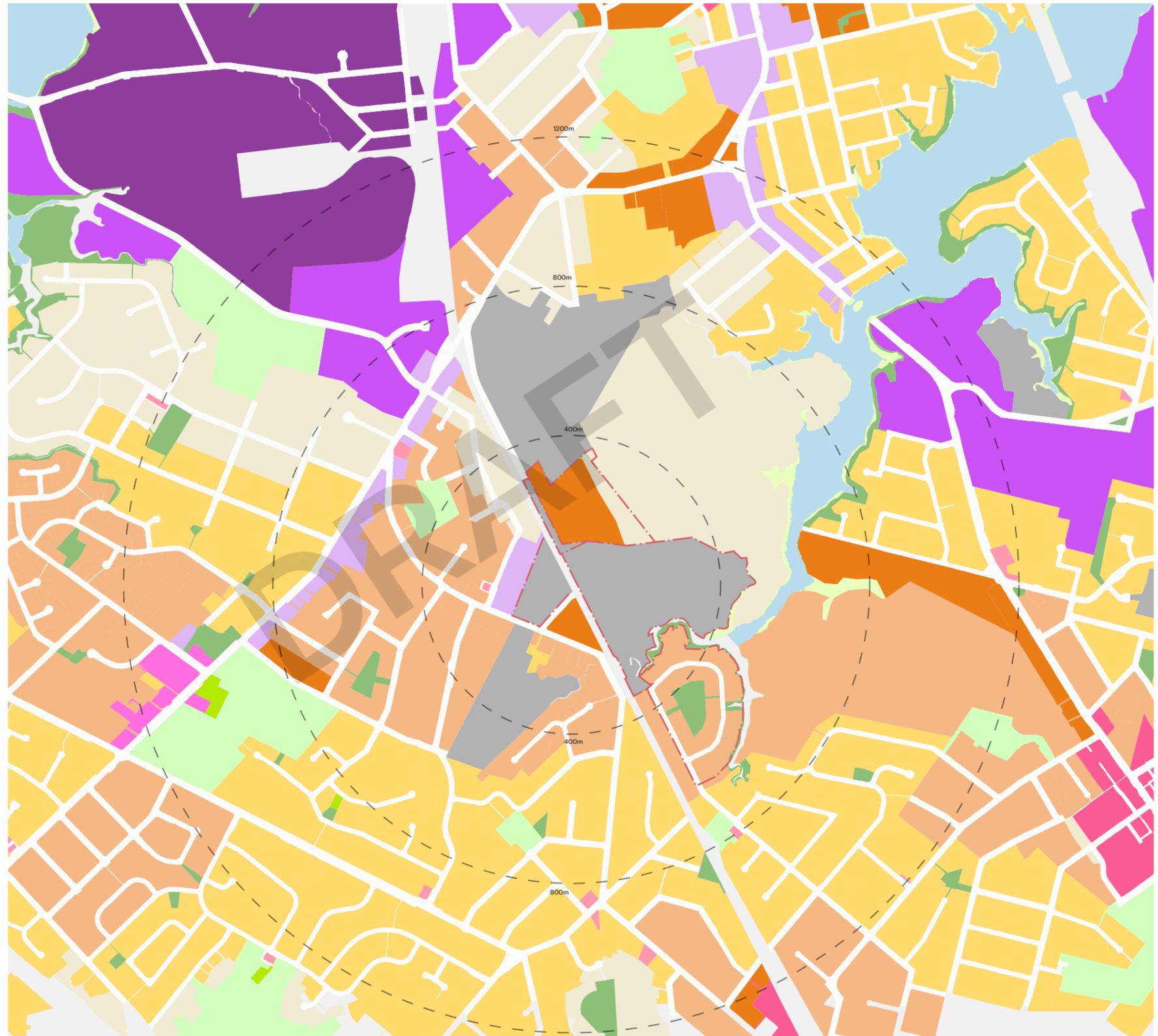
- Existing Rail Line
- Existing Bus Routes
- Existing Major Roads
- 5 / 10 / 15 Minute Pedestrian Catchment from Station
- Modelled 5 Minute Pedestrian Catchment
- Modelled 10 Minute Pedestrian Catchment
- Modelled 15 Minute Pedestrian Catchment
- Modelled 20 Minute Pedestrian Catchment
- Reserves

3.2 Unitary Plan Context



- Zoning within the precinct area is largely residential zoned other than the special purpose zoning for CMDHB and MOE land
- Zoning west of the station allows for medium density development up to three storeys with some mixed use along the Mangere Rd corridor
- North of the precinct is largely industrial zoning

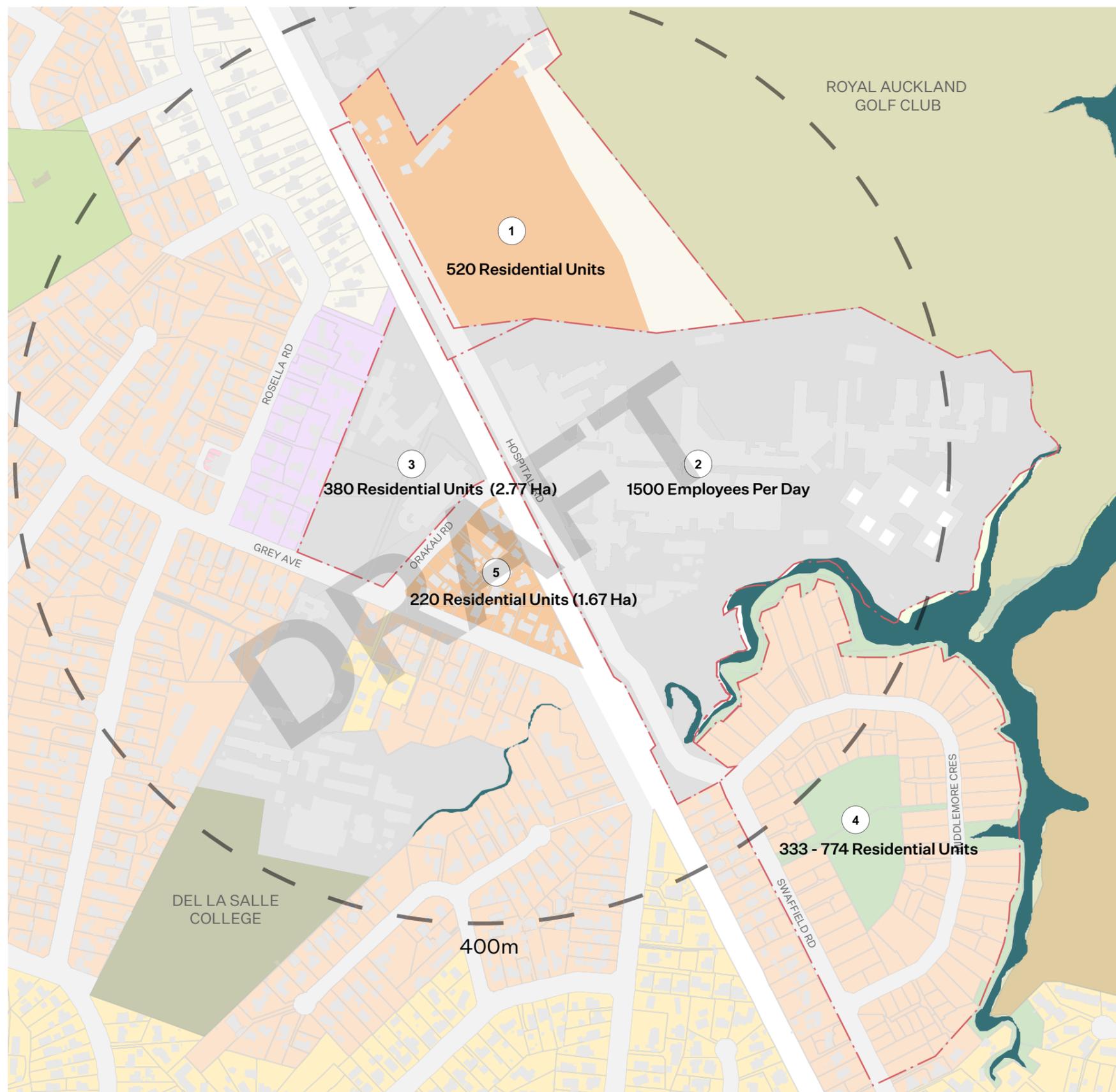
- Existing Building Footprints
- 5 / 10 / 15 Minute Pedestrian Catchment from Station
- Residential THAB Zoning
- Residential MHU Zoning
- Residential MHS Zoning
- Residential Single House Zoning
- Business / Mixed Use Zoning
- Existing Schools / Hospital Land
- Reserves



3.3 Indicative Development Uplift

Land Parcel	Document Referenced	Residential Units	People (2 per Unit)
1. Ngai Tai Ki Tāmaki	30 Hospital Rd Masterplan Subdivision Areas	520 Units	1,040
2. Middlemore Site	Employee statistics	N/A	1,500
3. Middlemore Western Campus	Area x assumed density of 136.1 D/Ha	380 Units	760
4. Kāinga Ora Middlemore Crescent Neighbourhood	Kāinga Ora Middlemore Crescent School Options - Lot Areas & Yield Options	774 Units	1,548
5. Potential THAB Development	Area x assumed density of 136.1 D/Ha	220 Units	440
Total		1,894	3,788

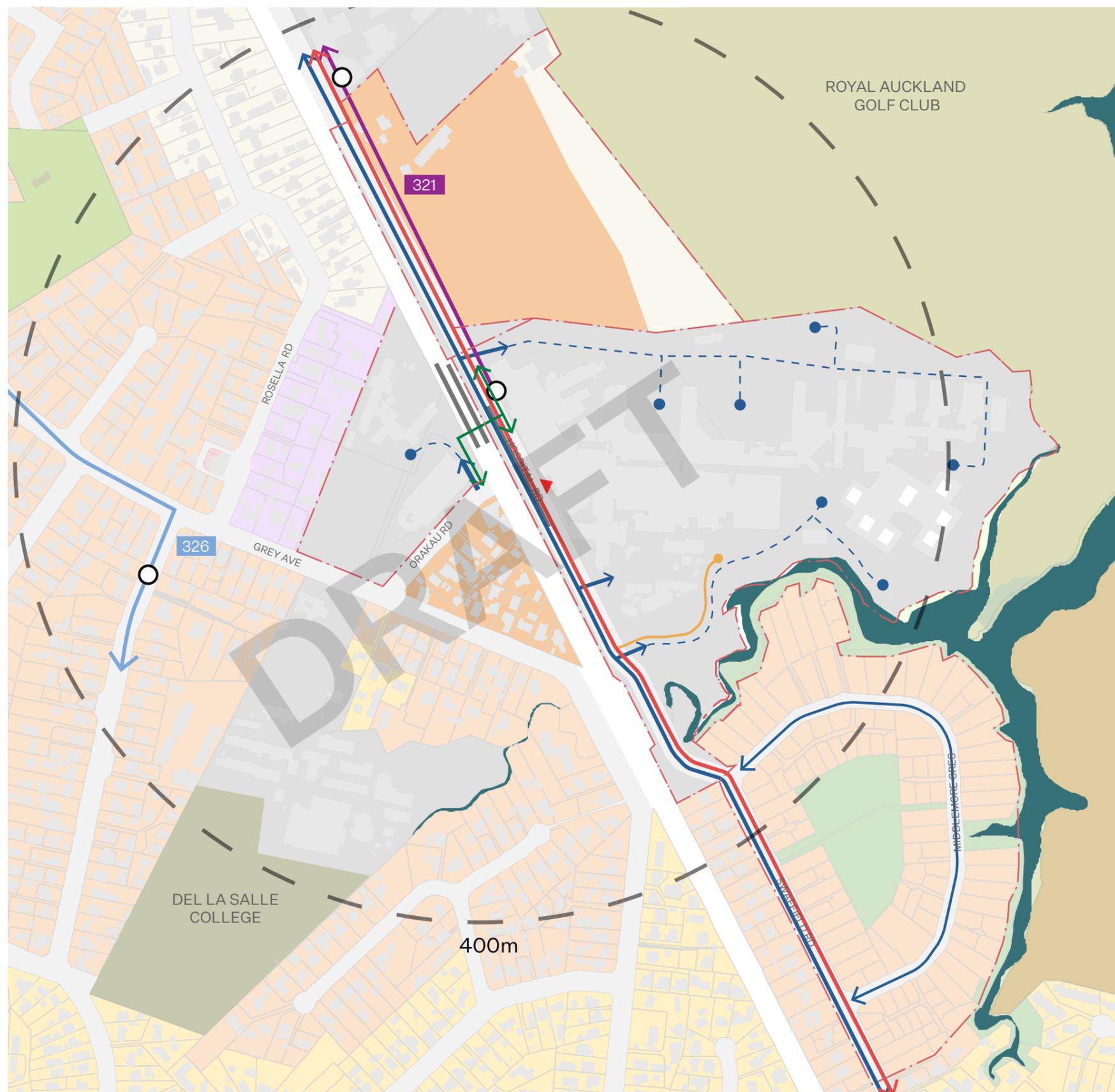
- ① Ngai Tai Ki Tāmaki Site
- ② CMDHB - Middlemore Site
- ③ CMDHB - Middlemore Western Campus
- ④ Kāinga Ora - Middlemore Crescent Neighbourhood
- ⑤ Potential THAB Development
- Existing Building Footprints
- Residential THAB Zoning
- Residential MHU Zoning
- Residential MHS Zoning
- Residential Single House Zoning
- Business / Mixed Use Zoning
- Existing Schools / Hospital Land
- Reserves



3.4 Existing Transport Diagram

- Hospital Rd which is in private ownership currently services emergency services, servicing vehicles, public transport, private vehicles and pedestrian and cycling
- East west connections across the rail corridor are pedestrian only and are at the existing station
- The western campus is serviced from the north of Orakau Rd with no entry off Grey Ave
- The 321 bus services the hospital campus and stops outside the station. This links to Otahuhu rail and bus interchange. The 326 bus stops 300m from the rail station on the west of the rail corridor
- Entry into the hospital campus is through 3 gates, all services are accessed from Hospital Rd with at grade parking throughout

- Existing Building Footprints
- Existing Station Platforms
- 5 Minute Catchment from Station
- Existing Rail Corridor
- Land Conflict
- Existing Bus Routes
- Existing Pedestrian Connection
- Private Vehicle Traffic
- Hospital Campus Vehicle Circulation
- Hospital Servicing Circulation
- Ambulance Access
- Emergency Department Ambulance Access
- Residential THAB Zoning
- Residential MHU Zoning
- Residential MHS Zoning
- Residential Single House Zoning
- Business / Mixed Use Zoning
- Existing Schools / Hospital Land
- Reserves

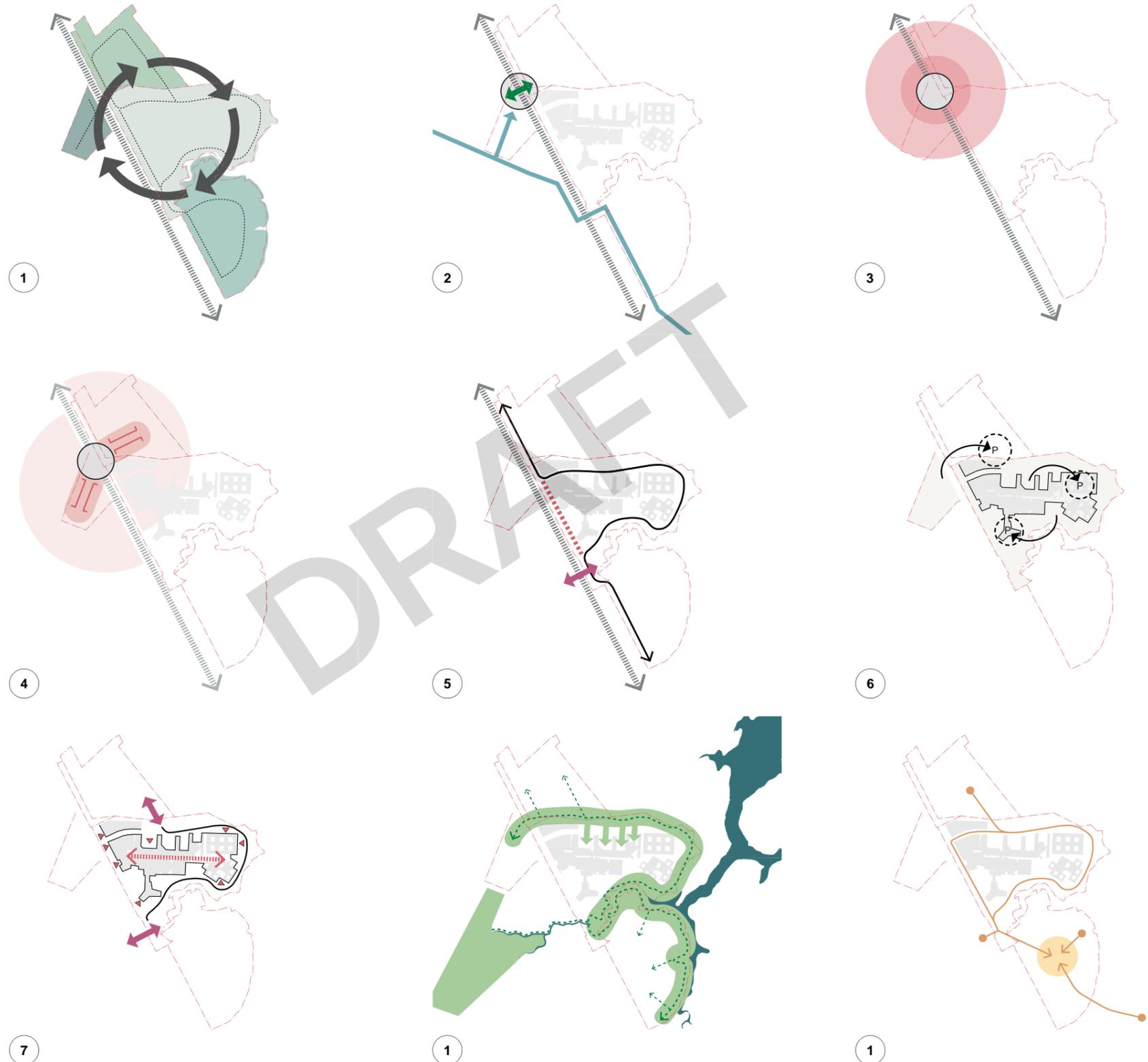


Precinct Proposal

DRAFT

4.5 Key Moves

- ① Leverage all stakeholders working in partnership to deliver a cohesive masterplan that is more than each of its individual parts. Utilise upgrade of train station infrastructure to deliver an integrated mixed modal transport hub that provides a safe and attractive crossings to the rail corridor. Prioritisation to be given to active modes of transport.
- ② Intensify development around train station with a mixed use element at its core. Provide a mix of housing typologies that follow best practice universal design and cater for key workers and those who require to be in close proximity to the hospital.
- ③ Enable opportunity for a new local centre at the transport node that serves the new development around hospital as well as the existing western catchment.
- ④ Investigate constraints on Hospital Road and provide a framework for optimal future state. Explore opportunity for new vehicle underpass to Gray Avenue and public ring road around hospital campus to relieve current congestion.
- ⑤ Consolidate parking from around hospital into multi-story structures to relieve the campus grounds, making space for future development and green space. Provide development opportunity outwith campus to allow decanting of services and therefore enabling the removed of existing, inefficient infrastructure.
- ⑥ Leverage opportunity for new points of access to the hospital campus to allow the hospital to function efficiently and effectively. Utilise and revitalize existing green and blue corridors to provide public amenity and a create a meaningful connection between the hospital and nature, promoting health rehabilitation. Use public realm to treat stormwater runoff before it enters the streams and estuary.
- ⑦ Provide an opportunity for a new urban primary school to support new and existing residents.



5.1 Key Moves Combined

- 1 Leverage all stakeholders working in partnership to deliver a cohesive masterplan that is more than each of its individual parts.
- 2 Utilise upgrade of train station infrastructure to deliver an integrated mixed modal transport hub that provides a safe and attractive crossings to the rail corridor. Prioritisation to be given to active modes of transport.
- 3 Intensify development around train station with a mixed use element at its core. Provide a mix of housing typologies that follow best practice universal design and cater for key workers and those who require to be in close proximity to the hospital.
- 4 Enable opportunity for a new local centre at the transport node that serves the new development around hospital as well as the existing western catchment.
- 5 Investigate constraints on Hospital Road and provide a framework for optimal future state. Explore opportunity for new vehicle underpass to Gray Avenue and public ring road around hospital campus to relieve current congestion.
- 6 Consolidate parking from around hospital into multi-story structures to relieve the campus grounds, making space for future development and green space. Provide development opportunity outwith campus to allow decanting of services and therefore enabling the removed of existing, inefficient infrastructure.
- 7 Leverage opportunity for new points of access to the hospital campus to allow the hospital to function efficiently and effectively.
- 8 Utilise and revitalize existing green and blue corridors to provide public amenity and a create a meaningful connection between the hospital and nature, promoting health rehabilitation. Use public realm to treat stormwater run off before it enters the streams and estuary.
- 9 Provide an opportunity for a new urban primary school to support new and existing residents.



5.1 Proposed Precinct Plan

-  Ped Sheds From Train Station
-  Proposed Building Massings
-  Frontages
-  Ground Floor Retail
-  Hospital Entrances
-  Parking
-  Community Node
-  Proposed Acquisitions
-  Reserves
-  Site Boundary



5.2 Proposed Movement Diagram



-  Ped Sheds From Train Station
-  326 Bus Route - Otahuhu to Mangere
-  321 Bus Route - Britomart to Middlemore
-  Connector Road
-  Local Road
-  Special Character Street
-  Living Street
-  Emergency Services Only Route
-  Hospital Servicing Route
-  Pedestrian Connection

5.3 Proposed Open Space Diagram



- Community Node in Reserve (Play, Community Garden...)
- Pedestrian Connection
- Stream (Proposed Daylighting on Western side of Rail)
- Estuary
- Reserves, Green Coastal Link and Green Courtyards Around Hospital

5.4 Proposed Heights Diagram



5.5 Proposed Massing



5.6 Proposed Massing



APPENDIX 9

ENVIRONMENT COURT ORAL DECISION (DECISION [2021] NZ ENVC 082)

IN THE ENVIRONMENT COURT
AT AUCKLAND

I TE KŌTI TAIAO O AOTEAROA
KI TĀMAKI MAKĀURAU

Decision [2021] NZEnvC 082

IN THE MATTER OF

an appeal under clause 14(1) of Schedule
1 of the Resource Management Act
1991 against a decision on Proposed
Plan Change 21 to the Auckland Unitary
Plan

BETWEEN

EDEN-EPSOM RESIDENTIAL
PROTECTION SOCIETY
INCORPORATED

(ENV-2020-AKL-079)

Appellant

AND

AUCKLAND COUNCIL

Respondent

AND

SOUTHERN CROSS HOSPITALS
LIMITED

Requestor

AND

KAINGA ORA – HOMES AND
COMMUNITIES

s274 Party

AND

TUPUNA MAUNGA O TAMAKI
MAKĀURAU AUTHORITY

s274 Party

Court: Alternate Environment Judge L J Newhook
Environment Commissioner R M Bartlett
Environment Commissioner J Baines

Hearing: 8 June 2021

Appearances: M Savage and R Enright for the Society
B Tree, S de Groot and C Woodward for Requestor



Eden Epsom Residential Protection Society Inc v Auckland Council

D Hartley for Auckland Council
C Kirman for Kāinga Ora

Date of Decision: 9 June 2021

Date of Issue: **15 JUN 2021**

**RECORD OF ORAL DECISION OF THE ENVIRONMENT COURT ON
PRELIMINARY QUESTIONS ABOUT RELEVANCE OF NPS-UD TO
THE PROPOSED PLAN CHANGE**

Introduction

[1] The Society had appealed a decision of a majority of independent hearing commissioners approving Proposed Private Plan Change 21 (“PPC21”) to the Auckland Unitary Plan (“AUP”) operative in part. The plan change was to enable expansion and intensification of development of an existing private hospital at 3 Brightside Road Epsom, including onto 3 adjoining residential lots on Gillies Avenue purchased by the requestor.

[2] At the start of the substantive appeal hearing on 8 June 2021, the Court placed 5 questions of law before the parties, the first two of which it advised should be the subject of submissions by the parties at the outset, and perhaps an urgent decision of the Court, against the possibility it could inform the relevance (or not) of some topics in the substantive enquiry.

[3] The two questions orally advised by the Court were:

- a) Does the NPS-UD apply yet? It is operative, but does it drive PPC21; are we required to move ahead of decision-making by the Council on implementation of directive and urgent policies?
- b) If it does drive PPC21 how and in what ways would it drive it?

[4] The NPS-UD was gazetted on 20 July 2020 and became operative on 20 August. It effectively replaced the 2016 NPS on Urban Design Capacity.

[5] It is common ground that Auckland Council is a “Tier 1” local authority, therefore having the greatest obligations of the 3 tiers under the new instrument.

[6] Clause 1.3 is titled “Application” and subclause (b) provides that “[the NPS applies to] planning decisions by any local authority that affect an urban environment”.

[7] The site owned by Southern Cross in Epsom is an urban environment.

[8] The question arises as to whether a decision on the merits of a private plan change on appeal under clause 29(7) of Schedule 1 RMA is a “planning decision”.

[9] The term “planning decision” is defined to the relevant extent in the NPS-UD as meaning a decision on:

...

(c) a district plan or proposed district plan

...

[10] “Proposed district plan” is not defined in the NPS-UD. It is relevant therefore to consider relevant definitions in the RMA, under which the NPS was promulgated.

[11] “District Plan” is defined in s 43AA RMA as (summarised) meaning an operative plan including operative changes.

[12] PPC 21 is not an operative plan change because it is under challenge in this appeal.

[13] “Proposed plan” is however defined in s 43AAC RMA in the following terms:

43AAC Meaning of proposed plan

(1) In this Act, unless the context otherwise requires, *proposed plan*—

- (a) means a proposed plan, a variation to a proposed plan or change, or a change to a plan proposed by a local authority that has been notified under clause 5 of Schedule 1 or given limited notification under clause 5A of that schedule, but has not become operative in terms of

clause 20 of that schedule; and

- (b) includes a proposed plan or a change to a plan proposed by a person under Part 2 of Schedule 1 that has been adopted by the local authority under clause 25(2)(a) of Schedule 1.

(2) Subsection (1) is subject to section 86B and clause 10(5) of Schedule 1.

[14] It is not apparent to us that here are any contexts or policy underpinnings for a proposed change not adopted by a council, not to be regarded in the context of the NPS-UD as being the subject of “planning decisions”.

[15] There is a hint that there is no such contextual difference in literature issued about the NPS-UD by the Ministry for the Environment and Ministry of Housing. Those documents do not however state the law but are limited to providing views from the Executive as to why the National Instrument has been promulgated and to what effect in the view of the Executive.

[16] Perhaps confusingly, there is a definition of “change” in s 43AA RMA as meaning a change proposed by a local authority under clause 2 of Schedule 1 RMA and a change proposed by a person under clause 21 of Schedule 1.

[17] The term “plan change” is found in clause 3.8 in Subpart 2 “Responsive Planning” of the NPS-UD and reads:

3.8 Unanticipated or out-of-sequence developments

(1) This clause applies to a plan change that provides significant development capacity that is not otherwise enabled in a plan or is not in sequence with planned land release.

(2) Every local authority must have particular regard to the development capacity provided by the plan change if that development capacity:

- (a) would contribute to a well-functioning urban environment; and
- (b) is well-connected along transport corridors;
- (c) and meets the criteria set under subclause (3); and

(3) Every regional council must include criteria in its regional policy statement for determining what plan changes will be treated, for the purpose of implementing Policy 8, as adding significantly to development capacity.

[18] From that clause it may be found that some provisions of the national instrument may be considered in a “planning decision” on the merits of a requested plan change including on appeal to the Environment Court.

[19] The question must then be asked “which provisions” [of the instrument]?

[20] It is appropriate to interrogate Part 2 of the NPS (“Objectives and Policies”). The reference to “planning decisions” among the eight Objectives and 11 Policies is quite limited, being found in only Objectives 2, 5, and 7, and Policies 1 and 6.

[21] Objective 3 and Policy 3 of the NPS attain significant focus in evidence called by Southern Cross.¹

[22] Objective 3 provides:

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.

[23] Policy 3 provides:

Policy 3: In relation to tier 1 urban environments, regional policy statements and district plans enable:

- (a) in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and
- (b) in metropolitan centre zones, building heights and density of urban form to reflect demand for housing and business use in those locations, and in all cases building heights of at least 6 storeys; and

¹ There was a dispute between the appellant and Southern Cross as to whether certain of the latter’s witnesses relied on them. We do not need to do more for present purposes than come to our conclusion in about there being “significant focus” on them.

- (c) building heights of least 6 storeys within at least a walkable catchment of the following:
- (i) existing and planned rapid transit stops
 - (ii) the edge of city centre zones
 - (iii) the edge of metropolitan centre zones; and
- (d) in all other locations in the tier 1 urban environment, building heights and density of urban form commensurate with the greater of:
- (i) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or
 - (ii) relative demand for housing and business use in that location.

[24] Neither Objective 3 nor Policy 3 employs the term “planning decision(s)”.

[25] Part 4 of the NPS (“Timing”) is important. Concerning Policies 3 and 4, to the relevant extent it provides as follows:

4.1 Timeframes for implementation

(1) Every tier 1, 2, and 3 local authority must amend its regional policy statement or district plan to give effect to the provisions of this National Policy Statement as soon as practicable

(2) In addition, local authorities must comply with specific policies of this National Policy Statement in accordance with the following table:

Local authority	Subject	National Policy Statement	By when
Tier 1 only	Intensification	Policies 3 and 4 (see Part 3 subpart 6)	Not later than 2 years after commencement date

[26] Evidence and submissions for the council, unchallenged on this aspect, advise that the council is busy with “workstreams” on these (and other) matters that must inform community consultation and the promulgation of plan changes to the AUP

under Schedule 1 RMA. The timing for promulgation under Part 4 is no later than 20 August 2022. That time has of course not yet been reached.

[27] These steps will be logically accomplished under Subpart 6 “Intensification in Tier 1 urban environments”, which requires very precise activity by the local authority (which we were told is happening in these workstreams) of identifying, by location, the building heights and densities required by Policy 3 – with information about these things to be publicly disseminated when notification of the plan changes occurs. Again, these things are yet to occur.

[28] Counsel referred us to two High Court decisions, *Horticulture NZ v Manawatu-Wanganui Regional Council*² and *Hawke’s Bay and Eastern Fish and Game Councils v Hawke’s Bay Regional Council*³, while conceding that the nascent instruments discussed in those cases were not necessarily worded the same as relevant provisions before us. We have not attempted to compare the several instruments and have preferred to undertake a first principles analysis of the NPS-UD and relevant RMA provisions.

Conclusion

[29] The Court holds that it is not required to and will not be giving effect in this case to Objectives and Policies in the NPS-UD that are not requiring “planning decisions” at this time.

[30] We acknowledge the promulgation and operative status of the NPS overall but cannot pre-judge, let alone pre-empt, Schedule 1 processes yet to be undertaken by the Council in implementation of it.

[31] Costs are reserved.

² [2013] NZHC 2492, (2013) 17 ELRNZ 652

³ [2015] NZHC 3191

For the Court:



L J Newhook
Alternate Environment Judge

