

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

**Date:** Monday 27, Tuesday 28 and Wednesday 29  
November 2023  
**Time:** 9.30am  
**Meeting room:** Uxbridge Theatre  
**Venue:** Ground Floor, Uxbridge Arts and Culture  
35 Uxbridge Road, Mellons Bay, Auckland

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**PRIVATE PLAN CHANGE 88**  
**HEARING REPORT**  
**VOLUME 1**

**110 JACK LACHLAN DRIVE; AND 620, 680, 682,  
702, 712, 722, 732, 740, 746, 758 AND 770  
WHITFORD-MARAETAI ROAD, BEACHLANDS.  
BEACHLANDS SOUTH LIMITED PARTNERSHIP**

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**COMMISSIONERS**

**Chairperson** Vanessa Hamm (Chairperson)  
**Commissioners** Dr Ian Boothroyd  
Trevor Mackie

**Sidra Khan**  
**KAITOHUTOHU WHAKAWĀTANGA**  
**HEARINGS ADVISOR**

Telephone: 09 890 8801 or 021 591 786  
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Website: [www.aucklandcouncil.govt.nz](http://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 their 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 their 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 their 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 PRIVATE PLAN CHANGE TO THE AUCKLAND UNITARY PLAN BY  
BEACHLANDS SOUTH LIMITED PARTNERSHIP**

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**Reporting officer, Chloe Trenouth, Planner**

Reporting on proposed Private Plan Change 88 - 110 Jack Lachlan Drive; and 620, 680, 682, 702, 712, 722, 732, 740, 746, 758 and 770 Whitford-Maraetai Road, Beachlands. The private plan change seeks to rezone approximately 307 hectares of land south of the Beachlands township.

**APPLICANT:** BEACHLANDS SOUTH LIMITED PARTNERSHIP

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| <b>FURTHER SUBMITTERS:</b> |   |
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**Private Plan Change 88 - 110 Jack Lachlan Drive; and 620, 680, 682, 702, 712, 722, 732, 740, 746, 758 and 770  
Whitford-Maraetai Road, Beachlands.  
Monday 27, Tuesday 28 and Wednesday 29 November 2023**

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# Hearing Report for Proposed Private Plan Change 88: Beachlands South to the Auckland Unitary Plan (Operative in part)

Section 42A Hearing Report under the Resource Management Act 1991

|                         |   |
|-------------------------|---|
| <b>Report to:</b>       | Hearing Commissioners   |
| <b>Hearing Date/s:</b>  | 27-29 November 2023   |
| <b>File No:</b>         | Hearing Report – Proposed Private Plan Change 88 (PC88)       |
| <b>File Reference</b>   | U:\CPO\RLP\FC\LUP\UP MODIFICATIONS\PC88 – BEACHLANDS SOUTH    |
| <b>Report Author</b>    | Chloe Trenouth, Consultant Planner                            |
| <b>Report Approvers</b> | Craig Cairncross, Team Leader Central South, Plans and Places |
| <b>Report produced</b>  | 18 September 2023   |

**Summary of Proposed Private Plan Change 88 Beachlands South:** A Private Plan Change application by Beachlands South Partnership Limited to rezone approximately 307 hectares of land at 110 Jack Lachlan Drive; and 620, 680, 682, 692, 702, 712, 722, 732, 740, 746, 758 and 770 Whitford-Maraetai Road in Beachlands from Rural – Countryside Living to a combination of residential, business and open space zones, with a new precinct and SMAF-1 Control.

## Summary of Proposed Plan Change 88: Beachlands South

|  |   |
|--|---|
| <b>Plan subject to change</b>  | Auckland Unitary Plan (Operative in part), 2016   |
| <b>Number and name of change</b>   | Proposed Plan Change 88 – Beachlands South to the Auckland Unitary Plan   |
| <b>Status of Plan</b>  | Operative in part   |
| <b>Type of change</b>  | Private Plan Change   |
| <b>Committee date of approval (or adoption) for notification</b>   | 25 November 2022  |
| <b>Parts of the Auckland Unitary Plan affected by the proposed plan change</b>                                   | <ul style="list-style-type: none"> <li>• Zoning Maps</li> <li>• Chapter 1 Precincts – South – proposed Beachlands South Precinct</li> <li>• Stormwater Management Area Flow 1 Control</li> </ul>  |
| <b>Date of notification of the proposed plan change and whether it was publicly notified or limited notified</b> | 26 January 2023<br>Public notification  |
| <b>Plan development process used – collaborative, streamlined or normal</b>                                      | Normal  |
| <b>Submissions received (excluding withdrawals)</b>  | 383   |
| <b>Date summary of submissions notified</b>  | 12 May 2023   |
| <b>Number of further submissions received (numbers)</b>  | 12  |
| <b>Legal Effect at Notification</b>  | None  |
| <b>Main issues or topics emerging from all submissions</b>   | <ul style="list-style-type: none"> <li>• Support for the provision of a secondary school with concerns about the lack of certainty that it will be provide</li> <li>• Concerns about the impact of land use change on character, ecology, coastal marine area, heritage values</li> <li>• Whether Beachlands is an appropriate location for urban growth</li> <li>• Transport effects of growth and lack of sufficient roading or public transport</li> <li>• Lack of funding and certainty relating to transport infrastructure upgrades, including ferry capacity and frequency, Whitford-Maraetai Road, and the Whitford Bypass</li> <li>• Inadequacy of existing infrastructure including water, wastewater, power, schools, medical facilities and community services</li> </ul> |



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# Abbreviations

Abbreviations in this report include:

| Abbreviation            | Meaning  |
|-------------------------|--|
| AEE                     | Assessment of effects on the environment                   |
| ATAP                    | Auckland Transport Alignment Programme                     |
| AUP                     | Auckland Unitary Plan                                      |
| BSLP or 'the applicant' | Beachlands South Limited Partnership                       |
| BSP                     | Beachlands South Precinct                                  |
| CMA                     | Coastal Marine Area  |
| CSL                     | Rural – Countryside Living Zone                            |
| CVA                     | Cultural Values Assessment                                 |
| EPAN                    | Ecological Protection Area Network                         |
| FULSS                   | Future Urban Land Supply Strategy 2017                     |
| FUZ                     | Future Urban Zone  |
| ITA                     | Integrated Transport Assessment                            |
| LCZ                     | Business – Local Centre Zone                               |
| LIZ                     | Business – Light Industry Zone                             |
| LLZ                     | Residential - Large Lot Zone                               |
| MDRS                    | Medium Density Residential Standards                       |
| MHU                     | Residential - Mixed Housing Urban Zone                     |
| MUZ                     | Business – Mixed Use Zone                                  |
| NES                     | National Environmental Standards                           |
| NPS                     | National Policy Statement                                  |
| OSSAR                   | Open Space Sport and Active Recreation zone                |
| PC78                    | Proposed Plan Change 78 Intensification                    |
| PC88 or 'Plan Change'   | Proposed Private Plan Change 88                            |
| RLTP                    | Regional Land Transport Plan                               |
| RMA                     | Resource Management Act 1991                               |
| RPS                     | Regional Policy Statement                                  |
| SMAF 1                  | Stormwater Management Area Flow 1                          |
| THAB                    | Residential - Terrace Housing and Apartment Buildings zone |
| TMP                     | Travel Management Plan                                     |
| VKT                     | Vehicle Kilometres Travelled                               |

# Attachments

| Attachments   |  |
|---------------|--|
| Attachment 1  | Beachlands South Precinct – notified version               |
| Attachment 2  | Information provided by the applicant to support PC88      |
| Attachment 3  | Clause 23 further information provided                     |
| Attachment 4  | Existing plan provisions applying to PC88                  |
| Attachment 5  | Review of policy cascade                                   |
| Attachment 6  | Specialist reports   |
| Attachment 7  | Assessment of relevant NPS and AUP objectives and policies |
| Attachment 8  | Submissions and Further Submissions                        |
| Attachment 9  | Table of recommendations on submissions                    |
| Attachment 10 | Suggested changes to precinct provisions                   |

## Executive Summary

1. Proposed Private Plan Change 88 (**PC88** or **Plan Change**) to the Auckland Unitary Plan (Operative in Part) (**AUP**) seeks to rezone approximately 307 hectares of land south of Beachlands township from Rural – Countryside Living zone to a mix of business, residential, open space and future urban zones. A new precinct is proposed to replace the existing Whitford precinct (and sub-precinct) provisions. The request also seeks to extend the Stormwater Management Area Flow 1 control over the plan change area.
2. The normal private plan change process set out in Part 2 of Schedule 1 of the Resource Management Act 1991 (**RMA**) was adhered to in developing PC88.
3. PC88 was lodged on 31 March 2022. Following receipt of all further information PC88 was accepted for processing under Clause 25(2)(b) of Schedule 1 of the RMA on 25 November 2022.
4. PC88 was publicly notified on 26 January 2023 and closed for submissions on 24 February 2023 and extended to 10 March 2023. The summary of submissions was notified on 12 May 2023 and closed for further submissions on 26 May 2023.
5. Total of 383 of submissions were received, including 2 late submissions and 12 further submissions. Most submission points (85 per cent) seek that PC88 be declined or declined but if approved amended.
6. In preparing for the hearing on PC88, this hearing report has been prepared in accordance with section 42A of the RMA.
7. This report considers the private plan change request and the issues raised by submissions and further submissions on PC88. The discussion and recommendations in this report are intended to assist the Hearing Commissioners, the requestor and those persons or

organisations that lodged submissions on PC88. The recommendations contained within this report are not the decisions of the Hearing Commissioners.

8. This report also forms part of council's ongoing obligations 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 PC88.
9. An evaluation 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 PC88 (including the s32 report and an Assessment of Environmental Effects) is attached in **Attachment 2**.
10. In accordance with my evaluation in this report, I consider that the objectives proposed by PC88 are not the most appropriate way of achieving the purpose of the RMA. However, if the Hearing Commissioners consider the objectives proposed to be the most appropriate way of achieving the purpose of the RMA, then I consider the proposed precinct provisions to be the most appropriate way to achieve those objectives subject to the suggested changes outlined in this report and provided at **Attachment 10**.
11. It is recommended that PC88 be declined under clause 29(4)(a) of Schedule 1 for the reasons set out in Section 12 of this report.

# 1. Purpose of the proposed private plan change

12. PC88 was lodged with the council on 31 March 2022 by Beachlands South Limited Partnership (BSLP). The purpose of PC88 as outlined on page 28 of the s32 evaluation report is to:

*“...deliver a comprehensively planned and integrated community for the subject land.*

*...provide for significant expansion of the existing coastal town of Beachlands and transformation to a comprehensively planned and public transport focussed community adjacent to the Pine Harbour Ferry Terminal that supports the development of a well-functioning urban environment.*

*...The PPC enables residential, commercial, recreational and educational development of the site for the community in order to provide for Auckland’s growing population, whilst respecting and enhancing cultural, ecological and environmental values of the land and wider locality.”<sup>1</sup>*

13. The plan change request seeks to expand the existing Beachlands coastal town which has a current urban area of approximately 363 hectares. The total plan change area is approximately 307 hectares including:

a. Northern portion (159.54 hectares) proposed to be “live” zoned to a mix of: Residential – Mixed Housing Urban; Residential – Terrace Housing and Apartment Buildings; Residential – Large Lot; Business - Local Centre; Business – Light Industry; Business – Mixed Use; and Open Space – Sport and Active Recreation zones.

b. Southern portion (147.5761 hectares) proposed to be zoned Future Urban Zone (FUZ), requiring a future plan change to “live” zone the land for urban development.

14. The applicant has provided the following specialists’ documents to support their plan change request.

**Table 1 Information provided by the requestor for the private plan change**

| Document title   | Specialist   | Date          |
|--|--|---------------|
| Beachlands South Precinct Private Plan Change Request – Section 32 Assessment Report | Unio Environmental   | 31 March 2022 |
| Beachlands South Structure Plan  | Unio Environmental, Studio Pacific Architecture, Jasmax                    | December 2021 |
| Masterplan Design Report   | Studio Pacific Architecture, Jasmax, Studio Woodroffe Papa and Woods Bagot | 28 March 2022 |
| Urban Design Assessment  | Studio Pacific Architecture, Jasmax, Studio Woodroffe Papa and Woods Bagot | 30 March 2022 |
| Beachlands South Sustainability Strategy   | Studio Pacific Architecture, Jasmax, Studio Woodroffe Papa and Woods Bagot | 29 March 2022 |
| Landscape and Visual Assessment (including visual simulations)                       | Brown NZ Ltd   | March 2022    |
| Economic Assessment  | Property Economics   | March 2022    |
| Integrated Transport Assessment  | Stantec  | March 2022    |
| Water Supply Concept Report  | GWE Consulting Engineers   | March 2022    |

<sup>1</sup> Unio Environmental, Private Plan Change Request – Section 32 Assessment Report (page 28).

| Document title   | Specialist   | Date             |
|--|--|------------------|
| Wastewater Assessment                                  | GWE Consulting Engineers   | March 2022       |
| Draft Stormwater Management Plan                       | Harrison Grierson  | March 2022       |
| Overall Ecology Executive Overview                     | Tonkin + Taylor  | March 2022       |
| Stream Ecological Effects Assessment                   | Tonkin + Taylor  | March 2022       |
| Terrestrial Ecology Effects Assessment                 | Tonkin + Taylor  | March 2022       |
| Freshwater Wetland Ecological Effects Assessment       | Tonkin + Taylor  | March 2022       |
| Marine Ecological Effects Assessment                   | Tonkin + Taylor  | March 2022       |
| Ecological Effects Assessment Volume 2: Appendices     | Tonkin + Taylor  | March 2022       |
| Water Quality and Sedimentation Modelling Report       | Tonkin + Taylor  | March 2022       |
| Coastal Hazards Report                                 | Tonkin + Taylor  | January 2022     |
| Earthworks Assessment                                  | Harrison Grierson  | 21 December 2021 |
| Geotechnical Report                                    | Tonkin + Taylor  | January 2022     |
| Contaminated Land Detailed Site Investigation          | Tonkin + Taylor  | February 2022    |
| Soil and Land Use Capability Assessment                | AgFirst  | March 2022       |
| Archaeological Assessment                              | Clough & Associates Ltd  | March 2022       |
| Tapuwae Ohiti I Kahawairahi Cultural Values Assessment | Ngāi Tai ki Tāmaki   | March 2022       |
| Consultation Summary Report                            | Unio Environmental   | March 2022       |
| New Zealand Coastal Policy Statement Assessment        | Unio Environmental   | March 2022       |
| Neighbourhood Design Statement                         | Studio Pacific Architecture, Jasmox, Studio Woodroffe Papa and Woods Bagot | 17 November 2021 |

## 2. Site description and background

15. The plan change area is adjacent to the southern extent of the Beachlands township and includes land at 110 Jack Lachlan Drive; and 620, 680, 682, 692, 702, 712, 722, 732, 740, 746, 758 and 770 Whitford-Maraetai Road, Beachlands. The plan change area is approximately 307 hectares and is bounded by Jack Lachlan Drive to the north, Whitford-Maraetai Road to the east, and the coastline forms the western boundary. The southern property boundary of the plan change adjoins 600 Whitford-Maraetai Road, which is zoned Rural-Countryside Living.
16. The plan change area is immediately south of the urban extent of Beachlands coastal town, located in the south-east of Auckland on the Hauraki Gulf approximately 37 kilometres from the Auckland central business district, and approximately 17km from Botany Metropolitan Centre. Beachlands (including Pine Harbour) has an existing urban area of approximately 363 hectares and had an estimated population of 7610 in 2022.<sup>2</sup> Beachlands is an established coastal town and currently accommodates a range of land uses including residential, business, industrial. It provides some

<sup>2</sup> Statistic NZ Estimated Resident Population in 2022.



social infrastructure such as sports fields, Formosa Golf Club, Pine Harbour Marina, primary school, local retail shops and a supermarket.

17. A list of the properties within the plan change area is included in the applicant’s s32 evaluation report - Appendix 2. BSLP owns the majority of the land within the Plan Change area (255.17 ha) across three properties, and the remaining 10 properties are owned by others (51.95 ha). Figure 1 below identifies the 13 properties within the plan change area.

**Figure 1: Plan change area Context**



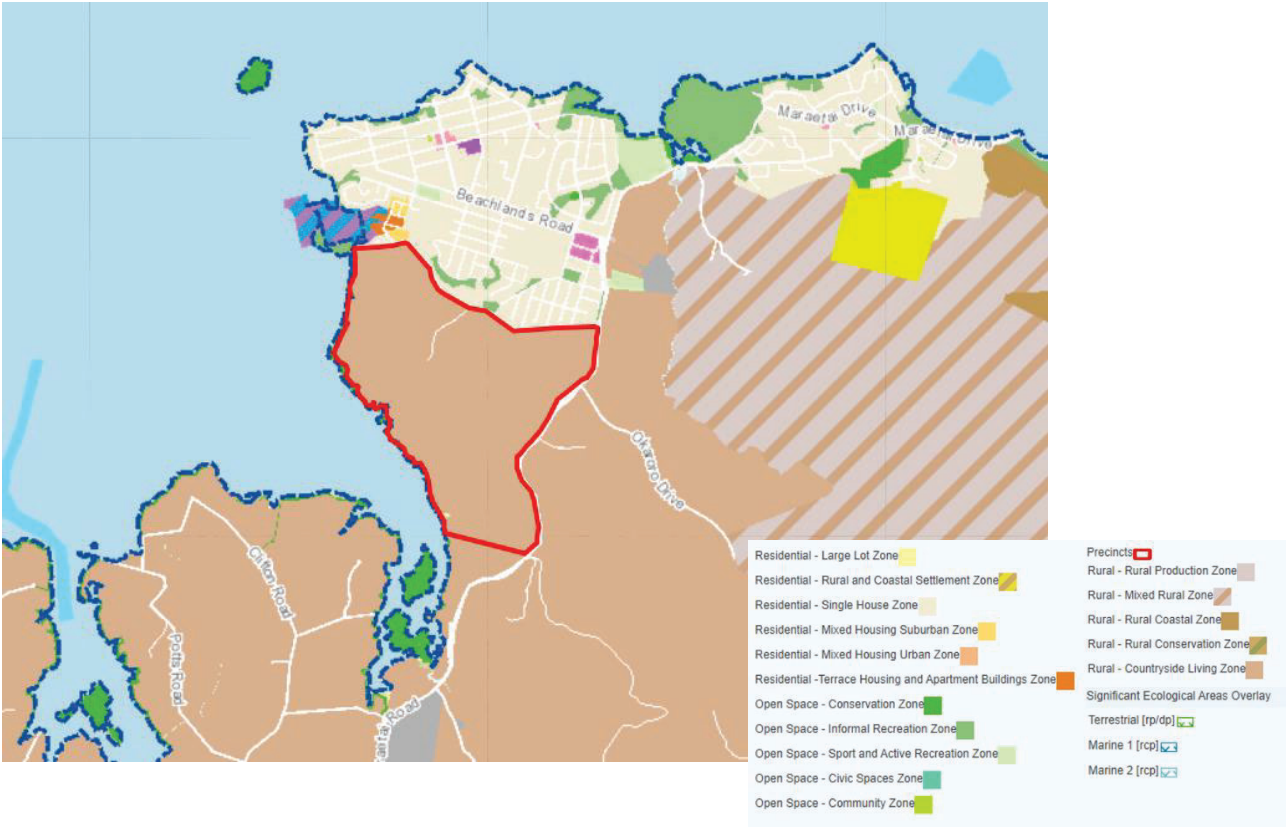
18. Currently the existing Rydges Formosa Golf Course and Resort occupies the northern portion of the plan change area. Approximately 17% of the land is occupied by 11 rural lifestyle properties fronting onto Whitford-Maraetai Road, which each contain a large residence. The remainder of the land is largely undeveloped and covered in pasture with an undulating landform with dramatic falls along the coastal margins.
19. Figure 2 below provides a zoning context map for the plan change area (outlined in red). Land immediately to the north and opposite the plan change area is within the existing Beachlands



township, which is predominantly zoned Residential – Single House in the AUP. Land along Jack Lachlan Drive opposite and adjacent to PC88 has been recently developed and contains several sites that are either still under development or yet to be developed. A small area of Residential – Terrace Housing and Apartment Buildings zone and Mixed Housing Suburban zone exists at Pine Harbour, at the western end of Jack Lachlan Drive which has been partially developed.

- 20. Land to the east and south of the plan change area is zoned Rural-Countryside Living and is subject to the Whitford Precinct, comprising of rural lifestyle properties and pastureland. Further east is coastal town of Maraetai, which is also zoned Residential – Single House. An area of Future Urban Zone exists at the southern extent of the existing urban area of Maraetai at 52 Rewa Road.

**Figure 2 Surrounding zoning**



- 21. The transport environment includes:
  - Whitford-Maraetai Road is the key road connection to Beachlands South from the wider Auckland region, it is a two-lane arterial road.
  - Jack Lachlan Drive is a two-lane road that is partially formed to an urban standard, with a footpath along part of the northern side only.
  - Pine Harbour Ferry berth is located approximately 150m from the northern end of the plan change area, with a weekday ferry service to Auckland’s CBD every 20 mins at peak times and with a journey time of approximately 35 mins.
  - Public bus service (No. 739) connects Maraetai Drive and Whitford-Maraetai Road to Botany Town Centre every hour weekdays and weekends.

22. I do not propose to repeat information included in the requestor's application and under s42A(1B)(b) I adopt the description of the plan change area and surrounds set out in pages 13-15 in the requestor's s32 evaluation report.<sup>3</sup>

### 3. Existing Plan Provisions

23. The entire plan change area is currently zoned Rural – Countryside Living (**CSL**) and is subject to the Whitford Precinct – Sub-precinct B, which includes specific provisions addressing landscape character and environmental considerations and provides for an average site size of 5ha.
24. The CSL zone provides for low-density rural lifestyle living on rural land that is generally closer to urban Auckland or towns and does not have significant rural production values, associated with steep topography and poor soils. The plan change area is not identified as a receiver area for transferable rural site subdivision from other zones.
25. The key provisions for the Whitford Precinct are:
- One dwelling in compliance with the relevant standards – provided for as a Permitted activity.
  - Buildings within the specified building area - provided for as a Permitted activity.
  - Buildings located outside specified building area are a Discretionary activity.
  - Subdivision of no more than one site per 5ha gross across the entire existing site as a Restricted Discretionary activity.
  - Permitted standards include:
    - front yard of 10m, side and rear yard of 3m, coastal yard of 30m, and yards fronting an arterial road of 20m
    - buildings must be limited to the specified building areas
    - minimum 20m strip must be planted and fenced off from each bank of all permanent streams and will constitute the riparian management indicative constraints area
    - all buildings and structures must be set back a minimum 5m from the riparian management constraints area
    - permanent protection of all areas of existing native vegetation shown on Precinct Plan 2 to be secured by suitable legal instrument
    - sites containing slopes steeper than 15 degrees shown on Precinct Plan 1 require report identifying slopes constraints areas that must be planted
    - additional subdivision for 4ha of native vegetation planting for each additional site and maximum number of sites in accordance with Table 4 (less than 10 ha = no additional sites)
    - a re-vegetation plan and programme is required and planting must be permanently protected
26. The plan change area is also subject to the following additional controls:
- Natural Resources: Significant Ecological Area Overlays – SEA-M1-43c, Marine 1, SEA-M1-43w4, Significant wading bird area, Marine 1; SEA-M2-43a, Marine 2
  - Natural Resources: Significant Ecological Area Overlays – SEA\_T\_4556, Terrestrial, SEA\_T\_1141, Terrestrial; and SEA\_T\_1140, Terrestrial
  - Controls: Coastal Inundation 1 per cent AEP Plus 1m Control – 1m sea level rise
  - Controls: Macroinvertebrate Community Index – Exotic, Native, Rural, and Urban

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<sup>3</sup> Unio Environmental, Private Plan Change Request – Section 32 Assessment Report.

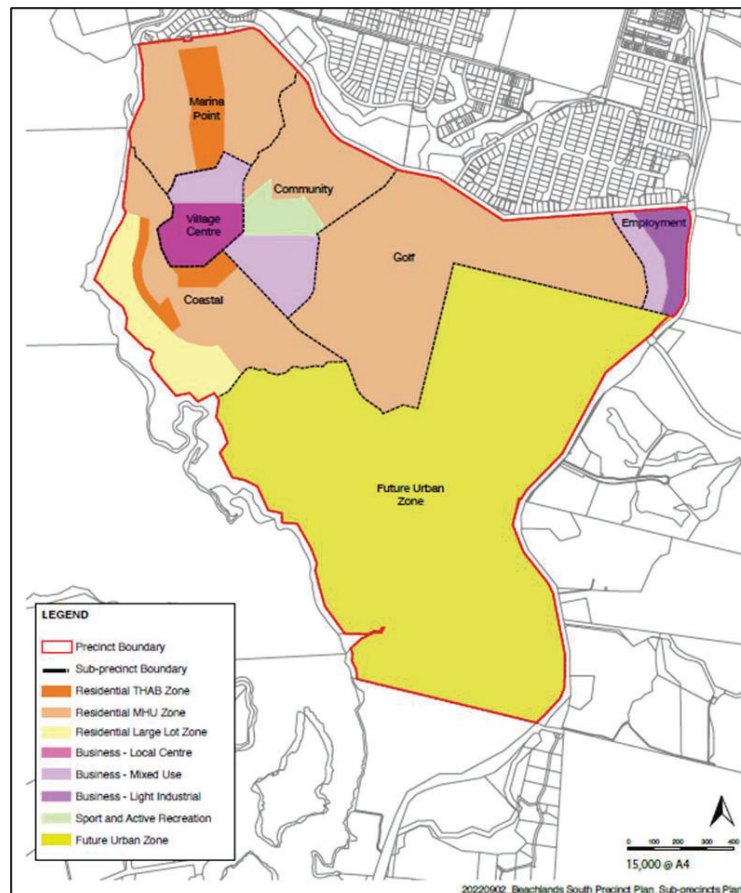
- Designations: 1806 Road widening – Beachlands Road

## 4. Proposed Plan Change Provisions

### 4.1. Proposed zones

27. The northern portion of the land (159.54 hectares) is proposed to be live zoned to a variety of urban zones. The southern portion of land (147.58 hectares) is proposed to be zoned Future Urban ('FUZ'), requiring future plan changes to "live" zone the land for future development.
28. The urban zones proposed to be applied in the live-zoned part of PC88 area outlined below and illustrated in **Figure 3**:
  - Residential – Terrace Housing and Apartment Buildings zone (**THAB**)
  - Residential – Mixed Housing Urban zone (**MHU**)
  - Residential – Large Lot zone (**LLZ**)
  - Business – Local Centre zone (**LCZ**)
  - Business - Mixed Use zone (**MUZ**)
  - Business - Light Industry zone (**LIZ**)
  - Open Space – Sport and Active Recreation zone (**OSSAR**).

**Figure 3 Proposed zones**



29. The majority of the northern portion of PC88 is proposed to be zoned MHU zone. As the plan change area is currently zoned CSL, Plan Change 78 – Intensification (**PC78**) does not apply to it. Whilst

PC78 isn't applicable to the plan change request, I note that PC78 amends the underlying MHU zone which is proposed. PC78 identifies the MHU zone to be the most widespread residential zone covering most of urban Auckland and incorporates the medium density residential standards (**MDRS**). It is a reasonably high-intensity zone, with development of typically three-storeys in a variety of sizes and forms, including detached dwellings, terrace housing and low-rise apartments.

30. Parts of PC88 are proposed to be THAB zone near the village centre and within a walkable distance (approximately 800m) of the Pine Harbour Ferry berth. The AUP identifies the THAB zone as a high-intensity zone enabling a high intensity of residential development, providing for urban residential living in a range of forms including terrace housing and apartments. The zone is predominantly located around metropolitan, town and local centres and the public transport network to support the highest levels of intensification. I note that the Pine Harbour Ferry is not identified as part of the rapid transit network. Therefore, Policy 3(c) of the National Policy Statement for Urban Development 2020 requiring district plans to enable building heights of at least 6 storeys within a walkable catchment of existing or planned rapid transit stops does not apply.
31. An area of LLZ is proposed within the Coastal Sub-precinct at the western edge of the plan change area. The AUP describes the LLZ as providing for large lot residential development on the periphery of urban areas, where development is managed to address one or more factors including landscape qualities, lack of reticulated services, and/or physical limitations.
32. A village centre is proposed and identified as LCZ, which the AUP describes as applying to a large number of small centres throughout Auckland. The AUP identifies that these centres are generally located in areas of good public transport, and primarily provides for the local convenience needs of surrounding residential areas.
33. Three areas of MUZ are proposed, two adjoining the village centre and one within the Employment Sub-precinct. The AUP describes the MUZ as typically located around centres and along corridors serviced by public transport. It acts as a transition area, in terms of scale and activity, between residential areas and City Centre, Metropolitan Centre, and Town Centre zones. It also applies where there is a need for a compatible mix of residential and employment activities. The MUZ provides for residential activities and predominantly smaller scale commercial activity that does not cumulatively affect the function, role and amenity of centres.
34. A LIZ area within the Employment Sub-precinct fronts Whitford-Maraetai Road. The AUP describes the LIZ as anticipating industrial activities that do not generate objectionable odour, dust or noise. This includes manufacturing, production, logistics, storage, transport and distribution activities. The anticipated level of amenity is lower than centre zones.
35. The OSSAR zone is proposed to apply within the Community Sub-precinct to an area identified as an indicative suburb park. The AUP describes the 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 and multi-sport facilities.
36. The FUZ is applied to the southern part of the plan change area, which is not proposed to be live-zoned. The FUZ applies to greenfield land that has been identified as suitable for urbanisation and is described as a transitional zone in the AUP. Land may be used for a range of general rural activities but cannot be used for urban activities until it is re-zoned for urban purposes.

#### **4.2. Beachlands South Precinct**

37. PC88 proposes to remove the existing Whitford precinct (and sub-precinct B) from the plan change area and replace it with a new precinct called the Beachlands South Precinct (**BSP**).



38. The BSP seeks to enable and guide development to achieve residential, commercial, recreational and educational development. The applicant advises that development capacity enabled through the new precinct (live-zoned area) is approximately 3,000 dwellings and approximately 960 jobs.
39. Six sub-precincts are proposed for the live-zoned area to identify specific character or activity outcomes for each part of the plan change area reflected as Marina, Village Centre, Community, Coastal, Golf and Employment. The Community Sub-precinct enables development of a primary and secondary school, and the Golf Sub-precinct maintains a 9-hole golf course. Employment opportunities are provided for in the Village Centre, Community, and Employment sub-precincts including through mixed use. The sub-precincts are described in further detail in the applicant's s32 evaluation report.<sup>4</sup>
40. The BSP proposes a comprehensive set of precinct provisions required to deliver the outcomes sought by the Plan Change. A description of the BSP provisions is provided in the applicant's s32 evaluation report.<sup>5</sup> The following provides a brief overview of key precinct provisions:
- Objectives and policies to achieve a well-functioning urban environment and address key issues for the precinct including Mana Whenua values, ecological values, transport upgrades, provision of infrastructure, a variety of housing outcomes, vibrant coastal town, and specific sub-precinct outcomes.
  - MDRS are incorporated into the precinct in accordance with Schedule 3A of the RMA. Therefore, 3 residential units per site as a permitted activity, and more than three residential units per site is a restricted discretionary activity (Table IX.4.1(A1) and (A2)). Subdivision in accordance with the MDRS is controlled according to the Auckland-wide subdivision provisions. However, in relation to transport upgrades it will be a restricted discretionary activity. Subdivision in the LLZ requires a minimum net site area of 1,000m<sup>2</sup> (Standard I.7.12).
  - Additional development controls include height variation controls enabling building height of 24m and 27m that are greater than the underlying zone (Standard I.7.1); building setbacks and planted landscape buffers of 10m and 15m from Whitford-Maraetai Road to soften the appearance of development from the road (Standard I.7.2); Riparian yard setbacks of 10m and requirement for planting along permanent and intermittent streams (Standard I.7.5); Coastal protection yard requires a building setback of 30m (Standard I.7.9).
  - All new buildings require consent as a restricted discretionary activity.
  - Protection of a Pā site identified on Precinct Plan 4 by requiring discretionary activity consent for any buildings or structures, earthworks or subdivision within the pā site (Standard I.7.10), spiritual connections, archaeological sites, key outlook point and key views of cultural significance to Ngāi Tai ki Tāmaki.
  - Identification of an Ecological Protected Area Network (**EPAN**) with associated standards to manage ecological and biodiversity outcomes (Standard I.7.6). Subdivision and development that does not comply with Standard I.7.6 is a discretionary activity (Table IX.4.1(A20)).
  - Stormwater quality treatment requirements for high contaminant generating carparks and all publicly accessible carparks, all other trafficked areas in accordance with the approved stormwater management plan, and use of inert cladding for buildings (Standard I.7.7).
  - Consent triggers for open space greater than 1,000m<sup>2</sup>, civic space, and a coastal pathway. Open space through an indicative Fairway Reserve to either be vested with Council or legally protected to provide a recreational open space and connection between the Village Centre and Pine Harbour Ferry Terminal (Standard I.7.8)

<sup>4</sup> Unio Environmental, Private Plan Change Request – Section 32 Assessment Report (pages 29-30).

<sup>5</sup> Ibid (pages 30-39).

- Standards seek to ensure that subdivision and development of land for business and housing is coordinated with the construction and delivery of infrastructure, including upgrades to the road network and ferry services to manage adverse effects on the local and wider network (Standard I.7.3). Transport triggers are based on the number of dwellings and quantum of retail, commercial and industrial GFA. Development or subdivision that does not comply with the transport triggers is a discretionary activity (Table IX.4.1(A10) and (A22))
  - Integration of development and infrastructure is managed by rules and standards that require certain infrastructure upgrades to be in place (Standard I.7.4), otherwise the development must be considered as a discretionary activity (Table IX.4.1(A11)).
  - Non-potable water supply efficiency required by the provision of rainwater tanks (or bladders) for dwellings (Standard I.7.13).
  - Matters of control and discretion and associated assessment criteria are proposed to support the implementation of the policies and rules for controlled and restricted discretionary activities.
41. A series of precinct plans are included as part of the proposed precinct to help guide development by identifying key elements and features that must be provided for as described by associated rules and standards in the precinct:
1. Additional Controls and Overlays Plan - reserve areas, landscape buffers, subdivision and height variation controls, and Golf Course Overlay.
  2. Natural Features – ecological protection area network (EPAN), indicative native regeneration, indicative natural wetlands, indicative constructed wetlands, high value terrestrial planting, and streams.
  3. Structuring Elements – indicative elements including EPAN, road network, coastal pathway, parks, linkages to open space, school, centre and employment areas.
  4. Cultural Landscape – spiritual connections, EPAN, pā site, indicative archaeological sites, key outlook point and key views.
  5. Movement Network – EPAN, existing connections to coast and ferry, indicative road network, indicative coastal pathway, indicative future connections.
  6. Transport Staging and Upgrades – road intersection upgrades, Pine Harbour Ferry Terminal.
  7. Earthworks Catchments – 5 catchments where bulk earthworks will be limited to minimise sediment runoff.

### 4.3. Additional overlays and controls

42. The Plan Change also seeks to apply the Stormwater Management Flow 1 (**SMAF 1**) Control over the entire plan change area. The AUP in Chapter E10 Stormwater management area describes the SMAF Control as seeking to protect and enhance Auckland's rivers, streams and aquatic biodiversity in urban areas.
43. The provisions in Chapter E10 would therefore apply to the establishment of impervious surfaces to manage hydrology effects on stream erosion and bank instability. SMAF 1 controls do not apply to development of impervious areas that are not directed to a stream or are discharged below RL 1.7m. Otherwise any impervious areas over 50m<sup>2</sup> are required to comply with Standard E10.6.1 to implement hydrology mitigation to:

- a. provide retention (volume reduction) of at least 5mm runoff depth for the impervious area for which hydrology mitigation is required; and
- b. provide detention (temporary storage) and a drain down period of 24 hours for the difference between the predevelopment and post-development runoff volumes from the 95th percentile, 24-hour rainfall event minus the 5 mm retention volume or any greater retention volume that is achieved, over the impervious area for which hydrology mitigation is required.

#### 4.4. How the private plan change works

44. PC88 proposes to utilise existing AUP zones and the underlying provisions of these zones will apply subject to any amendments made by the BSP. A summary of the existing plan provisions that would apply is provided at **Attachment 4** along with a summary of the proposed precinct provisions that are proposed to work alongside these.
45. The MDRS must be incorporated into the relevant residential zones in proposed by PC88 in accordance with Schedule 3A of the RMA. The applicant chose to incorporate the MDRS into PC88 rather than to rely on the underlying zones. However, PC78 already incorporates the MDRS into the MHU and THAB zones and in my opinion, they are not required within the BSP.
46. Where any precinct provisions conflict with the MDRS they must be identified as a qualifying matter in accordance with section 771 of the RMA. No qualifying matters are currently proposed by PC88, However, as identified in Attachment 4 the following provisions conflict with the MDRS and therefore should be identified as qualifying matters:
  - a. Subdivision complying with staging of development with transport upgrades in Standard I.7.3 is identified as a restricted discretionary activity (Table IX.4.1(A21)).
  - b. Standard I.7.3 as it applies to residential subdivision.
  - c. Standard I.7.5 requires a riparian yard of 10m; and
  - d. Standard I.7.9 requires a coastal protection yard of 30m.
47. I have reviewed the precinct provisions in **Attachment 5**, and generally consider the provisions achieve a clear cascade between provision from objectives through to assessment criteria. However, I consider there to be a few gaps that could be resolved through amendments to the BSP including:
  - a. An objective is needed for stormwater management to support the precinct provisions.
  - b. Policy I.4(5)(b) seeks that Mana Whenua values are recognised, protected and enhanced including key views and spiritual connections identified on Precinct Plan 4. However, there are no provisions requiring consideration of Precinct Plan 4 other than the pā site which is protected via specific standards.
  - c. Policy I.4(6)(d) and (e) seek to encourage development of energy efficient buildings including design buildings with optimal solar orientation and on-site energy generation, and development of buildings that have reduced embodied carbon and operational carbon. However, there are no provisions in the precinct that achieve this outcome.
  - d. No supporting policy framework for permitted activities (A7) Demolition of building, (A8) Internal alteration of buildings, (A9) Additions and alterations to an existing dwelling in Table IX.4.1, which are already identified as permitted within the underlying zones and therefore do not need to be included in the precinct.

- e. Matter of control I.8.1.1(1) refers to subdivision variation control which is identified in Table IX.4.1 as a restricted discretionary activity.
- f. Matters of discretion I.9.1(1)(a) only cross refers to MHU zone and does not cross refer to the relevant matters for the THAB zone.
- g. Assessment criterion I.9.2(4) only refers to non-residential buildings in the criteria chapeau but includes criteria that are intended to apply also to residential activities.
- h. Assessment criterion I.9.2(7) does not have a clear matter of discretion to support it in I.9.1.

## 5. Analysis of the section 32 report and any other information provided by the applicant

48. In accordance with s42A(1) of the RMA this report is prepared on information provided on any matter by the applicant. In accordance with s42A(1A) this report does not need to repeat information included in the applicant's application, and instead under s42A(1B) may—
- adopt all of the information; or
  - adopt any part of the information by referring to the part adopted.
49. Having carefully reviewed the applicant's s32 evaluation report I now set out those parts which I adopt and the parts which I disagree with.
50. The requestor's s32 assessment is contained within section 10 of their s32 evaluation report<sup>6</sup>. The assessment appropriately starts with an investigation of whether the objectives of the plan change are the most appropriate way to achieve purpose of the RMA. Thirty objectives are proposed and the applicant describes the outcomes that will achieve the purpose of the plan change at section 10.2. I acknowledge the applicant's approach to consider the proposed objectives by theme against sections 5-8 of the RMA to demonstrate how they achieve the purpose of the RMA.
51. It is difficult to consider whether the proposed objectives are the most appropriate way to achieve the purpose of the RMA without comparison with the operative objectives. Proposed Objectives I.3(1) and (2) relating to a well-functioning urban environment are mandatory in accordance with Schedule 3A of the RMA and are incorporated in accordance with s77G of the RMA. I have therefore not assessed these objectives but note that PC78 already incorporates these objectives and therefore they are not required in the BSP.
52. I have considered the Plan Change objectives as a whole against Part 2 of the Act below.
53. The applicant determines that the objectives of the plan change will enable future communities to meet their social, economic, and cultural wellbeing while reducing the need to travel out of the area. The suitability of the area for urban growth of the scale proposed and the effects on the environment are assessed in Section 8 of this report, concluding that additional growth is not required to meet demand for growth and PC88 would result in some significant adverse effects relating to economics, urban design, water supply and transport including lack of funding. I have assessed the Plan Change against the statutory framework of National Policy Statements and the AUP Regional Policy Statement (**RPS**) in Section 7 of this report, which have been determined to achieve the purpose of the RMA. I have concluded that PC88 does not give effect to the National Policy Statement for Urban Development or the RPS because it would not contribute to a well-functioning urban environment or achieve a quality compact urban form because people would need to travel out of the area for employment and other services and amenities.
54. I accept that the objectives of the Plan Change recognise and provide for matters of national importance in accordance with Section 6 of the RMA including the preservation of the natural character of the coastal environment, wetlands and lakes, streams and their margins; protection of

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<sup>6</sup> Unio Environmental, Private Plan Change Request – Section 32 Assessment Report, March 2022 (Section 10).



areas of significant indigenous vegetation; and the relationship of Mana Whenua with their ancestral lands, water, sites, waahi tapu, and other taonga.

55. Particular regard must be had to the matters identified in Section 7 of the RMA. Generally, I agree with the applicant's assessment that the objectives can maintain and enhance amenity values and the quality of the environment, intrinsic values of ecosystems of the environment. However, as discussed in Section 8.3 of this report, there has not been adequate regard to the efficient use and development of land because additional growth is not required to meet demand and would not be efficient. The scale of urban expansion proposed would almost double the size of the existing coastal township of Beachlands, which is not well connected in terms of roads or public transport. Without the ability to provide for all the social and economic needs of the community, the community will be reliant on meeting these outside the township which is inefficient.
56. In terms of Section 8 of the RMA, I accept that the applicant has taken into account the principles of the Treaty of Waitangi when developing the Plan Change. A Cultural Values Assessment was provided by Ngāi Tai ki Tāmaki and the objectives of PC88 address key issues identified.
57. I disagree with the applicant's s32 evaluation report<sup>7</sup> because the Plan Change relies heavily on upgraded ferry capacity and frequency and 'working from suburb' either at home or the innovation hub to reduce the need for travel and create a self-sustainable community when there is significant uncertainty that such improvements can be delivered. I do not consider Beachlands to be an appropriate location for the scale of growth proposed to occur and therefore I consider the operative objectives rather than those of PC88 to be the most appropriate to achieve the purpose of the RMA. The operative objectives for the CSL zone and Whitford Precinct provide for some limited growth in the rural area enabling the future community to meet its social, economic and cultural wellbeing while providing for protection of ecological and landscape values without resulting in significant economic, water supply and transport effects.
58. Turning then to section 32(1)(b), I have read the applicant's assessment of s32(1)(b) and in particular the alternative options and respond below.
59. The applicant considers the proposed urban extent of PC88 to be preferred to other options including the status quo because:

*"...the extension of the settlement at Beachlands within the Plan Change area is consistent with B2.6.1 in that urban development of coastal towns is enabled in a way that avoids elite soils, significant natural hazard risks and enhances mana whenua values, the coastal environment and natural and physical resources while in keeping with the local character. Analysis undertaken as part of this PPC request confirms there are infrastructure solutions available and able to be funded, without reliance on funding from Council. Furthermore, this option enables efficient use of land around the existing ferry terminal supporting transport mode shift and quality compact outcomes while delivering additional residential and commercial capacity.*

*This option is efficient and effective at achieving B2.2.1(3) as it will enable the development of 3,000 dwellings which represents a significant opportunity to deliver approximately 12.2% of Auckland's dwelling target in existing rural areas, while also making provision for additional term residential and commercial capacity at Beachlands via the FUZ."*<sup>8</sup>

60. I disagree with the requestor's assessment because sufficient development capacity will be provided within the East Auckland Housing Markets as discussed in Section 8.3 of this report and therefore additional growth is not required in this locality. In particular the applicant has provided insufficient justification for needing to identify the FUZ area which almost doubles the scale of the Plan Change but is anticipated to provide low density development to provide approximately 900 dwellings. In

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<sup>7</sup> Unio Environmental, Private Plan Change Request – Section 32 Assessment Report, March 2022 (Section 10.2).

<sup>8</sup> Unio Environmental, Private Plan Change Request – Section 32 Assessment Report, March 2022 (page 148).

terms of infrastructure, there is significant uncertainty that water and transport infrastructure required to service growth are feasible or fully funded as discussed in Sections 8.13 and 8.14. The Plan Change reflects urban expansion and therefore does not contribute to the growth anticipated in the rural area under the Auckland Plan 2050 but would increase the proportion of growth occurring in future urban areas as discussed in Section 7.8 of this report. In my view the status quo is the most appropriate to provide for growth in the rural area and for the same reasons I discussed above in paragraph 57.

61. Considering the potential options for the residential land use pattern, the applicant concludes PC88 is preferred because:

*“...the proposed zoning layout has been informed by a masterplan to respond to the characteristics of the Plan Change area and enables efficient use of land around the existing ferry terminal supporting transport mode shift and quality compact outcomes while delivering additional residential capacity.”<sup>9</sup>*

62. I disagree with the applicant’s assessment because the majority of residential land uses will be well beyond a walkable distance of the ferry terminal as discussed in Section 8.13 of this report. However, I accept that the greatest residential intensity should be in close proximity to the ferry terminal should the Plan Change be approved.

63. The applicant considers that commercial land use pattern proposed by PC88 is preferred because:

*“...The proposed zoning layout has been informed by economic analysis and therefore the proposed Local Centre and Light Industry zones within the PPC are sufficient to needs to needs of the local community and will also provide employment opportunities for that community.”<sup>10</sup>*

64. Commercial zoning is not required if urbanisation is not supported. However, I accept that if the Plan Change is approved that the commercial land use pattern is appropriate based on the economic assessment and ability to support some local employment opportunities as discussed in Section 8.3 of this report.

65. The applicant considers that the PC88 is preferred for coordinating development of land with infrastructure because:

*“...Coordinating development with the delivery of required transport infrastructure through the inclusion of a transport staging rule is the most appropriate mechanism for achieving the objectives of the AUP. The proposed provisions will stage the release of development capacity with the delivery of required infrastructure and therefore is consistent with B2.21(5), B3.2.1(5) and B3.3.1(1)(b).”<sup>11</sup>*

66. I accept that if the Plan Change is approved that the coordination of development with infrastructure could be addressed through appropriate staging provisions. However, I disagree that the proposed BSP provisions will adequately manage the coordination of infrastructure because not all required transport infrastructure is identified, and it is not fully funded as discussed in Sections 8.13 and 8.14 of this report. Therefore, there is significant uncertainty and risk that development as proposed would not be adequately coordinated with the development of infrastructure.

67. The applicant considers PC88 would achieve integrated and quality development for the plan change area because:

*“...The inclusion of a bespoke set of provisions to implement the structuring elements of the Masterplan for Beachlands South and require quality built form outcomes that respond to the unique sense of place*

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<sup>9</sup> Unio Environmental, Private Plan Change Request – Section 32 Assessment Report, March 2022 (page 151).

<sup>10</sup> Ibid (page 153).

<sup>11</sup> Ibid (page 158).

*enables the PPC to efficiently and effectively achieve B2.7.1(1), B3.3.1(1), B2.3.1(3) and B2.3.1(1)(a).<sup>12</sup>*

68. I accept that if the Plan Change is approved that the proposed precinct provisions subject to recommended amendments identified in Section 8.2 of this report could achieve integrated and quality development to meet AUP Objectives B2.7.1(1), B2.3.1(3) and B2.3.1(1)(a). However, Policy B3.3.1(1) would not be achieved because the Plan Change does not facilitate transport choices due to the uncertainty of providing an improved ferry service and only a limited bus service.
69. The applicant considers PC88 best addresses natural environment, sustainability and climate change outcomes because:
- “...The inclusion of a bespoke set of provisions to enhance the natural environment and reduce carbon emissions enables the PPC to efficiently and effectively achieve B7.2.1(2), E3.2(2), E15.2 (2), IX3(7) and IX3(12).<sup>13</sup>*
70. While I agree that the provisions will support environmental and sustainable outcomes within the precinct itself, I consider the significant uncertainty around delivery of a quality ferry service to undermine the overall sustainability and climate change outcomes promoted by the plan change. In particular, the community will have a high reliance on private vehicle travel increasing Vehicle Kilometres Travelled (**VKT**) and therefore transport related greenhouse gas emissions. I consider the status quo achieves environmental and sustainable outcomes because the provisions of the Whitford Precinct requires 10m wide planted riparian margins on the banks of all permanent streams (I.441.6.5.4), permanent protection of all existing native vegetation identified on Precinct Plan 2 (I.441.6.5.5), and provision of recreational trails on precinct plan 3 (I.441.6.5.7) without significant development.
71. The applicant considers the plan change delivers the Mana Whenua Cultural Landscape because:
- “...it will ensure Mana Whenua cultural, spiritual and historical values with local history and whakapapa is recognised, protected and enhanced and it is most efficient and effective at achieving B2.6.1 (1), IX3(5) and IX3 (6).<sup>14</sup>*
72. I acknowledge that PC88 would recognise, protect and enhance the Mana Whenua Cultural Landscape through the inclusion of Precinct Plan 4 and the protection of the identified pā site. The broader cultural values of Precinct Plan 4 would not be addressed by the proposed provisions, unless resource consent was required as a discretionary activity.
73. The applicant considers there to be sufficient information to determine the range and nature of environmental effects of the options considered and therefore does not consider there to be any need to assess the risk of acting or not acting.<sup>15</sup>
74. I disagree that that there is sufficient information, as discussed in Sections 8.13 and 8.14, there is significant uncertainty that the key infrastructure will be funded and delivered and therefore risk that the outcomes promoted by the Plan Change will not be achieved. The information provided in support of the request aims to develop a sustainable community that is largely self-sufficient which are based on uncertain assumptions including a significant increase in ferry mode share from 6% to 13%, and appears to assume a large proportion of people will either work from home or ‘work from suburb’ at an innovation hub.

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<sup>12</sup> Unio Environmental, Private Plan Change Request – Section 32 Assessment Report, March 2022 (page 163).

<sup>13</sup> Ibid (page 166).

<sup>14</sup> Ibid (page 169).

<sup>15</sup> Ibid (Section 10.5).

75. I note that the s32 evaluation does not consider whether the OSSAR zone is the most appropriate option. Several issues with the OSSAR zone are identified in Section 8.12, and in my opinion, it is not appropriate to apply a live OSSAR zone at this stage of the process. If the Plan Change is approved, I consider it appropriate to remove the OSSAR zone and replace it with the MHU zone.
76. Overall, I consider that the objectives proposed by PC88 are not the most appropriate way of achieving the purpose of the RMA. In my view, the objectives of the operative CLZ and the Whitford Precinct are the most appropriate way of achieving the purpose of the RMA and gives effect to the objectives and policies contained in the RPS (as discussed in Section 7.6 in this report). I therefore disagree with the findings of the alternative options set out in the applicant's s32 assessment. However, if the Hearing Commissioners determined that the objectives of the plan change do achieve the purpose of the RMA then I consider the proposed zoning (excluding the OSSAR zone) and proposed provisions (subject to amendments discussed in this report) to be the most appropriate methods to achieve the objectives generally.

## **6. Hearings and decision-making considerations**

77. Clause 8B of Schedule 1 of RMA requires that a local authority shall hold hearings into submissions on private plan changes.
78. 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 making the decision that is then publicly notified by the council.
79. In accordance with s42A(1), this report considers the information provided by the applicant and summarises and discusses submissions received on PC88 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 PC88. Any conclusions or recommendations in this report are not binding to the Hearing Commissioners.
80. 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.
81. This s42A report has been prepared at the request of the council by Chloe Trenouth. I am a consultant planner with a Bachelor of Planning (Hons) from The University of Auckland. I have over 25 years' experience, working within local authorities and central government and as a planning consultant within with both public and private clients. I am currently working as a sole practitioner, and prior to this I was a Director at Hill Young Cooper Ltd for 6 years. I am a full member of the New Zealand Planning Institute and am accredited as an Independent Commissioner under the Making Good Decisions programme.
82. My experience includes policy development, contributing to the preparation of regional policy statements and district plans including plan changes, and reviewing private plan changes as the reporting planner and also inputting to plan changes throughout the Auckland region through submissions and technical reviews. I was the lead planner for the council reporting to the Independent Hearings Panel on the Regional Policy Statement of the Proposed Auckland Unitary Plan for the Growth and Mana Whenua Chapters. I have also contributed to the development of the first Auckland Plan 2012 and subsequent reviews of the Development Strategy.

83. While this is not an Environment Court proceeding, I have read and abide by the code of conduct for expert witnesses contained within the Environment Court Practice Note 2023. Except where I state that I am relying on the specified advice of another person, the opinions expressed in this report are within the area of my expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.
84. This report has been prepared by the author and draws on technical advice provided by the following technical experts:

**Table 2 Specialist input into s42A report**

| Area of expertise          | Authors   |
|----------------------------|---|
| Transport                  | Wes Edwards, Arrive Transport Specialist  |
| Landscape and Urban Design | Rebecca Skidmore, R. A. Skidmore Urban Design Ltd   |
| Stormwater and Flooding    | Amber Tsang, Consultant Planner and Zheng Qian, Senior Stormwater Analyst, Healthy Waters |
| Ecology                    | Jason Smith, Morphum  |
| Open Space                 | Gerard McCarten, Sentinel Planning  |
| Economics                  | Derek Foy, Formative  |
| Heritage and archaeology   | Rebecca Ramsay and Megan Walker, Senior Heritage Specialists, Auckland Council            |
| Coastal Hazards            | Alison Clarke, 4Sight Consultants   |
| Coastal Water Quality      | Pete Wilson, 4Sight Consultants   |
| Water and wastewater       | David Russell, Development Engineer, Auckland Council                                     |

85. The technical reports provided by the above experts are attached in **Attachment 6** of this report.

## 7. Statutory and policy framework

86. 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.
87. 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)”.
88. 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.
89. PC88 seeks rezoning and removal of the existing precinct and the application of a new precinct which are district plan related. However, activities relating to the EPAN are considered regional plan matter as they seek to maintain indigenous biodiversity.
90. The following sections summarises the statutory and policy framework, relevant to PC88.



## 7.1. Resource Management Act 1991 – Regional and district plans

### Plan change matters – district plans

91. In the development of a proposed plan change to a regional and/ or district plan, the RMA sets out mandatory requirements in the preparation and process of the proposed plan change. Table 3 below summarises matters for plan changes to regional and district plan matters.

**Table 3 Plan change matters relevant to regional and district plans**

| Relevant Act/Policy/Plan     | Section    | Matters   |
|------------------------------|------------|---|
| Resource Management Act 1991 | Part 2     | Purpose and intent of the Act   |
| 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   |
| Resource Management Act 1991 | Section 80 | Enables a 'combined' regional and district document. The Auckland Unitary Plan is in part a regional policy statement, regional coastal plan, regional plan and district plan to assist Council to carry out its functions as a regional council and as a territorial authority |
| Resource Management Act 1991 | Schedule 1 | Sets out the process for preparation and change of policy statements and plans by local authorities, and private plan change applicants   |

92. 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.
93. The tests are the extent to which the objective of PC88 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)).

94. 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)).

## 7.2. Resource Management Act 1991 – Regional Matters

95. There are mandatory considerations in the development of a proposed plan change to regional matters. Table 4 below summarises regional plan matters under the RMA, relevant to PC88.

**Table 4: Plan change - regional matters under the RMA**

| Relevant Act/Policy/Plan     | Section    | Matters   |
|------------------------------|------------|---|
| Resource Management Act 1991 | Part 2     | Purpose and intent of the Act   |
| Resource Management Act 1991 | Section 30 | Functions of regional councils in giving effect to the RMA                          |
| Resource Management Act 1991 | Section 63 | Sets out the purpose of regional plans  |
| Resource Management Act 1991 | Section 65 | Sets out matters to be considered for changes to regional plans                     |
| Resource Management Act 1991 | Section 66 | Sets out matters to be considered in (other) regional council plans                 |
| Resource Management Act 1991 | Section 67 | Sets out required contents of regional plans  |
| Resource Management Act 1991 | Section 68 | Sets out the purpose and considerations of rules in regional plans (regional rules) |

## 7.3. Resource Management Act 1991 – District Matters

96. There are mandatory considerations in the development of a proposed plan change to district plans and rules. Table 5 below summarises district plan matters under the RMA, relevant to PC88.

**Table 5: Plan change - district plan matters under the RMA**

| Relevant Act / Policy / Plan | Section    | Matters  |
|------------------------------|------------|--|
| Resource Management Act 1991 | Part 2     | Purpose and intent of the Act.   |
| Resource Management Act 1991 | Section 31 | Functions of territorial authorities in giving effect to the Act.  |
| Resource Management Act 1991 | Section 73 | Sets out Schedule 1 of the RMA as the process to prepare or change a district plan.  |
| Resource Management Act 1991 | 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.  |
| Resource Management Act 1991 | Section 75 | Outlines the requirements in the contents of a district plan including to give effect to any national policy statement, New Zealand Coastal Policy Statement, national planning standard, and regional policy statement; and not be inconsistent with water conservation order or regional plan. |



| Relevant Act / Policy / Plan | Section     | Matters   |
|------------------------------|-------------|---|
| Resource Management Act 1991 | Section 76  | Provides that a territorial authority may include rules in a district plan for the purpose of – (a) carrying out its functions under the RMA; and (b) achieving the objectives and policies set out in the district plan. |
| Resource Management Act 1991 | Section 77G | Outlines the requirements to incorporate MDRS in relevant residential zones and give effect to policy 3 or 5 in residential zones.  |
| Resource Management Act 1991 | Section 77I | Sets out qualifying matters to be applied to MDRS and policy 3.   |

## 7.4. National Policy Statements

97. Pursuant to sections 74(1)(ea) and 75 of the RMA the relevant national policy statements (**NPS**) must be considered and given effect to in the preparation, and in considering submissions on PC88. The following NPS are relevant to PC88:
- a. NPS for urban development (NPSUD)
  - b. NPS for freshwater management (NPSFM)
  - c. NPS for indigenous biodiversity (NPSIB)
  - d. New Zealand Coastal Policy Statement (NZCPS)
98. The NPS for Highly Productive Land (NPS-HPL) came into force on 17 October 2022 and requires the protection of highly productive land that is zoned either general rural or rural production, and is predominantly LUC 1, 2 or 3 land, and forms a large and geographically cohesive area (clause 3.4(1)). The plan change area is zoned Rural – Country Living in the AUP and as such is not considered highly productive land. Therefore, the NPS-HPL is not considered relevant to the consideration of the Plan Change.
99. **Attachment 7** contains a full analysis of the relevant objectives and policies of each of the NPS which is summarised below.
100. The applicant provides an assessment against NPSUD at Section 8.6 of the s32 evaluation report, concluding that overall PC88 gives effect to the NPSUD. However, I disagree with that conclusion because in my opinion it does not achieve a well-functioning urban environment because additional development capacity is not required to meet demand, it does not support growth in an urban environment that is well-served by public transport or employment, it is not integrated with infrastructure planning and funding decisions and would not support the reduction in greenhouse gas emissions in accordance with Objectives 1, 3, 6, 8, and Policies 1, 6 and 8.
101. In terms of the NPSFM, I am satisfied that PC88 is not in conflict, and therefore adopt the assessment provided by the applicant in Section 8.7 of the s32 evaluation report. Therefore, I consider PC88 gives effect to the NPSFM.
102. PC88 considers the proposed NPSIB at Section 8.9 of the s32 evaluation report, concluding that the plan change aligns with the proposed NPS because it proposes significant enhancement of the ecological corridors including significant native revegetation throughout the plan change area. Since notification of PC88, the NPSIB has been approved and therefore PC88 must give effect to it. I consider the plan change to be generally consistent with the NPSIB in terms of identifying and

protecting Significant Natural Areas and indigenous biodiversity. However, the proposed approach to rely on riparian planting required to mitigate the effects of land use change for the purposes of off-setting or compensation for future development works would be contrary to Objective 1 and Policy 13. Therefore, in my opinion PC88 does not give effect to the NPSIB.

103. The NZCPS is relevant because PC88 is located within the coastal environment, and it is assessed by the applicant in section 8.4 and Appendix 30 of the s32 evaluation report. I consider PC88 to give effect to the NZCPS and accept the applicant's conclusions that development will be complementary to the existing character of the coastal environment as discussed in Section 8.1 below. I note that Ngāi Tai ki Tāmaki have lodged an application under the Marine and Coastal Conservation Act for the Coastal Marine Area adjoining the plan change area and I do not consider that PC88 will impact on this.

## 7.5. National environmental standards or regulations

104. Under section 44A of the RMA, local authorities must observe national environmental standards in its district/ region. No rule or provision may be duplicate or in conflict with a national environmental standard or regulation.
105. The national environmental standards or regulations relevant to PC88 are identified to be:
- a. National Environmental Standard on Freshwater Management;
  - b. National Environmental Standard on assessing and managing contaminants into soil to protect human health;
  - c. National Environmental Standard for sources of human drinking water; and
  - d. Water Services (Drinking Water Standards for New Zealand) Regulations 2022.
106. The applicant considers the relevant national environmental standards (**NES**) and regulations in the s32 evaluation report, and I adopt the following parts of their assessment concluding that the Plan Change is consistent:
- a. Section 8.11 NES - Freshwater Management; and
  - b. Section 8.12 NES – Contaminated Land.
107. I acknowledge the applicant's statement that the Plan Change does not compromise the outcomes sought by the NES – Sources of Human Drinking Water (Section 8.13) and note that these outcomes relate to protecting sources of human drinking water from being contaminated. Water supply to service the Plan Change will be via bores into below ground aquifers. One of the options for wastewater disposal is to discharge wastewater to land and as such any potential impacts on the groundwater used for water supply would need to be considered at the time of resource consent. could have potential impacts on groundwater.
108. Water supply will be required to meet the Water Services (Drinking Water Standards for New Zealand) Regulations 2022 and water treatment will be required. The applicant had indicated an intention to apply for the necessary water permits during the processing of the Plan Change. However, I understand this is no longer their approach and no applications have been lodged for water take. It would be helpful if the applicant could provide an update on the capacity of the aquifer for water supply and whether there are any issues to achieving the drinking water standards. Concerns have been raised about the existing quality of the Pine Harbour Marine Ltd bore water by submitters and the Franklin Local Board.

109. Overall, I do not consider PC88 to be in conflict with the relevant national environmental standard or regulations other than the drinking water standards potentially. I do not consider the applicant has provided sufficient information to confirm the quality of the aquifer or the level of treatment that may be required to meet the drinking water standards.

## 7.6. Auckland Unitary Plan

110. Section 75(3)(c) of the RMA requires that a district plan must give effect to any RPS. In addition, under section 74(2)(a)(i) regard shall be had to any proposed RPS. The council notified PC80 to the RPS on 18 August 2022 and relevant amendments are identified and considered but do not need to be given effect to. It is noted that the hearing for PC80 was held in June 2023 and the decision was publicly notified on 14 September 2023. Attachment 7 contains a full analysis of the relevant objectives and policies which is summarised below.

111. PC88 would not, in my opinion, give effect to RPS for the following reasons:

- Urban expansion at Beachlands is not required to provide sufficient development capacity to meet demand for growth within the East Auckland Housing Markets, and it would not achieve a quality compact urban form because most people would have to leave the area for work and proposed improvements to the transport network are either inadequate or uncertain so growth does not align with the provision of appropriate infrastructure (Objectives B2.2.1(1), (2), and (5) and Policy B2.2.2(4)).
- It has not been demonstrated that adequate infrastructure would be provided to service growth at Beachlands because there is uncertainty that the aquifer has sufficient capacity for water supply, or that transport improvements to the ferry service could be delivered, and necessary upgrades to the wider roading network area not adequately identified or funded (Objective B2.6.1(2) and Policy B2.6.2(1)).
- Insufficient information is provided demonstrating that there is adequate capacity within the aquifer for water supply to service the plan change and therefore growth is not integrated with infrastructure planning (Objective B3.2(5) and Policy B3.2(4)).
- The land use pattern would not reduce the rate of growth in demand for private vehicle trips plan change and transport infrastructure required would not be adequately planned, funded or staged to integrate with urban growth. Therefore, PC88 does not improve integration of land use and transport to support a quality compact urban form and is therefore inconsistent with Objective B3.3.1(1) and Policy B3.3.2(5).
- Two recorded archaeological sites are identified to be of high to outstanding heritage value meeting the threshold for scheduling as historic heritage places in Schedule 14. However, the plan change does not provide an assessment to justify why these features and others are not proposed to be scheduled or whether the existing provisions of the AUP would adequately protect them from inappropriate subdivision, use or development (Objective B5.2.1(1) and Policies B5.3.1(1) and (2)).
- Insufficient evidence has been provided to demonstrate that there is sufficient capacity within the aquifer to provide water supply and if PC88 were approved it could result in over allocation (Objective B7.3.1(3) and Policy B7.3.2(1), and Objective B7.4.1(3) and Policy B7.4.2(11)).
- Flood modelling provided does not use the most up-to-date information and does not adequately demonstrate whether development would increase flood risks downstream of the plan change area (Objective B10.2.1(2) and Policies B10.2.1(4) and (5)).

112. In my opinion the Plan Change does not give effect to the RPS because of the reasons outlined above, and therefore the objectives of the proposal are not the most appropriate way to achieve the purpose of the RMA.

113. A district plan must not be inconsistent with the provisions of a regional plan in accordance with Section 75(4)(b) of the RMA. I consider the AUP regional plan provisions relating to water, wastewater and indigenous vegetation to be most relevant to the consideration of PC88. In my opinion, the Plan Change is inconsistent with the regional plan for the following reasons:
- a. Flood modelling does not adequately demonstrate that downstream flooding would not be exacerbated by development (Policy E1.2(11)).
  - b. No assessment to demonstrate that water supply could be achieved within the established limits of the groundwater aquifers or whether this would have adverse effects on existing users (Objectives E2.2(1), (2), and (4), and Policies E2.3(1), (3), (4), and (7)).
  - c. Standard I.7.5(2) would enable 'double counting' of riparian margin planting required to mitigate the effects of land use for offsetting of future residual adverse effects (Objective E15.2(2) and Policy E15.3(3)).

## 7.7. Other relevant legislation

114. In considering a plan change, a territorial authority must have considered any regulation that is relevant to a regional or district plan change.
115. The Climate Change Response Act 2002 provides a framework to establish climate change policies to enable New Zealand to meet its international obligations and to prepare for, and adapt to, the effects of climate change. Section 5Q identifies emissions reductions targets for 2050, requiring that net accounting emissions of greenhouse gases in a calendar year (excluding biogenic methane), are zero by the calendar year beginning 1 January 2050 and for each subsequent calendar year. The Act requires an emissions reduction plan that sets out sector-specific policies to reduce emissions and increase removals.
116. The first Emissions Reduction Plan was published in May 2022. Transport emissions are identified as one of the largest sources of greenhouse gas emissions (17%). Key actions include:
- a. Reduce reliance on cars and support people to walk, cycle and use public transport including by:
    - i. improving the reach, frequency and quality of public transport and making it more affordable for low-income New Zealanders
    - ii. increasing support for walking and cycling, including initiatives to increase the use of e-bikes
    - iii. ensuring safer streets and well-planned urban areas.
117. I consider PC88 to be inconsistent with the Emissions Reduction Plan because it is not well served by public transport and would be heavily reliant on cars for travel to work, amenities and services not available locally as discussed in Section 8.3 and 8.13. The isolated location of Beachlands and poor connectivity to the wider area, including safety issues on Whitford-Maraetai Road, means that walking and cycling are not a viable alternative to using the car to access employment and services beyond Beachlands.
118. The Hauraki Gulf Marine Park Act 2000 is relevant to PC88, and I adopt the applicant's assessment in section 8.5 of the s32 evaluation report, concluding that the proposal is consistent because it will result in improvements to the life supporting capacity of the gulf. I do not consider P88 to conflict with sections 7 and 8 of the Hauraki Gulf Marine Park Act because any potential adverse effects on the coastal water quality would be appropriately managed as discussed in Section 8.10.

119. Ngāi Tai ki Tāmaki Claims Settlement Act 2018 is also relevant to PC88, and the applicant considers this in Section 8.17 of the s32 evaluation report. I adopt the applicant's assessment based on Cultural Values Assessment provided by Ngāi Tai ki Tāmaki and the precinct provisions that that recognise and provide for protection of the cultural landscape values within the plan change area. I note that the coastal marine area is identified as a statutory acknowledgement area (CMA (OTS-403-128), Hauraki Gulf/Tikapa Moana)) and that Ngāi Tai ki Tāmaki would be notified of any activities that potentially impact on the CMA.

## 7.8. The Auckland Plan

120. The Auckland Plan, prepared under section 79 of the Local Government (Auckland Council) Act 2009 is a relevant strategy document that council should have regard to in the preparation of PC88.

121. The applicant considers the Auckland Plan 2050 in Section 8.2 of the s32 evaluation report, and I generally concur with the description of it. However, I disagree with the way in which the applicant describes how the Auckland Plan provides for growth in rural areas.

122. The Auckland Plan's Development Strategy, which sets out how Auckland will grow over the next 30 years to achieve a quality compact urban form, anticipates growth focused in existing urban areas (62%) and future urban areas (32%) with some remaining growth in rural areas (6%). The total amount of growth anticipated in rural areas is identified to be approximately 19,000 dwellings between 2018 and 2048, or just over 6,000 dwellings each decade across the entire region.<sup>16</sup> The focus for residential growth in rural Auckland is in towns, particularly the rural nodes of Pukekohe and Warkworth with less growth anticipated in the smaller towns and villages.<sup>17</sup>

123. The Plan Change area is currently zoned CSL which provides for limited subdivision for rural lifestyle living. The Development Strategy anticipates growth will occur at Beachlands through limited intensification of the existing urban area and rural lifestyle subdivision in the CSL zone. In my opinion, PC88 represents urbanisation more consistent with the future urban areas and as such cannot be considered to contribute to the anticipated growth in rural areas. Therefore, I consider PC88 would increase the amount of growth provided for in future urban areas, which would reduce the amount of growth achieved in the existing urban area. Total capacity anticipated by PC88 is approximately 3,900 dwellings which equates to approximately 1% of the total growth of 313,000 dwellings anticipated for Auckland to 2048. I do not consider PC88 to be consistent with the Development Strategy because it effectively reduces the amount of growth that would occur in the existing urban area.

124. I note that the Housing and Business Development Capacity Assessment 2017<sup>18</sup> assumed additional feasible capacity of 15,000 dwellings in rural areas based on the AUP subdivision provisions at that time. I consider this to indicate that development capacity for growth in the rural area is not a concern.

125. The six outcomes of the Auckland Plan are also relevant to the consideration of PC88, and the strategic directions sought. I consider PC88 could support many of the Auckland Plan outcomes including Belonging and Participation, Māori Identity and Wellbeing, and Environment and Cultural Heritage but note the following inconsistencies:

- Homes and Places Direction 1 to develop a quality compact urban form to accommodate Auckland's growth and support a low carbon future;
- Transport and Access – Direction 1 Maximise safety, environmental protection and emissions reduction; and

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<sup>16</sup> Auckland Council, Auckland Plan 2050 (pages 217-218).

<sup>17</sup> Ibid (page 234).

<sup>18</sup> Auckland Council, National Policy Statement on Urban Development Capacity 2016: Housing and business development capacity assessment for Auckland, December 2017 (page i).



- Transport and Access – Direction 2 Better connect people, places, goods and services.

126. When considering the Development Strategy and the directives of the Auckland Plan, overall I consider PC88 to be inconsistent with the Auckland Plan.

127. I note that the council recently released the Draft Future Development Strategy for consultation, and this new strategy will supersede the Auckland Plan when it is adopted. While this document is a draft and therefore is not a relevant consideration for PC88, it signals that the current strategy for growth in rural areas is not changing. Importantly, climate change and infrastructure are key elements of growth management and enabling sufficient development capacity for growth in the right place at the right time. A key change is the reduced number of dwellings required to meet population growth over the next 30 years, from 313,000 in the Auckland Plan down to 200,000.<sup>19</sup> In rural areas total net capacity is identified to be 17,200 dwellings<sup>20</sup> confirming development capacity is not a significant issue.

## 7.9. Other relevant management plans and strategies prepared under any other Act

128. The following relevant plans and strategies are discussed below:

- Franklin Local Board Plan
- Future Urban Land Supply Strategy
- Regional Land Transport Plan
- Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan
- Watercare Asset Management Plan

129. There are no Iwi Management Plans that apply to the plan change area, but the applicant acknowledges Ngāi Tai ki Tāmaki prepared an Iwi Management Plan for land to the south of PC88 – the Waikopua Catchment and has taken this into consideration. I understand that the applicant is working in partnership with Ngāi Tai ki Tāmaki to address the cultural values and aspirations of the iwi as expressed in their Cultural Values Assessment prepared in response to the Plan Change.

### Franklin Local Board Plan

130. The Franklin Local Board Plan 2020 has been considered by the applicant at section 8.21 of the s32 evaluation report, setting out the key outcomes and opportunities but it is not clear how the Plan Change incorporates or provides for these.

131. Beachlands is located in the Wairoa Subdivision of the Franklin Local Board area and is identified as one of three townships alongside Pukekohe and Waiuku.<sup>21</sup> Better connection to the city centre by ferry for Beachlands is identified as an opportunity.<sup>22</sup> The plan identifies that significant growth is being experienced in Franklin with an additional 120,000 people and that the rural nature of settlements and lack of public transport options means communities are dependent on cars which is at odds with the Auckland Climate Action Plan and urban intensification guidelines.<sup>23</sup>

132. The Whitford-Maraetai Road is identified as no longer being fit for purpose resulting in safety issues. The Board indicates they will advocate for an extension to the bus service and for increased Pine Harbour ferry capacity to enable more of the community to access services, community facilities,

<sup>19</sup> Auckland Council, Consultation Draft Auckland Future Development Strategy 2023-2053 (page 29).

<sup>20</sup> Ibid, Appendix 4: Development Capacity (page 17).

<sup>21</sup> Auckland Council, Franklin Local Board Plan 2020 (page 7).

<sup>22</sup> Ibid (page 13).

<sup>23</sup> Ibid (page 15).

and jobs via public transport.<sup>24</sup> The plan identifies that locally accessible arts, library and community programmes are a priority for the community in the Wairoa subdivision; and the current population of Beachlands-Maraetai has reached a threshold that would support a small community centre.<sup>25</sup>

133. PC88 relies heavily on an improved ferry service and a significant increase in ferry patronage and indicates contributions towards funding of this along with increased population supporting the required investment. However, there is significant uncertainty around funding and provision of improved ferry service and the limited access that such a service provides as discussed in Section 8.13 and 8.14 of this report. PC88 provides opportunities to establish a high school in the area and also community facilities, but these are not guaranteed.
134. Although PC88 has the potential to support some of the outcomes of the Franklin Local Board Plan it does not adequately address the key issues of public transport and upgrades to Whitford-Maraetai Road. Feedback from the Franklin Local Board on PC88 is provided in Section 9.2 highlighting these concerns. Therefore, I do not consider PC88 to be consistent with the Franklin Local Board Plan.

### Future Land Supply Strategy

135. The Council's Future Urban Land Supply Strategy 2017 (**FULSS**) is relevant because it identifies the sequencing and timing of future urban land over the next 30 years to meet the Council's obligations to provide for growth and recognising the need for certainty due to the long lead in times required to plan for and fund bulk infrastructure to support growth. Also relevant is that the FULSS demonstrates the scale of growth planned and the timing of when it is anticipated to be development ready. The FULSS demonstrates that there will be significant greenfield growth over the next 30 years.
136. The applicant provides an assessment of the FULSS in section 8.3 of the s32 evaluation report concluding that there will be a shortage of supply of future housing in the East Auckland market between 2028-2038. The applicant identifies that the FULSS provides for alternative staging to be considered through a structure planning process.
137. I agree that a structure plan process has been undertaken in support of PC88 and if approved the FULSS could be updated to incorporate it as future urban area. However, I do not consider the Plan Change to be consistent with the FULSS. In my view, additional greenfield growth is not required in order to support Auckland's growth. As discussed above in relation to the NPSUD sufficient growth is planned to meet anticipated demand and there is insufficient capacity within the existing infrastructure networks to service development therefore potentially diverting funding and investment from other future areas that are planned.

### Regional Land Transport Plan

138. The statutory purpose of the RLTP is to set out the Auckland region's land transport objectives, policies and monitoring measures for the next ten years. Key strategies and plans underpinning the RLTP are the Auckland Plan 2050, Te Tāruke-ā-Tāwhiri and the Auckland Transport Alignment Programme (**ATAP**). In my opinion, PC88 is inconsistent with the RLTP because it does not align with the objectives of the RLTP. In particular the growth objective of "*Enabling and supporting Auckland's growth, focusing on intensification in brownfield areas, and with some managed expansion into emerging greenfield areas.*"<sup>26</sup>
139. In terms of growth, the RLTP responds to the spatial priority areas in brownfields and greenfields areas where availability of land or links to public transport of other infrastructure provide advantages.<sup>27</sup> Brownfield development is identified through ATAP as the highest priority for growth

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<sup>24</sup> Ibid (page 16).

<sup>25</sup> Ibid (page 21).

<sup>26</sup> Auckland Transport, Regional Land Transport Plan 2021-2031 (page 25).

<sup>27</sup> Ibid (page 70).



investment. Emerging greenfield areas are those identified in the FUZ with transport investments identified in ATAP through the Supporting Growth Programme. In addition to the investment made by developers in greenfields areas, additional large-scale investment is often required to connect areas to the wider network and support more sustainable transport behaviour.

140. Climate change and the environment is a key challenge that the RLTP is seeking to address, specifically the Te Tāruke-ā-Tāwhiri target to reduce transport carbon emissions through reduction in total vehicle kilometres travelled (**VKT**). The RLTP describes the two factors that drives transport emissions as VKT x average vehicle CO<sub>2e</sub> per km, and the importance of considering all trips and not just focus on peak trips.<sup>28</sup> Beachlands has limited public transport and urban expansion would increase VKT at peak and non-peak times because PC88 will not be fully self-sufficient and would still rely on jobs, education and services outside the area.
141. I do not consider PC88 to be consistent with the RLTP because not only are there no specific transport upgrades identified that would support the scale of growth proposed at Beachlands, but it does not align with stated objectives of the plan specifically relating to growth and climate change. As discussed in Section 8.13 of this report, public transport remains limited and there is significant uncertainty that the ferry service and capacity could be increased. Therefore, the community would remain heavily reliant on private vehicle travel increasing total VKT and resulting in the requirement for significant investment on upgrades to the wider road network including Whitford-Maraetai Road to address capacity and safety issues that are not planned or funded.
142. I note that the draft 2023-2031 RLTP has recently been released.<sup>29</sup> While not a relevant statutory document for consideration for PC88, it is helpful to recognise that the draft RLTP does include some investments relevant to PC88 including some changes to the Pine Harbour Ferry to include additional peak trips from 2024, midday trips from 2026, and weekend trips from 2026; and a new bus route from 2025 connecting Maraetai and Beachlands to the Pine Harbour ferry. Investment in the ferry network generally is focussed on decarbonising the ferries and upgrades to wharfs to enable this outcome. I do not consider these changes to provide any additional support to the scale of growth proposed by PC88.

#### **Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan**

143. Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan was adopted by the council in 2020 and identifies eight priorities identifying actions to respond to the climate change emergency. The plan provides a roadmap to a zero-emissions, resilient and healthier region by reducing greenhouse gas emissions and adopting to the impacts of climate change.
144. I acknowledge the sustainability concepts promoted by PC88 to address climate change and carbon emissions described in the Beachlands Sustainability Strategy (Attachment 2). However, as discussed above the Plan Change would be reliant on private vehicle trips and only limited public transport for both peak and non-peak travel. In my opinion, PC88 is contrary to the goals of Te Tāruke-ā-Tāwhiri because it is likely to undermine the ability to achieve the target of 64% reduction in transport emissions including a 12% reduction in total private vehicle trips VKT by 2030 sought by the plan.

#### **Watercare Asset Management Plan**

145. The applicant considers the Watercare Asset Management Plan 2016-2036 (**AMP**) but focuses on the proposed private wastewater treatment plant that will be constructed within the plan change area

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<sup>28</sup> Ibid (page 35).

<sup>29</sup> Auckland Transport, Draft Regional Land Transport Plan 2023-2033.

to service 10,000 people. I note an updated AMP was adopted in 2021 and identifies that Beachlands is not within a water service area but is within a wastewater service area.<sup>30</sup>

146. The current population of Beachlands is serviced by the local Beachlands-Maraetai Wastewater Treatment Plant which has capacity for 10,000 people, and to exceed this capacity would require a variation to the wastewater discharge consent.<sup>31</sup> The AMP identifies that the discharge consent expires in 2025 and will need to be renewed, and that further process expansion and upgrade would enable the plant to service approximately 14,000 people. However, additional growth would require further upgrades which could include connecting the community back to metropolitan Auckland.
147. There is no intention to service Beachlands with public water supply identified in the AMP. The community currently relies on rainwater tanks and bore water for water supply. The applicant proposes bore water to provide potable water supply to service PC88 and rain tanks for non-potable water supply. However, as discussed in Section 8.8, there is uncertainty that the aquifer has sufficient capacity to provide sufficient potable water to service the growth anticipated. If there is insufficient capacity within the aquifer the only alternative may be to extend the public water supply to service Beachlands which is not planned or funded in the AMP.
148. While the AMP does not identify any water and wastewater upgrades that would support PC88, I acknowledge that the applicant understands this and has proposed private services. However, I am concerned about the uncertainty of a potable water supply as previously discussed.

## 8. Assessment of effects on the environment

149. 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 clause 6 and 7 of the Schedule 4 of the RMA.
150. An assessment of actual and potential effects on the environment (**AEE**) is included in the report titled Beachlands South Precinct Private Plan Change Request – Section 32 Assessment Report by Unio Environmental dated 31 March 2022 lodged with PC88.
151. The submitted AEE identifies and evaluates the following actual and potential effects:
  - Landscape and visual amenity
  - Economics and centres hierarchy
  - Sustainability
  - Cultural values
  - Heritage and archaeology
  - Soils
  - Contamination
  - Geotechnical hazards
  - Flooding and stormwater management
  - Servicing – water supply and wastewater
  - Ecology
  - Coastal water quality and sedimentation
  - Urban form and quality built environment
  - Transport
152. I adopt the applicant's assessment provided in their s32 evaluation report on the following effects:

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<sup>30</sup> Watercare Asset Management Plan 2021 - 2041 (page 27).

<sup>31</sup> Ibid (page 68).

- a. Soils (Section 9.6) because although approximately 88ha of prime land was identified within the plan change area, it is zoned Country Living and therefore does not meet the definition of highly productive land.
  - b. Contamination (Section 9.7) and agree that overall, land contamination effects will be appropriately managed through the resource consent process and statutory requirements of the AUP and NES for contaminated land.
153. In my view, the applicant's AEE covers many of the positive and adverse effects. Where I agree with the AEE, I will state so and not repeat the assessment. There are effects where I disagree with the conclusions of the AEE and I will give reasons why. There are also additional effects which, in my opinion, need consideration. To this end 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:
- Landscape and character
  - Urban design
  - Economic effects
  - Cultural values
  - Heritage and archaeology
  - Geotechnical hazards
  - Flooding and stormwater management
  - Water supply and wastewater
  - Ecology
  - Coastal water quality and sedimentation
  - Coastal hazards
  - Open space
  - Transport
  - Infrastructure funding

### **8.1. Landscape and visual amenity**

154. As stated in section 9.1 of the s32 evaluation report based on the Landscape and Visual Assessment undertaken by Brown NZ Ltd and included at Attachment 2, the applicant concludes that the potential built form outcomes that will be enabled by the plan change are considered the most appropriate in terms of landscape, natural character and visual effects.
155. Rebecca Skidmore, the landscape expert on behalf of council has considered the above report and the further information found in Attachment 3 and concludes that the report sets out a robust landscape analysis that adopts an appropriate methodology, consistent with the relevant guidelines. Ms Skidmore notes that while the visual simulations are a useful tool to help understand the potential configuration and scale of development in relation to the underlying landscape and surrounding context, they do not represent actual development scenarios.
156. Ms Skidmore identifies the greatest adverse effect on rural character relates to the proposed FUZ and its relationship to the wider rural environment. However, the landscape experts agree that adverse effects will be moderate-high in the short-term reducing to low-moderate in the long term as restoration planting becomes established through this area. Furthermore, the landscape buffer proposed along the western side of Whitford-Maraetai Road is considered to provide a suitable interface with the rural environment.

157. While different in character from the existing Beachlands environment, Ms Skidmore considers the variation in building scale and forms enabled has the potential to create a visually rich character. Although Ms Skidmore supports greater height within the commercial core because it reinforces the area as a focal point, she does not support the area of greater height (27m) proposed within the MUZ to the southeast of the centre (Height Variation Control 27m) because it doesn't have the same rationale. I agree with Ms Skidmore that the applicant has not adequately justified the reason for the Height Variation Control 27m, and that additional height could be achieved through a resource consent which is required for any new building anyway. Without the Height Variation Control the underlying MUZ provides for a permitted maximum height of 18m as identified in Attachment 4.
158. The landscape experts agree that Whitford-Maraetai Road provides a strong urban edge, reinforced by the 10-15m landscape buffer which also creates a sensitive interface with the rural environment to the east. However, Ms Skidmore considers the cadastral boundary at the southern end of the Plan Change to be a weak urban edge compared to the where the natural feature of the Waikopua Creek Estuary intersects with Whitford-Maraetai Road.
159. PC88 is located within the coastal environment, adjoining the Hauraki Gulf. The landscape experts agree that landscaping outcomes required by the BSP can reduce adverse effects of development on the coastal environment. However, Ms Skidmore considers amendments to the BSP necessary to acknowledge the landscape function of planting to integrate the built environment with the natural coastal setting and ensuring restoration planting is implemented in a timely manner. Ms Skidmore also supports additional assessment criteria for buildings in the Marina Point, Village Centre and Coastal Sub-precincts to consider the visibility of buildings from the CMA and adjacent coastal margins and how the building design responds to this setting through design methods such as variation in the roofscape, modulation and articulation and use of exterior material and colour finishes.
160. Given the above, it is my view that landscape effects associated with PC88 would be adequately mitigated by the BSP and the amendments to precinct provisions recommended by Ms Skidmore. In summary, the landscape buffer along Whitford-Maraetai Road would reinforce the urban edge and reduce potential impacts on the rural environment to the east. Although PC88 would result in a fundamental change in character it has the potential to enhance the existing character and therefore would not be adverse.

## 8.2. Urban Design

161. As stated in section 9.14 of the s32 evaluation report based on the Urban Design Assessment prepared by Jasmax, the applicant concludes that overall the proposal will result in positive effects and will achieve a quality compact urban development and a successful urban form with a suitable level of amenity.
162. Several reports contribute to the Urban Design Assessment, including the Structure Plan, Neighbourhood Design Statement, Masterplan Design Report, and the Sustainability Strategy. Further information provided included a zone map and several precinct plans (1,3 and 5) overlaid with the masterplan.
163. Ms Skidmore, the urban design expert on behalf of council has considered the above report and further information provided concluding that if the location is considered suitable for additional growth, then PC88 is based on sound urban design theory and practice. However, Ms Skidmore recommends several amendments to the precinct provisions to address identified urban design issues and ensure promoted outcomes are achieved.
164. In considering the Urban Design Assessment, Ms Skidmore identifies that the assessment provides the background to explain the urban design rationale of PC88 but that it makes little direct reference to the proposed precinct provisions and how these will deliver the key urban design outcomes that

the masterplan has identified as being important. While the experts agree that the masterplan is only an example of outcomes that may be achieved, Ms Skidmore considers it helpful to identify the design approach that has been tested and applied to the plan change area and forms a foundation to the plan provisions. However, while the Urban Design Assessment proposes a Design Review Panel and design guidelines to achieve the urban design outcomes, Ms Skidmore indicates that as non-statutory methods they cannot be relied upon to deliver the outcomes of the AUP.

165. Ms Skidmore accepts that PC88 would result in a significant change in character but does not consider the change to necessarily be adverse. A change identified by Ms Skidmore is that the centre of Beachlands will shift to the plan change area, due to the scale of what is proposed compared to existing centres in Beachlands. The experts agree that structuring elements identified on Precinct Plan 3 would deliver a pattern of urban development with a strong sense of place by the experts, and that the new urban area would integrate with the existing township.
166. I agree with Ms Skidmore that the open space identified on Precinct Plan 3 together with the connections identified on Precinct Plan 5 contribute to a strong public realm (whether public or privately owned) framework. Ms Skidmore is concerned that the provisions are unclear about when the civic space is to be provided and suggests the matter of control should be expanded. In my opinion, it is unclear how the BSP would deliver the civic space because there is no requirement for subdivision or development to be in accordance with the structuring elements in Precinct Plan 3. Only the requirement for resource consent as a controlled activity to provide the civic space. If the Plan Change were to be approved, I support amendments to the BSP that require the civic space to be implemented in accordance with Precinct Plan 3, for any subdivision or development in the Village Centre sub-precinct which would also ensure that it is delivered early in the development process.
167. I understand that Ms Skidmore has concerns relating to the potential future development of the Golf Course Overlay because its configuration would make it difficult to integrate with the surrounding area. Ms Skidmore considers it appropriate for subdivision in the Golf Course sub-precinct to be required to demonstrate how future street connectivity can be achieved in relation to the Golf Course Overlay. There is nothing in the BSP that prevents subdivision in the Golf Course sub-precinct or Golf Course Overlay, and therefore I agree provision should be made to consider future street connectivity to ensure this area integrates with the wider precinct should the Plan Change be approved.
168. Ms Skidmore highlights the importance of the Fairway Reserve to provide good connection to the ferry terminal and suggests providing this access early in the development process would be beneficial. I agree that the Fairway Reserve connection is important and note the BSP requires it to be implemented as part of any subdivision or development within the Marina sub-precinct in accordance with rules IX.4.1(A26). However, development elsewhere in the BSP does not trigger the provision of the Fairway Reserve. While it may be anticipated and logical that the Marina sub-precinct develops first given its proximity to the ferry this is not guaranteed. I consider this issue could be resolved through amendment to the BSP that requires the Marina sub-precinct to develop first or alternatively the Fairway Reserve to be triggered by development elsewhere in the BSP should the Plan Change be approved.
169. In terms of the FUZ, Ms Skidmore identifies that while it is a logical extension to the proposed live-zoned area it is more remote from the existing settlement and could only accommodate pockets of lower density development due to the topographical and ecological constraints. Therefore, Ms Skidmore does not consider the FUZ to result in an efficient settlement pattern, and due to the constraints will also struggle to deliver a street network that achieves good connectivity.
170. Given the above, it is my view that the urban design effects of the live-zoned portion of the Plan Change would be adequately managed by the BSP subject to recommended amendments. However, I do not consider the potential urban design effects of the proposed FUZ to have been adequately considered and do not consider it sufficient to rely on the future plan change to address



these matters. I am concerned that the proposed FUZ does not achieve efficient land use and would be poorly integrated with the proposed live-zoned area and therefore would not achieve a quality compact urban form.

### 8.3. Economic effects

171. As stated in section 9.2 of the s32 evaluation report, the economic assessment by Property Economics (**PEL report**) included at Attachment 2, concludes that the potential economic benefits of PC88 outweigh the potential economic costs by a considerable margin.
172. The PEL report highlights unique attributes of PC88 identifying that these attributes increasingly resonate with the market and are qualities that purchasers are looking for, and initiatives such as collaborative working spaces provide opportunities to work from the suburb.<sup>32</sup> Key findings of the PEL report include:
- a. A localised housing supply deficit for the Howick Local Board / Beachlands areas before 2028 with associated economic and social costs;
  - b. The Plan Change proposes to deliver a mix of dwelling typologies representing a different composition from existing Beachlands increasing choice across typology and price points delivering greater economic efficiencies;
  - c. Provision of a local centre is appropriate for PC88 to provide a larger retail centre containing predominately convenience retail and services with capacity for 6,375m<sup>2</sup> of retail and commercial service space and 5,095m<sup>2</sup> of commercial office providing an innovation hub for flexible/co-working space; and
  - d. An estimated 960 local employment opportunities across a variety of land uses including retail, commercial office, retirement village, light industry, tourism/recreational and school activities supporting employment internalisation within Beachlands.
173. Derek Foy, the economic expert on behalf of council has considered the above report and the further information provided and concludes that the economic benefits do not outweigh the economic costs.
174. Mr Foy acknowledges that the Plan Change would provide additional capacity, and a larger population base to support future community facilities and a range of commercial activities. However, key concerns identified by Mr Foy include that:
- a. the applicant has not established that additional supply needs to be provided at Beachlands;
  - b. Beachlands is not an appropriate location for the scale of growth proposed by PC88 because it is a relatively large distance from urban Auckland's employment opportunities, retail, community facilities and public transport;
  - c. the Plan Change does not contribute to a well-functioning urban environment because it does not maintain the existing local employment ratio of workers per household and is reliant on employment areas some distance away; and
  - d. the financial burden of providing new infrastructure to service the Plan Change is unclear and any requirement for the Council to fund new infrastructure would divert funding from other locations and place an unexpected financial burden on the community.
175. Mr Foy identifies that although the PEL report anticipates a total yield of 3500-4500 households for the Plan Change there is no information on how the numbers were calculated. I agree with Mr Foy

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<sup>32</sup> Property Economics, Beachlands South Private Plan Change Economic Assessment, March 2022 (Section 2).

that without clarity around the development capacity enabled by the Plan Change it is possible that higher growth could be achieved with additional implications for the adequacy of employment land, traffic generation, and demand for other infrastructure.

176. Additional development capacity could potentially be realised through future development of the 9-hole golf course which has an underlying zone of MHU Zone. There is nothing within the BSP that would prevent future development of the golf course. The Golf Course Overlay on Precinct Plan 1 provides for ongoing use of the MHU zone as a 9-hole golf course, and Policy I.4(34) provides for the development of complementary residential activities. However, residential activities within the Golf Course Overlay do not have a different activity status than the underlying MHU zone (i.e. permitted up to 3 dwellings, and restricted discretionary for more than 3 dwellings). I accept that development within the MHU and THAB zones is likely to occur by way of an integrated residential development or medium density developments of more than 3 dwellings requiring resource consent as a restricted discretionary activity. Therefore, potential effects of development could be considered including the standards requiring adequate water supply and wastewater infrastructure and identified transport upgrades. However, there is a risk that a higher level of growth would result in additional infrastructure that has not been anticipated by the Plan Change and increased costs to the council to support this growth.
177. Having considered the PEL report and Mr Foy's peer review, I consider there to be sufficient residential capacity at a regional level because of the existing future urban areas and the intensification provided for through PC78. Mr Foy indicates that PC78 significantly increases enabled dwelling capacity in the Beachlands housing market area of East Auckland Residential Markets, with approximately 181,000 additional dwellings enabled in the catchment.<sup>33</sup>
178. It is agreed that enabled development capacity is not the same as what is reasonably expected to be realised. The PEL report includes an assumption that 50% of enabled development capacity may be realised, while Mr Foy considers it to be much less. Based on the enabled development capacity of 180,752 within the East Auckland Residential Markets identified by Mr Foy, I consider there to be sufficient supply to meet demand of approximately 23,000 dwellings (including NPS buffer) over the short to long-term under the medium growth scenario illustrated by the PEL report in Table 7 without the need for PC88.
179. I accept that additional housing supply and the range of housing typologies anticipated by PC88 would contribute to housing supply and choice. However, I agree with Mr Foy that additional housing supply will not improve housing affordability in Beachlands. Mr Foy refers to the findings of the 2021 Housing and Business Development Capacity Assessment that sufficient development capacity is likely to have a small if not negligible effect on housing affordability. Therefore, I do not consider the Plan Change to improve housing affordability.
180. It is generally agreed by both economic experts, that PC88 is well located in terms of its relationship adjacent to the existing township of Beachlands, providing good opportunities for integration with the existing local centre. However, a key issue in contention between the economic experts is whether Beachlands is an appropriate location for growth.
181. Mr Foy does not consider the PEL report to have adequately identified the negative aspects related to its location. The peripheral location of PC88 offers considerably poorer access to employment, facilities and services than a more centralised location according to Mr Foy highlighted by fact that most existing residents have to travel reasonably long distances to work as illustrated by Figure 4 below. Figure 4 illustrates the distances travelled to and from work by Statistical Area 2 (SA2)<sup>34</sup> in

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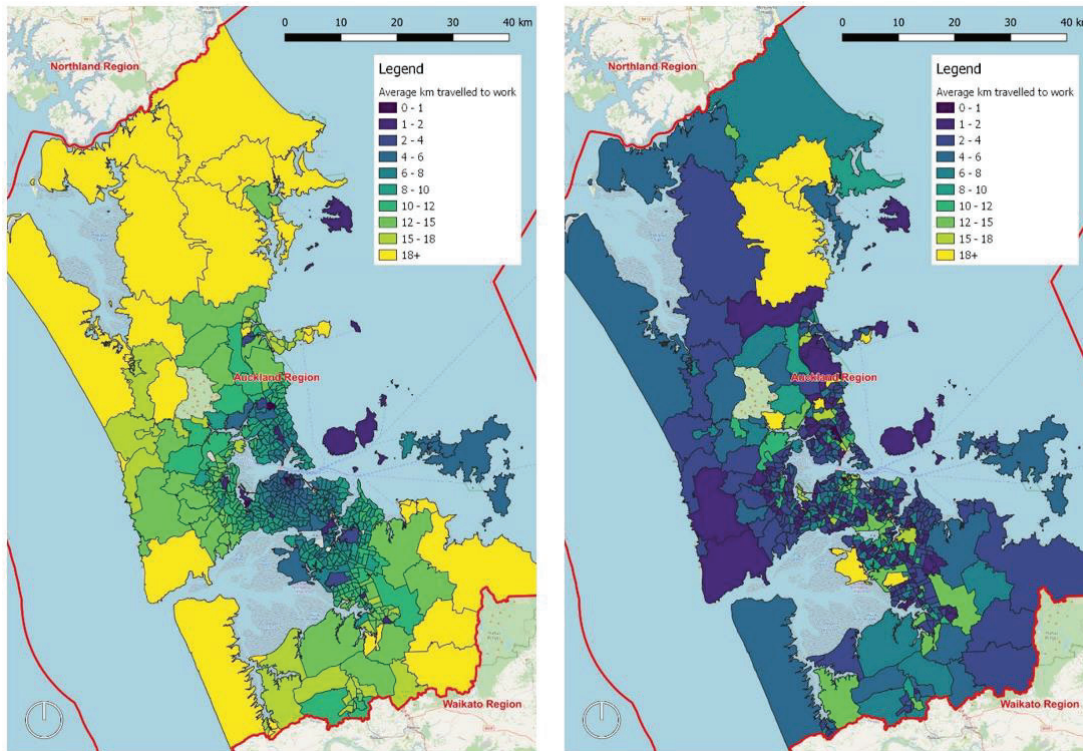
<sup>33</sup> Derek Foy, Peer Review Report on Economics, paragraph 4.18.

<sup>34</sup> Stats NZ identify geographical areas as statistical areas. Statistical Area 2 or SA2 provides higher aggregates of population data than can be provided at the SA1) level.



the Auckland region. The average distance travelled to work by people living in Beachlands is 18km or more.

**Figure 4 Distance travelled to work by (left) people living in each SA2, and (right) people working in each SA2.**



182. Access by different transport modes is identified as a key element of location by Mr Foy, which is discussed in more detail below in relation to transport effects in Section 8.13 of this report. Effectively the higher the access to a range of transport options, including different modes of public transport to a range of destinations the greater the access to jobs (as well as other services). Mr Foy agrees that the availability of some jobs, retail and services locally would reduce the need to travel beyond Beachlands and would yield some economic benefits. However, critical to the issue of self-sufficiency is access to employment.
183. While some employment would be provided by PC88, Mr Foy determines that the ratio of jobs to houses would reduce from 0.58 in 2023 to 0.43 - 0.46 in 2048.<sup>35</sup> A similar finding is reached in Mr Edwards assessment on transport effects identifying that 940 new jobs would be required to retain roughly the same level of employment self-sufficiency.<sup>36</sup> Based on these peer reviews it is my opinion that PC88 would act as a 'dormant residential suburb' rather than the self-sufficient town promoted by the applicant. Therefore, Beachlands is not an appropriate location for growth and would not achieve a well-functioning urban environment.
184. The PEL report sets out several economic benefits resulting from the Plan Change in section 6.1. These benefits focus on the proposed zones and appears to be based on the type of development that would be enabled without considering the peripheral location of the Plan Change as discussed above.
185. It appears that the PEL report relies on the scale of growth proposed by PC88 to demonstrate benefits of increased efficiency of infrastructure use including lower transport costs. However, there

<sup>35</sup> Attachment 6, Specialist Report – Economic prepared by Derek Foy (paragraph 4.57).

<sup>36</sup> Attachment 6, Specialist Report – Transport (paragraph 6.106).

is no existing water and wastewater infrastructure, limited public transport, and a constrained roading network. Mr Foy identifies that he is unclear whether the Plan Change would reach the threshold needed to support particular levels of public transport. As discussed below in Sections 8.13 and 8.14 below there is significant uncertainty that public transport improvements would be delivered. In my opinion this raises uncertainties that the economic benefits of PC88 would be realised.

186. Overall, considering the economic assessments, it is my view PC88 would provide additional development capacity that is not required to meet local demand for growth and that its location on the periphery of Auckland would have significant economic costs that would not be outweighed by the potential benefits.

#### 8.4. Cultural values

187. The applicant provided an assessment of cultural values in section 9.4 of the s32 evaluation report concluding that:

*“Overall, having regard to the supportive CVA and the compelling partnership between BSLP and Ngāi Tai with elevated formal recognition in the proposed precinct provisions, it is considered that adverse effects on cultural values will be avoided. Further, the proposed riparian planting standard in the precinct provisions will manage freshwater quality and the mana whenua standard will provide protection to the Pa site. On the whole, the plan change presents a significant opportunity to protect, restore and enhance cultural values.”*

188. Ngāi Tai ki Tāmaki prepared a Cultural Values Assessment (**CVA**) to inform the structure planning process undertaken to inform the PC88, which describes the cultural landscape values and associations of Ngāi Tai with the plan change area and its surroundings. Ngāi Tai conclude that they support the plan change based on the supporting technical reports and proposed mitigation measures.
189. Ngāi Tai have a settled Treaty Claim, but it is indicated in the CVA that their application<sup>37</sup> to recognise customary interest under the Marine and Coastal Area (Takutai Moana) Act 2011 may not be heard until 2045-2050.
190. The CVA was not made publicly available when PC88 was notified but is available to the council team and the Hearing Commissioners to consider the effects of the Plan Change on cultural values. I note that the coastline adjoining PC88 is identified as significant to Ngāi Tai ki Tāmaki, as reflected by the number of recorded archaeological sites identified along the coastline on Precinct Plan 4. I consider it important to understand whether the BSP provisions adequately address potential impacts on the cultural values and associations of the coastline. For example, whether there would be any implications associated with the coastal pathway bringing people through potentially significant areas. No submissions have been received either from Ngāi Tai ki Tāmaki or any other iwi in support or opposition to PC88. On this basis, I have accepted that any potential adverse effects from PC88 on cultural values have been appropriately addressed by the proposed precinct provisions.

#### 8.5. Heritage and archaeology

191. The applicant provided an assessment of heritage and archaeological effects in section 9.5 of the s32 evaluation report concluding that there are no sites of historic heritage value within the plan change area. Therefore, the applicant relies on the accidental discovery protocol and Heritage New Zealand Pouhere Taonga Act for future development.

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<sup>37</sup> Ngāi Tai ki Tāmaki, Application number MAC-01-02-003.

192. An Archaeological Assessment of the land within the plan change area was prepared by Clough & Associates provided within Attachment 2. A summary of effects on recorded archaeological sites is provided in Table 7 of the archaeological assessment, identifying potential impacts as none to low.<sup>38</sup>
193. Rebecca Ramsay, the heritage expert on behalf of the council has considered the above information (Attachment 6). Attached to Ms Ramsay's peer review is an assessment of built heritage that was undertaken by Megan Walker, Specialist: Historic Heritage. The key issues of concern raised by the peer review are:
- a. The archaeological assessment lacks research relating to the European history and occupation within the plan change area, with no assessment of the historic heritage value 740 Whitford-Maraetai Road.
  - b. Due to the number of recorded archaeological sites, evidence of extensive defended and undefended settlement areas, proximity to waterways and presence of a historic building, the peer review identifies that there is potential for further historic heritage to be present within the plan change area.
  - c. No further field survey has been undertaken although the archaeology clause 23 response identifies that based on the potential archaeological deposits encountered through geotechnical testing, the extent of archaeological sites is likely to be larger than initially reported.
  - d. Depending on the outcome of an additional historical heritage field survey further assessment of heritage significance against the AUP RPS criteria may be required.
  - e. Concern about the accuracy of identified recorded archaeological sites Precinct Plan 4 Cultural Landscape Plan including corresponding site extents and the need to include buffers for historic heritage places.
  - f. Significance assessment of Pā (R11/1619) against RPS Policy B5.2.2(1) and possible pā / kāinga (R11/344 = R11/1620) determined to be considerable/high value warranting inclusion in Schedule 14.1: Schedule of Historic Heritage Places.
194. Ms Ramsay raises specific concerns about whether two sites (R11/1620 and R11/1619) should be scheduled in the AUP because they meet one or more of the criteria in Policy B5.2.2(1) based on the assessment by Clough & Associates in Table 4 of the archaeological assessment. Figure 54 of the archaeological assessment identifies the extent of these two sites (Figure 5). The extent of R11/1619 is identified on Precinct Plan 4 Cultural Landscape (Figure 6) as a pā site with corresponding development standards (I.7.10) to protect the cultural values of the plan change area. The extents of other recorded archaeological sites, such as R11/1620, are not specifically identified on any precinct plans but are located within the EPAN, which is intended to afford them protection from inappropriate use, subdivision or development.
195. Many of the recorded archaeological sites are located within the area proposed to be rezoned FUZ, including 720 Whitford-Maraetai Road, and I am satisfied that the concerns raised by the peer review can be addressed through a future plan change process. A structure planning process is required to support a future plan change to live zone the FUZ, and the extents of historic heritage and appropriate protections could be determined at that stage.

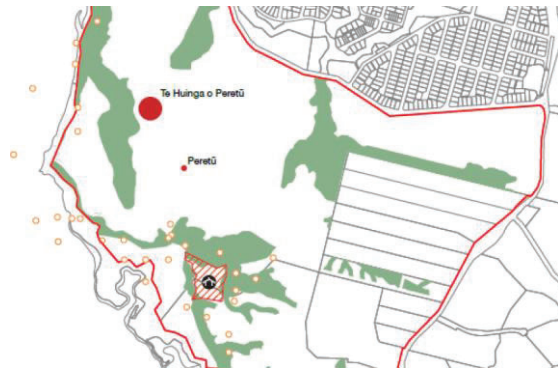
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<sup>38</sup> Clough & Associates Ltd, Archaeological Assessment of Beachlands South Structure Plan and Private Plan Change (page 69).

**Figure 5 Part of Figure 54 - Current extents of archaeological sites**



**Figure 6 Precinct Plan 4 Cultural Landscape**



196. It is unclear why the applicant determines there are no sites of historic heritage value within the plan change area. The Archaeological Assessment identifies both R11/1619 and R11/1620 to have considerable to high values when assessed against Policy B5.2.2(1), which means they meet the threshold for scheduling as historic heritage in the AUP. However, there is no assessment as to whether these sites should be scheduled.
197. I consider it appropriate to determine whether the heritage values warrant protection through scheduling but the objectives and policies of Chapter B5 are not considered in the s32 evaluation report. I acknowledge that R11/1619 is afforded protection through the precinct provisions, but R11/1620 is not. I also accept that there may be valid reasons for not scheduling these or any other sites but this information has not been provided. I am concerned that reliance on the Heritage New Zealand Pouhere Taonga Act and accidental discovery protocols will be inadequate to avoid, remedy or mitigate potential adverse effects on historic heritage given the complex archaeological features along the coastal edge.

### 8.6. Geotechnical hazards

198. The applicant provided an assessment of geotechnical hazards in section 9.8 of the s32 evaluation report concluding that:

*“the ground conditions within the plan change area is generally suitable for the indicative land uses.....Normal geotechnical investigations and analysis should be carried out during design of the subdivision and development, to establish Building Limitation Lines and/or to inform design of earthworks”*

199. A geotechnical assessment was undertaken by Tonkin and Taylor (Attachment 2) on behalf of the applicant that assessed the ground conditions and geotechnical implications relative to their development potential. The report identified historical and recent landslip movements, and coastal areas where there is the greatest potential for medium to large-scale instability are not identified for development with residential development setback to ensure they are not affected by cliff stability. The report recommends further analysis at the time of subdivision to set out Building Restriction and Limitation lines.
200. I note that the proposed precinct applies the EPAN along the coastal edge, and the Coastal Sub-precinct identifies a LLZ with a subdivision variation control that requires a minimum net site area of 1,000m<sup>2</sup> compared to a minimum site area of 4,000m<sup>2</sup> for a vacant lot subdivision in the underlying LLZ as identified in Attachment 4.



201. I consider the precinct provisions, in conjunction with the AUP Auckland wide provisions in Chapter E36 and Subdivision provisions in Chapter E38 would adequately address any potential geotechnical effects.

## 8.7. Flooding and stormwater management

202. The applicant provided an assessment of flooding and stormwater effects in section 9.10 of the s32 evaluation report concluding that the Auckland-wide provisions would manage flooding effects, and stormwater effects would be managed by the Auckland-wide provisions in conjunction with precinct provisions requiring quality treatment and applying the SMAF-1 Control for hydrology mitigation. It is proposed that the Stormwater Management Plan be adopted into the region-wide stormwater Network Discharge Consent.

203. Harrison Grierson prepared a draft Stormwater Management Plan to support the plan change (Attachment 2), which includes a flood hazard assessment and details the proposed stormwater management approach.

204. Zheng Qian and Amber Tsang, stormwater experts on behalf of the council have considered the above information. Overall, the peer review found the stormwater management approach to be appropriate. Outstanding concerns relate to clarity of quality treatment for private impervious areas, the number of at source devices, and flood risks.

205. The key issue in contention relates to flood risks and potential impacts on downstream properties. Further information was sought as part of the clause 23 request for further information, requesting that the flood model parameters be revised to provide an updated hydraulic model highlighting concerns about data accuracy and issue with the results and outdated information. The applicant confirmed that 2013 LiDAR information was used and that more updated information could be provided at the time of consenting and engineering approvals. At that stage the information was accepted for the purpose of notification because the applicant chose not to provide updated information and it was assumed that the issue could be resolved.

206. Healthy Waters considers that accurate flood modelling is required to confirm that existing downstream flooding would not be exacerbated within Pine Harbour Marina and low-lying residential properties along Jack Lachlan Drive. LiDAR information was updated in 2016 and is available to the applicant and it is not clear why this hasn't been utilised. Ms Qian outlines her concerns at section 4 of her memo.

207. I understand there are several issues with the methodology including:

- a. assuming a constant water level of 4.5m RL as the tidal boundary for both pre and post development scenarios being too conservative for predevelopment and potentially masks the effects of development in the plan change area.
- b. focusing on future rainfall with climate change factors for predevelopment scenarios does not accurately reflect the current (predevelopment) situation and misrepresents the increased flooding effects.
- c. use of 2013 LiDAR data as the ground model means does not recognise that the former Formosa Dam within the Jack Lachlan stream was decommissioned in 2015 which had a large reservoir storage (50,000m<sup>3</sup>).

208. Ms Qian does not consider that the applicant's proposal to mitigate downstream flood hazards through peak flow attenuation basins/wetland to be sufficient to address potential flood risks and considers the flood storage function of existing depression areas within the current landform of the plan change area needs to be assessed and may require retention.

209. I accept Ms Qian's concerns about the flood modelling and understand that the applicant has not adequately demonstrated that there would not be significant adverse flooding impacts on downstream low-lying properties. I understand these issues could be resolved by the applicant providing revised flood modelling and further discussion with Healthy Waters.
210. I accept that potential flood hazards will need to be addressed at the time of subdivision in accordance with the Auckland-wide provisions. Given the scale of the plan change, I consider there to be adequate space for attenuation of flooding to avoid downstream effects. However, I also consider it necessary to fully understand the scale of effects at the plan change stage in case additional mitigation is required to be included in the precinct provisions. I do not consider the information supplied to adequately demonstrate that future development can rely on the Auckland-wide provisions for subdivision and flooding.
211. It is also noted that at this stage Healthy Waters does not support the adoption of the Stormwater Management Plan under the Network Discharge Consent because it does not meet the performance requirements of Schedule 4 in relation to hydraulic modelling. While the applicant can seek a private stormwater discharge consent in accordance with E8.4.1(A11) as a discretionary activity, the same policy framework applies and the same information would be required to understand the extent of flood risk. There is a risk that a private stormwater discharge consent would not be granted based on the information provided.
212. I note that it is not appropriate for the SMAF-1 Control to apply to the proposed FUZ area because this would be inconsistent with the AUP policy framework of the control, which relates to urban development in urban areas. Therefore if the Plan Change were to be approved, the SMAF-1 Control should be reduced to apply only to the live-zoned area. If the proposed FUZ area is approved, it is appropriate to consider whether the SMAF-1 Control is the most appropriate method at the time of future plan changes.

## 8.8. Water supply and wastewater

213. The applicant provided an assessment of servicing water supply and wastewater in section 9.11 of the s32 evaluation report concluding that the live-zoned portion will be serviced with the necessary water supply and wastewater infrastructure.
214. GWE Consulting Engineers undertook assessments of water and wastewater servicing for the Plan Change area, and the live-zoned portion in particular, concluding that there are viable options for wastewater servicing and sufficient groundwater available for water supply (Attachment 2).
215. The GWE Water Supply Concept Design indicates that between 1,245m<sup>3</sup> / day to 1,424m<sup>3</sup> / day of water is required to service the live-zoned land, which would be met through the following groundwater supply sources providing a total of 1,565m<sup>3</sup> / day:
- a. Water supply agreement with Pine Harbour Living Limited (PHLL) = 765 m3/day
  - b. The existing Formosa water take permit = 300 m3/day
  - c. The proposed water take permit from the existing 620 Whitford Maraetai Road test bore = 250 m3/day
  - d. A proposed water take permit from an additional bore at 620 Whitford Maraetai Road = 250 m3/day
216. The GWE Wastewater Reticulation and WWTP Concept Design indicates that a low-pressure sewer system is preferred for reticulation. A high-level assessment is provided of options for alternative wastewater treatment options because the Beachlands-Maraetai WWTP is at capacity. A standalone

treatment option is proposed (Membrane Bioreactor) with potential for future upgrades to the Beachlands-Maraetai WWTP to be able to service the plan change area.

217. David Russell, Development Engineer on behalf of council has considered the above reports and concludes that viable options for wastewater servicing of PC88 have been identified by the applicant. However, Mr Russell is concerned that there may be insufficient capacity within the aquifer to adequately supply water to PC88.
218. Mr Russell has conferred with the council's coastal and water allocations team to ascertain whether there is sufficient capacity within the aquifer to provide water supply to PC88. While there is some water available, Mr Russell identifies that the aquifer is reaching capacity because the council's monitoring of bores shows draw down effects that indicate excessive extraction. The total amount of water abstracted from the aquifer is unclear because domestic bores do not require resource consent. Mr Russell indicates that further research is required to establish the cause of draw down in the area, and that this would be required as part of any application for a significant increase in water extraction. Mr Russell does not consider sufficient information to have been provided by the applicant to adequately demonstrate that sufficient water supply is available.
219. The GWE Water Supply Concept Design Report identifies that driving of the bores would require resource consent as a controlled activity. However, there is not discussion about the activity status for the water take itself. I understand that the water take is likely to be a discretionary activity under Rule E7.4.1(A26) to take and use groundwater not meeting the permitted activity or restricted discretionary activity standards or not otherwise listed. Standard E7.6.3.3 requires that the take will not result in the water availabilities and levels to exceed the limits in Appendix 3 of the AUP. Based on the review of Mr Russell, the applicant has not demonstrated that the relevant standards could be met. No assessment is provided by the applicant of the capacity within the aquifers to service the site to demonstrate whether the limits in Appendix 3 of the AUP would be met. I acknowledge that resource consent would be required to demonstrate this but consider this issue should also be addressed at the plan change stage to confirm resource consent could be obtained.
220. An alternative water supply option identified by Mr Russell is to extend the public water supply to service Beachlands. However, this is identified to be very costly and is probably not financially viable. Therefore, Mr Russell indicates this option cannot be relied upon as a fallback position if there is insufficient capacity within the aquifer.
221. Given the above, it is my view that suitable options have been identified for wastewater servicing. I acknowledge the water efficiency measures proposed in the BSP to reduce water demand, including rainwater reuse tanks, and agree that these would reduce water demand. However, I agree with Mr Russell that adequate capacity for water supply within the aquifer has not been demonstrated by the applicant, and there is no alternative viable solution available.
222. I consider water supply to be a fundamental issue for the Plan Change, and in my opinion, proposed Standard I.7.4 requiring adequate water supply will not manage the effects unless it can be demonstrated that sufficient capacity for water supply is available. Therefore, I do not consider the effects relating to water supply have been appropriately managed by the Plan Change.

## **8.9. Ecology**

223. The applicant provided an assessment of freshwater, wetland, terrestrial and coastal marine ecological effects in section 9.12 of the s32 evaluation report concluding that the urbanisation of land will require careful management of effects, which can be achieved by application of the proposed precinct and Auckland-wide provisions of the AUP.
224. Tonkin and Taylor prepared several reports on ecological effects (Attachment 2). The Ecological Effects Assessment: Executive Overview summarises how measures to avoid, remedy and mitigate



ecological effects associated with the change in land use; and indicates that compensation requirements were determined for residual effects that could not be avoided, remedied or mitigated, or offset. Tables 1 and 2 within the Executive Overview Report summarise the habitat types and fauna, including threat status; and a summary of recommended measures to avoid, remedy or mitigated adverse effects is also set out in this report.

225. Jason Smith, ecology expert on behalf of the council has reviewed the above information and further information provided (Attachment 6), concurring with the applicant's description of ecological values, potential effects, and the magnitude of those effects on ecology. However, Mr Smith raises one point of contention, which relates to the 'double counting' of riparian planting as offset mitigation or compensation for future resource consents (i.e. stream reclamation).
226. In response to the concerns about riparian planning during the clause 23 stage, the applicant amended the precinct provisions (September 2022) to remove the requirement for planting within riparian margin setbacks entirely. The amendments sought by the applicant are set out in their submission and are also reflected in their amended precinct provisions (24 July 2023) and set out below.

#### **1.7.5. Riparian Margins**

Purpose: Contribute to improvements to water quality, habitat, ~~and~~ biodiversity and contribute to addressing residual ecological effects.

- (1) A minimum riparian yard setback of 10m measured from the top of the bank must be provided along permanent or intermittent streams including those as shown on Precinct Plan 2. No buildings or structures are permitted in the riparian yard setback.
- (2) ~~The riparian yard setback required in Standard 1.7.5(1) above must be planted either side to a minimum width of 10m. This riparian planting must be native species and vested in Council or protected and maintained in perpetuity by an appropriate legal mechanism. The riparian planting required in this standard will be included as part of any ecological offsetting or compensation package. Any riparian planting proposed within the riparian yard setback required in Standard 1.7.5(1) as part of any ecological offsetting or compensation package must be native species and vested in Council, or protected and maintained in perpetuity by an appropriate legal mechanism.~~
- (3) Walkways and cycleways must not be located within the riparian planting area required in standard 1.7.5(1) above.
- (4) A building, or parts of a building, must be setback at least 20m from the bank of a river or stream measuring 3m or more in width, consistent with the requirements of E38.7.3.2.

227. Mr Smith does not support precinct provisions that would enable riparian planting to be 'double counted' towards addressing residual effects (pages 5 and 6). I agree with Mr Smith that the planting of riparian margins and the EPAN is required to address the effects of the change in land use as recommended by the Tonkin and Taylor Ecological Assessment.
228. Appendix 8 of the AUP sets out a framework for the user of biodiversity offsets, identifying that restoration, enhancement and protection actions as a biodiversity offset are demonstrably additional to what otherwise would occur. I therefore do not support the amendments to Standard 1.7.5 proposed by the applicant to remove the requirement for planting of riparian margins because it would not adequately manage the effects of land use change on ecology.
229. Overall, the potential adverse effects of PC88 on ecology would be more appropriately managed by the notified precinct provisions (March 2022). However, I do not support the wording of Standard 1.7.6(2) that identifies riparian planting required under the standard will be included as part of any ecological offsetting or compensation package. If the Plan Change were to be approved, I consider

it appropriate to amend Standard I.7.6(2) to remove reference to ecological offsetting and compensation.

## **8.10. Coastal water quality and sedimentation**

230. The applicant provided an assessment of coastal water quality and sedimentation effects in section 9.13 of the s32 evaluation report concluding that the effects of bulk earthworks and construction would be appropriately managed through the current AUP framework in conjunction with precinct provisions to limit the amount of exposed areas per catchment. In addition, the applicant considers the Plan Change to result in positive effects because at discharges from the plan change area into the receiving environment are currently uncontrolled.
231. Tonkin & Taylor prepared a water quality and sedimentation modelling report, and assessment of marine ecological effects in support of the Plan Change (Attachment 2), which considered effects of sediment discharge on the receiving environment from earthworks during construction and post-development stormwater and wastewater discharges. In conclusion, Tonkin & Taylor concluded an overall reduction in annual total suspended solids with likely long-term accumulation of zinc and copper within acceptable levels for developed landscape, but during earthworks phase sediment runoff from the plan change area will increase compared to existing landscape.<sup>39</sup>
232. Dr Pete Wilson, coastal water quality expert on behalf of the council considered the above information concluding that the potential effects of the development to be assessed appropriately and that identified residual effects are addressed by the proposed compensation including enhancing avifauna habitat and mangrove management.
233. The CMA is classified as a Marine Significant Ecological Area (SEA-M1) providing a significant wading area for a variety of coastal bird species. Experts agree that potential adverse effects relate to discharges of sediment during construction (short-term), and discharges from stormwater and wastewater management (long-term).
234. The greatest potential coastal water quality effects are identified by Dr Wilson to arise from discharges to the Wastewater Treatment Plant which he agrees would be appropriately assessed through the future resource consent process.
235. Stormwater will be discharged into streams via wetlands prior to discharging to the CMA. Based on the freshwater assessment that effects on freshwater quality is no more than low, Dr Wilson concludes potential adverse effects on water quality in the CMA would be unlikely. Dr Wilson assumes no direct discharges to the CMA.
236. Although heavy metals (copper and zinc) are anticipated to increase relative to current conditions following development, modelling indicates concentrations to be within the green ERC category indicating low risk to aquatic organisms.
237. Given the above, I consider any potential adverse effects on coastal water quality and sedimentation to be adequately managed by the precinct provisions in combination with the existing AUP framework.

## **8.11. Coastal hazards**

238. The applicant provided an assessment of coastal hazard effects in section 9.9 of the s32 evaluation report concluding that potential adverse effects would be appropriately managed by the proposed precinct provisions to include a Coastal Protection Yard standard and reliance on Chapter E36 of the AUP.

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<sup>39</sup> Tonkin & Taylor, Water Quality & Sedimentation Modelling Report, March 2022 (page 55).

239. Tonkin and Taylor undertook an assessment of coastal hazards (Attachment 2), which considered general coastal processes and susceptibility of the plan change area to coastal inundation, tsunami and erosion.
240. Alison Clarke, coastal hazards expert on behalf of the council has considered the above information. Ms Clarke agrees that the applicant’s assessment used appropriate methodologies and adequately assessed potential coastal hazard effects. Overall, Ms Clarke agrees that all development will be set back sufficiently, it is not expected to be affected by coastal erosion and nor will it exacerbate erosion risk. No specific mitigation is recommended.
241. Considering the technical assessments, I consider potential coastal hazard effects to be appropriately managed.

## 8.12. Open space

242. The s32 evaluation report discusses the provision of a network of open space and recreation reserves as a key element to the Plan Change to meet the needs of the growing Beachlands Community . A key element of the Plan Change is the identification of OSSAR zone to provide a destination public open space that would include sports fields for shared use by schools.
243. The Beachlands South Structure Plan prepared by Unio Environmental, Studio Pacific Architecture and Jasmax (Attachment 2) outlines how open space and recreation is provided for within the plan change area. The plan change area is identified to be a location within a wider area of public open spaces including a regional park, reserves and an esplanade reserve along the coastal edge.
244. The structure plan considers open space provision against the principles of the council’s Open Space Provision Policy (**OSPP**) identifying a need for publicly accessible coastal reserve with connections into the neighbourhood, green link reserves, informal walking and cycling network, up to two suburban parks, neighbourhood parks, and a civic space within the Village Centre. The Masterplan Design Report describes the open space network proposed by PC88 including:<sup>40</sup>
- A village park that functions as the key recreational open space and play space, it’s intended to be a destination park providing a sportsfield to be shared with adjacent schools (Figure 7);
  - Neighbourhood parks to provide informal recreational, play and social opportunities within short distance of surrounding residential areas

**Figure 7 Illustrative scenario of Village Park (Masterplanlan, page 26)**



<sup>40</sup> Beachlands South Plan Change Masterplan Design Report, 28 March 2022, page 26.

245. Gerard McCarten, the open space expert on behalf of council has considered the above information concluding there are several inconsistencies with the OSPP and recommending amendments to the BSP to address uncertainties.
246. Mr McCarten supports provisions that do not pre-suppose council's acquisition of open space, and agrees with the applicant's approach to providing open space that relies on the AUP subdivision provisions in Chapter E38.
247. The key issue identified by Mr McCarten relates to the Indicative Suburb Park identified on Precinct Plan 3 and zoned OSSAR. McCarten does not support the indicative location of the Suburb Park or the application of a live OSSAR zone at this stage of the process. The proposed location of the Suburb Park is considered too close to active recreation at Beachlands Domain and Te Puru Park and Mr McCarten recommends the location be shifted further south. In addition, Mr McCarten indicates that the extent to which there is a need for sports field provision and acquisition cannot be determined until the full extent of potential development enabled by PC78 and PC88 (if approved) is known.
248. I agree with Mr McCarten that the proposed OSSAR zone does not reflect an indicative Suburb Park because it provides a specific location, shape and area. Open space zoning should follow the consenting process which refines location, extent and shape in response to development. Mr McCarten does not consider the proposed OSSAR zone to be consistent with the OSPP because acquisition requires a political decision.
249. Additional changes to the precinct provisions are recommended by Mr McCarten to address alignment with the OSPP including:
- a. Remove the Open Space-Active Sport and Recreation Zoning from the proposed planning map.
  - b. Shift the indicative location of the Suburb Park in Precinct Plan 3 further to the south, away from the Beachlands Domain catchment and instead place it more centrally within the plan change area.
  - c. Reposition the indicative locations of the Neighbourhood Parks in Precinct Plan 3 so that they are distributed more evenly throughout the plan change area and reduced in number to better align with the OSPP.
  - d. Remove the indicative Neighbourhood Park in Precinct Plan 3 that is within the area of Residential – Large Lot Zone.
  - e. Amendments to the precinct provisions to clarify that vesting of open space is not presupposed.
250. Given the above, it is my view that PC88 provides a level of open space that is above the council's requirements under the OSPP. I understand that the applicant seeks to develop a strong sense of place and the open space network is a key element of PC88. All open spaces identified on Precinct Plan 3 are identified as indicative and as such their provision can be determined at consenting stage, and I note that some or all of these may be retained in private ownership if the council does not support them. I therefore do not support the recommendation of Mr McCarten to amend Precinct Plan 3 to align with the OSPP.
251. It is my view that the proposed OSSAR zone is the key issue in contention and whether it is appropriate for a live open space zone to be implemented as part of the Plan Change. I do not support the OSSAR zone based on the recommendations of Mr McCarten because there is significant uncertainty that a suburb or village park would be provided in this location at that scale or configuration. I support retaining the location of the indicative suburb park on Precinct Plan 3 because this reflects the master planning undertaken for the plan change area and relates to the

surrounding land uses. How the suburb park is to be provided for and whether it becomes an open space zone should be determined at the time of subdivision when the configuration is confirmed.

### 8.13. Transport

252. As stated in section 9.15 of the s32 evaluation, the applicant concludes that:

*“The proximity and accessibility of the plan change area to the Pine Harbour Ferry terminal as well as the scale and density of development enables Beachlands South to become a high density and highly public transport focussed development which capitalises on public transport availability and achieves the optimum levels of land use-transportation integration.”*

253. Stantec prepared an Integrated Transport Assessment (**ITA**) in support of the Plan Change provided at Attachment 2, concluding *“there is no traffic engineering and transport planning reason to preclude acceptance of the proposal.”*<sup>41</sup> The ITA indicates that future development has relatively good alignment with the various transport-related policy documents, and it integrates high-density development with ferry and bus services and quality walking and cycling facilities in order to promote a mode shift away from private vehicles. Traffic modelling is focused on the effects of development within the proposed live-zoned portion of PC88 to identify necessary transport infrastructure upgrades and anticipates development commencing in 2024 and completion in 2038. The ITA indicates that the proposed public network and roading infrastructure upgrades to enable the Plan Change creates a more integrated transport system and will positively influence the viability of and confidence in the public and active transport infrastructure investments that are planned in the area.

254. Wes Edwards, the transport specialist on behalf of council has considered the above report and the further information and concludes that the Plan Change should be declined on transport grounds because:

- a. The proposed provisions would not ensure a transit-oriented community, with only a small part of the plan change area located within walkable distance of the ferry service;
- b. The ferry service is a lower frequency “local” service and not a rapid or frequent transit service;
- c. If development does not achieve the anticipated highly self-sufficient community with high use of public transport, then the plan change would significantly increase private-vehicle travel on Whitford-Maraetai Road and other locations to the south and east;
- d. Substantial additional transport infrastructure is required to support the plan change, otherwise there will be significant adverse effects on the safe and efficient operation of the transport network;
- e. Additional transport infrastructure and services to support growth must be subject to prioritisation, and the plan change is not consistent with planning strategies and plans to help the efficient allocation of funding for growth infrastructure; and
- f. The Plan Change is based on multiple optimistic assumptions that cumulatively produce an overly optimistic view of the likely transport effects and the ability of the proposed provisions to address these.

255. Transport is a key issue for the Plan Change because the scale of development would approximately double the existing population of Beachlands, it’s peripheral location with essentially one road access via Whitford-Maraetai Road, limited public transport options, constraints within the local and wider

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<sup>41</sup> Stantec, Integrated Transport Assessment for Beachlands South, March 2022 (page 90).



transport network including Whitford-Maraetai Road, and lack of public funding identified for transport upgrades.

- 256. There is general agreement between the transport experts that Whitford-Maraetai Road is currently operating at or beyond capacity. However, Mr Edwards disagrees with the future traffic growth rates used in the ITA and identifies that Auckland Transport undertakes regular traffic volume counts that indicate rates of growth between 3.9% and 9.8% per annum at various locations along the road with an average of 6.5% per annum.
- 257. Mr Edwards has assessed the capacity of Whitford-Maraetai Road based on the 2022 count used in the ITA, using an assumption of 2% per annum for peak hours future growth which he considers to be more appropriate (Table 6). Table 6 illustrates that without PC88 in 2038 the Whitford-Maraetai Road would be operating at LOS E (ITA) and LOS F (Edwards), demonstrating that the road is currently at capacity during peak periods and has little or no ability to accommodate additional peak-period travel.

**Table 6 Performance of Whitford-Maraetai Road (at Trig Rd) in peak direction for 2038 without PC88 (Source Edwards, Table 4)**

| Scenario              | a.m. westbound |     | p.m. eastbound |     |
|-----------------------|----------------|-----|----------------|-----|
|                       | % of capacity  | LOS | % of capacity  | LOS |
| Stantec 2038 Baseline | 97%            | E   | 87%            | E   |
| Arrive 2038 Baseline  | 118%           | F   | 106%           | F   |

- 258. Mr Edwards is concerned that the ITA does not acknowledge that the Whitford-Maraetai Road is the only practical road connection to the wider network for Beachlands, and it does not consider widening necessary until the FUZ land is developed. Assessment of capacity in both the ITA and by Mr Edwards demonstrate that the Whitford-Maraetai Road is already at capacity and therefore there is no capacity for any additional growth from PC88.
- 259. The ITA assumptions rely on a large proportion of travel remaining in the Beachlands settlement and being carried by the ferry. It is Mr Edward’s view that the ITA significantly under-estimates future traffic volumes on the road and that future traffic volumes could be up to double the ITA projections. Based on the assessment provided by Mr Edwards, I agree that the ITA does not recognise the critical role that the Whitford-Maraetai Road currently provides for residents in the area or adequately assesses the actual and potential effects of growth from PC88 on this road.
- 260. In terms of bus improvements, Mr Edwards highlights the further information provided by the applicant indicating that *“in response to a greater residential catchment, it is appropriate to assume that Auckland Transport will increase the bus frequency during both peak and off-peak periods to/from Auckland City.”*<sup>42</sup> Mr Edwards considers that it is very unlikely that bus priority measures indicated in the ITA would ever be introduced along Whitford-Maraetai Road because there is one local service with low utilisation (paragraph 6.35). I acknowledge that bus mode share is currently identified to be 1% and is only proposed to increase to 2%. However, Mr Edwards considers it more likely to remain at 1%.
- 261. A key assumption of the ITA is that ferry mode share would increase from 6% to 13%. This assumes that where the population of Beachlands doubles, the ferry patronage would triple based on the growth in ferry patronage experienced at Hobsonville Point. While the ITA demonstrates that more people in Hobsonville Point travelled to the City Centre, it does not demonstrate the scale of increase in ferry patronage that is anticipated for Beachlands. The ferry mode share for Hobsonville Point is 6% which is the same as Beachlands now.

<sup>42</sup> BSLP Response to Clause 23 Request for Information, 29 August 2022, T56.



262. Mr Edwards does not agree a ferry mode share of 13% can be relied on to support the Plan Change, indicating that to double the ferry mode share would require significantly faster vessels providing a much-reduced travel time, and services to additional destinations with high levels of employment and reduced fares. Mr Edwards also demonstrates that if the existing Beachlands population retained their current employment locations, then around 40% of all new residents would need to be employed in the City Centre.
263. I accept that Hobsonville Point has some geographical similarities to Beachlands, and the ferry service is similar albeit slightly faster from Hobsonville Point. In my opinion, development enabled by PC88 could support increased ferry patronage, and it is reasonable to assume that people choosing to live in Beachlands could increasingly work in the City Centre. However, I agree with Mr Edwards that the ITA has not demonstrated that a ferry mode share of 13%, which is more than double that of Hobsonville Point, could be achieved. I agree with Mr Edwards that the ferry mode share assumption of 13% is aspirational and unrealistic.
264. Mr Edwards also highlights that although the ITA recommends additional ferry sailings and larger vessels to accommodate the increased demand for ferries, it does not address how existing constraints to the ferry service would be addressed. The ITA does not assess a new ferry terminal, nor does it propose to increase the capacity of the ferry car parking area.
265. The peer review of Mr Edwards has identified that there is significant uncertainty that the bus service will be improved or the ferry capacity and service will be increased. Therefore the community are likely to be heavily reliant on cars resulting in a significant increase in trips on the Whitford-Maraetai Road, resulting in the need for significant upgrades and construction of the Whitford Bypass. Neither of these upgrades are identified as being required in the BSP. Therefore, I do not consider that the BSP provisions including Standard I.7.3 would adequately manage the effects of land use and transport integration.
266. I agree with Mr Edwards that the ITA takes an overly optimistic approach and inaccurately describes the Plan Change as having good access or good public transport. I consider Mr Edward's peer review to provide a helpful counter-factual to the ITA of potential transport effects should the aspirational public transport outcomes not eventuate. In my opinion, Mr Edwards has illustrated that there would be significant adverse transport effects if public transport is not improved, which is also recognised by the ITA, which states that without significant public transport upgrades there would be increased pressure on the road network and an increase in transport-related emissions (page 49).
267. I have not gone into the detail of intersection designs as I consider that to be a detailed design issue. I am satisfied that the intersections are identified as being required in the BSP. However, I acknowledge that Mr Edwards has raised issues such as the need to acquire private land to undertake development. If PC88 was to be approved then I consider these issues can be resolved. Furthermore, if the Whitford Bypass is determined to be required then some of the upgrades may no longer be necessary.
268. In terms of the FUZ land, Mr Edwards indicates that the ITA provides limited analysis of potential development other than it being completed by 2051 and that it would require Whitford-Maraetai Road to be widened to four lanes, the Whitford Bypass completed, along with additional intersection upgrades. This is because the ITA analysis assumes that it would generate twice as much external traffic as the live-zoned area, given its distance from the ferry. Mr Edwards has demonstrated that in fact, the upgrade of Whitford-Maraetai Road would be triggered by the live-zoned proposal. Therefore, I consider development of the FUZ would only further exacerbate the transport effects and I do not consider the likely scale of transport effects of the FUZ to have been adequately addressed.
269. Given the above, in my opinion the transport effects of the Plan Change would be significant. The likely trip generation resulting from PC88 demonstrates that Beachlands is not an appropriate place

for this scale of growth given the constraints in the wider transport network. While upgrading the Whitford-Maraetai Road and construction of the Whitford Bypass would be required to accommodate increased traffic as determined by Mr Edwards, in my opinion this would not mitigate the transport effects of PC88 generating significant traffic. I consider the ferry to provide a local public transport service but not a frequent service adequate to support the scale of growth proposed.

#### 8.14. Infrastructure funding

270. At several locations throughout the s32 evaluation report, the applicant indicates that transport and infrastructure requirements will be fully funded by the development partnership or through Crown Infrastructure Partners (CIP) and does not rely on council funding. I have taken references to council funding to include Auckland Transport as a Council-Controlled Organisation.
271. The applicant confirmed in response to further information requested under Clause 23 (Attachment 3) that BSLP will not be funding or contributing to the capital cost of providing new public transport.<sup>43</sup> An indicative Draft Funding Plan was also provided along with a letter from CIP.
272. The applicant's Draft Funding Plan identifies transport infrastructure upgrades and estimated costs of \$75 Million, including \$16 Million contribution towards ferry services and infrastructure. The CIP letter confirms that the proposal is being considered as a possible Infrastructure Funding and Financing (IFF) and based on the estimated costs, the levy per apartment and house appears to be reasonable. The CIP letter confirms that approval of the IFF will require:
- "... support of key stakeholders, the approval of the CIP board, approval by CIP's Shareholding Ministers and the Minister of Finance and in particular the positive recommendation of Ministry of Housing and Urban Development as Recommender to the IFF Minister, approval by the IFF Minister and the support of Cabinet in enacting the Order in Council for an IFF Project."*
273. I accept that the applicant will fund all the infrastructure required within the plan change area itself, including water supply, stormwater, local road network, wastewater as well as some intersection upgrades in the wider road network. I accept that it may be possible for an IFF to be approved to apply a levy on dwellings. However, the transport peer review by Mr Edwards raises significant concerns about the funding of transport infrastructure within the wider network that would be required to support the Plan Change.
274. The council's Infrastructure – Beachlands Transport Constraints Control Section 32 for PC78 identifies significant costs associated with upgrading the Whitford-Maraetai Road, Whitford Bypass, and ferry capacity:<sup>44</sup>
- a. Whitford-Maraetai Road is estimated to exceed \$200 Million;
  - b. A new ferry terminal would be required with an estimated cost of between \$10 Million and \$13 Million for required infrastructure and dredging;
  - c. A new ferry vessel of 150 plus seat capacity would incur further capital investment and operational costs; and
  - d. Increased ferry service frequency would increase operating costs by approximately 25-40%.
275. Funding for transport is set out in the RLTP 2021-2023 as discussed above in Section 7.9, whereby no funding is currently allocated to the upgrading of public transport to the extent that would be required to support PC88. The RLTP is focused on completing transport projects that are already

<sup>43</sup> BSLP Clause 23 Response, 29 August 2022, T56.

<sup>44</sup> Section 32 Evaluation for the Infrastructure – Beachlands Infrastructure Constraint Control (page 9).

underway, accounting for 90% of the 10-year budget. The remaining 10% is available for new investments to address existing congestion, encourage alternative modes, ensure equity of access, provide infrastructure for growth, complement other climate change policies, and respond to the requirements of local communities.<sup>45</sup> The focus of new investment is on public transport and active modes.

276. The ITA assumes that Auckland Transport would fund improvements to the bus network because of the larger population base; and that funding would be available by 2051 to upgrade the Whitford-Maraetai Road to four-lanes, complete construction of the Whitford Bypass and associated intersection upgrades. However, the transport experts agree that due to the focus on public transport to reduce transport emissions these roading upgrades are unlikely to be funded. Therefore, there is no funding for the major road upgrades required to support the Plan Change. And it is unclear whether funding would be available for the required public transport improvements when significant investment is required in the public transport network to support planned growth through intensification and existing FUZ areas.
277. I acknowledge that the RLTP is reviewed every three years, and that additional transport projects could be added. However, the issue is that there is significant uncertainty that that could or would happen, and the applicant is not proposing to fully fund the necessary public transport improvements or upgrades to the wider transport network that would be required to support the scale of growth proposed.
278. In my opinion, the Plan Change does not adequately demonstrate how the required transport infrastructure upgrades would be funded. The Draft Funding Plan includes a contribution towards upgrading the ferry service and infrastructure, but additional funding would be required from Auckland Transport to an unspecified value.

## 9. Consultation

279. The following consultation was undertaken for PC88.

### 9.1. Mana Whenua

280. BSLP contacted the mana whenua contacts that identify the subject land is within their rohe. A request was made via email to the relevant contacts to request whether iwi wished to engage on the project or defer to others noting that Ngāi Tai ki Tāmaki were engaged as a development partner for the plan change. No responses were received from other iwi groups.

- 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
- Te Ahiwaru – Waiohūa
- Te Ākitai Waiohūa
- Waikato Tainui

281. The applicant indicates that Ngāi Tai ki Tāmaki have been engaged on the project since its inception. Several hui including site visits are identified in Section 11.3.1 of the s32 evaluation report. Ngāi Tai

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<sup>45</sup> Auckland Transport, Regional Land Transport Plan 2021-2031, page 47.

ki Tāmaki state in their CVA that over the past decade, the BSLP owners have genuinely involved Ngāi Tai as the mana whenua and mana moana for the area.<sup>46</sup>

282. No submission was received from any mana whenua on full notification of the plan change. No iwi resource management groups recommended needing a decision maker in accordance with clause 4A of Schedule 1 of the RMA.

## 9.2. Local Board

283. BSLP met and provided information of the proposed private plan change request to the Franklin Local Board on 29 October 2021. The local board raised concerns about traffic and the need to upgrade the ferry terminal, confirming that the project would need to be delivered without Council funding. The applicant identified that the local board supported school and employment opportunities, retention of a 9-hole golf course, innovation centre and provision of community facilities, and the coastal walkway and public access to and along the coast.

284. A report was taken to the Franklin Local Board meeting on 22 August 2022 following the close of further submissions. The report provided an overview of the plan change, themes from submissions received, and issues raised by council groups. A request was made for local board views on PC88.

285. At the August 2022 board meeting of the Franklin Local Board the following resolutions were passed:

*That the Franklin Local Board:*

*a) provide local board views on Plan Change 88 by Beachlands South Limited Partnership for 110 Jack Lachlan Drive; and 620, 680, 682, 702, 712, 722, 732, 740, 746, 758 and 770 Whitford-Maraetai Road, Beachlands, as follows:*

*(i) note that Beachlands is referred to as a township in the same way as Pukekohe and Waiuku in the Local Board Plan. It has legacy council deficiencies with no council managed facilities, kerb/channel and footpath gaps in provision, no secondary school or emergency medical facilities, is predominately reliant on tank water and has grown in an ad-hoc manner with residential development, a service centre and a retirement village.*

### **Road infrastructure:**

*ii) note that the application does not address adequately the increased numbers travelling along Whitford Maraetai Road, through the Whitford Village and on to the Whitford Road. The assumptions used are not credible*

*iii) note that the Beachlands and Maraetai area is accessed via the Whitford Maraetai Road, which has a high death and serious incident rate. The only other access route is via North Road and the Maraetai Coast Road, which is vulnerable to storm damage, slips and sea level rise, and deteriorating road surfaces. The community is often cut off by road closures, particularly due to serious accidents, which can also lead to power outages.*

*iv) note the proposal does not adequately address the effects on the traffic, intersections and flow through Whitford village. The effect on Whitford Village from further increasing traffic numbers would be significant.*

*v) suggest the proposed plan change should include significant upgrades to Whitford Maraetai Road.*

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<sup>46</sup> Ngāi Tai ki Tāmaki, Tapuwae Ohiti I Kahawairahi Cultural Values Assessment Beachlands South Limited Partnerships Beachlands South Structure Plan and Plan Change, March 2022 (page 10).

vi) suggest the proposed plan change should include construction of the Whitford Bypass, which has been in the Long-Term Plan in the past and for which land has been designated.

vii) suggest the Whitford Maraetai Road/Clifton Road/Trig Road/Whitford Landfill, the Whitford Maraetai Road/Henson Road and Jack Lachlan Drive/Whitford Maraetai Road intersections be upgraded for safety reasons, and note that safety of intersections is not adequately addressed in the proposed plan change.

viii) note around 50% of traffic through the Whitford Village enters the Whitford Road travelling towards Howick (according to the application). Whitford Road is a rural road with a high serious and death accident rate, particularly near and on the narrow bridge over the Mangemangeroa estuary. The effects of increased traffic from the Beachlands and Maraetai area will have a significant impact on the Whitford Road and the bridge, and onwards into Howick.

ix) request the plan change extend to and incorporate Jack Lachlan Drive, to create a contiguous urban zone, to avoid 'islands' of rural zoning in between the proposed plan change area and the existing developed urban area of Beachlands.

x) note there is no provision for cycling on the main road.

xi) request the proposal lift it's delivery to enable modal shift, including, but not limited to:

A) safe off-road walking and cycling connections to local schools

B) kerb and channel, off road walking and cycling paths, and safe road crossings on Jack Lachlan Drive

C) cycling lane from Jack Lachlan Drive to Whitford Village, using the existing hard shoulders and newly constructed ones where required.

### **Public Transport:**

xii) note the application points to increased ferry services for the new community, including larger ferries and a new ferry terminal, however does not clearly articulate who will provide and fund new ferry infrastructure.

xiii) note the current limitations within the privately owned marina site, and that Auckland Transport is responsible for provision of increased ferry services.

xiv) note that bus services travel from Beachlands and Maraetai to Ormiston and Botany along the Whitford Maraetai Road. Further development may benefit the community as increased population will support more frequent services.

xv) request bus stops be provided along the Whitford Maraetai Road so people living in the Whitford area can access the bus services.

### **Water**

xvi) request the development connect to the Watercare wastewater treatment plant at Okaroro Drive, and not develop its own treatment plant

xvii) note that the plan change may provide scale for Watercare to complete a centralized water and wastewater scheme to benefit the wider Beachlands area



xviii) note our concern that the application relies on water from bores and increased water take from the bore in Pine Harbour, which is already subject to complaints. Further investigation is recommended on the current servicing from aquifers.

xix) note our concern around access to sufficient publicly available water sources for fire fighting.

xx) suggest that provision of potable water for a population of 10-15,000 within the development should require Watercare to lead and provide the service.

xxi) suggest the development should be around current natural watersheds to limit stormwater damage to the estuary and bush blocks, and will require full co-operation from proposed Three Waters Entity A.

xxii) suggest existing culverts on Jack Lachlan Drive be upgraded to increase their capacity.

### **Ecology**

xxiii) note the area is directly adjacent to the Waikopua Estuary and native bush blocks, and that protection of the ecology and diversity of this area has not been fully addressed.

xxiv) note with concern that development may cause increased sedimentation in the Waikopua Estuary.

xxv) suggest the development should be given a greater set-back, to allow for further protection, and coastal erosion.

xxvi) suggest there needs to be consideration for provision of pest control, including of domestic cats and dogs, to protect the diversity of wildlife in the bush area and estuary.

### **Visual impact**

xxvii) note the ridgeline area is visible from a considerable distance, including the Hauraki Gulf.

xxviii) suggest consideration should be given to increased set back of housing to reduce the visual impact on the ridgeline.

xxix) suggest that street and other lighting should be designed in such a way that they do not significantly impact the dark sky, or disturb wildlife in the native bush and estuary.

### **Other infrastructure**

xxx) note that electricity power outages are frequent on this coast.

xxxi) suggest consideration needs to be given to how the power supply can be upgraded to be more reliable, and with sufficient capacity.

### **High School**

xxxii) note provision has been made for land to be available for the Ministry of Education to purchase and build a high school. As there is currently no high school and associated facilities servicing Beachlands (and the wider Wairoa subdivision), a new high school would benefit the wider community by creating local connection, providing much needed local facilities, and reducing travel movement out of the area to schools elsewhere.



### **Economic benefit**

xxxiii) note the area set aside for light industrial. While welcomed, it is questioned whether this will provide enough local jobs for the increased population.

### **Walkways and amenities**

xxxiv) request the proposed plan change acknowledge and follow the Pohutukawa Coast Trails Plan 2017, and development should include connections as provided for in this plan, including to the existing walkway at 600 Whitford Maraetai Road, connecting to the Henson Road end of the trails on the Clifton peninsula, and provision of a footpath along the length of Jack Lachlan Drive from Whitford Maraetai Road to the entrance to Pine Harbour.

xxxv) suggest adequate provision needs to be made for play spaces and recreation

xxxvi) request that the applicant develop play spaces and install playground equipment prior to any transfer of land ownership to Auckland Council, to ensure playgrounds are developed concurrent with housing development

b) appoint Angela Fulljames, Local Board Chair to speak to the local board views at a hearing on Plan Change 88.

c) delegate authority to the chairperson of Franklin Local Board to make a replacement appointment in the event the local board member appointed in resolution b) is unable to attend the private plan change hearing.

## **10. Notification and Submissions**

### **10.1. Notification details**

286. Details of the notification timeframes and number of submissions received is outlined below:

|   |   |
|---|---|
| Date of public notification for submissions         | 26 January 2023                             |
| Closing date for submissions                        | 24 February 2023, extended to 10 March 2023 |
| Number of submissions received                      | 383   |
| Date of public notification for further submissions | 12 May 2023                                 |
| Closing date for further submissions                | 26 May 2023                                 |
| Number of further submissions received              | 12  |

287. There were three submissions (240, 382, and 383) received after the closing date for submissions. However, the additional time was waived under section 37 of the RMA and as such these submissions are not considered to be late.

288. Copies of the submissions are attached as **Attachment 8** to this report.

## 11. Analysis of submission and further submissions

289. The following sections address the submissions received on PC88. Section 10(3) of the RMA states that the local authority is not required to give a decision that addresses each submission individually. Accordingly, submissions have been grouped by topic.
290. Submissions are summarised under each topic including discussion of the relief sought and a recommendation to the Hearing Commissioners in terms of accepting or rejecting the group of submissions. Due to the large number of submissions the analysis only refers to examples where relevant. A table of all submission and the recommendations is provided in **Attachment 9**.
291. Recommendations on further submissions follow the parent submission.
292. Submissions are considered under the following topic headings:
- Supporting PC88 in its entirety
  - Submissions on growth and extent of the plan change area
  - Submissions on heritage and cultural values
  - Submissions on landscape, character, and amenity
  - Submissions on environmental impacts
  - Submissions on transport
  - Submissions on water and wastewater
  - Submissions on stormwater and flooding
  - Submissions on social infrastructure
  - Submissions on open space and recreation
  - Submissions on infrastructure funding
  - BSLP submission
293. There is a total of 1224 submission points from the 383 submissions. Most submission points (85 per cent) seek that PC88 be declined or declined but if approved amended. The number of submission points for each of the four themes of relief sought is set out below:
- a. Approve the plan change without any amendments = 18 submission points;
  - b. Approve the plan change with the amendments I requested = 166 submission points;
  - c. Decline the plan change = 433 submission points; and
  - d. Decline the plan change, but if approved, make the amendments I requested = 607 submission points.

### 11.1. Submissions supporting PC88 in its entirety

294. A total of 18 submissions support PC88 in its entirety and seek that it be approved without any amendments. Reasons include:
- a. support growth because it provides for housing and businesses improving accessibility of local living;
  - b. support the provision of a high school; and
  - c. transport effects can be addressed by upgrades.

## Discussion

295. Submitters support the plan change because they anticipate the additional growth at Beachlands would support improved local services including commercial, retail, education and infrastructure. While I agree that additional growth can support increased self-sufficiency the assessment of effects demonstrates that PC88 does not secure delivery of these outcomes.
296. I accept that PC88 would enable additional retail and commercial opportunities, as well as space for a secondary school. As discussed below in Section 11.9, it appears reasonable that with the scale of growth anticipated a secondary school could be provided. However, as discussed in Section 8.3 above, the number of jobs enabled within the plan change area would be inadequate and most people would need to leave the area to work resulting in significant transport effects. Insufficient transport upgrades are proposed by the Plan Change as discussed in Section 8.13 and therefore transport effects would not be adequately addressed. Therefore I do not support the relief sought by submissions to approve the plan change without amendments.

## Recommendations

297. That submissions seeking approval of PC88 without amendments be rejected because it would not achieve a quality compact urban form and residents would be reliant on jobs outside the area resulting in significant transport effects.
298. There are no amendments associated with this recommendation.

### **11.2. Submissions on growth issues and extent of the plan change area**

299. A fairly large number of submissions seek PC88 be declined or amended because of issues relating to growth. Reasons include:
- a. Impact on the community;
  - b. Concerns about quality of housing;
  - c. Scale of development and extent of zoning;
  - d. Lack of employment opportunities; and
  - e. Beachlands is not an appropriate location for growth.
300. John Byers (337.1) highlights the council planning and policy documents continue to confirm that Beachlands will remain outside the Rural Urban Boundary and there is no budget for additional infrastructure for at least the next 10 years. Mr Byers considers the intensity of development would be more effective and efficient if built somewhere along the north/south corridor near a transport hub.
301. Beachlands Avenues Ltd (205.1) support the Plan Change with amendments because it will provide a master-planned development which will have a range of social and economic benefits to current and future residents.
302. Lisa Ball (45) is primarily concerned about the proposed FUZ because the area is too large and will have impacts on the environment, transport network, utilities network and social amenities (schools, medical/hospital). Matthew Cockram (332.3) considers it more appropriate to consider the entire plan change as live-zoned to understand the implications of proposed growth, failing that the FUZ should be dropped. Three Pines Trust (266.1 – 266.3) seek amendments to scale back the plan change area to enable assessment over time, requiring the FUZ to be left until impact of development of the northern part has been assessed. The submitter considers it would make better sense for the plan change area to be looked at in the context of the anticipated Regional Spatial Strategy and the

Natural and Built Environment Act, which will take a much better, broader and longer look at growth, infrastructure needs, and timing of development.

303. Sielia Ltd (206.1 – 206.11) seeks the inclusion of 600 Whitford-Maraetai Road within the plan change area as FUZ. This site is approximately 22 ha adjoining the southern boundary of the plan change area. Other consequential amendments are sought to apply relevant precinct provisions to site. The submitter considers their site to be visually more connected with the plan change area and inclusion would establish a more defensible boundary.
304. Barbara van Ryn (258.2) opposes PC88 because of the lack of employment opportunities provided. Steven Lucas (143.5) opposes PC88 and does not consider local employment will materialise because there are relatively few locals working in the existing commercial area such as Countdown supermarket where most staff are from South Auckland.

### Discussion

305. Several submissions are concerned about the impacts of social housing and seek an independent review. I note that the plan change request does not specifically identify the provision of social housing, and such provision could have some benefits in terms of housing choice and affordability. However, I would be concerned about the relatively isolated nature of Beachlands and lack of transport options that would not support large amounts of social housing.
306. Ms Skidmore considered the submission from Sielia Ltd, agreeing that the Waikopua Creek Estuary is a more defensible edge to the proposed urban environment. However, the submission doesn't include any structure planning information to support rezoning. I agree with Ms Skidmore's comments and note that there are also issues of natural justice by extending the plan change area in response to submissions and issues of scope. The submitter indicates that the site is approximately 2.6km from the ferry at Pine Harbour and its location would not support a quality compact urban form with limited access to the proposed services within the plan change and the wider Beachlands area. I do not consider the identification of a more defensible boundary to be justification for extending the plan change further. I therefore do not support the relief sought by the submitter.
307. I note Mr Cockram's concerns about whether the full extent of impacts from the Plan Change have been adequately considered including the FUZ. The precinct plans only extend onto the proposed FUZ areas owned by the applicant, and therefore there appears to be a gap on the remaining FUZ areas. However, I accept that the applicant is committing to outcomes on their FUZ areas based on the technical reports but that owners of other FUZ areas may not be willing to accept the same provisions and these can be confirmed through future structure planning and plan changes. The applicant's technical reports consider potential effects for the entire plan change area, including the FUZ at a high-level for transport, water and wastewater. However, I do not consider these assessments to be adequate because it is unclear how the yield has been determined and the peer reviews for transport and water supply identify significant capacity issues for the live-zoned areas.
308. I do not consider there to be sufficient justification for the need for any growth at Beachlands, as discussed in Section 8.3. I particularly do not support the proposed FUZ area because it significantly increases the urban extent of Beachlands and would be inefficient because it would provide low-density development with a yield of approximately 900 dwellings that could not be well connected to the live-zoned area due to ecological and topography constraints as discussed in Section 8.2.
309. My assessment of the Plan Change against the Auckland Plan, NPSUD, and RPS provisions in Section 7 conclude that Beachlands is not a suitable location for the scale of growth proposed, and the Plan Change would not achieve a quality compact urban form or contribute to a well-functioning urban environment, and sufficient development capacity is provided within the East Auckland

Housing Markets. I therefore support submissions that seek that PC88 be declined because of the impacts of growth.

### Recommendations

310. Submissions seeking that the plan change be declined are recommended to be accepted and submissions seeking amendments are recommended to be rejected for the following reasons:
- a. The extent of the plan change area is significant and would double the size of Beachlands with impacts on transport network, utilities network and social amenities; and
  - b. PC88 does not achieve a quality compact urban form or contribute to a well-functioning urban environment.
311. If the Plan Change is approved, it is recommended that the entire proposed FUZ area be removed from the plan change area along with any consequential changes to remove affected land and references to the FUZ.
312. Suggested amendments are included in Attachment 10. I have not provided a s32AA evaluation of the suggested amendments because I do not support approval of the Plan Change.

### **11.3. Submissions on heritage and cultural values**

313. Submissions from Heritage NZ Pouhere Taonga raise several issues and seeks the plan change be approved with amendments to the provisions to address heritage and cultural values. Key issues identified include:
- a. A Heritage Impact Assessment to inform the final planning provisions for the BSP;
  - b. Protection of archaeological and cultural sites located within the EPAN;
  - c. Include a Historical Heritage Landscape Precinct Plan and associated precinct provisions;
  - d. Protection of the pā (R11/1619) by including it in the Sites and Places of Significance to Mana Whenua Overlay; and
  - e. Protection of the pā (R11/1619) by including it in Schedule 14.1 Schedule of Historic Heritage.
314. BSLP (351.2) seeks that Precinct Plan 4 – Cultural Landscape be amended to reflect corrected version supplied to council in the clause 23 response to correct minor errors to the indicative location of archaeological sites.

### Discussion

315. Effects on cultural values are discussed in Section 8.4. Scheduling sites as Sites and Places of Significance to Mana Whenua is only one method to achieve recognition and protection of sites of cultural value. Ngāi Tai ki Tāmaki is a partner within the BSLP and has participated in the development of PC88. The fact that Ngāi Tai have not made a submission on PC88 indicates to me that they are satisfied with the approach taken in the BSP. I therefore consider the BSP provisions appropriately protect the pā site from a cultural values perspective and do not support the submission of Heritage NZ Pouhere Taonga (330.15).
316. Based on the assessment of heritage values discussed in Section 8.5, I agree that further assessment of 720 Whitford-Maraetai Road is required to determine whether protection is warranted due to risk that the values could be destroyed. I also agree that two sites (R11/1619 and R11/1620)

meet the threshold for scheduling and as such the applicant should provide further assessment to determine whether the pā site should be scheduled or the reasons why not.

317. Ms Ramsay has considered the submissions and recommends several amendments to the BSP to address heritage values. However, in my opinion it is more appropriate for heritage values to be managed through scheduling and reliance on the AUP framework rather than precinct provisions. In my view, precinct provisions should only be included where the AUP framework does not adequately provide for the management of effects. In this regard, I agree that the significant number of recorded sites along the coastal margin to be included in the EPAN warrants amendments to the Archaeological Vegetation Management and Planting Plan. The likelihood of discovering new archaeological sites is high and this should be considered in addition to the recorded sites. Furthermore, I agree that this plan should be developed in consultation with Mana Whenua but that it should be prepared by a suitably qualified archaeologist.
318. I accept that the incorrect version of Precinct Plan 4 was notified and that the revised version that BSLP seeks to have included in the plan is more accurate indication of the location of archaeological sites. However, the locations are only indicative on the precinct plan and I consider it to demonstrate that there are many recorded sites within the vicinity of the coast and as such there is a likelihood that further archaeological will be discovered.

### Recommendations

319. That submissions seeking that PC88 be approved with amendments to address cultural and heritage values be rejected because it is recommended that the Plan Change be declined for other reasons.
320. If PC88 is approved, I consider it appropriate to make the following amendments:
- a. Schedule pā site (R11/1619) as a historic heritage place
  - b. Amend I.10(3) to take into account unrecorded archaeology
  - c. Amend Precinct Plan 4 to more accurately reflect the location of archaeological sites.
321. Only amendments (b) above is shown in the suggested amendments provided in Attachment 10. I have not provided a s32AA evaluation of the suggested amendments because I do not support approval of the Plan Change.

### **11.4. Submissions on landscape, character and amenity**

322. A total of 72 submission points are concerned with the impacts on landscape, character and amenity. Most submissions seek that PC88 be declined, and some seek amendments. Key reasons for submitters concerns include:
- Urban visual pollution from the sea;
  - Impact on views and quiet;
  - Overdevelopment from apartment clusters and use of industrial areas;
  - High rise buildings disturb skyline;
  - Ruin natural beauty;
  - Degrade the visual amenity value of Beachlands and Pine Harbour;
  - Light and noise pollution; and
  - Effects on property values.



## Discussion

323. Several submitters raise concerns about the effects of PC88 on property values. However, effects on property values is not considered a relevant resource management issue, and therefore these submissions are not considered further.
324. Graeme Watt (68.2 - 4) is concerned about visual effects when viewed from 309 Clifton Road, which currently overlooks the Formosa Golf Course. Ms Skidmore has considered this submission identifying that although the higher density development will be readily apparent changing the outlook from this property, views towards the plan change area are part of a wider outlook, and there is considerable separation from this property. Furthermore, Ms Skidmore considers the change will occur over an extended timeframe, and a reasonable level of visual amenity will be maintained.
325. Manukau Quarries Ltd (352.5) support PC88 but seek amendments in relation to building setbacks and buffers because of concerns that they block views from public places onto industrial buildings reducing visibility and significantly reduce land available for employment activities. The submitter seeks that requirement for building setbacks and buffers be deleted or reduced and landscaping reduced in width and plant density, or objectives and policies be amended to refine the resource management effects to be mitigated. The submitter is concerned to ensure that the Plan Change preserves the ability for its land to be comprehensively redeveloped in the future. Ms Skidmore considered this submission and supports the building setbacks and landscape buffers as discussed in Section 8.1. Therefore the submitters' relief sought is not supported.
326. Karin Vince (2.2) seeks that PC88 be amended to retain the area proposed to be FUZ as rural land because higher density housing in this area will adversely affect the green landscape and viewpoints for all out across Whitford.
327. As discussed in Section 8.1, Ms Skidmore does not consider the change in character to be a significant adverse effect, and she considers the proposed provisions will mitigate potential impacts on character and amenity subject to several recommended amendments.
328. Amendments recommended by Ms Skidmore would address some of the issues raised by submitters (46.5, 101.1, 312.1) relating to landscape, character and amenity by ensuring that further consideration is given to the impact of buildings on the natural coastal character, timing of vegetation in the EPAN and delivery of key amenities including the civic space, coastal pathway and pathway through the Fairway Reserve.
329. Ms Skidmore identifies that revegetation in the EPAN provides opportunities to integrate the built environment with the natural coastal setting, although this is not specifically recognised within the BSP. To recognise the landscape function that revegetation has, Ms Skidmore recommends amending the policy and assessment provisions to ensure planting is implemented in a timely manner in relation to surrounding environment. Ms Skidmore also recommends assessment criteria to consider the visibility of buildings from the CMA. I support the recommended amendments and consider they would require a new policy and assessment criteria to consider the landscape function of the EPAN at the time of subdivision and visibility of buildings for all new buildings in the relevant sub-precincts.

## Recommendations

330. Submissions on landscape, character, and amenity impacts are recommended to be accepted in part because it is recommended that PC88 be declined and therefore there would be no impacts on landscape, character and amenity.
331. If PC88 is approved, I recommend the following amendments to address landscape, character, and amenity effects as detailed in the assessment by Ms Skidmore:

- a. Require early delivery of public plaza / civic space in Village Centre sub-precinct;
  - b. Additional matter of control for civic space in Village Centre sub-precinct to consider shade and shelter from wind;
  - c. Assessment criteria to assess how street network will maintain connectivity in relation to Golf Course Overlay area within the Golf Course sub-precinct
  - d. Require early delivery of Coastal Pathway and pathway through Fairway Reserve;
  - e. Remove 27m Height Variation Control from Standard I.7.1;
  - f. Amend policies and assessment for EPAN to consider the landscape function of revegetation planting to integrate the built environment with the natural coastal setting and to ensure restoration planting is implemented in a timely manner in relation to surrounding development; and
  - g. Amend assessment criteria for new buildings in the Marina Point, Village Centre and Coastal Sub-precincts to consider the visibility of buildings from the CMA and adjacent coastal margins and how the building design responds to this setting through design methods such as variation in the roofscape, modulation and articulation and use of exterior material and colour finishes.
332. Suggested amendments are included in Attachment 10. I have not provided a s32AA evaluation of the suggested amendments because I do not support approval of the Plan Change.

### **11.5. Submissions on environmental impacts**

333. Several submissions raise concerns about environmental impacts and either seek that PC88 be declined or amended. Key reasons include:
- a. Inconsistency with climate change goals within Te Tāruke-ā-Tāwhiri, Emissions Reduction Plan, and Adapt and thrive: Building a climate-resilient New Zealand Aotearoa New Zealand's First National Adaptation Plan;
  - b. Impacts of development on streams and the coastal marine area including highly protected bird species;
  - c. Multi-storey buildings along hillside will negatively affect kite-surfers creating turbulence/wind effects which is a hazard for kite-surfers;
  - d. Lack of adequate consideration of an active landslide on west part of proposed plan change moving out onto adjoining beach; and
  - e. Sustainability outcomes.

### Discussion

334. Potential climate change impacts and the inconsistency of PC88 with relevant climate change goals and directions are discussed above in Section 7.7 and 7.9. I agree with submitters that the community would be reliant of private cars for travel to access work, education, services and amenities increasing VKT and greenhouse gases. Therefore, I support submissions that seek PC88 be declined because of inconsistency with climate change goals.
335. Adverse effects of PC88 on ecology are discussed above in Section 8.9, and coastal water quality and sedimentation in Section 8.10. The experts agree that any potential adverse effects on ecology

and coastal water quality would be acceptable. Therefore, I do not support submissions seeking that PC88 be declined because of ecological impacts.

336. Nigel Hannan Trust (323.1) owns 758 Whitford-Maraetai Road, proposed to be FUZ, and opposes Standard I.7.6 because he considers it would constitute an excessive hurdle and negatively impact the ability to develop and subdivide their land. If PC88 is approved, confirming the site as FUZ, a future plan change process will determine the standards that will apply. Accordingly, Precinct Plan 2 Natural Features does not identify the EPAN applying within the proposed FUZ areas not owned by the applicant. I do not support the relief sought to delete this provision.
337. Murray Stevens (48.7) and Christine Jansen (144.3) are concerned that land in the western part of the plan change area is unstable and therefore not appropriate for intensive housing. Geotechnical effects are discussed above in Section 8.6, concluding that effects could be adequately managed by the precinct provisions in conjunction with the AUP. I consider the proposed requirement for buildings to be set back 30m from the coastal edge, and application of the LLZ in this area with a minimum site area of 1,000m<sup>2</sup> to adequately manage potential adverse geotechnical effects in the vicinity of unstable land. Therefore, I do not support the relief sought by these submissions.
338. Auckland Council (345.24) seeks amendments to the BSP to ensure they are clearly interpreted and applied. The submitter refers to the Beachlands South Sustainability Strategy which is a matter of discretion in I.9.1 as being unclear because the document can be altered at any time without a statutory process and some of its content is not robust enough to be the basis for a matter of discretion or assessment criteria.
339. Schedule 1 Part 3 of the RMA addresses the incorporation of documents by reference in plans where they are standards, requirements or recommended practices, or any other written material that deals with technical matters and is too large or impractical to include. Material may be included in whole or in part, and it has legal effect as part of the plan. Accordingly, any amendments or replacements of referenced material must go through a plan change process to update the reference. In my opinion, the Beachlands South Sustainability Strategy does not deal with technical matters. At best it provides guidance and therefore it is not sufficiently clear and should not be incorporated by reference in the BPS as an appropriate matter of discretion. I therefore agree with Auckland Council that references to the Beachlands South Sustainability Strategy should be removed.

### Recommendations

340. That submissions seeking that PC88 be declined are recommended to be accepted in part and submissions that seek amendments be rejected because it is recommended that the plan change be declined for other reasons.
341. If the Plan Change is approved, I recommend all references to the Beachlands South Sustainability Strategy. Suggested amendments are included in Attachment 10. I have not provided a s32AA evaluation of the suggested amendments because I do not support approval of the Plan Change.

### **11.6. Submissions on transport**

342. Over a third of all submissions raise specific concerns about transport and generally seek that PC88 be declined or if approved, amended to ensure required transport upgrades are provided to support growth.
343. Auckland Transport (344), Auckland Council (345) and Waka Kotahi (327) all raise significant concerns about the transport effects of the Plan Change. These submitters all agree that the actual and potential adverse effects on the transport network have not been adequately assessed or addressed. Paul Hebditch (113.5) indicates the traffic assessment lacks consideration in the of

additional intensification of the Countdown area, Pine Harbour, 250 new homes from Fletchers, PC78 intensification and increased high school student commuting.

344. Equal Justice Project (146.2) seeks that PC88 be declined because it will result in an increase in VKT and greenhouse gas emissions. The submitter identifies that there is no public transport or cycling network for these trips that will be easier than driving, and a small increase in ferry capacity will not mitigate this. This concern is also raised by Waka Kotahi (327.2) highlighting that a key focus of the Emissions Reduction Plan is to reduce reliance on cars and support people to walk, cycle and use public transport. Waka Kotahi is concerned that the ITA focuses on trips to work and education, which only account for one quarter to one third of daily household trips based on the Household Travel Survey undertaken by the Ministry of Transport. Waka Kotahi identifies that no other information is supplied by the applicant about other trips, their VKT impact, and their possible impact on interpeak and weekend congestion. Furthermore, Waka Kotahi also raises concern that the ITA does not explain how the yield of the Plan Change has been calculated.
345. Waka Kotahi (327.5) considers the Plan Change does not adequately provide for active mode connectivity to surrounding urban areas. Auckland Transport (344.4) seeks amendments to ensure the ability to serve by active mode and passenger transport the needs of each stage of development, connect with the surrounding network and ensure that interim adverse effects are adequately avoided, remedied or mitigated. Ministry of Education (357.5 and 6) seek amendments to ensure connections and linkages are integrated within the precinct and into the existing Beachlands settlement.
346. Auckland Transport (344.27) and Waka Kotahi (327.4) indicate the additional ferry capacity that the ITA relies on is uncertain and cannot be relied upon. Pine Harbour Marina Limited (340.1) supports PC88 but identifies that to achieve the increase in the ferry service requires BSLP to undertake discussions and formulate agreements with the submitter and Auckland Transport, which had not occurred at the time of the submission. Therefore Pine Harbour Marina Limited indicates that they cannot confirm increases in ferry patronage are achievable. Pine Harbour Berth Holders Association (293.1 and 2) also raise significant concerns about the ferry services. In summary, key issues highlighted by these submitters include:
- a. Due to Maritime NZ and Auckland Harbour legally mandated speed restrictions close to shore, structures in the Inner Harbour downtown, the suggested time of approximately 35 minutes is unlikely to change.
  - b. The existing ferry berth cannot accommodate any significant increase in the ferry length or width (affecting ferry capacity), and one-way travel within the marina due to width restrictions and tidal constraints limits the frequency.
  - c. The ferry berth is in a private marina which provides limited scope to expand, and no evidence is provided that an eventual fleet of 200-seat boats could practically enter the marina or where ferry operations would need to be relocated to.
  - d. Opportunities for active mode journeys (i.e. cycling) to the ferry are limited because of lack of available space on-board the ferries reducing access at the other end.
  - e. The scale, timing and extent of improvements identified as being required in the BSP are significantly beyond the ability of the applicant to sufficiently influence the provision of, have no certainty of timing and are subject to variables which land based transport infrastructure is not (e.g. coastal consents and assessment under the NZCPS).
  - f. Currently there is no dedicated terminal, an absence of storage facilities for bikes, and the park and ride area cannot accommodate additional demands.

- g. Further increase in ferry frequency would severely impact on current berth holders access to and from the marina in busy periods.
  - h. Operating larger ferries within the general confines of the existing marina would present a hazard to other berth holders and their vessels.
  - i. Any alternative to avoid constraining existing users general marina operations would require widening and deepening the approach channel involving sea dredging operations that are extremely expensive and typically dump tailings at sea.
  - j. Coastal inundation would be a longer-term risk for any permanent structure in the marina.
347. Many submitters are concerned about the impacts of growth on Whitford-Maraetai Road because it is already congested and it is not safe, and the need to also provide the Whitford Bypass including Steven Lucas (143.1), Philip Granger (304.1), and Matthew Cockram (332.5). Brian Slingsby (142.1) also seeks provision of upgrades to the intersection at Clifton Road.
348. Terence Bruce (116.4) identifies that the existing Pine Harbour ferry carparking facility has reached maximum capacity, and increased development will increase demand for parking in this area. Fraser Bull (356.1) seeks that if the Plan Change is approved more than one car park on site for each development is needed as parking around Pine Harbour for residential and commuters is in very short supply.
349. Beachlands Avenues Ltd (205.2 and 3) seeks amendments to consider potential effects of the future indicative Primary Collector (School) Road on any future access to 101 Jack Lachlan Drive.
350. Auckland Transport (344.39) indicates a range of additional transport upgrades and improvements would be required if PC88 were approved, which are not identified in the ITA or precinct provisions. Auckland Council (345.5) and Auckland Transport (344.17 and 22) seek amendments to the BSP to ensure that subdivision and development do not occur in advance of operational transport infrastructure, and the language is made more certain. To ensure that development is monitored in terms of the thresholds and upgrades identified in Standard I.7.3, Auckland Transport (344.33) seeks a provision that all applications provide a register of development and subdivision to demonstrate compliance.
351. Manukau Quarries Ltd (352.1 and 4) is concerned that Standard I.7.3 identifies triggers for non-residential activities to provide additional ferry capacity when this is required to mitigate additional traffic generated by residential activities and therefore seeks that reference to non-residential activities be removed. BSLP (351.3) seeks amendments to the thresholds for subdivision and development in Standard I.7.3 to reflect updated information in the ITA relating to ferry passenger numbers and peak periods.
352. BSLP (351.7) seeks amendment to include the requirement for a Travel Management Plan (**TMP**) for the development of commercial activities greater than 500m<sup>2</sup> in I.10 Special information requirements. The submitter indicates that providing a TMP is considered best practice for reducing private vehicle use in commercial activities and will further strengthen the sustainability initiatives of PC88, which encourages and promotes modal shift. The requirement to provide a TMP is considered to support a reduction in car dependency, promote modal shift and give effect to the sustainability initiatives of PC88.

## Discussion

353. Transport effects are discussed in Section 8.13, determining that there are inadequacies in the applicant's assessment, uncertainty that the ferry service improvements could be delivered or that public transport mode share increases could be achieved, the need to upgrade Whitford-Maraetai



Road and construct the Whitford Bypass to support growth, and that growth would result in increased VKT and greenhouse gases. Therefore, I support submissions that seek the Plan Change be declined for transport reasons.

354. Mr Edwards has considered the relief sought by submissions to amend the BSP in detail within his peer review and I agree that his recommendations to amend transport related provisions would help to mitigate transport effects should the Plan Change be approved.
355. Identifying all relevant transport upgrades that are required to support development within the plan change area, and coordinating development with transport upgrades at the appropriate time is fundamental to mitigate potential adverse effects relating to the Plan Change. Mr Edwards supports submissions by Auckland Transport, Auckland Council, Manukau Quarries Ltd and others and recommends several amendments to Standard I.7.3 and related precinct provisions to better address coordination of development with transport upgrades. I support these recommendations including the identification of additional transport upgrades required to mitigate transport effects to make the precinct provisions more certain and clearer should the Plan Change be approved.
356. The additional information for a TMP proposed by BSLP is supported by Mr Edwards subject to the deletion of (b) because it is unclear who is to be restricted from using employee parking. Mr Edwards also supports the relief sought by Auckland Transport (344.23) to include additional special information that is applicable to permitted development as well as subdivision, development and activities that require resource consent similar to the Waihoehoe Precinct in Drury. Auckland Transport (344.26) identifies that the Auckland-wide provisions of E27.6.1 for trip generation should apply to the Plan Change, which Mr Edwards supports. I agree with these amendments should PC88 be approved.

### Recommendations

357. That submissions that seek PC88 be declined because there will be significant transport effects that would not be adequately mitigated by the BSP are recommended to be accepted, and those submissions seeking decline, but if approved make the amendments are recommended to be accepted in part. Key reasons include:
  - a. Lack of public transport will result in an increase in VKT and greenhouse gas emissions;
  - b. Ability to implement improvements to ferry capacity and frequency as well as increases to ferry mode share are uncertain and cannot be relied upon;
  - c. Growth would require upgrading of Whitford-Maraetai Road to four lanes, construction of the Whitford Bypass and additional safety improvements that are not identified as being required; and
  - d. Lack of walking and cycling connections between the plan change area and the existing Beachlands town.
358. That submissions seeking PC88 be approved subject to amendments are recommended to be either accepted in part because the issues raised would be addressed by declining the Plan Change or rejected because the Plan Change will not be amended.
359. If PC88 is approved, I consider it necessary to amend the BSP to better manage transport related adverse effects in response to the issues raised in submissions. In summary the following amendments are recommended:
  - a. Delete references stating that the precinct is public transport focussed and will be progressively upgraded and funded due to uncertainty;



- b. Delete Objective I.3(7) because the location of Beachlands South relies on private vehicle trips increasing transport emissions and as such is not a low carbon town;
  - c. Amend Objective I.3(10), Policy I.4(11), Standard I.7.3 to ensure that subdivision and development does not occur in advance of the availability of operational transport infrastructure and provide greater certainty;
  - d. Amend Policy I.4(12), Standard I.7.8, and Assessment criteria to require active mode connections to ferry terminal which maintains public access at all times and which is to be provided at the same time as residential development, and providing linkages to the existing Beachlands settlement;
  - e. Amend precinct provisions to include a requirement to consider the appropriate provision of car parking;
  - f. Delete the reference to E27.6.1 in I.7 to ensure that the Auckland-wide provision applies;
  - g. Amend Activity IX.4.1(A22) subdivision that does not comply with staging to be a non-complying activity;
  - h. Amend Standard I.7.3 to split out requirements by residential and non-residential separately, to identify the upgrade of Whitford-Maraetai Road, Whitford Bypass, provision of park and ride car parking spaces, additional intersections as well as reduce specificity regarding whether upgrades are roundabouts;
  - i. Amend I.10 Special information requirements to include additional information requirements for Travel Management Plans, Transport Design Assessments, and a requirement to register development and subdivision compliance with Standard I.7.3;
  - j. Amend Precinct Plan 5 to show fixed location of Primary Collector (School) Road compatible with access to 101 Jack Lachlan Drive; and
  - k. Amend I.12 Appendix 1 to delete the road cross sections and to update the road design details consistent with Auckland Transport's submission.
360. Suggested amendments are included in Attachment 10. I have not provided a s32AA evaluation of the suggested amendments because I do not support approval of the Plan Change.

### **11.7. Submissions on water and wastewater**

361. A total of 172 submissions raise specific concerns about water supply and wastewater. Most of these submissions seek PC88 be declined, but some support approval subject to amendments.
362. All submissions concerned about water supply raise issues about the availability of capacity within the aquifer to supply the Plan Change and do not consider the application material to have adequately assessed potential impacts on existing users. Several submitters seek that the plan change area be serviced by a public water supply.
363. Submissions seeking that PC88 be declined because of wastewater issues are concerned about the lack of capacity in the existing Beachlands-Maraetai Wastewater Treatment Plan (BWWTP) and the need for significant upgrades to service the scale of growth proposed. Other submitters are concerned about the proposed private WWTP and the effects of disposal to land, the need for it to be adequately sized for development and made flood-proof.

## Discussion

364. Pine Harbour Marina Limited (340.2) owns the Tui Brae bore and indicates that they do not have confidence that there is adequate capacity in the aquifer to service PC88 with the 765m<sup>3</sup> per day identified by GWE. The submitter identifies that they already have an agreement with Pine Harbour Living Limited to supply 810m<sup>3</sup> per day (total 16,000m<sup>3</sup> per year) and if this is exceeded, a variation to the water take consent is required. The submitter anticipates that future water demand is likely to increase as the THAB zoned land is developed, marine industry uses develop and the marina operations expand. The submitter is concerned that increased extraction would impact on the availability of water for their own operations and development programme, and notes that the aquifer level has dropped and there may already be issues with adequate supply from the aquifer.
365. Watercare Services Ltd (354.1) indicate that a technically feasible water supply solution has been proposed, which will require resource consent, Water Treatment Plant to meet relevant Drinking Water Standards, and reservoirs within the development to ensure fire-fighting standards are met. On the basis that water supply will be sourced and managed by the applicant privately, Watercare indicate that they have no reason to oppose PC88.
366. Council's expert, as discussed in Section 8.8 agrees with submissions that there is significant uncertainty about the capacity of the aquifer to service the plan change area. Although the BSP requires adequate water supply for development or subdivision there is a risk that the aquifer is overallocated and therefore adequate water supply could not be achieved. Watercare has no future plans to service Beachlands with public water supply, as discussed in Section 7.9 in relation to the AMP, so this cannot be relied upon. Therefore, I support submissions that seek the Plan Change be declined because of water supply issues.
367. Beachlands Maraetai Omana Concerned Citizens (368.9) consider development of this magnitude requires appropriate infrastructure to be in place and controlled by Watercare with a pipeline over the hill to Māngere, but notes this scenario is not budgeted for. The submitter identifies that the coastal area is vulnerable to environmental damage if private wastewater treatment is inadequate and considers relying on a private entity to treat wastewater is a very high-risk strategy.
368. Whitford Coast Society Incorporated (272.7, 272.8, and 272.10) seeks amendments to PC88 to require a long-term solution by a properly recognised and capitalised controlling body; that monitoring be required weekly; and that the impacts of development on aquifer recharge and contamination from on-site wastewater discharges are considered. The submitter seeks to ensure that potential ecological impacts of development are appropriately mitigated noting that the Waikopua estuary is delicate and already suffers from eutrophication from the Whitford Landfill, historic silting from poor forestry harvesting practices, and bad practice by council contractors building walkways. The submitter considers long term security would be provided by Watercare and private wastewater systems are not supported.
369. Watercare (354.2) supports approval of the plan change on the basis that the applicant can deliver a technically feasible wastewater solution privately. The submitter seeks to work with the applicant to enable the efficient and more cost-effective delivery of infrastructure overall and notes that the additional growth can be considered as part of Watercare's Servicing Strategy, due to be complete in mid-2023. Therefore, the applicant's proposed private WWTP solution could be considered interim until such time as the plan change area can connect to an upgraded BWWTP. The submitter indicates that connection to the BWWTP is not feasible until capacity upgrades are completed, which would require a new resource consent. Any significant upgrades to the BWWTP, necessary to accommodate significant growth are identified by the submitter to have budgetary implications for Watercare in its long-term planning process.
370. Watercare (345.3) considers that wastewater servicing can be achieved through modifications of the proposed solution, and seeks that appropriate provisions be included in the Plan Change to address

timing to connect to the BWWTP or allow for interim solutions before the BWWTP upgrade has been completed.

371. As discussed in Section 8.3, the applicant has demonstrated viable options for wastewater servicing which are generally accepted by Watercare. I support an approach that ultimately connects to the upgraded BWWTP because Watercare identifies this as the most efficient outcome and would address many of the concerns raised by other submissions. Therefore, the Plan Change can rely on a private WWTP as an interim solution until a connection to an upgraded BWWTP can be achieved.
372. If PC88 is approved, I support an amendment to the BSP to outline how adequate wastewater servicing could be achieved, including future connection to the BWWTP, and suggest that the applicant work with Watercare to develop appropriate provisions and present these through evidence.

### Recommendations

373. That submissions that seek PC88 be declined because of uncertainty that there is sufficient capacity in the aquifer to supply water to the plan change area are recommended to be accepted or accepted in part because insufficient information has been provided to determine there is sufficient capacity.
374. That submissions that seek PC88 be declined because of concerns about wastewater are recommended to be accepted in part because although wastewater is not considered a reason to decline the Plan Change, it is recommended to be declined for other reasons
375. That submissions that seek PC88 be approved or approved with amendments relating to wastewater are recommended to be rejected because it is not recommended to approve the Plan Change. However, if PC88 is approved I consider it appropriate to amend the precinct provisions to recognise future connection to the upgraded BWWTP may be an option in the future.
376. There are no amendments associated with these recommendations.

### **11.8. Submissions on stormwater and flooding**

377. Several submissions seek that PC88 be declined or amended because of concerns about stormwater and flooding. Reasons include:
- a. Impermeable road surfaces cause huge silt and sediment runoff;
  - b. Flooding impacts not adequately assessed; and
  - c. Impacts on Te Mana o Te Wai.
378. Pine Harbour Marina Limited (340.3) identifies that they had not had the opportunity to assess the flood assessment and modelling results in detail at the time of preparing their submission. Therefore the submitter opposes the stormwater management and flood control proposals until they can determine that adequate measures are being proposed to avoid and/or mitigate any effects on Marina holdings.
379. Auckland Council (345.23) seeks review and reassessment of natural hazards / stormwater management in light of recent severe weather events and any necessary amendments to precinct to address the findings.
380. Auckland Transport (344.29) seeks amendments to include whole of life costs and effectiveness of treatment over time associated with publicly vested stormwater assets as a matter of discretion and that stormwater devices in roads vested in Auckland Transport be designed to meet the Auckland Transport Design Manual and design requirements.

381. Many submissions raise concerns about the adequacy of infrastructure provision, including stormwater. Simone Beesley (307.1) seeks amendments to revise stormwater management devices with more realistic scenarios using best practice guidance to maintain and operate them, noting that existing wetlands and stormwater devices in the area are poorly maintained.

#### Discussion

382. Healthy Waters assessed stormwater management and flooding effects in Section 8.7, concluding that the flood modelling undertaken by the applicant is inadequate and existing flooding downstream within the Pine Harbour Marina could be exacerbated. However, Ms Qian indicates that potential flood risk could be resolved by the applicant providing revised flood modelling to address the issues identified.

383. I consider it appropriate for the applicant to liaise with Healthy Waters to determine how to resolve the flood modelling issues. Provided these issues are addressed and the applicant can demonstrate that downstream flooding would not be exacerbated then I would be satisfied that flooding effects would be managed.

384. In terms of stormwater management, Healthy Waters was generally satisfied with the proposed stormwater management approach. However, amendments to the provisions are recommended to ensure the implementation of appropriate stormwater management and treatment devices, including reducing the number of devices and by combining them into larger but fewer communal devices with multiple stormwater management functions where possible to be more cost-effective. Amendments are also recommended to include a specific objective to support the proposed stormwater provisions and amendments to address the design of stormwater devices in the road to reflect Auckland Transport's relief sought on this matter.

385. Were PC88 to be approved, I support the recommended amendments to the BSP proposed by Healthy Waters to address concerns raised in submissions.

#### Recommendations

386. Submissions that seek PC88 be declined because of flood risks are recommended to be accepted, and submissions seeking amendments are accepted in part because further information is required to demonstrate flooding effects have been adequately managed.

387. All other submissions that seek PC88 be declined because of stormwater issues are recommended to be accepted in part and submissions seeking amendments are recommended to be rejected because the Plan Change is recommended to be declined for other reasons.

388. If PC88 is approved, the following amendments are recommended:

- a. Insert a new objective to support the stormwater policies and provisions; and
- b. Amend Standard I.7.7 to ensure the implementation of appropriate stormwater management and treatment devices

389. Suggested amendments are included in Attachment 10. I have not provided a s32AA evaluation of the suggested amendments because I do not support approval of the Plan Change.

### **11.9. Submissions on social infrastructure**

390. A large number of submissions seek that the plan change either be declined or amended because of concerns relating to social infrastructure. Key reasons include:

- a. Lack of schools and no commitment from the Ministry of Education to provide a secondary school in the area;
- b. Lack of healthcare and medical services;
- c. Lack of emergency response facilities; and
- d. Lack of community facilities.

## Discussion

391. A large number of submitters are concerned about the lack of schools in the area to support PC88 because Beachlands Primary School is nearing capacity and there is no high school. Although the Plan Change provides the opportunity to establish a high school within the precinct, there is no commitment from the Ministry for Education to provide one. Precinct Plan 3 – Structuring Elements identifies the location for an Indicative School within Sub-precinct C: Community near the OSSAR zone and proposed Objective I.2(23) and Policy I.3(31) support the development of new schools for existing and planned communities area near the Village Centre, as well as an Indicative Primary Collector (School Road) in I.12 Appendix 1 relating to road details.
392. The Ministry of Education (357) is neutral on PC88, acknowledging that additional housing will likely drive the need for new school(s) in the community. While highlighting the requirements of the NPSUD to achieve integrated land use and infrastructure planning, the Ministry indicates careful planning and communication between the applicant, the council and the Ministry will be required to meet community demand for educational facilities. I consider the issue of whether a high school would be provided or not to be significant because currently, all students must travel outside the area, and if additional growth occurs then this issue would be exacerbated.
393. It appears that the Ministry is open to ongoing discussion regarding the provision of a high school, and I consider further guidance is needed from the Ministry to understand whether it is likely or not and the timeframe within which this could be provided. I accept that the precinct provisions do what they can to facilitate the provision of a school but cannot require it.
394. The applicant's revised precinct provisions (24 July 2023) address the relief sought by the Ministry of Education. I agree that if the Plan Change is approved it would be appropriate to address the relief sought by the submitter by amending the precinct provisions.
395. Fire and Emergency (156.1 and 2) seek amendments to require development in accordance with SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice, and that proposed roads are developed to ensure that fire appliances can easily access each road even with cars parked either side of the road. Auckland Transport recommends amendments to the road design standards in I12 Appendix 1, as discussed above, and I consider minimum road reserve widths would provide sufficient space for fire appliances and would need to meet Auckland Transport's Code. I do not consider any amendments to the BSP necessary to address the submitter's concerns.
396. Beachlands Maraetai Omana Concerned Citizens (368.10) indicate that the Beachlands Medical Centre is at capacity and, therefore new residents would need to seek GP services further afield. Fraser Bull (356.2) identifies that getting a medical appointment can take over a week. I consider it can generally be assumed that social infrastructure would follow growth, and that additional growth at Beachlands could support improved services such as new medical facilities. However, there is significant pressure on healthcare services nationwide so I do not consider it can be assumed that additional facilities will be provided. In addition, the isolated location of Beachlands would require people to travel relatively long distances to access emergency healthcare. I therefore support submissions that seek PC88 be declined due to lack of social infrastructure.



## Recommendations

397. That submissions seeking PC88 be declined be accepted and submissions seeking amendments to the Plan Change be accepted in part for the following reasons:
- a. There is no certainty that a high school will be provided within the plan change area. However, I acknowledge that the Ministry of Education appears to be willing to discuss the provision of additional schools, and in the event that a high school would be provided, this would support integrated land use and infrastructure planning and be a positive impact on the existing community. It would be helpful if the Ministry of Education and the applicant could address this issue in evidence to provide greater certainty to the community.
  - b. Additional growth will increase pressure on existing social infrastructure including healthcare services which are either deficient or at capacity.
398. If the Plan Change is approved, I support the amendments proposed by the Ministry for the Environment to address the provision of educational facilities. These amendments are included in Attachment 10. I have not provided a s32AA evaluation of the suggested amendments because I do not support approval of the Plan Change.

### **11.10. Submission on open space and recreation**

399. Several submissions raise concerns about open space and recreation, either seeking the plan change be declined or if approved amended. Key reasons include:
- a. Retain Formosa Golf Course;
  - b. Include on and off-road trail connection to the wider Pohutukawa Coast environment;
  - c. Additional pressure on existing public parks in the wider area;
  - d. Reduces green space between Howick and Beachlands;
  - e. Ensure public access to Fairway Reserve; and
  - f. Amendments to precinct provisions to reflect the open space are indicative and vesting to council is not guaranteed.

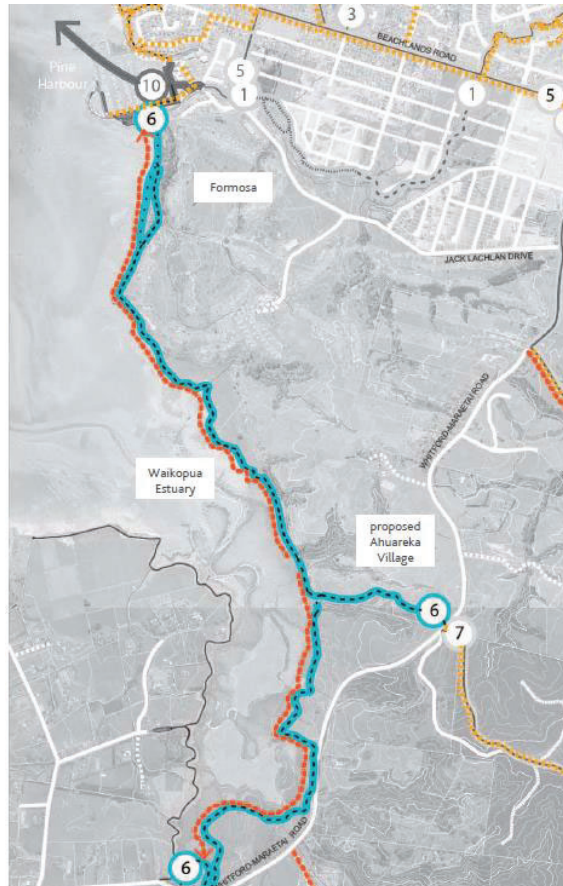
## Discussion

400. Submissions relating to the Formosa Golf Club seeking that PC88 be declined or amended because of concerns that it should be retained as an 18-hole golf course (143.7, 302.5), a public park (234.2, 373.1) are not considered relevant because the golf course is privately owned. It is not the responsibility of the applicant to retain the golf course in its current form. I consider sufficient provision of open space opportunities to have been provided through the precinct provisions, and do not consider it appropriate to retain the golf course as a public park. Retention of the golf course as a public park would require acquisition by the council or some other public agency.
401. Auckland Council (345.16-22) seeks amendments to the precinct provisions to provide greater clarity that open spaces and reserves are indicative only and may not be vested to the council. These amendments are supported by Mr McCarten as they address the concerns raised in his review of open space and discussed in Section 8.12 above.
402. Auckland Transport (344.30 and 31) seeks amendments to the precinct provisions to ensure public access is maintained to the Fairway Reserve at all times because it provides a key linkage to the Pine Harbour Ferry.



403. Pohutukawa Coast Trails Committee (303.1-3) indicates that the Franklin Local Board endorsed “Pohutukawa Coast Trails – An Aspirational Plan” in 2017 and identifying three main connections that PC88 should connect to (Connections 6, 6c/7, and Okaroro Road). Connection 6 is a 5.25km coastal walkway to the Whitford Bridal way identified below in Figure 8, which the submitter supports being provided early. Ms Skidmore agrees and recommends amendments to the precinct provisions to secure it's formation early in the development phasing.

**Figure 8 Excerpt from Pohutukawa Coast Trails - An Aspirational Plan (page 32)**



404. The coastal pathway is identified as indicative on Precinct Plan 5 – Movement Network but the BSP does not require or identify when it must be provided. Resource consent is required as a controlled activity to develop the coastal pathway to consider connectivity to the Pine Harbour Ferry Terminal. However, I support amendments to ensure the provision of the coastal pathway is considered at the time of subdivision.

Recommendations

405. That submissions seeking that the plan change be declined be accepted in part, and submissions seeking that the plan change be approved with amendments be rejected because it is recommended the plan change be declined for other reasons.

406. In the event that the plan change is approved, I consider it appropriate to make the following amendments:

- a. Delete the OSSAR zone;
- b. Amend provisions to clarify that opens and reserves are indicative only;

c. Amend assessment criteria to consider the provision of the coastal pathway.

407. Suggested amendments are included in Attachment 10. I have not provided a s32AA evaluation of the suggested amendments because I do not support approval of the Plan Change.

### **11.11. Submissions on infrastructure funding**

408. Several submissions seek that the plan change be declined because of specific concerns about infrastructure funding.

409. Matthew Cockram (332.1) seeks amendments to adequately address the need for close collaboration and interface with the council, Watercare, Auckland Transport, Vector, Chorus and other network infrastructure providers regarding infrastructure funding noting the CIP letter of commitment is equivocal and highly conditional. Given the scale and intensity of the proposal, Mr Cockram considers a comprehensive plan and scheme should be presented alongside the proposal to demonstrate how funding issues will be dealt with and the commitments obtained from the counterparties to them.

410. Matthew and Karen Thomassen (376.2) and Pamela Gallagher (350.1) do not consider the proposed funding of the ferry improvements to be a solution because it only suits a limited number of commuters working in the CBD. Helen Cahill (334.2) also highlights that the applicant has not provided any substantive detail about any new ferry terminal infrastructure or how funding will be achieved.

411. Most submissions seek that the plan change be declined unless there is an agreement that the applicant will fund all infrastructure and associated services, including upgrades to Whitford-Maraetai Road, additional schooling facilities, and public transport improvements.

412. Paul Hebditch (113.8) identifies that the traffic assessment relies on \$75 million of funding which will only upgrade local roads and the ferry terminal and will not affect the wider transport issues outlines.

### Discussion

413. Infrastructure funding is discussed in Section 8.14, identifying the CIP consider a levy per apartment and house appears to be reasonable based on infrastructure costs of \$75 Million. However, not all infrastructure costs have been identified and therefore it is remains uncertain that additional funding could be provided through an IFF.

414. Subdivision and development is required to provide adequate water in accordance with Standard I.7.4, and confirmation of funding, supply arrangements or other such measures are identified for water supply as a matter of discretion. However, there are no such provisions for transport or wastewater.

415. Transport effects are discussed in Section 8.13, identifying the need for significant additional upgrades and uncertainty that the public transport improvements could be delivered. Although the applicant identifies a contribution of \$16 million towards ferry upgrades, significant additional funding would be required to increase the service to the extent required to enable development in accordance with Standard I.7.3, including both capital and operational costs as discussed above in Section 8.14. No public funding is allocated to ferry improvements or upgrades to Whitford-Maraetai Road which are understood to be in the order of \$200 million. Therefore, there is significant uncertainty that infrastructure required to service the growth proposed by PC88 could be delivered.

## Recommendations

416. That submissions seeking the plan change be declined are recommended to be accepted and submissions seeking amendments be rejected because there is no certainty that there is funding for all the necessary infrastructure to service growth.
417. There are no amendments associated with this recommendation.

### **11.12. BSLP Submission**

418. The applicant made a submission to PC88 because the incorrect version of the precinct provisions was notified and as such it did not reflect several of the changes proposed by the applicant through the clause 23 stage.
419. Amendments to the notified version of the precinct include:
- a. Reduce the extent of THAB.
  - b. Update Precinct Plan 4 – Cultural landscape relating to location of archaeological sites.
  - c. Update Standard I.7.3 Staging of development and transport upgrades.
  - d. Incorporate separate and/or additional transport infrastructure upgrades relating to schools.
  - e. Update Standards I.7.5 Riparian Margins and I.7.6 EPAN to remove the requirement to plant riparian yard setbacks.
  - f. Include a requirement for a TMP as special information requirement.
  - g. Update Precinct Plan 2 Natural Features to reflect indicative natural inland wetlands.
  - h. Update Standard I.7.14 Residential Density Standards and any other consequential amendments to align with PC78

## Discussion

420. Some of the matters raised in the BSLP submission had been included in the September 2022 version of the precinct provisions and had inadvertently been omitted by notifying the lodged March 2022 version. These submissions anticipate changes may be required to ensure consistency or to recognise staging of development.
421. I believe the notified version of PC88 incorporates changes to the extent of THAB.<sup>47</sup> As such consideration of PC88 has taken into account the correct extent of THAB.
422. Precinct Plan 4 is discussed above in Section 11.3. Changes proposed to ferry passenger numbers and requiring Travel Management Plans have previously been discussed in Section 11.6 in relation to submissions on transport, and amendments relating to schools are discussed in Section 11.9.
423. I do not agree with the changes proposed to Standard I.7.5 to remove the requirement to plant riparian margins because this was a recommendation of the applicant's expert to mitigate the effect of land use change. This issue is discussed in Section 8.9, indicating that planting of riparian margins is proposed to mitigate the effects of land use change and 'double-counting' planting for off-setting or compensation at later stages of development would not adequately manage ecology effects.

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<sup>47</sup> <https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-1-plan-change-zoning-map.pdf>.

424. The Auckland-wide provisions of the AUP apply to the precinct, and land use and development activities addressed by the precinct are identified pursuant to section 9(3) of the RMA which relates to use of land as a district plan matter, and for subdivision pursuant to section 11 of the RMA. Activities that would result in the requirement of offsetting or compensation relate to regional plan matters and as such the precinct provisions have no relevance and are considered inconsistent. Therefore I do not support the relief sought to amend Standards I.7.5 Riparian Margins and I.7.6 EPAN.
425. BSLP seeks amendments to update Standard I.7.14 Residential Density to align with PC78. I have compared the proposed precinct provisions that seek to incorporate the MDRS, which are also reflected in PC78. I understand that the applicant chose to incorporate MDRS rather than rely on the underlying zones. However, I do not consider it necessary to include the MDRS within the precinct as the underlying zones can be relied upon to avoid duplication and inconsistencies.

### Recommendations

426. That submission 351 seeking amendments to PC88 be rejected because it is recommended to decline the plan change for reasons discussed previously.
427. If the Plan Change is approved, I recommend the following amendments:
- a. Update Precinct Plan 4 to update the indicative locations of archaeological sites;
  - b. Update Standard I.7.3 to reflect updated passenger numbers;
  - c. Incorporate separate and/or additional transport infrastructure upgrades relating to schools
  - d. Include Travel Management Plans as a special information requirement in I.10;
  - e. Update Precinct Plan 2 to reflect indicative natural wetlands; and
  - f. Remove all MDRS provisions in the precinct and rely on the underlying zoned.
428. Suggested amendments are included in Attachment 10. I have not provided a s32AA evaluation of the suggested amendments because I do not support approval of the Plan Change.

## **12. Conclusions**

429. A total of 383 submissions resulting in 1,224 submission points, and 12 further submissions were received. Approximately 85 per cent of all submissions oppose the Plan Change.
430. Submitters that support the Plan Change consider the additional growth would help support the liveability of Beachlands by increasing access to housing as well as retail and commercial services. Those that support PC88 consider the necessary infrastructure upgrades can be provided and support the provision of a high school in the plan change area.
431. It is my opinion that PC88 would not:
- assist the council in achieving the purpose of the Resource Management Act 1991
  - give effect to the National Policy Statement for Urban Development or the National Policy Statement for Indigenous Vegetation
  - give effect to the Regional Policy Statement
  - be consistent with parts of the AUP regional plan
  - be consistent with the Auckland Plan
  - be consistent with the Franklin Local Board Plan
  - be consistent with the Future Urban Land Supply Strategy

- be consistent with Te Tāruke-ā-Tāwhiri: Auckland's Climate Action Plan or the Emissions Reduction Plan
  - be consistent with the Regional Land Transport Plan.
432. PC88 does not give effect to the NPSUD because growth in this location does not contribute to a well-functioning urban environment because additional development capacity is not required to meet demand, it does not support growth in an urban environment that is well-served by public transport or employment, it is not integrated with infrastructure planning and funding decisions and would not support the reduction in greenhouse gas emissions in accordance with Objectives 1, 3, 6, 8, and Policies 1, 6 and 8.
433. PC88 does not give effect to the Regional Policy Statement for the following reasons:
- a. Growth at Beachlands is not required to provide sufficient development capacity to meet demand within the East Auckland Housing Markets, and it would not achieve a quality compact urban form (Objectives B2.2.1(1), (2), and (5) and Policy B2.2.1(4)).
  - b. Adequate infrastructure would not be provided to service growth at Beachlands in terms of water supply and transport improvements and upgrades (Objective B2.6.1(2) and Policy B2.6.2(1)).
  - c. Uncertainty as to whether there is sufficient capacity within the aquifer to provide water supply and if the PC88 were approved, it could result in over-allocation (Objective B3.2(5) and Policy B3.2(4), Objective B7.3.1(3) and Policy B7.3.2(1), and Objective B7.4.1(3) and Policy B7.4.2(11)).
  - d. PC88 does not improve integration of land use and transport to support a quality compact urban form because transport infrastructure required would not be adequately planned, funded or staged to integrate with urban growth (Objective B3.3.1(1) and Policy B3.3.2(5)).
  - e. Insufficient justification for why two recorded archaeological sites meeting the threshold for scheduling as historic heritage places are not proposed to be scheduled in Schedule 14 and therefore heritage values are not adequately protected from inappropriate subdivision, use or development (Objective B5.2.1(1) and Policies B5.3.1(1) and (2)).
  - f. Flood modelling provided does not use the most up-to-date information and does not adequately demonstrate whether development would increase flood risks downstream of the plan change area (Objective B10.2.1(2) and Policies B10.2.1(4) and (5)).
434. I consider PC88 to be inconsistent with regional plan provisions relating to water, flooding, and indigenous vegetation for the following reasons:
- a. Flood modelling does not adequately demonstrate that downstream flooding would not be exacerbated by development (Policy E1.2(11)).
  - b. No assessment to demonstrate that water supply could be achieved within the established limits of the groundwater aquifers or whether this would have adverse effects on existing users (Objectives E2.2(1), (2), and (4), and Policies E2.3(1),(3), (4), and (7)).
  - c. Standard I.7.5(2) would enable 'double counting' of riparian margin planting required to mitigate the effects of land use for offsetting of future residual adverse effects (Objective E15.2(2) and Policy E15.3(3)).
435. The Plan Change is inconsistent with the Auckland Plan because Beachlands is not identified as a location for urban growth, and additional development capacity would increase the proportion of total



growth within future urban areas inconsistent with the Development Strategy and Auckland Plan outcomes for housing and transport.

- 436. PC88 would not be consistent with Te Tāruke-ā-Tāwhiri: Auckland’s Climate Action Plan or the Emissions Reduction Plan because it would not reduce reliance on cars because there would be limited public transport options, and most people would have to leave the area for work. Total VKT from household trips is expected to increase due to the relatively long distances that people will travel, increasing greenhouse gas emissions.
- 437. I also do not consider PC88 to be consistent with the Franklin Local Board Plan or the Regional Land Transport Plan because it does not adequately address the key issues of public transport and upgrades to the wider road network including Whitford-Maraetai Road to address capacity and safety issues that would be required to support the scale of growth proposed.
- 438. Having considered all the information provided by the applicant, carried out an assessment of effects, reviewed all relevant statutory and non-statutory documents and made recommendations on themed submissions, I recommend that PC88 be declined. However, should the Hearing Commissioners determine to approve the Plan Change, I recommend extensive amendments to the precinct provisions to address the issues raised in submissions and discussed above in Section 11. Suggested amendments are set out in Attachment 10 to this report.

**13. Recommendations**

- 439. That, the Hearing Commissioners accept or reject submissions (and associated further submissions) as outlined in this report and detailed in Attachment 9.
- 440. That, as a result of the assessment of the plan change request and recommendations on the submissions, I recommend that PC88 should be declined and the Auckland Unitary Plan not be amended because the location for growth does not achieve a quality compact urban form or contribute to a well-functioning urban environment and is not integrated with the adequate provision of transport and water infrastructure and therefore does not give effect to the RPS.
- 441. Should the Hearing Commissioners determine to approve PC88 to amend the Auckland Unitary Plan, I recommend the amendments set out in Attachment 10 to this report.

**14. Signatories**

| Name and title of signatories   |   |
|---------------------------------|---|
| Authors                         | <br>Chloe Trenouth, consultant planner                   |
| Reviewer / Approved for release | <br>Craig Cairncross, Team Leader Plans and Places South |



## **ATTACHMENT 2**

### **INFORMATION PROVIDED BY THE APPLICANT TO SUPPORT PC88**



## Attachment 2 – Information provided by the applicant to support PC88

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-private-plan-change-request.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-4-beachlands-south-structure-plan.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-5-masterplan-design-reported-part-1.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-5-masterplan-design-reported-part-2.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-5-masterplan-design-reported-part-3.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-5-masterplan-design-reported-part-4.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-5-masterplan-design-reported-part-5.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-5-masterplan-design-reported-part-6.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-6-urban-design-assessment.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-7-beachlands-south-sustainability-strategy.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-8-landscape-and-visual-assessment.pdf>

[https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-9-visual-simulations-\(s-brown-attachments-1-22\).pdf](https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-9-visual-simulations-(s-brown-attachments-1-22).pdf)

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-10-economic-assessment.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-11-integrated-transport-assessment.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-12-water-supply-concept-report.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-13-wastewater-assessment%20red.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-14-draft-stormwater-management-plan.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-15-overall-ecology-executive-summary.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-16-freshwater-ecology-assessment.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-17-terrestrial-ecology-assessment.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-18-wetland-ecology-assessment.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-19-marine-ecology-assessment.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-20-ecological-assessment-volume-2-appendices.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-21-coastal-water-quality-and-sedimentation-assessment.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-22-coastal-hazards-report.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-23-earthworks-assessment.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-24-geotechnical-report.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-24-geotechnical-report-appendix-d.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-25-detailed-site-investigation.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-26-land-use-capability-assessment.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-28-cva-ngai-tai-ki-tamaki.pdf>

[https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-29-consultation-summary-report-\(csr\).pdf](https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-29-consultation-summary-report-(csr).pdf)

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-29-csr-attachment-5-iwi-consultation-letters.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-30-nzcps-assessment.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-annexure-a-photo-simulations.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-beachlands-south-limited-partnership-photo-simulation-statement-of.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-beachlands-south-neighbourhood-design-statement.pdf>

[https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88\\_beachlands-south-precinct-plan-zoning-plan-02-09-2022.pdf](https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88_beachlands-south-precinct-plan-zoning-plan-02-09-2022.pdf)

Please note that if any of the above links do not work, all documents are available here: [\*\*https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/unitary-plan/auckland-unitary-plan-modifications/Pages/details.aspx?UnitaryPlanId=187\*\*](https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/unitary-plan/auckland-unitary-plan-modifications/Pages/details.aspx?UnitaryPlanId=187)



## **ATTACHMENT 3**

### **CLAUSE 23 FURTHER INFORMATION PROVIDED**



## Attachment 3 – Clause 23 further information provided

### Clause 23 - Request for further information – Part 1

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-beachlands-south-ppc-clause-23-response-14-07-2022.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-beachlands-south-ppc-clause-23-response-05-08-2022.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-attachment-1-certificates-of-titles.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-attachment-2-appendix-29-consultation-summary-report-updated.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-attachment-4-aup-rps-objectives-and-policies-assessment-table.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-attachment-4-aup-rps-objectives-and-policies-assessment-table.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-attachment-6-geotechnical-risk-zones-map.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-attachment-7-beachlands-south-precinct-provisions-september-2022-updated-plans.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-attachment-8-transportation-response.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-attachment-9-masterplan-and-precinct-plans.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-attachment-9-masterplan-and-precinct-plans.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-attachment-11-policy-b5.2.2-historic-heritage-assessment.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-attachment-12-coastal-hazard-cross-sections.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-attachment-13-transportation-response-dated-03-09-2022.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-attachment-14a-landscape-and-visual-responses-no-fuz.pdf>

## **Clause 23 - Request for further information – Part 2**

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-clause-23-response-table-2.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-1-section-32-report-updated.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-2-draft-funding-plan.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-3-flood-maps-and-escp-catchment-plans.pdf>

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc88-appendix-4-precinct-plan-4-cultural-landscape-plan-updated.pdf>

Please note that if any of the above links do not work, all documents are available here: <https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/unitary-plan/auckland-unitary-plan-modifications/Pages/details.aspx?UnitaryPlanId=187>





**ATTACHMENT 4**  
**EXISTING PLAN PROVISIONS**



## Attachment 4 Existing plan provisions applying to PC88

PC88 relies on the underlying provisions of a range of land use zones. The Beachlands South Precinct alters some of the underlying provisions and also proposes additional provisions.

The following table summarises the key provisions of the relevant underlying zones and highlights if the precinct seeks to change these.

| Summary of key provisions of relevant zones   | Beachlands South Precinct  |
|---|--|
| <p><b>Residential – Large Lot Zone (Chapter H1)</b></p> <ul style="list-style-type: none"> <li>• 1 dwelling per site permitted activity;</li> <li>• minor dwellings (&lt; 65m<sup>2</sup>) are a restricted discretionary activity;</li> <li>• more than one dwelling per site (excluding minor dwelling) is a discretionary activity;</li> <li>• integrated residential development is a discretionary activity;</li> <li>• maximum permitted building height 8m;</li> <li>• minimum yards include 10m front yard, 6m side/rear yard, 10m riparian yard, <b>25m coastal protection yard</b>;</li> <li>• <b>maximum impervious area 35% or 1400m<sup>2</sup></b>;</li> <li>• maximum impervious area of 10% in riparian yard; and</li> <li>• <b>maximum permitted building coverage is 20% or 400m<sup>2</sup></b></li> </ul>   | <p>The precinct relies on the underlying LLZ provisions apart from where the following precinct provisions alter those:</p> <ul style="list-style-type: none"> <li>- maximum building coverage is 35% (I.7.12(2));</li> <li>- maximum impervious area 50% (I.7.12(2));</li> <li>- minimum coastal protection yard of 30m (I.7.9)</li> </ul>  |
| <p><b>Residential - Mixed Housing Urban - as modified by PC78 (Chapter H5)</b></p> <ul style="list-style-type: none"> <li>• up to three dwellings as a permitted activity;</li> <li>• four or more dwellings is a restricted discretionary activity;</li> <li>• integrated residential development is a restricted discretionary activity;</li> <li>• visitor accommodation up to 10 people is a permitted activity otherwise it is a restricted discretionary activity;</li> <li>• community facilities and healthcare facilities &lt;200m<sup>2</sup> are a restricted discretionary activity;</li> <li>• educational facilities and healthcare facilities &gt;200m<sup>2</sup> are a discretionary activity;</li> <li>• maximum permitted building height of 11m;</li> <li>• maximum building coverage of 50 per cent;</li> <li>• maximum impervious surface of 60 per cent;</li> <li>• maximum impervious area of 10% in riparian yard</li> <li>• minimum landscaping of 20 per cent;</li> <li>• height in relation to boundary standard of 4m plus 60 degrees;</li> <li>• minimum 1.5m front yard, 1m side and rear yards, <b>10m riparian yard, 10m coastal protection yard</b>;</li> <li>• outlook, daylight controls, and outdoor living space; and</li> <li>• minimum dwelling size 30m<sup>2</sup> per studio or 45m<sup>2</sup> for 1 or more bedrooms.</li> </ul> | <p>The precinct applies the MDRS provisions in accordance with Schedule 3A of the RMA (I.7.14).</p> <p>The precinct relies on the underlying MHU zone provisions apart from where the following precinct provisions alter those:</p> <ul style="list-style-type: none"> <li>• All new buildings (other than MDRS) are a restricted discretionary activity (Table IX.4.1(A6));</li> <li>• Educational facilities, community facilities and Visitor accommodation identified as permitted activities in Sub-precinct C Community (Table IX.4.1(A28, A29, A30));</li> <li>• Riparian margin of 10m to be planted (I.7.5);</li> <li>• Fences or walls adjoining the Fairway Reserve must not exceed 1.2m in height or 1.8m in height if at least 50% visually open (I.7.8(5)); and</li> <li>• Minimum coastal protection yard of 30m (I.7.9).</li> </ul> <p>It is noted that any precinct provisions that conflict with the MDRS would need to be identified as qualifying matters in accordance with s77I of the RMA.</p> |

| Summary of key provisions of relevant zones  | Beachlands South Precinct  |
|--|--|
|  | <p>The riparian and coastal yard requirements conflicts with MDRS for yards and, therefore should be identified as a qualifying matter.</p>  |
| <p><b>Residential - Terrace Housing and Apartment – as modified by PC78 (Chapter H6)</b></p> <ul style="list-style-type: none"> <li>• up to 3 dwellings is a permitted activity;</li> <li>• four or more dwellings is a restricted discretionary activity;</li> <li>• integrated residential development is a restricted discretionary activity;</li> <li>• maximum building height and height in relation to boundary for up to 3 dwellings as per MHUZ;</li> <li>• maximum permitted building height 4+ dwellings within a walkable catchment 21m (6 storeys), and outside a walkable catchment is 16m (5 storeys) unless modified by the Height Variation Control;</li> <li>• height in relation to boundary standard for 4+ dwellings is 8m plus 60 degrees outside walkable catchment;</li> <li>• height in relation to boundary standard for 4+ dwellings within a walkable catchment within 21.5m from frontage of 19m plus 60 degrees plus;</li> <li>• height in relation to boundary standard for 4+ dwellings within a walkable catchment 21.5m+ from frontage of 8m plus 60 degrees plus;</li> <li>• minimum 1.5m front yard, 1m side and rear yards, 10m riparian yard, 10m coastal protection yard;</li> <li>• maximum building coverage of 50 per cent;</li> <li>• maximum impervious surface of 70 per cent;</li> <li>• maximum impervious area of 10% in riparian yard</li> <li>• minimum landscaping of 20 per cent;</li> <li>• outlook, daylight controls, and outdoor living space; and</li> <li>• minimum dwelling size 30m<sup>2</sup> per studio or 45m<sup>2</sup> for 1 or more bedrooms.</li> </ul> | <p>The precinct relies on the underlying THAB Zone provisions apart from where the following precinct provisions alter those:</p> <ul style="list-style-type: none"> <li>• Riparian margin of 10m to be planted (I.7.5);</li> <li>• Fences or walls adjoining the Fairway Reserve must not exceed 1.2m in height or 1.8m in height if at least 50% visually open (I.7.8(5)); and</li> <li>• Minimum coastal protection yard of 30m (I.7.9).</li> </ul> <p>It is noted that any precinct provisions that conflict with the MDRS would need to be identified as qualifying matters in accordance with s77I of the RMA.</p> <p>The riparian and coastal yard requirements conflicts with MDRS for yards and, therefore should be identified as a qualifying matter.</p> |
| <p><b>Business - Local Centre Zone – as modified by PC78 (Chapter H11)</b></p> <ul style="list-style-type: none"> <li>• dwellings are a permitted activity;</li> <li>• integrated residential development is a restricted discretionary activity;</li> <li>• visitor accommodation is a permitted activity;</li> <li>• other permitted activities include commercial services, food and beverage, offices &lt;500m<sup>2</sup>, retail &lt; 450m<sup>2</sup>, supermarkets &lt; 2,000m<sup>2</sup>, community facilities, education facilities, healthcare facilities, recreation facilities, warehousing</li> </ul>   | <p>The precinct relies on the underlying LC Zone provisions apart from where the following precinct provisions alter those:</p> <ul style="list-style-type: none"> <li>• Standard I.7.5 applies a Height Variation Control within two specified areas identified on Precinct Plan 1 including a portion of the LC zone with an HVC of 24m.</li> </ul>  |

| Summary of key provisions of relevant zones   | Beachlands South Precinct   |
|---|---|
| <p>and storage, light manufacturing and servicing;</p> <ul style="list-style-type: none"> <li>• industrial activities are a non-complying activity;</li> <li>• development of new buildings is a restricted discretionary activity;</li> <li>• bars and taverns, outdoor eating areas to restaurants, entertainment facilities, childcare centres within 30m of a residential zone are a restricted discretionary activity;</li> <li>• maximum permitted building height in a walkable catchment is 21m and outside a walkable catchment is 18m unless subject to a HVC;</li> <li>• height in relation to boundary applies where site adjoins residential zone or open space zone;</li> <li>• dwellings must not locate on the ground floor of a building where building has frontage to public open space including streets;</li> <li>• minimum 3m front rear/side yard, 10m riparian margin;</li> <li>• landscape buffer of 2m depth along street frontage;</li> <li>• maximum impervious area of 10% in riparian yard; and</li> <li>• minimum dwelling size 30m<sup>2</sup> per studio or 45m<sup>2</sup> for 1 or more bedrooms.</li> </ul> |   |
| <p><b>Business – Mixed Use Zone – as modified by PC78 (Chapter H13)</b></p> <ul style="list-style-type: none"> <li>• dwellings are a permitted activity;</li> <li>• integrated residential developments are a permitted activity;</li> <li>• visitor accommodation is a permitted activity;</li> <li>• other permitted activities include commercial services, food and beverage, offices &lt;500m<sup>2</sup>, retail &lt; 200m<sup>2</sup>, supermarkets &lt; 450m<sup>2</sup>, community facilities, education facilities, healthcare facilities, recreation facilities, warehousing and storage, light manufacturing and servicing;</li> <li>• industrial activities are a non-complying activity;</li> <li>• development of new buildings is a restricted discretionary activity;</li> <li>• bars and taverns, outdoor eating areas to restaurants, entertainment facilities, childcare centres within 30m of a residential zone are a restricted discretionary activity;</li> <li>• maximum permitted building height in a walkable catchment is 21m and outside a walkable catchment is 18m unless subject to a HVC;</li> </ul>          | <p>The precinct relies on the underlying MUZ provisions apart from where the following precinct provisions alter those:</p> <ul style="list-style-type: none"> <li>• Standard I.7.5 applies a Height Variation Control of 24m or 27m within two specified areas identified on Precinct Plan 1.</li> <li>• Fences or walls adjoining the Fairway Reserve must not exceed 1.2m in height or 1.8m in height if at least 50% visually open (I.7.8(5)).</li> </ul> |

| Summary of key provisions of relevant zones  | Beachlands South Precinct   |
|--|---|
| <ul style="list-style-type: none"> <li>• height in relation to boundary applies where site adjoins residential zone or open space zone;</li> <li>• building setback at upper floors is 6m at 18m opposite residential zones, or at 27m opposite other zones;</li> <li>• maximum tower dimension and tower separation standards;</li> <li>• dwellings must not locate on the ground floor of a building where building has frontage to public open space including streets;</li> <li>• minimum 3m front rear/side yard, 10m riparian margin;</li> <li>• landscape buffer of 2m depth along street frontage;</li> <li>• maximum impervious area of 10% in riparian yard; and</li> <li>• minimum dwelling size 30m<sup>2</sup> per studio or 45m<sup>2</sup> for 1 or more bedrooms.</li> </ul>   |   |
| <p><b>Business – Light Industry Zone – as modified by PC78 (Chapter H17)</b></p> <ul style="list-style-type: none"> <li>• workers accommodation one per site is a permitted activity;</li> <li>• dwellings and integrated residential developments are a non-complying activity;</li> <li>• offices accessory to primary activity &lt;30% of all buildings or &lt;100m<sup>2</sup> are a permitted activity;</li> <li>• retail accessory to an industrial activity &lt;10% of all buildings;</li> <li>• other permitted activities include industrial activities, dairies &lt;100m<sup>2</sup>, food and beverage &lt;120m<sup>2</sup>, service stations, show homes, trade suppliers, emergency services, horticulture;</li> <li>• <b>new buildings are a permitted activity;</b></li> <li>• bars and taverns, outdoor eating areas to restaurants, entertainment facilities, childcare centres within 30m of a residential zone are a restricted discretionary activity;</li> <li>• maximum permitted building height in a walkable catchment is 21m and outside a walkable catchment is 20m unless subject to a HVC;</li> <li>• height in relation to boundary of 6m and 35 degree recession plane applies where site adjoins residential zone or open space zone;</li> <li>• maximum impervious area of 10% in riparian yard; and</li> <li>• minimum 2m front yard, 5m rear/side yard, 10m riparian margin.</li> </ul> | <p>The precinct relies on the underlying LI Zone provisions apart from where the following precinct provisions alter those:</p> <ul style="list-style-type: none"> <li>• New buildings are restricted discretionary activity in Sub-precinct F Employment</li> <li>• Building setback of 15m identified on Precinct Plan 1 must be provided along frontage of Whitford-Maraetai Road measured from designation 1806 and must be planted otherwise subdivision or development becomes a discretionary activity (Standard I.7.2);</li> <li>• Prior to operation of any light industry activities in Sub-precinct F, Jack Lachlan Drive must be upgraded to provide two-way walking and cycling active modes along full length of one side of the road (I.7.3(1))</li> </ul> |
| <p><b>Open Space – Sport and Active Recreation Zone (Chapter H7)</b></p>   | <p>The precinct applies the underlying open space provisions. The following precinct provision is in addition to those:</p>   |



| Summary of key provisions of relevant zones   | Beachlands South Precinct   |
|---|---|
| <ul style="list-style-type: none"> <li>• Informal recreation and associated facilities are a permitted activity;</li> <li>• Community centres and halls are a discretionary activity;</li> <li>• Other permitted activities include clubrooms, organised sport and recreation, public amenities, recreation facilities, retail access to permitted activity, parks infrastructure, recreational trails;</li> <li>• restaurants and cafes accessory to a permitted activity located 50m from residential zone is a permitted activity;</li> <li>• new buildings that comply with the standards are a permitted activity;</li> <li>• maximum permitted building height of 10m;</li> <li>• minimum 5m front yard, 6m side/rear yards if site adjoins residential zone, 10m riparian yard;</li> <li>• gross floor area of individual buildings must not be more than 150m<sup>2</sup>;</li> <li>• maximum site coverage of 30%; and</li> <li>• maximum impervious area of 40%.</li> </ul> | <ul style="list-style-type: none"> <li>• Organised sport and recreation including associated maintenance in the Golf Course Overlay shown on Precinct Plan 1 is a permitted activity (Table IX.4.1(A31)).</li> </ul>  |
| <p><b>Future Urban Zone (Chapter H18)</b></p> <ul style="list-style-type: none"> <li>• permitted activities include farming, greenhouses, on-site primary produce manufacturing;</li> <li>• no more than one dwelling per site as a permitted activity;</li> <li>• minor dwellings are a restricted discretionary activity;</li> <li>• maximum permitted building height is 15m;</li> <li>• minimum 20m front yard adjoining arterial roads otherwise 10m, 12m side/rear yards, 20m riparian yards, 50m coastal protection yard; and</li> <li>• subdivision is either a discretionary or non-complying activity.</li> </ul>   | <p>Precinct provisions specific to the FUZ:</p> <ul style="list-style-type: none"> <li>• Building setback of 10m identified on Precinct Plan 1 must be provided along frontage of Whitford-Maraetai Road measured from designation 1806 and must be planted otherwise subdivision or development becomes a discretionary activity (Standard I.7.2);</li> <li>• No buildings or structures are permitted within the pā site identified on Precinct 4, and modifications or earthworks is a discretionary activity (I.7.10(1) and (2));</li> <li>• Subdivision that results in the pā site extending across multiple contiguous lots is a discretionary activity (I.7.10(3)).</li> </ul>  |
| <p><b>Subdivision – Urban (Chapter E38)</b></p> <ul style="list-style-type: none"> <li>• subdivision of a site with two or more zones or along an undefined zone boundary is a restricted discretionary activity;</li> <li>• subdivision establishing an esplanade reserve or esplanade strip is a restricted discretionary activity;</li> <li>• subdivision of land within a natural hazard area is a restricted discretionary activity;</li> <li>• subdivision in accordance with approved land use resource consent or existing buildings complying with MDRS is a controlled activity otherwise, it is a restricted discretionary activity;</li> <li>• subdivision that does not comply with MDRS is a discretionary activity;</li> <li>• vacant lot subdivision involving parent sites of less than 1h is a restricted discretionary activity, and greater than 1ha is a discretionary activity;</li> </ul>  | <p>The precinct applies the MDRS subdivision provisions in accordance with Schedule 3A (I.7.15) and relies on AUP Subdivision provisions.</p> <p>The following precinct provisions are in addition to the underlying subdivision provisions:</p> <ul style="list-style-type: none"> <li>• Subdivision for 1 or more residential units per site in a residential zone is a controlled activity;</li> <li>• Subdivision Variation Control in Sub-precinct D Coastal requiring a minimum of 1,000m<sup>2</sup> in LLR zone (I.7.12);</li> <li>• Subdivision within the precinct must not exceed the thresholds in Table 2 until the infrastructure upgrades are constructed and operational (I.7.3);</li> <li>• Adequate water supply and wastewater infrastructure must be provided at the time of subdivision as a restricted discretionary</li> </ul> |

| Summary of key provisions of relevant zones   | Beachlands South Precinct  |
|---|--|
| <ul style="list-style-type: none"> <li>subdivision of sites identified in a subdivision variation control complying with standards is a restricted discretionary activity otherwise it is non-complying;</li> <li>subdivision of a minor dwelling from principal dwelling where sites do not comply with minimum site size requirements is a prohibited activity;</li> <li>subdivision in the building zone is generally a restricted discretionary activity where it complies with relevant standards;</li> <li>subdivision in open space zone is restricted discretionary activity where it complies with relevant standards;</li> <li>vacant site subdivision minimum net site area for parent sites less than 1 ha is 1,200m<sup>2</sup> for THAB, 300m<sup>2</sup> for MHU, and 4,000m<sup>2</sup> for LLZ;</li> <li>minimum net site area standards do not apply to sites identified in the subdivision variation control;</li> <li>vacant site subdivision for parent sites greater than 1ha for MHU is minimum net site area is 240m<sup>2</sup>; minimum average net site area is 300m<sup>2</sup>; maximum average net site area of 360m<sup>2</sup>; and</li> <li>vacant site subdivision for business zones for LCZ zone is minimum net site area of 200m<sup>2</sup>, and for LIZ is 1,000m<sup>2</sup>.</li> </ul> <p>Relevant qualifying matters:</p> <ul style="list-style-type: none"> <li>subdivision involving indigenous vegetation scheduled in SEA Overlay is a restricted discretionary activity;</li> <li>vacant site subdivision requires site shape factor outside 1% AEP floodplain, coastal erosion hazard area, coastal storm inundation 1% AEP area, land subject to land instability, areas affected by Overlays, riparian and coastal protection yards</li> </ul> | <p>activity otherwise becomes a discretionary activity (I.7.4);</p> <ul style="list-style-type: none"> <li>Any application for subdivision must include areas of EPAN, SEA – terrestrial, high value terrestrial planting areas, wetland margin buffer planting areas, indicative native revegetation areas (I.7.6(3)); and</li> <li>Indicative Fairway Reserve shown on Precinct Plan 1 must be provided in the form of an open space linear park for a minimum of 20m to provide a continuous walking and cycling connection for public use at all times, to be vested with council or maintained by way of an appropriate legal protection (I.7.8).</li> </ul> <p>It is noted that any precinct provisions that conflict with the MDRS would need to be identified as qualifying matters in accordance with s771 of the RMA.</p> <p>Activity IX.4.1(A12) requires all subdivision complying with the staging requirements in Standard I.7.3 to apply for consent as a restricted discretionary activity, which conflicts with the MDRS and therefore should be identified as a qualifying matter.</p> |
| <p>No equivalent AUP provision</p>  | <p>Precinct wide specific provisions:</p> <ul style="list-style-type: none"> <li>Prior to operation of any education facility in Sub-precinct C, Jack Lachlan Drive must be upgraded to provide two-way walking and cycling active modes along full length of one side of the road (I.7.3(1))</li> <li>Minimum riparian margin setback of 10m along permanent or intermittent streams, no walkways or cycleways to be located within these, a minimum of 10m wide planting required, and a building must be setback at least 20m from the back of a stream measuring 3m or more in width (I.7.5).</li> <li>No earthworks or development of buildings or structures are permitted within the EPAN shown on Precinct Plan 2, and terrestrial</li> </ul>  |

| Summary of key provisions of relevant zones | Beachlands South Precinct  |
|---|--|
|   | <p>vegetation and habitat must be protected and maintained (I.7.6(1) and (2)).</p> <ul style="list-style-type: none"> <li>• A minimum of 5m building setback from high value terrestrial planting identified on Precinct Plan 2 (I.7.6(7)).</li> <li>• All stormwater runoff from high contaminant generating carparks, publicly accessible carparks, and all roads must be treated with stormwater management device(s) in accordance with GD01, and all other trafficked impervious surfaces to achieve water quality treatment in accordance with the approved stormwater management plan (I.7.7)</li> <li>• A maximum area exposed at any one time for bulk earthworks must not exceed 4 ha for each catchment as shown on Precinct Plan 7 (I.7.11)</li> <li>• All new dwellings are designed to have non-potable water requirements for toilets, laundry and gardens supplied by rainwater tanks or bladders sized in accordance with Table 3, and must be fitted with water efficient fixtures to a minimum of 3 star standard (I.7.13)</li> </ul> |



# **ATTACHMENT 5**

## **ASSESSMENT OF PC88 PROVISION CASCADE**





## Attachment 5 Assessment of PC88 policy cascade

| I.3 Objectives  | I.4 Policies  | Rule / Standards  | Assessment criterion   | Comments   |
|---|---|---|--|--|
| <p>(1) A well-functioning urban environment that enables all people and communities to provide for their social, economic and cultural well-being and for their health and safety now and into the future.</p> <p>(2) A variety of housing types and sizes that respond to:</p> <p>a) Housing needs and demand; and</p> <p>b) The neighbourhoods planned urban built character.</p> | <p>(1) Enable a variety of housing types with a mix of densities within the precinct including attached and detached dwellings, and low-rise apartments.</p> <p>(2) Encourage development to achieve attractive and safe streets and public open spaces, including by providing for passive surveillance.</p> <p>(3) Enable housing to be designed to meet the day to day needs of residents.</p> <p>(4) Provide for developments not meeting the permitted activity status, while encouraging high quality developments.</p> | <p>Table IX.4.1 (A1), (A2), (A3), (A4) and (A25)</p> <p>I.7.14 Residential Density Standards - incorporates MDRS</p> <p>I.7.15 Subdivision – incorporates MDRS</p>  | <p>I.9.1 Matters of discretion<br/>(2) Buildings of 1 or more residential unit in a residential zone which do not comply with any of the 1.7.11 Residential Standards</p> <p>I.9.2 Assessment criteria<br/>(1)(e) the extent to which dwellings...</p> | <p>The MDRS objectives, policies and rules have been incorporated and are a permitted activity.</p> <p>PC78 has been notified which incorporates MDRS into the residential zones of the AUP. Therefore these provisions are not necessary within the precinct.</p> |
| <p>(3) Beachlands South is a vibrant coastal town that provides for the social and economic needs of the wider Beachlands community with a mix of experiences for all people including residential, retail, community, recreation and employment activities.</p>  | <p>(19) Manage building height and form to:</p> <p>a) Maximise densities close to the Pine Harbour Ferry Terminal, the planned public transport network and around the Village Centre;</p> <p>b) Enable greater building height in the Village Centre to</p>  | <p>Table IX.4.1 Activity Table including:<br/>(A4) 3+ residential buildings RD<br/>(A5) MDRS not complying with standards RD<br/>(A6) other new buildings RD<br/>(A12) public amenities</p> <p>I.7.1 Building height to enable height to be optimised</p> | <p>I.9.1 Matters of discretion:<br/>(1) more than 3 dwellings per site including, H5.8.1(2)(a), the Beachlands South Sustainability Strategy, Residential Density Standards I.7.14, and infrastructure servicing.</p>                                  | <p>The proposed zoning along with Precinct Plan 1 along with the requirement for all new buildings (excluding MDRS) to obtain resource consent supports the stated outcomes sought.</p>  |

| I.3 Objectives  | I.4 Policies   | Rule / Standards  | Assessment criterion   | Comments  |
|---|--|---|--|---|
| <p>(4) Development of Beachlands South creates a distinctive sense of place which maintains and enhances significant ecological features, and responds to natural site features, landform and mana whenua values.</p> | <p>reinforce sub-precinct B as the commercial core of Beachlands South;</p> <p>c) Contribute positively to Beachlands South’s sense of place, including by:</p> <p>i) Responding to landform and the coastal environment; and</p> <p>ii) Transitioning the scale of built form to visually integrate with adjoining areas.</p> <p>(20) Promote high-quality and diversity in architecture and urban design that enhances the relationship of buildings with public open spaces and reflects the coastal character of the precinct.</p> <p>(21) Requiring buildings to be set back behind the Whitford-Maraetai Road landscape buffer area as shown on Precinct Plan 1.</p> | <p>close to the PHFT and contribute to sense of place by providing height variation control in specified areas identified in Precinct Plan 1.</p> | <p>Precinct Plan 1 - Additional controls and overlays plan</p> |   |
| <p>(5) Mana Whenua cultural, spiritual and historical values and their relationship associated with the Māori cultural landscape, including</p>   | <p>(5) Recognise, protect and enhance the cultural, spiritual and historical values and relationships associated with the cultural landscape at</p>  | <p>I.7.6 Riparian margins</p> <p>I.7.7 Stormwater quality</p>   |  | <p>Precinct Plan 4 along with Standard I.7.10 protect the pā site requiring consent as a discretionary activity for</p> |

| I.3 Objectives  | I.4 Policies  | Rule / Standards   | Assessment criterion  | Comments   |
|---|---|--|---|--|
| <p>ancestral lands, water, waahi tapu, and other taonga, in the Beachlands South Precinct are identified, recognised, protected, and enhanced.</p> <p>(6) The tangible and intangible mana whenua values of the pa site identified on Precinct Plan 4 are protected and enhanced.</p> | <p>Beachlands South. These values include but are not limited to:</p> <p>(a) The pa site identified on Precinct Plan 4, wāhi tapu and other taonga;</p> <p>(b) The key views and spiritual connection identified on Precinct Plan 4;</p> <p>(c) Freshwater quality; and</p> <p>(d) Mauri, particularly in relation to freshwater and coastal resources.</p>                                   | <p>I.7.10 Mana Whenua recognises and protects identified pa site on Precinct Plan 4 including from development, subdivision and modification or earthworks.</p> <p>Precinct Plan 4 – Cultural Landscape</p>  |   | <p>subdivision or development.</p> <p>Standards for riparian margins and stormwater quality address freshwater quality.</p> <p>There are no provisions requiring that key view and spiritual connections identified on Precinct Plan 4 are considered unless consent was required as a discretionary activity.</p> |
| <p>(7) Beachlands South is a highly sustainable and low-carbon coastal town.</p>  | <p>(6) Develop Beachlands South as a highly sustainable and low-carbon coastal town by:</p> <p>(a) Encouraging the implementation of water sensitive design principles in all development to maintain and enhance water quality in the receiving environment;</p> <p>(b) Promoting modal shift to walking and cycling active modes and public transport including bus and ferry services;</p> | <p>Table IX.4.1 (A2), (A4), (A6) more than 3 residential dwellings and all other buildings are RD (A21) subdivision complying with I.7.3 is RD (A10), (A22) development or subdivision that does not comply with I.7.3 is D (A20) subdivision and development that does not comply with EPAN standard is D (A28) and (A29) development in Marina sub-precinct D if Fairway Reserve (A34) new buildings in employment sub-precinct RD</p> | <p>I.9.1 Assessment matters (2) more than 3 residential units, and (3) new buildings include consideration of the Beachlands South Sustainability Strategy</p> <p>I.9.2 Assessment criteria (7) subdivision to consider Precinct Plan 5, connectivity, high-quality interconnected local roads supporting walkable streets, road design that prioritises walking and cycling, road design</p> | <p>Water quality outcomes achieved via Standard I.7.7.</p> <p>Promoting modal shift is supported by permitted standards and requiring resource consent as RD for subdivision.</p> <p>EPAN provisions support by requiring the areas to be identified as subdivision, protected and enhanced. If</p>                |

| I.3 Objectives   | I.4 Policies   | Rule / Standards  | Assessment criterion   | Comments   |
|--|--|---|--|--|
|  | <p>(c) Protecting and enhancing biodiversity values in the precinct with restoration and regeneration native planting, particularly within the Ecological Protected Area Network;</p> <p>(d) Encouraging the development of energy efficient buildings including design buildings with optimal solar orientation and on-site energy generation; and</p> <p>(e) Encouraging the development of buildings that have reduced embodied carbon and operational carbon.</p> <p>(7) Contribute to mitigating the effects of climate change by encouraging native revegetation within the Ecological Protected Area Network identified on Precinct Plan 2 and across the wider precinct to enhance carbon sequestration and biodiversity values.</p> | <p>I.7.3 Staging development with transport upgrades</p> <p>I.7.6 Ecological Protected Area Network protects these areas and requires subdivision to identify them</p> <p>I.7.7 Stormwater quality</p> <p>I.7.8 Fairway reserve</p> <p>I.7.13 Non-potable water supply efficiency</p> <p>Precinct Plan 1 Additional controls - identifies indicative fairway reserve</p> <p>Precinct Plan 2 Natural Features – identifies EPAN</p> <p>Precinct Plan 5 Movement Network – indicative local transport network</p> |  | <p>standard not met then becomes D.</p> <p>Standard I.7.13 is the only provision requiring a sustainability building outcome. Otherwise the precinct relies on assessment criteria to consider the Beachlands South Sustainability Strategy which sits outside the plan and has no statutory weight.</p> <p>Generally matters cascade apart from Policy I.2(6)(d) and (e) which have no relevant provisions in the precinct.</p> |
| <p>(8) Beachlands South is public transport focussed development that supports high density residential, employment generating, retail</p> | <p>(11) Require subdivision and development in the precinct to be coordinated with required transport infrastructure upgrades to minimise the</p>  | <p>Table IX.4.1 (A2), (A4), (A6) more than 3 residential dwellings and all other buildings are RD</p>   | <p>I.9.1 Matters of discretion (4) subdivision that complies with I.7.3 includes design and sequence of upgrades, whether proposal is of a</p> | <p>Transport outcomes delivered through series of provisions including triggers for consent.</p>   |

| I.3 Objectives  | I.4 Policies   | Rule / Standards   | Assessment criterion   | Comments  |
|---|--|--|--|---|
| <p>and community activities within walking and cycling distance of the Pine Harbour Ferry Terminal in a manner which prioritises active modes of transport.</p> <p>(9) Beachlands South is a walkable coastal town with a street-based environment that positively contributes to pedestrian amenity, safety and convenience for all active modes. Beachlands South develops and functions in a way that:</p> <p>(a) Results in a significant mode shift to public and active modes of transport including walking and cycling;</p> <p>(b) Provides safe and effective active mode movement between focal points of commercial activity, community facilities, housing, jobs, open spaces and the Pine Harbour Ferry Terminal; and</p> <p>(c) Integrates with, and minimises adverse effects on the safety and efficiency of, the surrounding transport network, including any upgrades to the surrounding network.</p> | <p>adverse effects of development on the safety, efficiency and effectiveness of the surrounding road network.</p> <p>(12) Promote a mode shift to public transport and active modes by:</p> <p>(a) Encouraging walking and cycling connections to the Pine Harbour Ferry Terminal, including along the indicative coastal walkway and indicative primary and secondary collector roads as shown in Precinct Plan 5; and</p> <p>(b) Encouraging streets to be designed to provide safe separated access for cyclists on collector roads.</p> <p>(14) Require primary and secondary collector roads to be generally in the locations as shown on Precinct Plan 5, while allowing for variation, where it would achieve a better-connected street layout that integrates with the surrounding transport network.</p> <p>(15) Encourage the design of new collector and local roads</p> | <p>(A21) subdivision complying with I.7.3 is RD (A10), (A22) development or subdivision that does not comply with I.7.3 is D (A28) and (A29) development in Marina sub-precinct D if Fairway Reserve (A34) new buildings in employment sub-precinct RD</p> <p>I.7.3 Staging development with transport upgrades</p> <p>I.7.8 Fairway reserve</p> <p>Precinct Plan 1 Additional controls identifies indicative fairway reserve</p> <p>Precinct Plan 5 Movement Network</p> <p>Appendix 1 Road design criteria</p> | <p>scale or type that promotes increased walking, cycling and use of public transport.</p> <p>I.9.2 Assessment criteria (2) subdivision complying with I.7.3 (7) subdivision to consider Precinct Plan 5, connectivity, high-quality interconnected local roads supporting walkable streets, road design that prioritises walking and cycling, road design</p> | <p>Missing matter of discretion to support the assessment criteria (7).</p> |

| I.3 Objectives | I.4 Policies  | Rule / Standards | Assessment criterion | Comments |
|----------------|---|------------------|----------------------|----------|
|                | <p>to be in general accordance with the road design and cross section details provided in I.12 Appendix 1: Beachlands South Precinct, Road Design and Cross Section Details.</p> <p>(16) Ensure that development provides a local road network that achieves a highly connected street layout and integrates with the collector road network within the precinct, the surrounding transport network, and supports the safety and amenity of the open space and stream network.</p> <p>(17) Encourage streets to be attractively designed to appropriately provide for all modes of transport by:</p> <p>(a) Providing a high standard of amenity for pedestrians in areas where higher volumes of pedestrians are expected; and</p> <p>(b) Providing for and prioritising active modes with safe separated access for cyclists on primary and secondary collector roads that link key destinations; and</p> |                  |                      |          |



| I.3 Objectives  | I.4 Policies   | Rule / Standards   | Assessment criterion  | Comments  |
|---|--|--|---|---|
|   | (c) Providing for the safe and efficient movement of vehicles.   |  |   |   |
| (10) Subdivision and development in the precinct is coordinated with the efficient provision of required transport, water, energy and telecommunications infrastructure.  | (13) Require subdivision and development in the precinct to be coordinated with the provision of sufficient stormwater, wastewater, water supply, energy and telecommunications infrastructure.  | Table IX.4.1 Activity table including:<br>(A11) non-compliance with I.7.3 is a D.<br>(A23) subdivision that complies with I.7.3 is a RD activity.<br>(A24) subdivision that does not comply with I.7.4 is a discretionary activity.<br><br>I.7.4 Water supply and wastewater requires adequate infrastructure to be provided at the time of subdivision or development.  | I.9.1 Matters of discretion: (5) subdivision that complies with I.7.4 includes staging and design of development to align with infrastructure, confirmation of funding, supply arrangements or other measures between applicant and holders of water take permits.  | Provisions require consent for development that doesn't provide adequate water and wastewater. All subdivision RD for providing adequate water and wastewater.<br><br>Cascade achieves objectives and policy outcomes   |
| (11) Identified ecological values within terrestrial, wetland, stream and coastal marine habitats are protected, restored, maintained and enhanced.<br><br>(12) Subdivision and development are designed and located to avoid, or otherwise remedy or mitigate, adverse effects on ecological features within the Ecological Protected Area Network.<br><br>(13) Adverse effects on the receiving environment including the natural coastal | (8) Enable the subdivision and development of land while protecting, restoring, maintaining and enhancing identified terrestrial, wetland, stream, coastal marine and wetland ecological values, particularly within the Ecological Protected Area Network.<br><br>(9) Require the protection, restoration, maintenance and enhancement of terrestrial, wetland and permanent and intermittent stream habitats including within the Ecological Protected Area Network as | Table IX.4.1 Activity table including:<br>(A16) Pest and invasive vegetation removal within the EPAN =P<br>(A17) & (A18) Vegetation alternation or removal in EPAN (excluding high value terrestrial and wetland vegetation) to form shared path links shown on Precinct Plan 5, or for routine operation, maintenance and repair of existing tracks = P.<br>(A19) Vegetation alteration or removal for all other reason = RD. | I.9.1 Matters of discretion:<br>(7) infringement of I.7.5 Riparian Margins includes effects on water quality, biodiversity and stream erosion.<br>(8) infringement of I.7.7 Stormwater Quality includes E9.8.1(1).<br>(9) infringement of I.7.9 coastal protection yard includes effects of coastal hazards.<br>(10) infringement of I.7.11 Earthworks includes E11.8.1(1) and E12.8.1(1).<br><br>1.9.2 Assessment criteria | Establishment of riparian margins and EPAN achieved through standards.<br><br>Where riparian margin standards not complied with sent is RD and assessment criteria provided<br><br>Vegetation alteration in EPAN is RD but no matter of discretion or assessment criteria provided. Note that applicant intended the activity status to be D. |

| I.3 Objectives   | I.4 Policies  | Rule / Standards   | Assessment criterion  | Comments   |
|--|---|--|---|--|
| <p>environment and significant ecological areas are avoided as far as practicable, or otherwise minimised or mitigated</p> | <p>shown on Precinct Plan 2 by native revegetation planting, including:</p> <p>(a) Riparian planting;</p> <p>(b) Terrestrial revegetation including within existing high value habitats;</p> <p>(c) Wetland buffer planting; and</p> <p>(d) Wetland native enrichment planting.</p> <p>(10) Encourage the restoration, maintenance and enhancement of biodiversity values in the coastal marine environment by:</p> <p>(a) Invasive weed management within coastal bird roosting and nesting sites;</p> <p>(b) Selective mangrove management for the restoration and enhancement of coastal bird inter-tidal habitat;</p> <p>(c) Mammalian pest control to improve biodiversity values and facilitate the recovery of threatened species.</p> <p>Note 1</p> | <p>(A20) subdivision or development that does not comply with I.7.6 = D.</p> <p>I.7.5 Riparian Margins contribute to improvements to water quality, habitat and biodiversity by requiring a minimum riparian yard setback of 10m from bank of permanent and intermittent streams, which are required to be planted and vested to Council or by appropriate legal mechanism.</p> <p>I.7.6 Ecologically Protected Area Network (1) restricts earthworks and development of buildings and structures within EPAN identified on Precinct Plan 2. (2) All vegetation and habitat must be protected and maintained. (3) - (5) Requires areas to be identified at the time of subdivision and legally protected by way of covenant (or other legal protection mechanism) on the Certificate of Title, (6) requiring revegetation in accordance with a Biodiversity Management Plan. (7) 5m building setback from High Value Terrestrial Planting and Wetland Margin</p> | <p>(8) riparian margin refers back to policy 8<br/> (9) cross references to E9.8.1 + approved SMP<br/> (10) coastal hazards<br/> (11) cross references to E11.6.2 and E12.8.2</p> | <p>Cascade achieves objectives and policy outcomes</p> |

| I.3 Objectives | I.4 Policies   | Rule / Standards   | Assessment criterion | Comments |
|----------------|--|--|----------------------|----------|
|                | <p>When having regard to Policy I.3(9) and (10) above, the following documents or any updated version of them should be referred to:</p> <ul style="list-style-type: none"> <li>• Auckland Council Technical Report 2011/009: Stream Ecological Valuation (SEV): a method for assessing the ecological functions of Auckland Streams (October 2011) for guidance on how the location and extent of any offset may be calculated and assessed;</li> <li>• Biodiversity Offsetting under the Resource Management Act: A Guidance Document (September 2018), prepared for the Biodiversity Working Group on behalf of the BioManagers Group.</li> <li>• Ecological Impact Assessment (EclA): EIANZ guidelines for use in New Zealand: terrestrial and freshwater ecosystems. 2nd Edition (May 2018).</li> </ul> <p>Neither of these reference documents has precedence. An acceptable offsetting proposal may combine</p> | <p>Buffer Planting as shown on Precinct Plan 2.</p> <p>I.7.9 Coastal Protection Yard requires all buildings and structures to be setback 30m to maintain water quality and provide protection from natural hazards.</p> <p>I.7.11 Earthworks catchment minimises sediment runoff and discharge effects on receiving environment.</p> <p>Precinct Plan 2 Natural Features</p> |                      |          |

| I.3 Objectives   | I.4 Policies  | Rule / Standards   | Assessment criterion   | Comments  |
|--|---|--|--|---|
|  | elements from both documents.   |  |  |   |
| <p>(14) A high-quality coastal walkway and connected network of open spaces is established which recognises the need to protect and manage effects on the marine significant ecological areas.</p> | <p>(18) Establish an integrated movement and public open space network within and across the precinct as indicatively shown on Precinct Plan 3, including:</p> <p>(a) Providing a safe, attractive and connected network of indicative open space linkages such as walkways and pedestrian accessways;</p> <p>(b) Encourage provision of the indicative coastal walkway to enable access to and along the coast while avoiding adverse effects on the marine significant ecological areas;</p> <p>(c) Requiring provision of the Fairway Reserve and connection to the coastal walkway;</p> <p>(d) Enabling the provision of a high-quality civic space adjacent to the Village Centre;</p> <p>(e) Encouraging the establishment of a network of suburban and neighbourhood</p> | <p>Table IX.4.1 Activity table including:</p> <p>(A13) development of publicly accessible open spaces greater than 1,000m<sup>2</sup> is RD.</p> <p>(A14) development of a civic space as shown on Precinct Plan 3 is a controlled activity.</p> <p>(A15) establishment of the Coastal Pathway as shown on Precinct Plan 5 is a controlled activity.</p> <p>(A26) &amp; (A27) development that does not provide the Fairway reserve or comply with I.7.8 is a discretionary activity.</p> <p>I.7.8 Fairway Reserve identified on Precinct Plan 1 required to provide connection between Village Centre and Pine Harbour Ferry Terminal. must be vested with Council or appropriate legal protection.</p> <p>Precinct Plans:</p> <p>(1) Additional controls and overlays plan</p> <p>(3) Structuring Elements</p> | <p>I.8.1.1 Matters of control: (3) establishment of coastal pathway on Precinct Plan 5 includes connectivity to existing connections and the PHFT.</p> <p>I.9.1 Matters of discretion: (6) development of publicly accessible open space greater than 1000m<sup>2</sup> including location, design and function of indicative publicly accessible open spaces on Precinct Plan 3, and location and design of other publicly accessible open spaces greater than 1000m<sup>2</sup>.</p> | <p>Open space network is enabled but not required other than the coastal pathway and fairway reserve.</p> <p>Publicly accessible open space &gt; 1,000m<sup>2</sup> is RD and is required to be in accordance with indicative locations on Precinct Plan 3.</p> <p>Matters of control and assessment criteria address delivery of civic space.</p> <p>Cascade achieves objectives and policy outcomes</p> |

| I.3 Objectives          | I.4 Policies  | Rule / Standards   | Assessment criterion   | Comments   |
|-------------------------|---|--|--|--|
|                         | parks, walkways and pedestrian linkages.  |  |  |  |
| No objective identified | <p><i>Stormwater</i></p> <p>(22) Require subdivision and development to achieve stormwater quality treatment of stormwater runoff from all impervious areas within the precinct through inert building materials and devices designed in accordance with GD01 for other impervious surfaces.</p> <p>(23) Require subdivision and development to be consistent with any approved network discharge consent and the treatment train approach outlined in the supporting stormwater management plan for the precinct including: a) Application of water sensitive design to achieve water quality and hydrology mitigation;</p> <p>b) Requiring the use of inert building materials to eliminate or minimise the generation and discharge of contaminants;</p> <p>c) Requiring treatment of runoff from public road carriageways and publicly accessible carparks at or near source by a</p> | I.7.7 Stormwater quality requires treatment of stormwater runoff from high contaminant generating carparks, all publicly accessible carparks, and all roads. | <p>I.9.1 Matters of discretion: (7) infringement of I.7.5 Riparian Margins includes effects on water quality, biodiversity and stream erosion. (8) infringement of I.7.7 Stormwater Quality includes E9.8.1(1).</p> <p>1.9.2 Assessment criteria (8) riparian margin refers back to policy 8 (9) cross references to E9.8.1 + approved SMP</p> | <p>Stormwater quality outcomes achieved by standards and assessment criteria.</p> <p>Stormwater provisions are missing a direct objective to frame the outcome to be achieved.</p> |

| I.3 Objectives  | I.4 Policies   | Rule / Standards  | Assessment criterion  | Comments  |
|---|--|---|---|---|
|   | <p>water quality device designed in accordance with GD01;</p> <p>d) Requiring runoff from other trafficked impervious surfaces to apply a treatment train approach to treat contaminant generating surfaces, including cumulative effects of lower contaminant generating; and</p> <p>e) Providing planting on the riparian margins of permanent or intermittent streams.</p>  |   |   |   |
| <p><i>Sub-precinct A: Marina Point</i><br/>(15) The highest density urban living is developed in sub-precinct A closest to the Pine Harbour Ferry Terminal and along key planned public transport routes and the Fairway Reserve.</p> <p>(16) A series of high-quality, safe and well-connected of open spaces are established in sub-precinct A and supported by clear north-south connections including the Fairway Reserve Area, spine road and coastal walkway.</p> | <p><i>Sub-precinct A: Marina Point</i><br/>(24) Provide for a variety of highest density residential typologies responding to its close proximity to the Pine Harbour Ferry Terminal and Village Centre.</p> <p>(25) Require provision of the Fairway Reserve Area as shown on Precinct Plan 1 as a high-quality linear park linking to the indicative coastal walkway and Pine Harbour Ferry Terminal.</p> <p>(26) Encourage the development of highest density residential typologies along both sides of the Fairway Reserve to reinforce the amenity and quality of this</p> | <p>Table IX.4.1 (A2), (A4), (A6) more than 3 residential dwellings and all other buildings are RD (A21) subdivision complying with I.7.3 is RD (A26) &amp; (A27) development that does not provide the Fairway reserve or comply with I.7.8 is a discretionary activity.</p> <p>I.7.8 Fairway Reserve identified on Precinct Plan 1 required to provide connection between Village Centre and Pine Harbour Ferry Terminal. must be vested with Council or appropriate legal protection.</p> <p>Zoning map</p> | <p>I.9.1 Matters of discretion:<br/>(1) cross refers to H5.8.1(2)a<br/>(3) new buildings other than residential buildings in a residential zone including H13.8.1(3) and H11.8.1(4), design and external appearance, infrastructure servicing, design and sequence of upgrades to existing network and ferry services</p> <p>I.9.2 Assessment criteria<br/>(4) new buildings other than residential uses (h) buildings in marina sub-precinct</p> | <p>Cross reference only relates to MHU zone and misses THAB zone where the higher densities are anticipated.</p> <p>Potentially (4)(h) should be a separate criterion relating to marina because includes residential buildings in THAB zone.</p> |



| I.3 Objectives   | I.4 Policies   | Rule / Standards   | Assessment criterion   | Comments   |
|--|--|--|--|--|
|  | open space and provide passive surveillance.   |  |  |  |
| <p><i>Sub-precinct B: Village Centre</i><br/> (17) A compact, walkable and active pedestrian environment that provides priority to pedestrians and cyclists in a high-quality and slow speed street environment.</p> <p>(18) A built form featuring a variety of mixed-use and multi-level buildings with increased vertical density that supports the social, economic and cultural well-being of the community.</p> <p>(19) An innovation hub for employment, community facilities and social amenities to foster a sense of place, local identity and social interaction.</p> <p>(20) A high-quality public realm in which the design of buildings, open spaces and plaza areas all contribute to a visually rich and vibrant local centre.</p> | <p><i>Sub-precinct B: Village Centre</i><br/> (27) Provide for employment opportunities and the development of commercial activities to complement the existing Beachlands centre.</p> <p>(28) Provide for the development of supporting community activities and residential activities above the ground floor.</p> <p>(29) Provide for the development of a civic space exhibiting high architectural quality that enhances the distinctive coastal character and is surrounded by commercial and retail activities.</p> | <p>Table IX.4.1<br/> (A2), (A4), (A6) more than 3 residential dwellings and all other buildings are RD</p> | <p>I.8.1.1 Matters of control:<br/> (2) development of civic space on Precinct Plan 3</p> <p>I.9.1 Matters of discretion:<br/> (3) new buildings other than residential buildings in a residential zone cross refers to H13.8.1(3) and H11.8.1(4)</p> <p>I.9.2 Assessment criteria<br/> (4) including (i) new buildings in village centre<br/> (7) subdivision to consider Precinct Plan 5, connectivity, high-quality interconnected local roads supporting walkable streets, road design that prioritises walking and cycling, road design</p> | <p>New buildings require consent as RD and trigger assessment of the matters identified in the objectives and policies.</p> <p>Cascade achieves objectives and policy outcomes</p> |

| I.3 Objectives  | I.4 Policies   | Rule / Standards  | Assessment criterion   | Comments  |
|---|--|---|--|---|
| <p><i>Sub-precinct C: Community</i><br/>(21) Development of a destination public open space and associated public amenities as the focal point of sub-precinct C that serves Beachlands South and the wider community.</p> <p>(22) Development of visitor accommodation in a high-quality architectural built form that complements the coastal environment.</p> <p>(23) The development of new schools provides for the educational needs of school students within existing and planned communities.</p> <p>(24) Opportunities for communities to use school facilities, and for the co-location of school and community facilities are provided.</p> | <p><i>Sub-precinct C: Community</i><br/>(30) Enable a range of activities including residential, education, recreation, early childhood learning services, community, and appropriate accessory activities.</p> <p>(31) Enable community use of future school land, buildings and infrastructure and the co-location of school and community facilities.</p> | <p>Table IX.4.1 Activity table including:<br/>(A28), (A29) &amp; (A30) education facilities, community facilities and visitor accommodation = P</p> <p>OSSAR zone</p> | <p>I.9.1 Matters of discretion:<br/>(3) new buildings other than residential buildings in a residential zone cross refers to H13.8.1(3) and H11.8.1(4)</p> <p>I.9.2 Assessment criteria<br/>(4) new buildings addresses design</p> | <p>OSSAR zone provides for destination public open space in proximity to other anticipated community and educational facilities to enable shared use.</p> <p>Identifying education, visitor and community facilities as P meets the policy outcomes to enable such activities.</p> <p>Cascade achieves objectives and policy outcomes</p> |
| <p><i>Sub-precinct D: Coastal</i><br/>(25) Development in sub-precinct D responds to the natural topography and landform character of the coastal edge by minimising modifications to coastal</p>   | <p><i>Sub-precinct D: Coastal</i><br/>(32) Require subdivision and development to respond to the natural coastal landscape.</p> <p>(33) Require subdivision to achieve larger lot sizes along the coastal edge by application</p>  | <p>Table IX.4.1 Activity table including:<br/>(A32) subdivision of land complying with I.7.12 = RD<br/>(A33) subdivision of land not complying with I.7.12 = D</p>    | <p>I.8.1.1 Matters of control<br/>(1) subdivision of one or more residential units per site in a residential zone and subdivision complying with subdivision variation control E38.11.1(1)</p>                                     | <p>Provisions achieve policy cascade through the requirement for RD consent for subdivision or D where doesn't comply with standard.</p>  |

| I.3 Objectives   | I.4 Policies  | Rule / Standards  | Assessment criterion  | Comments   |
|--|---|---|---|--|
| <p>landforms and landscape features.</p> <p>(26) Subdivision along the coastal edge within the Large Lot Zone achieves a spacious landscape character.</p>   | <p>of a subdivision variation control in the Large Lot Zone.</p>  | <p>I.7.12 Large Lot Zone – Subdivision Variation Control</p>  | <p>I.9.1 Matters of discretion: (11) subdivision in Sub-precinct D within the Subdivision Variation Control includes E38.12.1(7).</p>   |  |
| <p><i>Sub-precinct E: Golf</i></p> <p>(27) Provide for on-going organised sport and recreation (including golf) for the Beachlands community.</p> <p>(28) Residential development complements the golf course.</p> | <p><i>Sub-precinct E: Golf</i></p> <p>(34) Provide for the on-going use and enjoyment of a golf course within the Golf Course Overlay and the development of complementary residential activities.</p>                  | <p>Table IX.4.1 Activity table including:<br/>(A31) organised sport and recreation including associated maintenance in the Golf Course Overlay shown on Precinct Plan 1 is a permitted activity.</p> <p>Precinct Plan 1 - Additional controls and overlays plan</p> |   | <p>Golf Overlay area identified on Precinct Plan 1 and rules provide for ongoing maintenance and operation of golf course</p> <p>No provisions cascade from objective 28 relating to residential development.</p> <p>Cascade achieves objectives and policy outcomes for ongoing golf but not for residential development.</p> |
| <p><i>Sub-precinct F: Employment</i></p> <p>(29) Local employment opportunities in a quality-built environment and the development of residential accommodation above the ground floor in the Mixed Use Zone.</p>  | <p><i>Sub-precinct F: Employment</i></p> <p>(35) Provide for the development of commercial, light industrial and employment activities in a manner that supports the Village Centre and wider Beachlands community.</p> | <p>Table IX.4.1 Activity table including:<br/>(A34) new buildings are a restricted discretionary activity.<br/>(A35) additions and alterations to existing buildings are a restricted discretionary activity.</p>   | <p>I.9.1 Matters of discretion: (3) new buildings other than residential buildings in a residential zone including H13.8.1(3) and H11.8.1(4),</p> <p>I.9.2 Assessment criteria (4) new buildings addresses design</p> | <p>MU and LI zones identified in the Employment sub-precinct provide for local employment opportunities.</p> <p>New buildings require consent as RD enabling design and</p>  |

| I.3 Objectives  | I.4 Policies   | Rule / Standards   | Assessment criterion                                | Comments  |
|---|--|--|---|---|
| <p>(30) Development is of a form, scale and design quality that reinforces Beachlands distinctive sense of place and arrival at the Whitford-Maraetai Road gateway.</p> | <p>(36) Achieve a quality-built form at the Whitford-Maraetai Road gateway by encouraging buildings to be attractive and designed to a high standard.</p> <p>(37) Enable the development of residential activities above the ground floor within the Mixed Use Zone in a manner that does not compromise the efficient operations of employment generating activities.</p> | <p>1.7.2 Building setback along Whitford-Maraetai Road requires a landscape buffer of 15m to be planted to soften the appearance of development along the road frontage. Non-compliance is a discretionary activity.</p> <p>Employment zones</p> | <p>(5) new buildings in employment sub-precinct</p> | <p>form of development to be considered including gateway to Beachlands.</p> <p>Cascade achieves objectives and policy outcomes</p> |
| <p>No objective</p>   | <p>No policy</p>   | <p>Table IX.4.1 Activities:<br/> (A7) Demolition of buildings<br/> (A8) Internal alterations to buildings<br/> (A9) Additions and alterations an existing dwelling</p>   |   |   |

**ATTACHMENT 6**  
**SPECIALIST REPORTS**





## Memo (Technical specialist report to contribute towards Council's section 42A hearing report)

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**To:** Chloe Trenouth – reporting planner (Chloe Trenouth Consulting)

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**CC:** Joe McDougall – Policy Planner, Central & South Planning, Plans and Places

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**Date:** 28 August 2023

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**Reference:** Private Plan Change Request PC88 – Urban Design and Landscape Assessments Review

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### 1 Introduction

- 1.1 I have undertaken a review of Private Plan Change 88 on behalf of Auckland Council, in relation to urban design and landscape effects.
- 1.2 I am an Urban Designer and Landscape Architect. I am a director of the consultancy RA Skidmore Urban Design Limited and have held this position for approximately twenty years.
- 1.3 I hold a Bachelor of Science degree from Canterbury University (1987), a Bachelor of Landscape Architecture (Hons) degree from Lincoln University (1990), and a Master of Built Environment (Urban Design) degree from Queensland University of Technology in Brisbane (1995).
- 1.4 I have approximately 28 years' professional experience, practising in both local government and the private sector. In these positions I have assisted with district plan preparation and I have assessed and reviewed a wide range of resource consent applications throughout the country. These assessments relate to a range of rural, residential and commercial proposals.
- 1.5 I regularly assist council with policy and district plan development in relation to growth management, urban design, landscape, character and amenity matters. I have also assisted with the preparation of a range of plan changes and reviewed private plan change requests on behalf of Councils.

- 1.6 I am an accredited independent hearing commissioner. I also regularly provide expert evidence in the Environment Court and I have appeared as the Court's witness in the past.
- 1.7 In writing this memo, I have reviewed the following PC request documents:
- The zoning map (Appendix 1) and proposed provisions (Appendix 3) and updates to the masterplan and precinct plans set out in the Clause 23 responses;
  - The Masterplan Design Report (Appendix 5);
  - The Urban Design Assessment (Appendix 6);
  - The Landscape Assessment (Appendix 8) and accompanying annexure of graphics (Appendix 9);
  - The Clause 23 response by Brown NZ Ltd. (dated 23/08/22), including an updated annexure to the Landscape Assessment.
- 1.8 My review has also been informed by reference to:
- the Section 32 Analysis Report (by Unio 30/09/22, updated in Clause 23 Response);
  - The AUP and RPS Objectives and Policies Assessment table contained in Attachment 4 to the Clause 23 response;
  - The Beachlands South Structure Plan (December 2021, Appendix 5);
  - The Beachlands South Neighbourhood Design Statement (17/11/21) and
  - The Beachlands South Sustainability Strategy (29/03/22, Appendix 7).
- 1.9 I attended a project-wide site visit on 03/05/22.

## 2 Key Urban Design and Landscape Issues

### Urban Design

- 2.1 The following sections address a number of urban design topics, having considered the assessment reports, submissions received and statutory frameworks. These can be summarised as:

- Settlement pattern – scale, form and intensity;
- Range of land-use enabled and spatial distribution;
- Urban Structure – connectivity and legibility;
- Design quality - use of guidelines and design review panel.

## Landscape

2.2 The following sections also address a number of landscape topics, having considered the assessment reports, submissions received and statutory frameworks. These can be summarised as:

- Landscape character;
- Definition of urban edge; and
- Natural character of the coastal environment; and
- Effects on surrounding properties (as identified in submissions).

2.3 I note that there is a relationship and some overlap between topics related to urban design and landscape considerations.

## 3 Applicant's Assessment

### Urban Design Assessment

- 3.1 The PPC request includes an Urban Design Assessment (the "UDA")(Appendix 6 of the Section 32 Analysis report). Section 2 of the report sets out the assessment methodology. It draws on frameworks from non-statutory documents including the NZ Urban Design Protocol (2005) and Building for Life 12 (2015, Design Council, UK) to structure the assessment. While these relate to well accepted urban design principles, the relevant higher order RMA statutory documents have not been used as a framework for assessing the PPC. Therefore, the assessment is primarily useful as a background document to explain the urban design rationale of the PPC.
- 3.2 The PPC is also underpinned by a Structure Plan and accompanying Neighbourhood Design Statement. A Masterplan Design Report is also provided in Appendix 5 of the PPC documentation. Section 1.1 of the UDA notes that "this content has been assessed as part of this urban design assessment, but it is recognised that certain aspects of the design are "envisaged" as opposed to being formally guaranteed as part

of the Plan Change documentation.”<sup>1</sup> The report notes that the focus of the assessment report relates to: the Masterplan Design Report; the Sustainability Strategy; and the Neighbourhood Design Statement. In my opinion, the Masterplan report is helpful to identify the design approach that has been tested and applied to the Site and forms an important foundation for developing the PC provisions. However, as noted in the UDA, it provides only an example of outcomes that may be achieved and some caution should be applied to relying on the illustrative outcomes as being delivered by the PPC provisions, including the proposed Precinct provisions. The UDA makes little direct reference to the PPC provisions and how these will deliver the key urban design outcomes that the masterplan has identified as being important.

- 3.3 Further urban design analysis was sought through the Clause 23 request process. However, no amendments to the UDA were provided. While appreciating that the masterplan is for illustrative purposes only and it represents just one design outcome within the PPC area, it has clearly been an important foundation for the distribution of zones proposed and features identified on a number of Precinct Plans. A request was made for the zone map, Precinct Plan 1, 3 and 5 overlaid on the masterplan. This was provided and has been helpful to better understand the relationship between the two.
- 3.4 In my opinion, the Structure Plan (Section 2.2) and Neighbourhood Design Statement (Section 1.6) sections of the UDA set out a clear and detailed analysis of the existing PPC area (the “Site”) and its relationship to the surrounding context, particularly the existing settlement of Beachlands.
- 3.5 The Structure Plan sets out a number of design principles (Section 1.3) to ensure the described vision for Beachlands south and the key outcomes sought are achieved. It goes on to identify key spatial design moves to give effect to these matters and to establish a ‘sustainable and reliant community’.<sup>2</sup> The design moves are described as:

<sup>1</sup> P.6, Urban Design Assessment (Appendix 6 of PPC), 30.03.2022

<sup>2</sup> P.15 & 16 Beachlands South Structure Plan, Dec. 2021



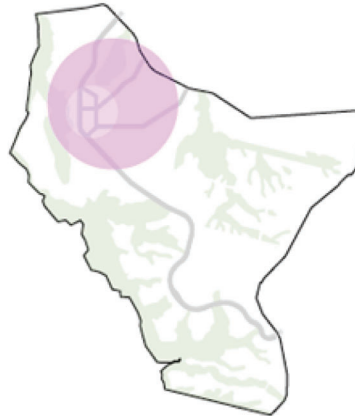
Retain, protect and enhance natural ecological areas



Creation of a spine road as a central organising element



Locate the village centre in the heart of the development and close to the existing Pine Harbour Marina



Establish local employment opportunities, social and community infrastructure to support the existing and future Beachlands community



Provide an extensive network of walkways and cycleways to maintain and enhance public access to and along the coastal edge



Assign residential density in response to proximity to high frequency public transport and community facilities.

- 3.6 The strategic suitability of the Site to accommodate the proposed extension of Beachlands is set out in the planning report rather than the UDA report. If this location is considered suitable to accommodate additional growth, I consider the key design moves are based on sound urban design theory and practice.
- 3.7 Within the framework of the key design moves, in Section 4 below, I address a number of key urban design considerations and how the PPC will achieve the outcomes sought.

## Landscape Assessment

- 3.8 The PPC includes a Landscape Assessment by Brown NZ (the “LA”)(Appendix 8 of the Section 32 Analysis report). In my opinion, the report sets out a robust landscape analysis that adopts an appropriate methodology, consistent with the guidance set out in Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines (Tuia Pito Ora / NZ Institute of Landscape Architects, 2022).
- 3.9 Key elements of the PPC provisions that have formed the basis for the assessment are set out in section 2 (the Proposal) of the report. A clear description of the Site, its landscape setting and identification of significant landscape values is provided in Section 3. The statutory context for carrying out the landscape assessment is identified in Section 4 of the report. This includes identifying key objectives and policies in the RPS section of the Auckland Unitary Plan (the “AUP”) and the provisions of the Whitford sub-precinct B.
- 3.10 The report assesses the PPC in relation to five criteria:
- Natural character values;
  - Rural character and landscape value;
  - Amenity values;
  - Integration with the current Beachlands settlement; and
  - Establishment of a defensible urban-rural boundary.
- 3.11 Eight publicly accessible representative viewpoints are used to assess the PPC provisions in relation to these criteria. The report includes a graphic annexure (contained in Appendix 9 of the Section 32 Analysis report). This contains photographs and visual simulations from each of these representative viewpoints.
- 3.12 From each viewpoint, four images are provided:
- The existing view;
  - The proposed view with PPC modelled;

- Single frame (A3) images of the existing view; and
  - Single frame (A3) images of the proposed view with PPC modelled.
- 3.13 In response to the Clause 23 request, further simulations for Viewpoints 6 – 9 were provided that depicted only development within the proposed live-zoned areas (omitting development within the proposed Future Urban zone) with accompanying additional assessment. An additional 3 viewpoints (Viewpoints 10-12) were also modelled and assessed<sup>3</sup>. A summary of the updated assessment against each of the criteria is provided in the Clause 23 response letter.<sup>4</sup>
- 3.14 The visual simulations are a useful tool to help understand the potential configuration and scale of development in relation to the underlying landscape and surrounding context. However, it is important to note that they do not represent actual development scenarios. As confirmed in the Clause 23 response letter<sup>5</sup>, the modelling used shows realistic development ‘ghosted’ models to the maximum storey height permitted for each zone, together with a pattern of development that is otherwise realistic given the bulk and location controls proposed for each zone. When viewing the visual simulations, I consider it is also important to bear in mind that the full ‘build-out’ of the precinct would not occur all at once, but would develop and evolve over time.
- 3.15 I am in general agreement with the assessment set out in the LA report and the subsequent assessment (and proposed amendment to the zone distribution) set out in the Clause 23 response. A difference of opinion on limited matters and recommendations for amendments to the PPC provisions is discussed in the following section.

## 4 Assessment of Urban Design and Landscape Effects and Management Methods

### Urban Design Associated Effects

#### *Settlement Pattern – scale, form and intensity*

- 4.1 A key urban design consideration is the relationship of the proposed Precinct to the existing Beachlands and its suitability in relation to the established coastal settlement.

<sup>3</sup> Assessment set out in a letter from Stephen Brown dated 23/08/22

<sup>4</sup> P. 16, *ibid.*

<sup>5</sup> P.8, *ibid.*



The PPC will enable a fundamental change to the settlement of Beachlands both in terms of extent of the settlement and the scale and intensity of development enabled.

- 4.2 The increased extent and scale of the settlement would fundamentally change the character of the Beachlands settlement. While different in character, I do not consider that change would be perceived by all as adverse. As expressed in the submission, and discussed further below, the change in character will detract from the amenity values perceived by some but improve amenity values appreciated by others.
- 4.3 In my opinion, if the PPC proceeds the centre of the Beachlands settlement will shift to the PC area. The existing settlement already contains a number of neighbourhoods with differing character that reflects their period of development and location within the settlement. The scale and form of development enabled by the PPC would be a step change in the settlement pattern. This does not necessarily represent a poor outcome and the NPS:UD lends support to a shift in the efficiency and intensity of our urban settlements in order to create well-functioning urban environments.
- 4.4 The structure planning and masterplanning that underpins the PPC demonstrates a comprehensive approach to the way the land could be developed and I consider shows a considered design response to the Site's characteristics and its relationship to its surrounding context. In particular, the distribution of zones, sub-precincts and the identification of key structuring elements in Precinct Plan 3 will result in a pattern of urban development with a strong sense of place. The PCC demonstrates how the new area of Beachlands could be stitched into the existing settlement, while the topography would reinforce a separation and distinction between the established and new area of the settlement.
- 4.5 The proposed Future Urban Zone portion of the Precinct provides a logical extension to the 'live-zoned' area but becomes more remote from the existing settlement. Due to topographical and ecological constraints, this area exhibits greater sensitivity limiting the ability to efficiently develop the land and create a connected movement network. Some fragmentation of land tenure in this area will also potentially challenge delivery of integrated development. It is likely that the Future Urban zone would accommodate only contained pockets of lower density development which would achieve a high amenity environment for residents but would not result in an efficient settlement pattern.

#### *Range of land-use enabled and spatial distribution*

- 4.6 In terms of the urban settlement pattern enabled by the PPC, there would be benefits in enabling the proposed growth within the 'live zoned' area in order to create a more 'complete' settlement. Whereas the existing settlement at Beachlands functions as somewhat of a dormitory suburb, the PPC would enable the establishment of a range of services, amenities and employment opportunities that are currently limited in the area, together with an increased residential critical mass and range of housing typologies to support these. This would be beneficial for the settlement and would enable residents to access more of their day to day needs locally.

- 4.7 As noted above, within the proposed Future Urban zone the topography and the identified Ecological Protected Area Network creates sensitivity and constraints to the location and type of activity that will be able to be accommodated. The more fragmented land tenure in the north eastern area of the Future Urban Zone will also potentially create constraints to achieving an integrated urban structure. In my opinion, the ability to accommodate a range of activities and housing typologies within the Future Urban zone will be constrained and it is likely that this area will only accommodate a lower intensity of residential activity.
- 4.8 The Masterplan demonstrates how a diversity of activities and associated building typologies and forms could be accommodated within the Precinct. Of course, this is one indicative scenario and the Precinct provisions do not preclude other design outcomes.
- 4.9 The Site's location, and particularly its elevated relationship to the Hauraki Gulf, contributes to the qualities that make this area attractive for residential use and supporting commercial activity. The items identified in Precinct Plan 3 – Structuring elements, spatially identify key elements to be delivered in the proposed urban environment and have been derived through the masterplanning exercise. In my opinion these structuring elements would contribute positively to the amenity and character of the neighbourhood. In particular, the open space features identified in Precinct Plan 3, together with the connections depicted on Precinct Plan 5 – Movement Network, would make an important contribution to the delivery of a strong public realm (whether public or privately owned with public access) framework.
- 4.10 The UDA report notes that the Precinct is expected to have an 'outstanding public realm with a large outdoor plaza space that has been located and oriented to enjoy views out over the coast and towards Rangitoto'<sup>6</sup>. I agree that the creation of such as space would be beneficial to provide a public realm heart and focus for the establishing community. The proposed Precinct provisions include references to a civic space in the policy framework, and development of a civic space as shown on Precinct Plan 3 is listed as a controlled activity. However, it is unclear what provision will require the delivery of this space at an appropriate stage of development. This should be clarified in the provisions.
- 4.11 In my opinion, the matters of control set out in I.8.1.1(2) should also be expanded to include:
- The scale and design of the space to provide suitable shade and shelter from wind.*
- 4.12 Precinct Plan 1 identifies a 'Golf Course Overlay' over a portion of the existing golf course in order to provide for a 9-hole golf course embedded within the new

<sup>6</sup> P.26, Urban Design Assessment, Appendix 6 of Section 32 Evaluation.

neighbourhood. The underlying zoning is proposed as Residential: MHU. Given the configuration of the overlay area and its relationship to the surrounding residential areas, if it is developed at a later stage there will be constraints to achieving good integration and a poor urban structure may result with poor street connectivity through the area. In my opinion, subdivision within the Golf sub-Precinct should be required to demonstrate how future street connectivity can be achieved in relation to the Golf Course overlay area.

#### *Urban Structure – Connectivity and legibility*

- 4.13 Section 3.4 of the UDA report addresses 'connections'. As noted, the location of the ferry terminal has had a significant impact on the design of the proposed residential areas. Adequacy of the public transport network and its relationship to the proposed Precinct is addressed by the transport planners. In terms of urban design considerations, Precinct Plan 5 – Movement Network, identifies key linkages to connect with the Pine Harbour Ferry terminal, primarily the street connection (including a bus route) that links via Jack Lachlan Drive and additional pedestrian routes via a coastal pathway and pathway through the Fairway Reserve. I note that the existing residential development between the Precinct and the ferry terminal, together with the steep topography, creates a separation that frustrates the ability to directly integrate the new urban environment with the public transport hub and constrains the ability to provide a direct, easy, legible and safe connection.
- 4.14 In my opinion, the identified pedestrian connections (both the coastal pathway and pathway through the Fairway Reserve) are an important complement to the street network and critical to maximising connectivity between the Precinct and the ferry terminal. While they are clearly identified on Precinct Plans 3 and 5, it is unclear what provisions will require their early delivery as the Precinct is urbanised. In my opinion, the Precinct provisions should be amended to require delivery of these critical connections early in the development sequencing.
- 4.15 As noted above, the configuration of the golf course overlay would create challenges to achieve a well-connected and legible street network if subsequently developed for residential use following development of the surrounding area.
- 4.16 In my opinion, the street network shown on Precinct Plan 5 identifies a number of street connections to Jack Lachlan drive that will assist to integrate the new neighbourhood with the existing settlement of Beachlands. Precinct Plan 5 also shows a number of indicative local streets. While some of these are important to achieve good connectivity (such as the two east west streets connecting the coastal pathway with the primary collector spine road), others seems less critical to spatially identify (such as the northern most street to the west of the indicative collector spine road just off Jack Lachlan Drive).
- 4.17 As noted above, the topographical constraints and identified areas of ecological sensitivity within the proposed Future Urban zone will present challenges to achieving

a well-connected network of streets through this area. Fragmented land tenure patterns in areas may also further frustrate the ability to achieve good connectivity.

### *Design Quality – Use of guidelines and design review panel*

- 4.18 The UDA report notes that it is envisaged that a set of design guidelines will be produced to provide further control over the built form and landscape design outcomes, with elements such as building massing and form, colours and materials, boundary treatments and planting addressed. The report suggests that a Design Review Panel would be created to review proposed developments against the guidelines<sup>7</sup>. I note that the use of these tools would be non-statutory and could not be relied on to deliver appropriate design outcomes within the AUP framework. In my opinion, any particular matters that are considered necessary to address particular identified effects should be included within the Precinct provisions (if not addressed through the underlying zone provisions). I note that a number of renders are provided in the UDA report and the accompanying Masterplan Design report. These should be viewed as indicative and aspirational rather than demonstrating outcomes required by the PPC provisions.
- 4.19 In my opinion, the additional provisions that apply to the Precinct are generally suitable to ensure appropriate built form outcomes are achieved. Further comment on a number of detailed matters is set out in the following section.

## Landscape Effects

### *Landscape Character*

- 4.20 A key consideration for the PPC is the effect of development enabled by the PPC on the landscape character of the area, both in relation to the character of the existing Beachlands settlement and in relation to the surrounding rural interface. The LA sets out a detailed assessment in relation to 'rural character and landscape value' and 'amenity values' as experienced from each of the representative viewpoints identified (including the additional viewpoints included in the Clause 23 response). In Section 5.5 an overall summary is provided in relation to a number of catchments around the PPC area.
- 4.21 As set out in the LA, the area proposed to be 'live zoned' currently has a manicured character that reflects the golf course use, contrasting with the rural character of land to the east and south. Land within the proposed Future Urban zone currently exhibits a more rural character that is consistent with the surrounding area to the east and south. The PPC will result in a fundamental change in character both within the 'live

<sup>7</sup> P.24, Urban Design Assessment, Appendix 6 of Section 32 Evaluation.

zoned' area and within the Future Urban zone (with less certainty about the final form of development that will be determined by the future zone distribution).

- 4.22 The adverse effect on rural character will largely relate to the proposed area of Future Urban zone and its relationship to the wider rural environment. While there is no certainty about the final pattern of development that would eventuate in this area, I agree with the LA report (as assessed in relation to Viewpoints 6 and 7) that adverse effects will be moderate-high in the short term reducing to low-moderate in the long term as restoration planting becomes established through this area.
- 4.23 In relation to the interface with the rural environment on the eastern side of Whitford Maraetai Road, I note the existing settlement of Beachlands already creates a clear definition and contrast between rural and urban along the street boundary. The location of the Business: Light Industry zone adjacent to this interface has the potential to create a stark and poor interface. To avoid this poor relationship the proposed Precinct provisions (Rule I.7.2) include the requirement for a 15m building setback and buffer planting within this area. While the planting will take some time to establish<sup>8</sup>, if successfully implement as depicted in the visual simulations from Viewpoint 5, in the longer term, I consider the strong vegetated edge will provide a suitable interface with the rural environment to the east. A similar interface treatment (with a 10m building setback and depth of planting) is proposed for the Future Urban zone frontage.
- 4.24 As set out in the LA and depicted in a number of the viewpoints from the southern area of the existing settlement of Beachlands (Viewpoints 1-4), the PPC will result in a fundamental change in the nature of the landscape beyond Jack Lachland Drive. While of a different intensity and form, I largely agree with the assessment that the distribution of zones will successfully integrate with the existing settlement, with the scale of buildings enabled in the different proposed zones increasing away from the immediate interface. While different in character from the existing Beachlands environment, the variation in building scale and forms enabled has the potential to create a visually rich environment. In my opinion, the location of greater building scale and intensity within the commercial core of the B:LC zone and adjacent B:MU zone will reinforce this area as a focal point within the wider settlement. This includes a proposed Height Variation Control area of 24m. A second area of Height Variation Control of 27m is proposed further to the southeast. As shown in the visual simulations, this creates a more stark contrast with the surrounding pattern of development enabled in the Residential: MHU zone and does not have the same rationale of identifying the commercial core. I acknowledge that the modelling shown in the visual simulations does not depict fully resolved building forms and it may be possible to accommodate buildings to this height in this location in a manner that can suitably integrate with the wider settlement pattern. However, I consider it would be more appropriate to maintain the height limit of the

<sup>8</sup> Clause 23 response letter from S. Brown (23/08/22) confirms planting would start to filter views within a 3-5 year period, establishing an effective filter within 8 – 10 years, a planting achieving full maturity creating a solid buffer after approximately 15 years.

underlying zoning Business: MU (16m +2m for roof form). Any specific proposal to exceed this height would be considered as a restricted discretionary activity.

### *Definition of Urban Edge*

- 4.25 The LA sets out an assessment in relation to ‘establishment of a defensible urban-rural boundary’ from each of the representative viewpoints. In the Clause 23 response letter by S. Brown (dated 23/08/22) a detailed analysis was provide in relation to the PPC boundary relative to the natural and physical characteristics of the landscape and the use of landscape features to contribute to the defensibility of the urban edge created. I generally agree with the analysis provided.
- 4.26 In relation to the strong edge created by Whitford-Maraetai Road that generally follows a ridge, the Precinct provisions that require a 10 – 15m building setback from the street boundary, together with requirements for establishment of a planted buffer in that setback, will assist to reinforce the urban edge and create a sensitive interface with the rural environment to the east.
- 4.27 At its southern extent the PPC area is defined by a cadastral boundary rather than a landscape feature. In my opinion this creates a weak settlement edge. Where the natural feature of the Waikopua Creek Estuary intersects with Whitford-Maraetai Road creates a more clearly defined edge and boundary between different landscape environments.

### *Natural Character of Coastal Environment*

- 4.28 The LA considers effects on the natural character of the coastal environment as experienced from each of the representative viewpoints. The particularly relevant viewpoints are 8 – 12. I note that the assessment in relation to viewpoints 10 – 12 is set out in the Clause 23 response letter by S. Brown. The assessment finds that adverse effects would range from low to low-moderate. The summary of effects notes a number of factors that have contributed to the assessment effects ratings including:

*The extensive revegetation proposed along the coastal escarpment / edge of the site and its internal gullies would break the proposed development up into a sequence of layers and nodes across the Plan Change area. This revegetation would also progressively enhance demarcation of the CMA’s margin.<sup>9</sup>*

- 4.29 The Clause 23 response letter by S. Brown notes that following review of the preliminary modelling of development visible from the marina and beach (with additional viewpoint visual simulations requested), some amendments to the zone distribution were made. This included changing of THAB zoning at the northern end of

<sup>9</sup> P. 52, Landscape Assessment, Appendix 8 to Section 32 Evaluation report



the coast (near adjacent housing above the marina) and near the central gully system behind the beach to the MHU. The additional visual simulations provided reflect this amended zoning.

- 4.30 An assessment against the relevant Coastal Environment (B.8) provisions of the AUP is set out in Section 6 of the LA report.
- 4.31 I generally agree with the assessment set out in the LA report. While acknowledging the visibility of built development enabled within the PPC area and the visual contrast this will create with the natural coastal environment, the assessment places considerable importance on the role of revegetation planting along the coastal escarpment as a natural counterbalance to the built environment and means of restoring natural values at the immediate coastal margins. I note that the identification of these areas as part of the Ecological Protection Area network is largely recognised in the Precinct provisions in relation to the ecological values provided. In my opinion, it would be helpful in both the policy framework and the assessment matters and criteria in relation to delivering this revegetation, to also acknowledge the landscape function of this planting to integrate the built environment with the natural coastal setting. Ensuring this restoration planting is implemented in a timely manner in relation to surrounding development should also be addressed in the Precinct.
- 4.32 I agree that revegetation will be an important way to settle buildings into their coastal setting. In particular, within the Future Urban Zone area of the Precinct the Ecological Protection Area Network will provide a strong natural framework to visually contain the pockets of development areas, particularly if a lower scale and intensity of development is enabled in this area. The THAB zone, Business: LC and Business: MU zones within the Marina Point, Village Centre and Coastal Sub-precincts will enable building forms of a scale that is more visually prominent when viewed from the immediately surrounding CMA and coastal edge (see simulations from Viewpoints 8 and 9). Depending on how successfully the revegetation along the escarpment establishes and the species mix used, closer range glimpses will also be obtained from the immediately adjacent shoreline (see simulations from Viewpoints 10 – 12). In my opinion, the design of buildings, and particularly the roofscape created and the way buildings are modulated and articulated, together with the selection of external material and colour finishes can be effective in integrating buildings with their natural setting. In my opinion, the assessment criteria should be expanded for buildings in these sub-precincts to consider the visibility of buildings from the CMA and adjacent coastal margins and how the building design responds to this setting through design methods such as variation in the roofscape, modulation and articulation and use of exterior material and colour finishes.



## 5 Submissions

- 5.1 While a considerable number of submissions raise issues relevant to urban design and landscape considerations, little detail is provided in most. Following are responses grouped under relevant topics raised.

### Character of Beachlands

- 5.2 A range of opinions are expressed about the character that will result from the PPC and its effect on the overall settlement of Beachlands. As set out above, the PPC will undoubtedly result in a fundamental change to the settlement. However, that change will not necessarily be adverse. My opinion about the appropriateness of the location, extent, scale and intensity enabled by the PPC and its relationship to the existing settlement of Beachlands is set out above.
- 5.3 I note that the submission by Beachlands South Limited Partnership (#351) seeks to update the proposed zoning over the PPC area to reduce the extent of THAB zoning in the Marina Point and Coastal sub-precincts, as provided in the Clause 23 response and discussed above. In my opinion this change is positive and will reduce potential adverse effects in relation to the coastal character and adjacent established development.
- 5.4 The submission by the Whitford Residents and Ratepayers Association (#380) raises the issue of light pollution at night time and notes that the visual simulations provided do not illustrate this effect. I agree that lighting at night will be visible and will reinforce the change from a rural to urban character in this location. Rather than creating an unacceptable effect, it will be viewed as part of the changed urban environment.
- 5.5 The submission by Auckland Council notes that the reference to the Design Review Panel in the precinct text is inappropriate and should be deleted. As a non-statutory method for achieving good design outcomes, I consider it is not inappropriate to include reference to the Design Review Panel in Section 1.2 – Precinct Description. However, it may be helpful to make it clear that this is a non-statutory method. As set out in the commentary above, I agree that the Design Guide and associated Design Review Panel can't be relied on to achieve design outcomes through the resource consent process and any particular effects that need to be addressed should be included in the Precinct Provisions. I have made a number of recommendations above, setting out additional matters that should be included in the Precinct provisions.

## Relationship to Neighbouring Properties

- 5.6 A number of submitters raise concerns about the way the proposed Precinct will be experienced from their properties.

### *6 Tui Brae*

- 5.7 The submission by G. Clapham (#25) raises concerns about the effects that will be experienced from their property at 6 Tui Brae. I note that the single-level dwelling on the property is located in close proximity to the PPC northern boundary. However, it has a primary orientation to the north. The proposed zoning adjacent to this property is R:MHU. While there will be an obvious change in character as this area is developed, I consider a reasonable level of residential amenity will be maintained.

### *309 Clifton Road*

- 5.8 The submission by G. Watt (#68) raises concerns about the visual effects of the PPC when viewed from his property at 309 Clifton Road, Whitford. The submission notes that the house on the property looks out to the Formosa golf course and the high density nature of development enabled will cause a loss of enjoyment of the property. Effects of light pollution at night are also highlighted.
- 5.9 The dwelling on this property is located approximately 1.7km from the 'live zoned' portion of the Precinct and approximately 1.5km from the proposed Future Urban zone. Development within the proposed Precinct, and particularly the higher density zone development will be readily apparent and will change the outlook from this property. Lighting will reinforce the urban nature of the outlook at night. However, I note that views towards the PPC area are part of a wider outlook and there is considerable separation from this property. The change will not occur all at once, with development occurring over an extended timeframe. Therefore, the change experienced will be gradual. In my opinion, a reasonable level of visual amenity will be maintained.

### *740 Whitford-Maraetai Road*

- 5.10 The submission by E. Riddick (#83) raises concerns about the change in character for the area generally and more specifically the outlook from their property at 740 Whitford Maraetai Road. This property is located within the proposed Precinct in the Future Urban zone. While the PPC will enable a fundamental change in character from rural to urban within the Precinct, this change will occur gradually. As expressed in the submission, the change in character will be perceived by the submitter as adverse. In my opinion, adverse effects on the visual amenity experienced from this property will be moderate.

*600 Whitford-Maraetai Road*

- 5.11 The submission by Sielia Limited (#206) supports the PPC but suggests their property at 600 Whitford-Maraetai Road should be included in the Precinct noting that it is visually more strongly connected to the PPC land than land to the south. The submission suggests that the property would be a natural and strong 'visual gateway' into the new Beachlands South area.
- 5.12 As set out in my assessment above, I agree that the Waikopua Creek Estuary, which forms the southern edge to this property, is a landscape feature that would provide a more defensible edge to the urban environment. I note that the submission does not include any structure planning information to support rezoning. If this were to be considered for inclusion within the Future Urban zone, such information would need to be provided in evidence.

## Planted Buffers

- 5.13 The submission by Manukau Quarries Limited Partnership (#352) opposes the proposed precinct provisions that require extensive building setbacks and planted buffers in relation to the Business: Light Industrial zone adjacent to Whitford-Maraetai Road.
- 5.14 The intersection of Whitford-Maraetai Road will provide a key entrance to the expanded settlement. Given the nature of the road corridor there will be limitations to development accessing directly from and fronting Whitford-Maraetai Road. As set out above, I consider the precinct provisions are necessary and appropriate to ensure a suitable interface is achieved in this location.
- 5.15 The submission by A. Mason (#348) supports the establishment of a secondary school within the Precinct and recommends the provisions are amended to require a suitable landscape buffer surrounding the high school campus, including mature trees of appropriate size and spacing to provide screening of the school fields, as viewed from the public road, as well as shade and wind shelter for students.
- 5.16 Within Sub-precinct C – Community, education facilities are proposed as a permitted activity (A28). However, new buildings are proposed as a restricted discretionary activity (A6) with the matters of discretion (I.9.1(3) including (b) design and external appearance of buildings and landscape design and (e) the extent to which development achieves the outcomes outlined in the Beachlands South Sustainability Strategy. In my opinion, these provisions are suitable to ensure an appropriate landscape response is achieved. For completeness, I note that using planting to create a visual screen to playing fields would not be appropriate as it would result in poor integration with the public realm and reduce the safety of spaces. The Sustainability Strategy includes specific reference to 'avoid the climate warming-induced effects of urban heat islands

by planting trees for shade and shelter and using permeable surfacing where appropriate'.<sup>10</sup>

## Trail Connections

- 5.17 The submission by the Pohutukawa Coast Trails Committee (#303) identifies the 'Pohutukawa Coast Trails – an aspirational plan' (2017) (the "Trails Plan") and notes the importance of trails in the area. The submission highlights the importance of the PPC coastal pathway as part of Connection 6 in the Trails Plan. The submission suggests that this linkage should be delivered in an early phase of development within the Precinct, rather than waiting for various stages of development to occur. As set out in my assessment above, I agree that this connection is important and the Precinct provisions should secure its formation early in the development phasing.

## 6 Conclusions and Recommendations

- 6.1 The PPC seeks a change of zoning that will enable a fundamental change to the settlement of Beachlands both in terms of extent of the settlement and the scale and intensity of development enabled.
- 6.2 The PPC is supported by a number of documents relevant to urban design and landscape considerations. These include a Structure Plan, Neighbourhood Design Statement and Masterplan Design report that have informed the development of the PPC provisions. This memo sets out a review of the Urban Design Assessment and Landscape Assessment that accompanied the Section 32 Analysis report (Appendix 6 and 8 respectively).
- 6.3 Having considered the assessment reports, submissions received and statutory frameworks, my review has identified the key urban design and landscape topics requiring consideration as:

### Urban Design

- Settlement pattern – scale, form and intensity;
- Range of land-use enabled and spatial distribution;
- Urban Structure – connectivity and legibility;
- Design quality - use of guidelines and design review panel.

<sup>10</sup> Point 3.14, p. 16, Beachlands South Sustainability Strategy, Appendix 7 of Section 32 Evaluation report

## Landscape

- Landscape character;
  - Definition of urban edge; and
  - Natural character of the coastal environment; and
  - Effects on surrounding properties (as identified in submissions).
- 6.4 The strategic suitability of the Site to accommodate the proposed extension of Beachlands is set out in the planning report rather than the UDA report. If this location is considered suitable to accommodate additional growth, I consider the key design moves are based on sound urban design theory and practice. As set out in the review above, I recommend a number of amendments to the Precinct provisions to address identified urban design issues and to ensure promoted outcomes are achieved.
- 6.5 I am in general agreement with the assessment set out in the LA report and the subsequent assessment (and proposed amendment to the zone distribution) set out in the Clause 23 response. There is a difference of opinion on limited matters and I recommend a number of amendments to the Precinct provisions to address these.

## Recommendations

- 6.6 If the PPC is confirmed, I recommend amendments to the Precinct provisions are necessary to address the following matters.

### *Village Centre Plaza*

- 6.7 Amendments to the provisions to require delivery of a publicly accessible plaza space within Sub-precinct B: Village Centre at an early stage of development.
- 6.8 Expand the matters of control set out in I.8.1.1(2) to include:

*The scale and design of the space to provide suitable shade and shelter from wind.*

### *Future Development within Golf Course Overlay*

- 6.9 Include assessment criteria for subdivision within the Golf Sub-precinct to assess how the street network will maintain connectivity in relation to the Golf Course overlay area.

### *Connectivity to Ferry Terminal*

- 6.10 Amend Precinct provision to require delivery of the Coastal Pathway and pathway through the Fairway Reserve at an early stage of the development sequencing.

*Landscape Character*

- 6.11 Remove the 27m Height Variation control located in the Business: Mixed Use zone.

*Revegetation in Ecological Protection Area*

- 6.12 Expand the Precinct policies and assessment matters and criteria in relation to revegetation within the Ecological Protection Area to acknowledge and consider the landscape function of revegetation planting to integrate the built environment with the natural coastal setting and to ensure restoration planting is implemented in a timely manner in relation to surrounding development.

*Coastal Character - Additional Building Assessment Criteria*

- 6.13 Expand the assessment criteria for new buildings in the Marina Point, Village Centre and Coastal Sub-precincts to consider the visibility of buildings from the CMA and adjacent coastal margins and how the building design responds to this setting through design methods such as variation in the roofscape, modulation and articulation and use of exterior material and colour finishes.



Rebecca Skidmore

Urban Designer/Landscape Architect  
28 August 2023

**Memo: Technical specialist report to contribute towards Council’s section 42A hearing report**

25 August 2023

To: Chloe Trenouth, Consultant Planner, Plans and Places, Auckland Council

From: Derek Foy, Director, Formative Limited

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**Subject: Private Plan Change – PC88 Beachlands South – Economic Assessment****1.0 Introduction**

- 1.1 I have undertaken a review of the private plan change, on behalf of Auckland Council in relation to economic effects.
- 1.2 I am a Director of Formative, an independent consultancy specialising in social, economic, and urban form issues. Prior to this, I was an Associate Director of Market Economics Limited, a research consultancy for six years, and was employed by Market Economics for 18 years.
- 1.3 I have 23 years consulting and project experience, working for commercial and public sector clients. I specialise in retail analysis, assessment of demand and markets, the form and function of urban economies, the preparation of forecasts, and evaluation of outcomes and effects.
- 1.4 I have applied these specialties in studies throughout New Zealand, across most sectors of the economy, notably assessments of housing, retail, urban form, land demand, commercial and service demand, tourism, and local government. I have been involved in assessments for greenfields developments around Auckland, including in the north-west (Kumeu-Huapai, Redhills and Whenuapai), Warkworth, Silverdale, Waiuku, and Drury.
- 1.5 In writing this memo, I have reviewed the application materials as notified for the Private Plan Change request – PC88 Beachlands South (“PC88”, or the “PPCR”), and in particular the following documents:
- “Beachlands South Structure Plan”, December 2021, Beachlands South Limited Partnership (the “Structure Plan”)
  - “Beachlands South Private Plan Change Economic Assessment”, March 2022, Property Economics Limited (the “PEL report”).
  - “Beachlands South Precinct Private Plan Change Request Section 32 Assessment Report”, 31 March 2022, Unio Environmental (the “s32 report”).
  - “Private Plan Change request by Beachlands South Limited Partnership - request for further information”, Simpson Grierson, 30 June 2022 (the “clause 23 response”).

**2.0 Key economics issues**

- 2.1 In my opinion the key economic issues associated with the proposal are:



- The potential dwelling yield of the PPCR area.
- Demand for and supply of residential dwellings in Auckland generally, and Beachlands in particular.
- The appropriateness of the PPCR area as a location for residential development, including compared to other alternative residential supply areas.
- The proposed provision of business land to enable employment opportunities within the PPCR area.
- Infrastructure costs.

### 3.0 Applicant's assessment

3.1 I accept and adopt the site description provided in the s32 report, including the zoning and description of existing activities, noting that some minor changes to the requested zoning are included within the applicant's submission.

3.2 I generally accept the methodology applied in the applicant's economic assessment (the PEL report). That report provided an assessment of the demand for and supply of housing and retail/commercial space, and the costs and benefits of enabling housing and commercial activity within the PPCR area.

3.3 I agree with the PEL report's assessment of:

- Recent population growth in Beachlands and its broader catchment.
- Regional housing demand and supply, including that having more housing supply available now would help make house prices somewhat more affordable.
- The demographic composition of the Beachlands, and broader catchment population.<sup>1</sup>
- An increasing recent acceptance of higher density residential typologies, and that the PPCR would enable a mix of dwelling densities and typologies in a "non-central" location.<sup>2</sup> The PEL report expects that the PPCR area would accommodate a large proportion of dwellings of higher density typologies, with 75% of the PPCR area's 3,800 dwellings assumed in the PEL report to be apartments or terraced housing, and generally at higher rather than lower price points.<sup>3</sup> I agree that provision of a large proportion of dwellings at Beachlands South in the form of apartments (indicatively 42% of enabled dwellings) and terraced housing (33%) would be appropriate to enable efficient use of the PPCR area.
- The quantum of retail and commercial services floorspace (c.7,000m<sup>2</sup>) that would be sustainable within Beachlands South based on the size of the Beachlands South residential development, and avoiding the Beachlands South centre detracting from the existing Beachlands Local Centre.<sup>4</sup> I also agree that a local centre zone would be an appropriate centre type for a centre of that size, and therefore if the PPCR is approved, that the local centre zone requested is of an appropriate type and scale.

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<sup>1</sup> PEL report, section 4.1

<sup>2</sup> PEL report, page 14

<sup>3</sup> "Cumulatively, these attributes of Beachlands South are vital to promoting the higher price points with competing product", PEL report, page 52

<sup>4</sup> PEL report, page 15

- That it will be necessary to provide for local employment opportunities in Beachlands South, that the indicated local centre zone should be planned to enable commercial office space to that end, and that the PPCR represents a positive step to growing local employment opportunities.<sup>5</sup>
- There would be positive effects of residential development of the PPCR area, including increased range of housing typologies, location and price options, increased local employment opportunities, improved access to convenience retail and services, lower transport costs, private sector infrastructure investment, and higher density zoned areas making development more feasible.<sup>6</sup>

3.4 There are some aspect of the PEL report's assessment with which I disagree, including:

- That the PPCR is necessary to provide sufficient dwelling capacity in order to meet demand arising in the local residential market.
- That the PPCR area is an appropriate location to accommodate the scale of residential growth that would be enabled by the PPCR.
- That the PPCR would contribute to a well-functioning urban environment.
- That sufficient business land zones are proposed within the PPCR area.

3.5 In the rest of this statement I provide only limited expansion on the matters in the application with which I agree, but describe in the next section why I disagree with some aspects of the economic assessment.

#### **4.0 Assessment of economic effects and management methods**

4.1 In this section I identify the parts of the economic assessment with which I disagree, and explain the reasons for my disagreement and the likely effects on the environment of the PPCR. The key matters discussed below are:

- a. Dwelling yield uncertainty;
- b. The housing demand assessment, including the implications of the NPSUD and MDRS, and the adequacy of residential supply enabled;
- c. The locational attributes of Beachlands;
- d. Employment opportunities enabled; and,
- e. Assessment of infrastructure costs.

#### **Dwelling yield**

4.2 The PEL report anticipates that 3,500-4,500 households would be enabled within the PPCR area.<sup>7</sup> There is no information provided as to how that capacity has been calculated, or the amount of the PPCR area that would be able (or not able) to be developed (i.e. a net to gross conversion). The s32 report states that the PPCR's live-zoned area has a potential yield of

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<sup>5</sup> PEL report, page 16

<sup>6</sup> PEL report, page 74

<sup>7</sup> PEL report, page 59

3,000 dwellings,<sup>8</sup> which is generally consistent with the PEL report's expectation of 2,900 dwellings in that area.<sup>9</sup>

- 4.3 While the 3,500-4,500 households range might be reasonable, it is not possible to understand the potential dwelling yield, and as I understand it there would be no restrictions that would prevent greater dwelling densities and a higher yield being achieved than was assumed in the PEL report. Because the PPCR seeks the requested zones to be applied, with no proposed conditions limiting development intensity, dwelling yield would only be limited by the rules applying to each zone and overlay area.
- 4.4 Because the total PPCR area is just over 300ha, and only around 24ha is proposed to be business zones, that leaves around 270ha of land for non-business purposes. I understand that quite significant parts of the PPCR area would be subject to overlays (including ecological and golf course) that would limit development capacity.<sup>10</sup> Nevertheless, I have not seen any explanation of the assumptions underlying the dwelling capacity estimates applied in the application.
- 4.5 If the PPCR is approved, and development achieves greater dwelling yield than assumed in the application, that would have implications for the adequacy of employment land (as I discuss below), traffic generation, and demand on other infrastructure.

#### **Housing demand assessment**

- 4.6 The PEL report provides an in-depth assessment of residential demand and supply matters, in its section 4. That assessment defines a Beachlands local catchment (Beachlands, Maraetai, and Whitford, extending nearly as far inland as Brookby, and excluding the urban areas through Howick, Ormiston, and Flat Bush), and also presents data for other East Auckland residential markets in the Howick Local Board area.
- 4.7 I agree that the catchments defined in the PEL report<sup>11</sup> are appropriate geographic areas to use as the basis for the report's housing demand assessment. I disagree with the PEL report's conclusion that any location where a large proportion of Beachlands residents work, is a location from which people may consider shifting to live in Beachlands:

*Based on this distribution of employment, Property Economics would expect current or future residents from any of these areas to see Beachlands South as a viable alternative.<sup>12</sup>*

- 4.8 The logic underlying that assumption is flawed. Consider the following example: people who live in Beachlands now, and work in the Auckland CBD, do so because there are many employment opportunities in the CBD, and particularly the types of jobs not found in many other parts of Auckland (for example specialised office-based roles). That does not provide any indication that people who live in the CBD (or East Tamaki, or at the Airport) might wish to live in Beachlands, and in my opinion Beachlands has a quite different appeal to parts of urban Auckland. For that reason, the catchment identified in the PEL report is a better basis for assessing demand.

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<sup>8</sup> Section 32 report, page 3

<sup>9</sup> PEL report, page 7

<sup>10</sup> Shown in figures 6 and 7 of the Structure Plan

<sup>11</sup> PEL report, figure 2

<sup>12</sup> PEL report, page 19

- 4.9 The assessment reviews recent historic trends in each catchment, and presents projections of future growth in population and households, as a basis for establishing that there is expected to be strong demand for additional dwellings in both Beachlands, and the Howick Local Board area, in the future.
- 4.10 The Statistics NZ population projections used in the PEL report have been superseded by more recent projections, as acknowledged in the clause 23 response.<sup>13</sup> That response notes that the more recent projections now project more population (and by implication also households) to be resident in the study area in the future, relative to the projections they replace. As the clause 23 response notes, that will result in retail and residential demand in the area being higher than was projected in the PEL report, and I accept and agree with those observations.
- 4.11 I also agree with the summary of the study area's demographic composition, including that population in the 20-39 years age cohort is underrepresented in Beachlands, compared to the Auckland average. I disagree with the PEL report's conclusion that the types of housing sought to be enabled in the PPCR area would necessarily result in a broader (demographic) range of people coming to live in Beachlands, including younger adults. Instead, I interpret the under-representation of people in this age range in Beachlands now as largely due to the limitations that living in a peripheral location entails, such as more limited access to work and social opportunities that are available in more central locations, and are attractive to younger adults. Unless the PPCR results in a material change in those opportunities, and I have not seen any indication that it is likely to, I would not expect that that demographic composition will change in any significant way.
- 4.12 The PEL report next moves to assessing the capacity that is available to accommodate projected growth, and relies on information sourced from the Auckland Plan 2050, and the Auckland Council Housing and Business Development Capacity Assessment 2017 ("2017 HBA").<sup>14</sup>
- 4.13 The 2017 HBA reaches a number of key conclusions which are used to inform the PEL report's ultimate conclusions about the economic merits of the PPCR. The PEL report's key capacity-related conclusions include:
- The 2017 HBA provides limited geographic detail about capacity.
  - Areas in which theoretical capacity is identified will not necessarily come to accommodate new dwellings, due to landowners being unwilling or unable to advance potential developments, and also because only a part of plan enabled capacity will actually be feasible to develop, even if landowners are motivated to pursue development.
  - The Auckland Plan 2050 does not provide any information on the share of plan enabled capacity that is likely to be realised within a given time period.
  - There are challenges in assessing feasible and reasonably expected to be realised dwelling capacity, and the 2017 HBA data only provides plan enabled capacity estimates.

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<sup>13</sup> Response ECO2

<sup>14</sup> National Policy Statement on Urban Development Capacity 2016: Housing and business development capacity assessment for Auckland (2017)

- Within Beachlands and the Howick Local Board area there will be shortfall of capacity of 530 dwellings by 2028, and 6,930 by 2050, or 3,630 by 2028 and 18,160 by 2050 under a high growth projection.<sup>15</sup>
- There is a shortfall of residential land supply in East Auckland, and economic costs (including price pressure and slowed growth) will arise from a failure to provide additional supply.<sup>16</sup>

4.14 I respond to those conclusions below.

4.15 As a general observation I note that Auckland Council has now undertaken capacity modelling for Plan Change 78 Intensification (“PC78”), to assess the plan enabled supply that PC78 would enable across Auckland.

4.16 I have not undertaken an assessment of residential dwelling demand, or supply, although note that PC78 will result in a significant increase in plan enabled capacity in Auckland’s existing residential areas. I also note that there are large new greenfields development areas around the Auckland periphery as well, such as at Drury. At a regional level, there is likely to be sufficient residential dwelling capacity over the long term, although localised undersupply of residential land in some parts of the region could be possible.

4.17 The PEL report has assessed potential dwelling capacity only under the pre-PC78 planning rules, which enable many fewer dwellings than PC78 will. That is, PC78 now significantly changes the future demand-supply environment relative to the 2017 HBA, and the implications of those changes have not been assessed as part of the PPCR.

4.18 The modelling work undertaken by Auckland Council for PC78<sup>17</sup> indicates a very significant amount of plan enabled supply in the PEL report’s “East Auckland Residential Markets”.<sup>18</sup> The PC78 modelling indicates that within the PEL report’s catchment there is total plan enabled capacity of 233,613 dwellings, including around 52,860 existing dwellings (Figure 4.1). That indicates that there is plan enabled dwelling capacity for nearly 181,000 net additional dwellings in the catchment.

Figure 4.1: PEL residential catchment dwelling capacity from PC78 modelling (infill and redevelopment)

| Spatial area       | PC78 plan enabled dwelling capacity | Current households* | Net additional plan enabled dwelling capacity |
|--------------------|-------------------------------------|---------------------|---|
| Howick Local Board | 225,780                             | 49,200              | 176,580                                       |
| Beachlands         | 7,833                               | 3,661               | 4,172   |
| PEL catchment      | 233,613                             | 52,861              | 180,752                                       |

\* Relates only to urban areas for which HBA assesses capacity (excludes rural areas)

4.19 I note that the amount of development that might actually occur in the area will be far less than that plan enabled capacity, because not all plan enabled capacity will be feasible to develop, or be in the hands of owners who are motivated to and/or financially capable of

<sup>15</sup> PEL report, tables 7 and 8

<sup>16</sup> PEL report, page 37

<sup>17</sup> <https://knowledgeauckland.org.nz/publications/auckland-council-capacity-for-growth-study-20222023-data-business-capacity/>

<sup>18</sup> PEL report, figure 2, and used as the basis for the PEL report’s table 7.

developing their land. That means that very large proportions of that theoretical capacity are not reasonably expected to be realised. I note that the PEL report states that “Estimates of the realisable rates varies but a commonly applied assumption is 50%.”<sup>19</sup> In my opinion the conversion of plan enabled to reasonably expected to be realised would be much less than 50%, particularly for the PC78 modelled capacities, and I agree with the PEL report’s observation that there may be other constraints (such as infrastructure, as identified in the PEL report) that would also limit development rates.<sup>20</sup>

- 4.20 In the 2021 HBA Auckland Council only assessed the share of plan enabled capacity that might be commercially feasible to develop at a regional level, and has not for any geography assessed the share that is reasonably expected to be realised. For the recent PC78 assessment, neither commercially feasible nor reasonably expected to be realised capacity is assessed at any geography. However, even if only very small shares of plan enabled capacity are acted on and result in new dwellings, the large net additional plan enabled capacity indicates that there would likely be capacity for a significant number of new dwellings in the area.
- 4.21 The PEL report assessed a shortfall in dwelling capacity in the area of 3,650 dwellings by 2038, and nearly 7,000 dwellings by 2050, as a result of an increase in dwelling demand out to 2050 of 23,070 dwellings.<sup>21</sup> That projected dwelling growth would require only 13% of net additional plan enabled capacity (of 180,750, from Figure 4.1) to be realised by 2050 in order to accommodate demand.
- 4.22 A significant amount of plan enabled dwelling capacity in the Howick Local Board area is on large, undeveloped lots, primarily in Ormiston. The PC78 modelling indicates that there is plan enabled capacity on vacant<sup>22</sup> lots of 3,000m<sup>2</sup> or larger of over 10,000 net additional dwellings. There is also capacity in that area for additional dwellings to be built as infill, and in my opinion it would be reasonable to expect the infill capacity to be many, many thousands out to 2051. The PEL report estimates total capacity of only 9,420 feasible dwellings in the Howick local board area.
- 4.23 The same applies in Beachlands and Maraetai, where there is plan enabled dwelling capacity on large, undeveloped lots (of 3,000m<sup>2</sup>+) of 1,240 net additional dwellings, with further capacity from infill. The PEL report estimates total capacity of only 680 feasible dwellings in all of the Beachlands local catchment (which also includes Clevedon and Whitford Village).
- 4.24 If all of the 11,240 net additional plan enabled dwellings on vacant lots in Ormiston and Beachlands are built, only 7%<sup>23</sup> of all other plan enabled capacity would need to be developed to provide sufficient supply to meet the PEL report’s demand projection (including NPSUD buffer). That indicates that of the PEL estimate of 23,072 additional dwellings demand (to 2050) about half (49%) might be supplied on (effectively) greenfields sites, and half on all other lots (primarily infill, but also on smaller vacant lots).

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<sup>19</sup> PEL report, page 33

<sup>20</sup> PEL report, page 39

<sup>21</sup> PEL report, Table 7

<sup>22</sup> Which I have taken to be lots with zero or one dwelling, given the ability to substantially redevelop all of the large lot whether replacing the existing dwelling or not

<sup>23</sup> Calculated as total PEL report capacity of 23,072 – 10,000 – 1,240 = 11,832 dwellings, as a share of PC78 net additional capacity of 180,752 – 10,000 – 1,240 = 169,512. Then 11,832 / 169,512 = 7.0%

- 4.25 Included in that PC78 capacity, there is capacity for nearly 500 dwellings at Clevedon that I understand is likely to become available for occupation within the next five years:
- a. 284 lots at Clevedon Meadows<sup>24</sup>
  - b. Around 150 lots at Metlifecare Clevedon<sup>25</sup>
  - c. 60 lots adjacent to Clevedon Meadows, in the ownership of Karaka Holdings.
- 4.26 If then there is capacity for 1,240 dwellings in larger vacant residential zoned lots in Beachlands and Maraetai, and capacity at Clevedon for another 500 lots, that supply together would provide for most (1,740 or 63%) of the 2,750 dwellings (including NPSUD buffer) demanded out to 2050 within the PEL report's Beachlands local catchment.
- 4.27 Based on that assessment of PC78 dwelling capacity data, I disagree with the PEL report's conclusion<sup>26</sup> that there will be a shortfall of residential land supply in Beachlands within the next 30 years.
- 4.28 However, even if there is no shortage of residential land/dwelling supply in Beachlands, providing additional dwelling capacity in the PPCR area will not in and of itself represent a negative outcome from an economics perspective, and providing more capacity in an appropriate location can have economic benefits, such as improving housing affordability and choice. I next assess whether the PPCR area is an appropriate location in which to enable the scale of new dwelling capacity that is being sought.

#### NPS-UD

- 4.29 The PEL report correctly identifies the NPS-UD as an important guide on urban development in Auckland. However, while the PEL report discusses parts of the NPS-UD, such as those relating to providing a range of housing stock and affordable housing, it does not explicitly recognise other objectives, in particular:
- 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.
  - Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:
    - a. the area is in or near a centre zone or other area with many employment opportunities
    - b. the area is well-serviced by existing or planned public transport
    - c. there is high demand for housing or for business land in the area, relative to other areas within the urban environment.
  - Objective 6: Local authority decisions on urban development that affect urban environments are:
    - a. integrated with infrastructure planning and funding decisions; and

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<sup>24</sup> <https://clevedonmeadows.nz/#masterplan>

<sup>25</sup> <https://www.metlifecare.co.nz/our-retirement-villages/auckland-east/clevedon-village>

<sup>26</sup> PEL report, page 53



- b. strategic over the medium term and long term; and
  - c. responsive, particularly in relation to proposals that would supply significant development capacity.
- 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.
- 4.30 These other objectives provide some qualifiers as to how Objective 2 (“planning decisions improve housing affordability by supporting competitive land and development markets”) should be achieved. Objective 2 should not be considered in isolation, and it is not a case of achieving housing affordability or additional supply at all costs. Instead, competitive land and development markets should be achieved with consideration of other objectives in the NPSUD, and take into account the broader environment within which development is to occur.
- 4.31 Because not all locations are created equal, some will better fit with NPSUD objectives and policies than others. Auckland Council has sought to recognise the different costs and benefits associated with development in different locations in its planning, providing for greenfields development in some locations (particularly those identified as FUZ in the Unitary Plan) and infill development in established parts of the urban area. Council has tested the adequacy of future dwelling supply in its Housing Assessment 2021<sup>27</sup> (an updated version of the 2017 assessment the PEL primarily relies on) which was undertaken as required by the NPSUD. That assessment concluded that:

*even though development capacity surpasses households, actual dwellings entering the market may not be necessarily affordable. A large share of current renters may not be able to become homeowners. In a dynamic setting, the unaffordability of housing in Auckland may become permanent unless affordable housing supply grows at a pace much higher than the growth of population.<sup>28</sup>*

*There are many other dimensions of complexity out of the scope or control of local councils that may have greater impact on affordability and competitiveness. This does not disregard the impact that the NPS-UD could have on prices over time as more supply enters the markets, enabling capacity in accessible locations and providing the opportunity to revisit planning provisions and zoning. In summary, any improvements on affordability for intermediate households (or any other target groups earning below the median income) are likely to be small, if not negligible.<sup>29</sup>*

- 4.32 So, while there is sufficient residential capacity enabled in Auckland, the Housing Assessment notes that even providing additional capacity may not improve the affordability situation, and it is difficult to influence how landowners and developers will utilise capacity. Developers “will adapt their proposals to maximise profit within the context of the day, as influenced by many social, economic, and environmental factors. For example, if land supply becomes unrestricted, developers may slow the release of housing, decreasing supply in turn putting

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<sup>27</sup> Fernandez, MA, Hu C, Joynt JLR, Martin SL and Jennings I (2021). “Housing assessment for the Auckland region”

<sup>28</sup> Housing Assessment, page 133

<sup>29</sup> Housing Assessment, page 134

pressure on demand.”<sup>30</sup> For these reasons, I disagree with the PEL report’s conclusion that additional housing supply will necessarily improve housing affordability.<sup>31</sup>

- 4.33 The PEL report has not considered the broader range of objectives in the NPSUD that are relevant to the PPCR, and in so doing has not considered the implications of the PPCR area’s location away from urban Auckland, and the negative effects that location will give rise to.

## Location

- 4.34 A core matter with which I disagree with the applicant’s economic assessment is the appropriateness of Beachlands as a location for significant residential growth within Auckland. While there are positive aspects of Beachlands’ location that have been assessed in the PEL report (attractive coastal location, proximity to ferry service), there are also negative aspects, and in my opinion those have not been adequately identified or assessed in the PEL report. I discuss below both the positive and negative aspects.
- 4.35 First I address the positive aspects of the location, from an economics perspective. The PPCR area is, in my opinion, well located within Beachlands in terms of being adjacent to the existing settlement, and close to the Beachlands local centre. That location would support efficient access from the PPCR area to frequently used retail and commercial activities such as the supermarket and other commercial businesses, and makes the PPCR area’s location superior to in a standalone greenfields location in a rural area that is not adjacent to an existing town and commercial centre.
- 4.36 The PPCR would enable residential development in a location where there is existing, and projected demand for residential dwellings, and at a price point lower than observed for comparable dwellings in urban Auckland.<sup>32</sup> While I agree with the PEL report’s claims that dwellings in Beachlands would likely be sold at a price point lower than observed for comparable dwellings in urban Auckland, that does not indicate that dwellings in the PPCR area will be affordable per se, because, as the PEL report notes the attractive coastal location will be likely to encourage dwellings with higher quality fitout and materials, in a development that provides” high quality services, facilities and amenities”.<sup>33</sup>
- 4.37 Next I address the negative aspects of the PPCR area’s location, from an economics perspective. Beachlands is located in rural Auckland, and the southern boundary of the PPCR area is around 10-11km or 10-12 minutes’ drive away from the urban edge at either Ormiston Road (Flat Bush) or Point View Drive (Howick) (the southern boundary of the proposed live zone is 1.8km more than that). The fact that Beachlands is an outlying rural settlement in Auckland means that it is a relatively large distance from urban Auckland’s employment opportunities, retail, community facilities and public transport.
- 4.38 The PEL report identifies that there are Future Urban zones (“FUZ”) at Snells Beach (38ha), Clarks Beach (67ha) and Kahawai Point (Glenbrook, 19ha), and observes that those places are “significantly more distant to Auckland than Beachlands.”<sup>34</sup> I am not aware of the reasons those FUZ areas came to be zoned, and there may be unique characteristics (such as pre-Auckland Council development plans) that supported their zoning. In any case, just because those places were zoned FUZ at the time of the AUP is not justification for changing the

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<sup>30</sup> Housing Assessment, page 133

<sup>31</sup> PEL report, page 75

<sup>32</sup> PEL report, pages 13, 43, and 45

<sup>33</sup> PEL report, page 52

<sup>34</sup> PEL report, page 27

zoning of 307ha of the PPCR area from rural to urban (or future urban) zone. I note also that the other examples given are of a much different scale to the PPCR area.

- 4.39 Beachlands' location relatively far away from many key urban features is possibly one reason why the town is not identified as a future growth area in:
- a. the Future Urban Land Supply Strategy 2017. I note however that the FULSS identified future urban areas at nearby Maraetai,<sup>35</sup> and Clevedon,<sup>36</sup> which were zoned FUZ as a result of submissions to the IHP hearings (for Maraetai) and a private plan change (for Clevedon), and which were subsequently identified in the FULSS as growth areas.
  - b. The Auckland Plan 2050.
  - c. The Future Development Strategy 2023 (consultation draft version).
- 4.40 I note that exclusion from those regional planning documents would not preclude new urban developments in Beachlands if they are "significant" in an NPSUD context. The NPSUD directs local authorities to have particular regard to the development capacity provided by a plan change that is not enabled in a plan or is not in sequence with planned land release.<sup>37</sup> However, in having that regard, the local authority should under clause 3.8(2) consider whether the development capacity created (a) would contribute to a well-functioning urban environment; and (b) is well-connected along transport corridors.
- 4.41 Because the PPCR is not enabled or in sequence with a planned land release, it becomes important to understand whether it will contribute to a well-functioning urban environment, and is well connected along transport corridors.
- 4.42 Within the context of the wider Auckland "urban environment", a peripheral location such as Beachlands offers considerably poorer access to employment, facilities and services than a more centrally located development, and therefore, relative to that other development, would not contribute as well to a well-functioning urban environment.
- 4.43 Beachlands' peripheral location is evident in the PEL report's assessment of travel to work patterns. That assessment shows that only 28% of workers living in Beachlands also work in the Beachlands local area,<sup>38</sup> and 72%<sup>39</sup> commute outside the local catchment to other employment locations across Auckland. The nearest significant employment hubs to Beachlands are East Tāmaki (15km) and Botany (14km), and the distance of those nearest areas from Beachlands means that workers who live in Beachlands travel a long average distance to work.
- 4.44 In Auckland there is a well-defined relationship between place of residence and distance travelled to work. People living in peripheral parts of the region travel, on average, much further to work than residents of more central areas (the left map in Figure 4.2). This is to be expected, because peripheral areas have more limited employment opportunities than Auckland's large business areas offer, meaning that inevitably some of the people living in

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<sup>35</sup> At Maraetai there were originally three FUZ areas, two of (the eastern end of Maraetai Beach, behind Carlton Crescent and in the south west near Matara Avenue) which have subsequently been live zoned, and one area which remains as FUZ

<sup>36</sup> Clevedon Waterways

<sup>37</sup> Policy 8 and sub-part 2

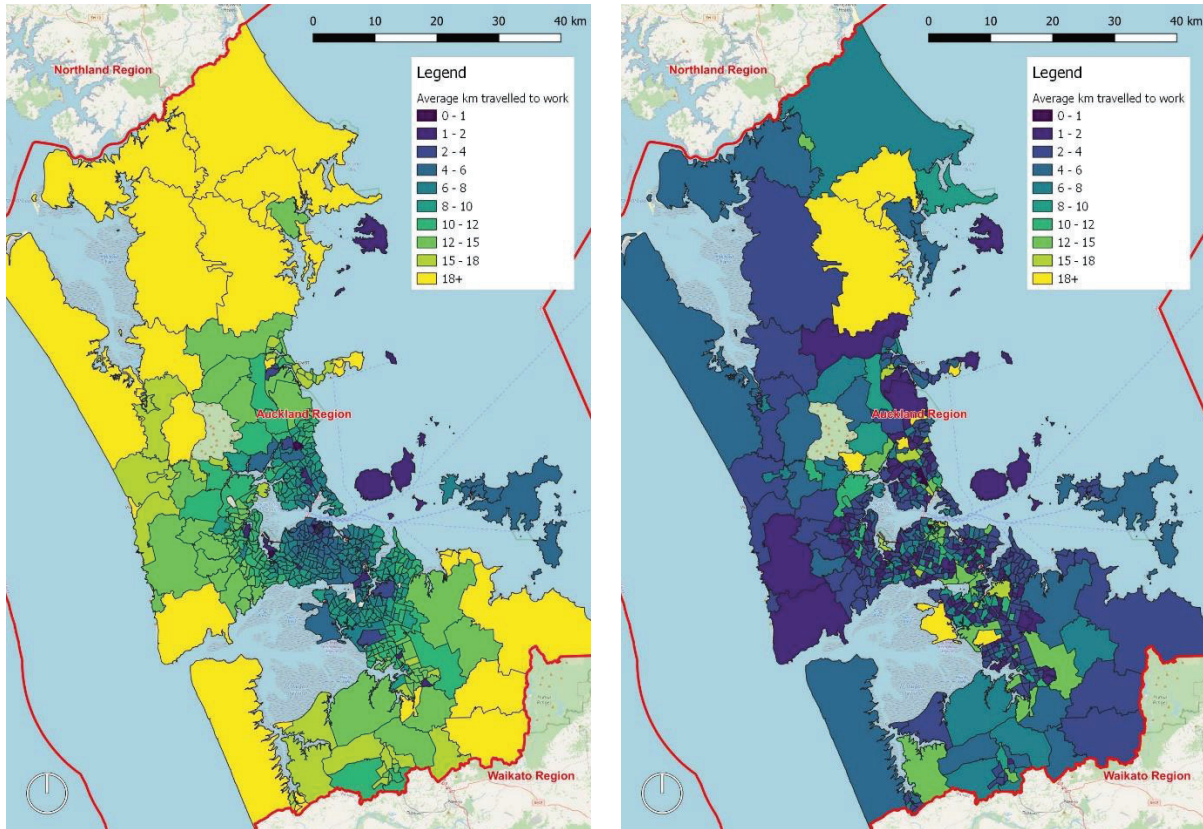
<sup>38</sup> PEL report, page 16 and Table 1 on page 19

<sup>39</sup> Stated in error to be 78% on page 16, but correctly stated as 72% on page 70

those peripheral areas will need to travel longer distances to access employment suited to their skillsets.

- 4.45 In contrast, people living in the central Auckland isthmus have a very broad range of job types available to them in close proximity to where they live, from office-based jobs in the CBD and metropolitan centres, to a wide range of jobs in industry, retail, hospitals, ports and other special employment zones.

Figure 4.2: Distance travelled to work by (left) people living in each SA2, and (right) people working in each SA2



- 4.46 Figure 4.2 shows that the average distance travelled to work by people living in Beachlands (and other peripheral locations such as Waiuku, Hunua, Kaukapakapa and Puhoi) is around 18km (or more), compared to 7-10km across the North Shore and urban Manukau City,<sup>40</sup> 10-12 for people living in urban Waitakere,<sup>41</sup> and 8km or less for most of the isthmus.

- 4.47 One important part about location is accessibility of that location, including by different transport modes. Because Beachlands is located away from urban Auckland it is not well serviced by public transport, with only a single bus service (which runs hourly from 6am to 7pm)<sup>42</sup> and a ferry service to the Auckland CBD (which runs slightly more frequently than the bus during morning and evening peaks, but less frequently on weekends).<sup>43</sup>

- 4.48 While the clause 23 response states that “There is significant public transport infrastructure in place (ferry)”<sup>44</sup> the ferry only travels to central Auckland, and does not make any stops

<sup>40</sup> Including Howick, Pakuranga, Māngere, Botany, Ormiston, Manurewa

<sup>41</sup> Including Westgate, Henderson, Te Atatu, Titirangi

<sup>42</sup> <https://at.govt.nz/media/1975093/beachlands-maraetai-new-network-brochure-website-version.pdf>

<sup>43</sup> <https://at.govt.nz/media/1986099/pine-harbour-ferry-timetable.pdf>

<sup>44</sup> Clause 23 response item ECO6

elsewhere, meaning it does not provide access to most parts of Auckland. AT data<sup>45</sup> shows that Pine Harbour ferry passengers make an average of 339 passenger journeys per day on weekdays (equivalent to 170 return trips), which accounts for only 5% of the 3,378 daily return trips<sup>46</sup> to work undertaken by Beachlands residents.

- 4.49 I note also that the City Centre is the destination of 9% of all work trips,<sup>47</sup> so not all trips to the Auckland CBD for work use the ferry service.<sup>48</sup> This indicates that Beachlands residents are, and PPCR area residents will be heavily reliant on private vehicles to travel long distances to work, which tends to indicate that the PPCR will not contribute to a well-functioning urban environment. I acknowledge that the PPCR envisages a substantial increase in ferry capacity and services from Pine Harbour, which would enable greater patronage to the Auckland CBD. However, the benefits of that additional capacity will be limited by the number of Beachlands residents who work in the CBD, and I also understand from submissions that there is some uncertainty about the feasibility of increasing the ferry services as proposed.
- 4.50 As Beachlands grows, and attains a greater critical mass, a wider range of retail and commercial businesses and community and recreation facilities will be viable in Beachlands. That will enable a greater proportion of trips made by Beachlands residents to be made locally, with reduced need to leave Beachlands such as for shopping or to visit medical practices.
- 4.51 This means that while a large proportion of the locally resident workforce leaves the area for work, and will probably continue to do so even if the PPCR is approved, the net effect of the PPCR on travel efficiency is unclear, and I acknowledge that out-commuting for work may be balanced out (at least to some degree) by greater local retention of trips for other purposes as some elements of self-sufficiency in Beachlands improve.
- 4.52 These observations show that Beachlands is a fringe location within Auckland, and a less efficient place within Auckland in which to accommodate residential growth than places within urban Auckland. There are considerable economic costs attached to the inefficiency of this location. However, because there is already an existing settlement at Beachlands, expansion of that settlement as proposed in the PPCR would yield some economic benefits in terms of greater ability of local residents to meet a larger proportion of their retail and community needs locally. In my opinion the economic costs of the peripheral location would outweigh the associated benefits.

### **Employment supply**

- 4.53 As the PEL report notes,<sup>49</sup> a positive aspect of the PPCR is its proposal to zone some areas that will support employment, and therefore allow more people to work in Beachlands. The PEL report estimates that the Structure Plan would enable employment for around 960 workers “across a variety of land uses including retail, commercial office, retirement village, light industry, tourism / recreational and school activities”.<sup>50</sup> I agree that is a reasonable estimate of the employment that might be accommodated within the proposed zones.

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<sup>45</sup> <https://at.govt.nz/media/1990010/pine-harbour-ferry-weekend-trial-report-september-2022.pdf>

<sup>46</sup> PEL report, table 1

<sup>47</sup> PEL report, table 1

<sup>48</sup> Although acknowledging the different data sources (AT patronage data in 2022 and Census data 2018) makes market share observations impossible

<sup>49</sup> PEL report, page 16

<sup>50</sup> PEL report, page 16



- 4.54 The PEL report also anticipates that 3,500-4,500 households would be enabled within the PPCR area, and states that:

*At capacity, the development has the potential to increase the local employment base to over 6,000 workers who in absence of jobs being made available locally, would increase daily commute levels of Beachlands.*

*At present 78% of residents leave the Beachlands / Maraetai area for work. Moreover, of these residents who are travelling outside of the local area for work, 60% commute daily to either Central or South Auckland. Therefore, the provision of employment land within the PPC is therefore considered essential to ensure there is a meaningful increase in employment internalisation within Beachlands. That is, more local employment opportunities for local Beachlands residents.*

*This is also important to providing a balanced community rather than simply a dormant residential suburb. A growing community requires increased local services and employment opportunities to support and facilitate that growth, and the PPC represents a positive step to satisfy the growing local employment opportunities and demand.*

- 4.55 The clause 23 request response picks up on that and states that “the proposed PPC intends to help internalise a large portion of employment”.<sup>51</sup>
- 4.56 To assess the degree to which the employment enabled within the PPCR area would ‘keep pace’ with the additional households projected to establish in the area, I have calculated the average employment per household in the Beachlands Local Catchment<sup>52</sup> using data from the PEL report.
- 4.57 That assessment shows that there are currently about 0.58 jobs based in the Beachlands local catchment for every household in that catchment. If the PPCR area yields 960 workers as the PEL report expects, and if employment elsewhere in the catchment is maintained at 0.58 workers per household (resulting in growth of 780-1,140 workers in the rest of the catchment) then there would, by 2048, be 4,320-4,680 workers based in the catchment (the range being medium to high population growth scenarios) (Figure 4.3). Given the household yield anticipated in the PPCR area, that would result in the ratio of workers to households in the catchment decreasing from 0.58 in 2023 to 0.43-0.46 in 2048.
- 4.58 There is the possibility that the ability to work remotely will mitigate the projected net additional outflow of workers, however that remains uncertain, and I am aware that while some remote working is being accepted by businesses, there is also a strong push towards having workers return to the office for at least some of the time. Further, there are many types of jobs (retail, industrial, services) for which working from home is not an option. All factors considered, it is uncertain what the net effects of remote working on commuting patterns will be, and whether reliance on those patterns would offset the declining ratio of Beachlands workers per household.

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<sup>51</sup> Clause 23 response, item ECO6

<sup>52</sup> The area defined in the PEL report’s Figure 2

Figure 4.3: Beachlands local catchment employment per household with PPCR approved<sup>53</sup>

|                                   | 2023         | 2048         |               |
|-----------------------------------|--------------|--------------|---------------|
|                                   |              | Medium       | High          |
| <b>Households</b>                 |              |              |               |
| Beachlands South                  | 10           | 3,500        | 4,500         |
| Ro Beachlands catchment           | 4,470        | 5,830        | 6,450         |
| <b>Total Beachlands catchment</b> | <b>4,480</b> | <b>9,330</b> | <b>10,950</b> |
| <b>Workers employed</b>           |              |              |               |
| Beachlands South                  | 30           | 960          | 960           |
| Ro Beachlands catchment           | 2,580        | 3,360        | 3,720         |
| <b>Total Beachlands catchment</b> | <b>2,610</b> | <b>4,320</b> | <b>4,680</b>  |
| <b>Jobs per household</b>         |              |              |               |
| Beachlands South                  | 3.00         | 0.27         | 0.21          |
| Ro Beachlands catchment           | 0.58         | 0.58         | 0.58          |
| <b>Total Beachlands catchment</b> | <b>0.58</b>  | <b>0.46</b>  | <b>0.43</b>   |

- 4.59 That ratio would decrease because the ratio in the PPCR area (0.21-0.27) would be much lower than the current catchment average (0.58), thereby pulling down the catchment average as the PPCR area household base increases. On that basis, the zoning requested in the PPCR is insufficient to maintain the same level of employment self-sufficiency in the Beachlands local catchment, and that sufficiency would decline as a result of the PPCR, even if the number of jobs provided in the catchment increased.
- 4.60 Contrary to the PEL report, in my opinion the level of employment land proposed would be insufficient to offset the population increase enabled by the PPCR, and therefore more likely to make Beachlands function as a “dormant residential suburb” than a self-sufficient rural town.
- 4.61 In order to maintain the catchment’s workers per household ratio at 0.58, the PPCR area would need to provide less residential zoned land, and more business zoned land. I have calculated that in order to maintain that ratio, around 19-29ha (medium to high dwelling yield range) would need to change from a residential to a business zoning,<sup>54</sup> assuming no additional business land would be provided in the FUZ part of the PPCR area.
- 4.62 If the non-FUZ (proposed to be live-zoned) part of the PPCR area is considered in isolation from the FUZ part, the non-FUZ part would need to provide 10-17ha more business land than is proposed to yield a ratio of 0.58 workers for non-FUZ households (i.e. 24ha plus 10-17ha equals 34-41ha in total would be required to maintain the current ratio). The Structure Plan does not specify what types of activity might be provided for in the FUZ area, although the PEL report does indicate its assessment assumes that around 900 households would be accommodated there.<sup>55</sup>
- 4.63 The zoning indicated in the Structure Plan indicates around 24ha of business land in the non-FUZ part of the PPCR area (6ha in the Local Centre Zone, 11ha in the Mixed Use Zone around the Centre, and 7ha by the highway (3ha of Mixed Use Zone and 4ha of Light Industry

<sup>53</sup>

<sup>54</sup> Accommodating 570-720 fewer households (at 30 dwellings/ha), and 760-960 more workers (at 40 workers/ha), giving a changed yield of 2,930-3,280 dwellings, and 1,720-1,920 workers

<sup>55</sup> PEL report, page 10



Zone).<sup>56</sup> The 10-17ha of additional business land the non-FUZ area would need to maintain a ratio of 0.58 workers/household would represent a considerable increase in business land within the non-FUZ part of the PPCR area.

- 4.64 The PEL report notes the potential for the local employment base to be over 6,000 catchment workers once the PPCR area is developed to capacity, of which indicatively 2,500 workers would live in the PPCR area.<sup>57</sup> If there continue to be 28% of catchment residents employed locally, that would equate to 1,660 people employed locally, and 4,340 employed elsewhere. That 4,340 people leaving the catchment for work would represent an increase of 1,900 people leaving for work, which is quite contrary to the PEL report's statement that the PPCR would "help internalise a large portion of employment", and further supports a conclusion that the amount of employment land (local centre, Mixed Use and Light Industry zones) proposed is insufficient to maintain current employment levels. The PEL report does not quantify the work from home opportunity in Beachlands, and it may be that the share of Beachlands residents who can work from home increases as work practices change and technology improves, potentially increasing the 28% of catchment residents employed locally, although that is highly uncertain.
- 4.65 Further, as towns grow they tend to achieve higher levels of employment self-sufficiency, because they reach greater critical mass of market size that supports a wider range of businesses, meaning the population has a reducing need to leave the area to meet their retail, services, recreation and employment needs. The amount of additional employment land that might be required to enable an increase in local self-sufficiency from the current ratio of 0.58 jobs per household would depend on the target, and I have not assessed how much additional might be required, although it would be more than the 10-17ha of additional (and 34-41ha in total) business land required to maintain the current employment per household ratio.
- 4.66 This assessment has shown that while the PPCR area would enable greater local Beachlands employment, that increase would be much less than would be required to even maintain Beachlands' local employment at a current ratio of workers per household. Because Beachlands is some distance from the nearest significant employment nodes, the proposed under provision of employment land will not, in my opinion, help to create a well-functioning urban environment.

### **Infrastructure costs**

- 4.67 The application contains the following statements in relation to infrastructure funding:
- a. The PEL report notes that the applicant proposes to spend "around \$210m, out of a circa \$450m total infrastructure investment, to increase above and below ground infrastructure capacity in Beachlands beyond the PPC area"<sup>58</sup> which would "provide significant infrastructure benefits for the wider community at no financial cost". This infrastructure spend is stated to be funded by an Infrastructure Funding and Financing solution.

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<sup>56</sup> Business zoned land measured from GIS using digitised Structure Plan

<sup>57</sup> PEL report, page 16. There is no indication in the PEL report of how many of those 6,000 catchment workers are due to the plan change alone, however assuming PPCR area households have the same rate of workers per household, the 6,000 jobs would be split 59%:41% between the non-PPCR part of Beachlands and the PPCR part (based on 4,500 (41%) of the catchment's 10,950 (in 2048) households being in the PPCR area.

<sup>58</sup> PEL report, page 76

- b. The PEL report also states that the “significant private sector investment that will ensure this development is cost efficient for the Council” (emphasis added - not cost neutral).
  - c. The s32 report states that “all necessary infrastructure to service urbanisation of the proposed live-zoned land can be provided on site and delivered by the applicant without requiring funding from Auckland Council”.<sup>59</sup>
  - d. The legal opinion provided with the clause 23 response indicates that there will be infrastructure costs that the developer will not be required to fund, and refers to case law relating to what infrastructure-related costs an applicant in a private plan change is required to contribute to.
- 4.68 Infrastructure costs are one of the largest costs of developing land, and for a very large development such as the PPCR area would be, the level of infrastructure spend represents a significant level of investment required. If it is correct that the applicant will fund all required infrastructure, then there should be no financial implications for ratepayers, and no negative economic effects of the cost of providing infrastructure, and no risk to the Council, and community.
- 4.69 However, the various statements above about funding arrangements appear to contradict the s32 report’s statement that council funding will not be required, and the risk at this stage of the proposal is that there is a misalignment between the expectations of Council and the developer about the need for various infrastructure expenditure, and who is liable for it.
- 4.70 If Auckland Council will be required to contribute to infrastructure costs when (I understand) such contribution has not been planned for or budgeted, then that would likely require diversion of Council funding away from other, potentially more appropriately located, more efficient infrastructure, or infrastructure that supports more dwellings. That would be an unexpected financial burden and economic cost to the community.
- 4.71 In my opinion the PEL report adequately assesses the economic implications of the infrastructure costs based on the assumption that infrastructure costs will not require contribution by Council. However, there should be certainty as to Council’s potential liability for infrastructure contributions in order to assess the merits of the PPCR.
- 4.72 One infrastructure-related benefit identified in the PEL report is that “Higher density zoning also provides lower transport costs as a greater number of people will be able to access efficient transport links. This means there is a greater benefit of providing public transit and higher capacity roading near areas of high-density dwellings”<sup>60</sup> This is correct, however there is some critical mass required to support particular levels of public transport, and it is unclear whether the population sought to be enabled within the PPCR area would reach that threshold. If it does not, there may be no material change in public transport provision in Beachlands, despite the increased population.
- 4.73 If there is no material change in public transport provision in Beachlands but a very large increase in population, then in my opinion the PPCR would not contribute to a well-functioning urban environment.

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<sup>59</sup> s32 report, page 39

<sup>60</sup> PEL report, page 75

## 5.0 Submissions

- 5.1 In this section I identify matters raised in submissions that are relevant to this statement, and provide my opinion on the submission points, in light of the assessment of effects provided above in section 4.0.

### Housing demand

- 5.2 Submission 327 (Waka Kotahi) states that the region has adequate capacity for housing growth.<sup>61</sup> Based on my assessment above in section 4.0, I agree with that submission point.

### Staging

- 5.3 A number of submissions<sup>62</sup> recommend that if the development proceeds, that some form of staging should be required, so as to spread the arrival of new households in Beachlands, and to provide some basis for requiring infrastructure upgrades (particularly roads and ferries).
- 5.4 I agree that some form of staging or development ‘triggers’ would be beneficial to ensure that adequate facilities and infrastructure are in place to appropriately provide for the community. I understand that some of the precinct provisions include triggers, although not triggers that address employment or commercial activities. If there are no requirements as to when employment areas are released to the market, or when the retail centre is developed, any of the potential employment self-sufficiency shortcomings I have identified will be worsened. Access to medical services has been identified as an area of concern in some submissions, and if all of the residential parts of the PPCR could be developed ahead of the new local centre (and potential medical centre tenancies therein) being constructed, the new PPCR population would increase pressure on existing medical services, retailers and other service businesses.
- 5.5 I accept that there would be a commercial incentive for the developer to provide a centre within the PPCR area, and possibly early within its development, so as to ‘anchor’ the development and provide an attractive selling point for residential properties, so staging might be unnecessary for the centre. There might, however, be less commercial incentive to pursue early development of other business areas (such as the Light Industry Zone), within the PPCR area, and if those are developed after all of the residential land, there will be a period when Beachlands’ population has increased significantly, and its workforce has not followed, promoting a large net outflow of people working in other locations, which is not a characteristic of a well-functioning urban environment.
- 5.6 To mitigate against the potential adverse effects that would arise as a result of population growing in advance of employment opportunities, or as result of new employment opportunities not eventuating at all, it would be appropriate in my opinion to make provision for some staging in the precinct provisions that would tie release of new residential land to the release of new business land.

### Urban form

- 5.7 Submissions by Auckland Council (#345) and AT (#344) are that the PPCR would not promote a quality urban compact form. A number of other submissions oppose the PPCR

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<sup>61</sup> Submission 327, page 2

<sup>62</sup> Including Three Pines Trust (#266), Jonathan Ashby (#274) and Auckland Transport (#344),

because the proposal would result in an expansion of existing Beachlands in what some submitters refer to as 'urban sprawl', which is submitted to be contrary to good current urban design practice.

- 5.8 I agree with the thrust of those submissions, that the PPCR would enable a very significant increase in the spatial extent of Beachlands. The 4,500 households the PEL report assumes as an upper end yield of the PPCR area would be similar to the number of households present in the entire Beachlands catchment now (4,470),<sup>63</sup> meaning the PPCR would enable the settlement to more than double in size, and nearly double in area.
- 5.9 I note, however, that there is no certainty that the PPCR would yield the 3,500-4,500 dwellings assumed in the PEL report, as I discuss in section 4.0, and that yield might be lower, or higher. Nevertheless, if the PPCR area comes to be predominantly developed, I would agree with submissions 344.1, 344.2<sup>64</sup> and 345<sup>65</sup> that the urban form of Beachlands would change significantly from the current form, and there is uncertainty as to whether the outcome would be a compact urban form that enables "better use of existing infrastructure and efficient provision of new infrastructure".<sup>66</sup>
- 5.10 One submission (#347.1) implies that growth in the area is inevitable, and states that the PPCR is "in the best interests of properly managed urban growth in this area". I disagree that the scale of growth that the PPCR would enable is inevitable, or necessary in the area, and therefore do not agree that the PPCR is a necessary response to be able to accommodate growth.

## Location

- 5.11 Many submissions refer to the negative features of the PPCR area's location, and raise the following points:
- The PPCR area is not anticipated as a growth area in any regional planning documents, meaning there are no infrastructure improvements planned in Beachlands, and any diversion of funding to Beachlands would have adverse effects on allocation of funding to areas where growth is planned.<sup>67</sup>
  - The location of Beachlands means that the PPCR would not contribute to well-functioning urban environments due to not having good accessibility,<sup>68</sup> and with the PPCR overstating the area's self-sufficiency.
  - The relatively remote location of Beachlands means it is serviced by limited public transport, namely a ferry service and one bus route. This limited public transport has implications for accessibility and traffic congestion on the Beachlands-Maraetai Road, and making travel to the main work destinations (East Tāmaki, Airport, Penrose) dominated by car travel.<sup>69</sup> The AT submission (#344) notes there are no plans to increase the frequency of the bus service.

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<sup>63</sup> PEL report, figure 3

<sup>64</sup> Submission 344, paragraphs 7(c),

<sup>65</sup> Submission 345, paragraphs 24 and 25

<sup>66</sup> Regional Policy Statement B2.2.1 Objective (1)(c), as raised in submission 345, at paragraph 11

<sup>67</sup> Submissions 327, 344 and 345 and many from private individuals

<sup>68</sup> Submissions 344 and 345

<sup>69</sup> Submissions 368 and 344

- The high density residential development proposed would be better suited to a location in close proximity to major arterials with train and motorway access.
- 5.12 I agree that the PPCR area is poorly located within Auckland, as discussed above in section 4.0, including because the peripheral location of Beachlands is removed from significant public transport infrastructure and employment nodes, and is in a location where growth is not anticipated, with the associated inefficiencies that brings.

### **Access to facilities**

- 5.13 Several submissions<sup>70</sup> support the PPCR on the grounds that it will provide a range of social and economic benefits to the community, including provision of a new secondary school, and retail activity, and that the increased population will support existing local businesses.
- 5.14 Many more submissions oppose the PPCR due to perceptions that already inadequate access to amenities (including healthcare/doctors, schooling, recreation activities for teenagers) will become even more difficult.
- 5.15 In my opinion it is likely that the centre zone and other business land proposed within the PPCR area would be able to accommodate some additional service provision to mitigate existing difficulties in access to medical facilities, employment opportunities, and to a limited extent also to retail and commercial services activities.
- 5.16 While there is no certainty that development within the business areas would proceed, nor certainty about the types of tenants that might establish if development does proceed, it is reasonable to expect that the provision of space will enable the market to meet demand in an efficient manner. That is true for retail activities, although tenancy of additional medical practices may be more difficult to secure given what I understand are shortages of medical staff in New Zealand at present.
- 5.17 Typically a larger population will support a wider range of retail and services businesses, and this would, in the case of Beachlands, reduce the need to travel outside the local area to support some types of retail and services. This local provision of services is a benefit to the local community, providing convenient access, and reducing time spent travelling to access improved retail and services. However, balancing that is that the local population will become much larger if the PPCR is approved, increasing the number of trips out of the local area to access the (slightly diminished) range of goods and services unavailable in the future Beachlands.
- 5.18 The additional retail and services sought to be enabled in the PPCR would be within a local centre and Mixed Use zones. Because those zones do not enable a materially different range of activities from those already enabled in Beachlands' operative business zones (local and neighbourhood centres and a small Light Industry zone), in my opinion the PPCR would be unlikely to result in a significant increase in the range of retail and services available in Beachlands. For that reason, I expect that the PPCR would have costs (increased travel to the range of activities not provided locally) that exceed the benefits (decreased travel to a small range of new activities).
- 5.19 In summary, the PPCR will not lack the opportunity to adequately provide for the needs of the PPCR area, and also to improve access to some types of businesses for existing Beachlands

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<sup>70</sup> Submissions 3, 10 and 205

residents, however there is no guarantee that any particular level of service or types of businesses will eventuate, and there will continue to be a heavy reliance on services and facilities outside the PPCR area .

### **Business land provision**

- 5.20 Several submissions<sup>71</sup> raise concerns with the amount of business land proposed by the PPCR, and with the certainty of that land yielding employment opportunities. Some submission points are that the amount of business land proposed may be insufficient to appropriately provide for the employment needs of an expanded Beachlands.
- 5.21 Submission 352 identifies the issue that no light industrial, retail or commercial GFA can be provided within the PPCR area until such time as additional ferry capacity is provided. If residential activity is able to proceed in advance of additional ferry capacity, and business zones cannot proceed, then the 'overstated self-sufficiency' identified in the Auckland Council submission, and to which I refer in section 4.0, would be even more pronounced than I have assessed.
- 5.22 Submission 50 supports the PPCR because it will provide a resident population that will be available to work in local businesses. I agree that that is a positive aspect of the PPCR.
- 5.23 Consistent with my assessment in section 4.0, I agree that the amount of business land proposed is insufficient to appropriately provide for the needs of an expanded Beachlands.

### **Infrastructure**

- 5.24 Many submissions raise concern that the PPCR would place pressure on existing waters and roading infrastructure. As referred to above in section 4.0, the PPCR area is not an area that has been planned by Council to be provided with infrastructure. The greenfield location of the Site, and the fact that the Site is not identified as a growth area in regional planning documents, makes provision of new infrastructure to the Site less efficient than if a comparable number of dwellings were to be provided in an area that was already serviced, or scheduled to be serviced.
- 5.25 The fact that the PPCR is not anticipated should not prevent its approval if (under subpart 2 of the NPSUD) the PPCR provides significant capacity, and would contribute to a well-functioning urban environment, and is well-connected along transport corridors. However, per my assessment in section 4.0, I do not believe that the PPCR would contribute to a well-functioning urban environment. For that reason I believe the PPCR fails to meet the criteria in sub-part 2 of the NPSUD, meaning that the cost of providing unplanned for residential capacity on the PPCR area outweighs the benefits of that provision, including in relation to infrastructure.
- 5.26 Many submissions<sup>72</sup> also identify the possibility that infrastructure costs may not be adequately assessed in the application, and that the infrastructure required may not be able to be funded via the Infrastructure Funding and Financing Act 2020. Some of these submissions seek conditions that the applicant should be required to fund all infrastructure costs.

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<sup>71</sup> Submissions 258, 298, 344

<sup>72</sup> Including 100.2 (and a number of other similar pro forma submissions), 114.8, 116.1, 133.2, 163.3, 168.2, 178.2, 225.6, 305.3, and 368.8



5.27 As I have discussed, in my opinion there is considerable uncertainty from the application as it stands that the applicant would fund all infrastructure costs,<sup>73</sup> and in the absence of any guarantee to the contrary, there is significant risk to the Council and ratepayers that a large, additional, unanticipated financial burden may be created if the PPCR is approved.

## 6.0 Conclusions and recommendations

- 6.1 In my opinion the applicant has adequately assessed demand for housing in and around Beachlands, although has not established that that demand requires additional supply to be provided in the PPCR area. However, even if there is no shortage of residential dwelling supply in Beachlands, providing additional dwelling capacity in the PPCR area will not in and of itself represent a negative outcome from an economics perspective.
- 6.2 However, I conclude that the PPCR area is not an appropriate location in which to enable the scale of new dwelling capacity that is being sought, because Beachlands is a large distance from relatively large distance from urban Auckland's employment opportunities, retail, community facilities and public transport.
- 6.3 My assessment has shown that while the PPCR area would enable greater local Beachlands employment, that increase would be much less than would be required to even maintain Beachlands' local employment at a current ratio of workers per household. Because Beachlands is some distance from the nearest significant employment nodes, the proposed under provision of employment land will not, in my opinion, help to create a well-functioning urban environment.
- 6.4 It is unclear to me which groups will bear the financial burden of providing the new infrastructure required to service the PPCR area, and it is possible that Auckland Council and Auckland Transport will be required to contribute to infrastructure costs when such contribution has not been planned for or budgeted. That would divert Council funding away from other locations, and place an unexpected financial burden on the community. In my opinion it will be important that the PPCR process provides clarity as to infrastructure funding mechanisms, and infrastructure costs will be significant, and a material consideration in evaluating the merits of the application.
- 6.5 The PPCR is inconsistent with the direction and framework of the AUP, RPS, Auckland Plan and FULSS, insofar as those documents relate to the intended location and distribution of growth within Auckland, and the attendant considerations of efficient travel urban form. None of these documents anticipate residential growth to occur on the PPCR site, and growth of the scale proposed in Beachlands would have adverse implications for Auckland's urban form and travel efficiency, arising from the peripheral location of the PPCR area far from urban Auckland.
- 6.6 There are positive aspects of the PPCR, such as the additional capacity it would provide, and providing a larger population base to support future community facilities and range of commercial activities in the area. However, those positive aspects are subject to some uncertainty and other shortcomings. While the PPCR seeks to enable new business areas, those areas are, from my assessment, insufficient to adequately provide for the local employment needs of the local population. While the PPCR recognises the need for, and

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<sup>73</sup> My section 4, under the heading 'Infrastructure Costs'



seeks to accommodate a new school, there is no certainty that a new school will eventuate within the PPCR area. That certainty gives rise to the question of how much weight to give those potential positive aspects of the PPCR.

- 6.7 Overall I do not support the PPCR because of its peripheral location within Auckland and because it would not, in my opinion, contribute to a well-functioning urban environment, and from the evidence presented the economic costs of the PPCR would outweigh the economic benefits.

**Memo (technical specialist report to contribute towards Council’s section 42A hearing report)**

18 August 2023

To: Chloe Trenouth - Planning Consultant, Chloe Trenouth Consulting on behalf of Auckland Council

From: Rebecca Ramsay – Senior Specialist: Heritage, Heritage Unit, Plans and Places Department

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**Subject: Proposed Private Plan Change – PC 88, Beachlands South – Historic Heritage (Archaeological Assessment)**

**1.0 Introduction**

- 1.1 I have undertaken a review of the proposed private plan change (PC 88), on behalf of Auckland Council in relation to historic heritage (archaeological) effects.
- 1.2 Megan Walker (Specialist: Historic Heritage) has undertaken a review of specific built heritage matters relating to 740 Whitford-Maraetai Road. This memo is provided in Appendix 1 and referenced in text.
- 1.3 My review has not addressed effects on mana whenua cultural values. The cultural and other values that mana whenua place on the area may differ from its historic heritage values and are to be determined by mana whenua. It is the applicants’ responsibility to consult with mana whenua to determine mana whenua values.
- 1.4 I have a Master of Arts degree with first class honours in anthropology (archaeology) specialising in New Zealand archaeology. I have worked in the field of historic heritage management for 8 years. My experience spans archaeology (including landscape archaeology) and heritage policy.
- 1.5 In writing this memo, I have reviewed the following documents:
- Beachlands South Precinct Private Plan Change Request: Section 32 Assessment Report. 31 March 2022. Prepared by UNIO Environmental for Beachlands South Limited Partnership.
    - Appendix 1: Plan Change Zoning Map
    - Appendix 2: List of Properties included in Plan Change Area
    - Appendix 3: Beachlands South Precinct Provisions
    - Appendix 4: Beachlands South Structure Plan
    - Attachment 9 - Masterplan and Precinct Plans
    - Appendix 24: Geotechnical Assessment
    - Appendix 27: Archaeological Assessment
    - Appendix 28: Cultural Values Assessment
  - Clause 23 – Request for Further Information
    - Request for further information response 14 July and 5 August 2022
      - Attachment 1: Certificate of Titles
      - Attachment 4: AUP RPS Objectives and Policies Assessment Table
      - Attachment 7 - Beachlands South Precinct Provisions, September 2022-Updated Plans
      - Attachment 9: Master and Precinct Plans
      - Attachment 11: Policy B5.2.2 Historic Heritage Assessment
    - Clause 23 Response Table 2
      - Appendix 1: Section 32 Report - Updated
      - Appendix 4: Precinct Plan 4 Cultural Landscape Plan Updated
- 1.6 A site visit to the plan change area was undertaken on 3 May 2022.

## 2 Key Historic Heritage Issues

2.1 The key issues in relation to historic heritage are:

- whether the application has sufficiently assessed and addressed actual and potential effects on historic heritage. Specifically, how the proposed precinct through the Mana Whenua provisions (I.3.5, I.4.5 and I.7.10), Precinct Plan 4 – Cultural Landscape Plan, and the Ecological Protection Area Network identify and protect historic heritage places from inappropriate subdivision, use and development.
- whether the application is consistent with the AUP Regional Policy Statement (**RPS**) B5. *Ngā rawa tuku iho me te āhua – Historic heritage and special character*, including the identification of significant historic heritage place/s in Schedule 14.1 Schedule of Historic Heritage.

### 3 Applicant's assessment of historic heritage values, adverse effects and mitigation methods

3.1 In relation to historic heritage the applicant has provided an archaeological assessment by Clough and Associates Ltd. (S. Bickler, R. Clough and G. Farley. 2022 - Appendix 27). The Ngāi Tai Ki Tāmaki cultural values assessment (Appendix 28) also addresses historic heritage to some extent along with other values. The cultural values technical report provides mana whenua perspectives on the significance of the archaeological sites that are assessed in the archaeological report.

3.2 The archaeological assessment provides a description of those places of heritage value within the plan change area, and the wider heritage context through desktop research and field survey. It then assesses the significance of the sites in the plan change area against both the Auckland Unitary Plan (**AUP**) Historic heritage Regional Policy Statement (**RPS**) and Heritage New Zealand Pouhere Taonga Act (**HNZPTA**) criteria. Finally, it provides a preliminary summary of actual and potential adverse effects and recommended management and mitigation measures.

#### Actual and potential effects

3.3 The archaeological assessment sets out five key areas in relation to actual and potential impacts on historic heritage places and values and provides recommendations intended manage and mitigate potential adverse effects on archaeological values<sup>1</sup>. These are set out below and discussed in more detail under section 4:

#### Pā site R11/1619 and Cultural Landscape Plan (Precinct Plan 4)

3.4 The archaeological assessment identifies pā site (R11/1916) as a significant historic heritage and cultural heritage place within the plan change area<sup>2</sup>.

3.5 Along the coastal and riparian margins, the extent of the pā site overlaps with the Ecological Protection Area (EPAN) and areas of High Value Terrestrial Planting as shown on Precinct Plan 2 – Natural Features<sup>3</sup>. Vegetation removal and planting in these areas will require additional archaeological input to ensure avoidance of heritage features and appropriate site management. Provisions under the special information requirements (I.10.3) provide for this additional reporting.

3.6 The location and extent of the pā site (R11/1916) has been identified within the Cultural Landscape Plan (Precinct Plan 4)<sup>4</sup> with associated provisions set out under the Mana Whenua objectives (I.3.5-6), policies (I.4.5 a-d) and standards (I.7.10 Mana Whenua 1-3)<sup>5</sup>, to protect the site from adverse effects<sup>6</sup>.

3.7 The assessment also notes “that it is Heritage NZ policy to grant authorities to modify pā sites only in exceptional circumstances (see 2.2.3 of this report, policy 9.4)”<sup>7</sup>.

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<sup>1</sup> Bickler et al. 2022: p. 66-79.

<sup>2</sup> Bickler et al. 2022: p. 76.

<sup>3</sup> Attachment 7 - Beachlands South Precinct Provisions, September 2022

<sup>4</sup> CI 23 Response Part 2 – Appendix 4 - Precinct Plan 4 Cultural Landscape Plan Updated. Dated 10/05/2022.

<sup>5</sup> Attachment 7 - Beachlands South Precinct Provisions, September 2022

<sup>6</sup> Bickler et al. 2022: p. 76.

<sup>7</sup> Bickler et al. 2022: p. 76.

### Ecological Protection Area Network (EPAN)

3.8 Majority of the recorded historic heritage (archaeological) sites fall within the proposed EPAN, intended to "...protect and enhance identified significant terrestrial vegetation/habitat types and significant ecological areas from subdivision and development..."<sup>8</sup>. While this area is excluded from development, the archaeological assessment has identified that vegetation removal and planting within the EPAN has the potential to adversely affect archaeological sites. To identify, avoid, remedy and/or mitigate effects an "*Archaeological Vegetation Management and Planting Plan*" is proposed under I.10. – Special information requirements.

3.9 As stated in section 3.5 (above) the pā site (R11/1916) also overlaps with the EPAN.

### Coastal Walkway Development

3.10 The development of a coastal walkway and coastal access points, particularly with the EPAN area, have the potential to impact recorded archaeological sites. Detailed design should consider and avoid the location and extent of these known sites and recognise areas of historic heritage potential. Further, increased public access coastal areas provides additional opportunities to increase awareness and appreciation of the cultural and archaeological landscape. Opportunities for on- and off-site interpretation and education should be considered in partnership with mana whenua and the project archaeologist.

### Residential Zoning

3.11 Several recorded sites are also located entirely or partially within the proposed residential and future urban zone areas and are likely to be affected by future development resulting from the proposed plan change. Avoidance of these places in future development plans is recommended in the archaeological assessment.

### Potential Effects

3.12 The archaeological assessment states that in areas where archaeological sites have been previously recorded, particularly along the coastal margins and in areas relatively unmodified by previous developments (i.e., outside of the Formosa Golf Course), there is the potential for unrecorded archaeological sites to be present.

### Section 32 Analysis Report

3.13 The Section 32 Analysis Report under section 8.1 states that "Issue 3 is not considered to be relevant as there are no built/historic heritage or character items/areas identified within the PPC area"<sup>9</sup>.

3.14 This statement is reiterated in section 9.5, "...that there are no sites of historic heritage value within the plan change area"<sup>10</sup>. However, the report goes on to say, "that there are a series of recorded archaeological sites within the plan change area"<sup>11</sup>. These comments are also reflected in the Structure Plan<sup>12</sup>.

### Section 32 "Heritage and Archaeology" Recommendations

3.15 The Section 32 Analysis Report supports the recommendations and conclusions provided in the archaeological assessment and states that:

"... it is considered that the effects on any archaeological values existing within the plan change area will be appropriately managed or mitigated through the methodologies outlined in this report<sup>13</sup>..."

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<sup>8</sup> Attachment 7 - Beachlands South Precinct Provisions, September 2022: I.7.6 Ecological Protection Area Network.

<sup>9</sup> Section 32 2022: p. 44.

<sup>10</sup> Section 32 2022: p. 105.

<sup>11</sup> Section 32 2022: p. 105.

<sup>12</sup> PC 88 – Appendix 4 - Beachlands South Structure Plan. p. 66.

<sup>13</sup> Section 32 2022: p. 105-107

3.16 From the Section 32 report these methodologies include<sup>14</sup>:

- Inclusion of a Cultural Landscape Plan (Precinct Plan 4) and Mana Whenua standards/provisions within the PPC, with the intention to recognise “*the historic Pa site, spiritual connections, archaeological sites, a key outlook point and key views of cultural significance to Ngai Tai to ensure hononga to ancestors, the connection and leadership, and whakapapa are all preserved to honour the special significance of this cultural history*”<sup>15</sup>.
- The historic Pā site (R11/1619) assessed as considerable significance will be protected by way of identifying its location and extent on the Cultural Landscape Plan and proposed Mana Whenua standard which does not permit earthworks or development within its extent.
- Protection of recorded archaeological sites within the Ecologically Protected Area Network (EPAN) in which standards set out in the precinct provisions do not permit earthworks or the development of any buildings or structures. The EPAN is also required to be protected by way of a covenant or other legal protection mechanism which provides an additional layer of protection to the recorded archaeological sites, beyond the HNZPT Act.
- That the final location and alignment of this coastal walking avoids any recorded archaeological site which will be addressed at the time of future planning and design for this coastal walkway.
- Seeking an Archaeological Authority from HNZPT prior to the commencement of site works.
- That standard accidental discovery protocols will be implemented in the event that any archaeological material is uncovered during excavation works, and any sites will be recorded for inclusion in the Cultural Heritage Inventory.

#### 4 Assessment of historic heritage (archaeological), effects and management methods

##### Historical Research and Field Survey

4.1 The archaeological assessment is lacking research with regards to the European history and occupation within the plan change area. A key omission is the presence of a potential building of historic heritage value located at 740 Whitford-Maraetai Road<sup>16</sup>, likely associated to the Kelly family.

Further historical research is requested to inform heritage values and significance assessments of those historic places within the plan change area (for example the former building site within the coastal margin, R11/1444 – possible gum digging pit and standing built structure at 740 Whitford-Maraetai Road). Recommendation one, section 7.1 and the built heritage memo by Megan Walker, provided in appendix 1, address this information gap.

4.2 A field survey has not yet occurred on private land along Whitford-Maraetai Road<sup>17</sup> due to access constraints and is unclear whether field survey of 712 Whitford-Maraetai Road, owned by the applicant has been undertaken. These properties are proposed to be included within the Future Urban Zone (**FUZ**).

4.3 The clause 23 response<sup>18</sup> provided by Clough and Associated Ltd. maps the location of geotechnical testing locations across 620 Whitford-Maraetai Road which encountered potential archaeological deposits against the locations of recorded archaeological sites<sup>19</sup>. Of note, the clause 23 response<sup>20</sup> states that based on the geotechnical reporting, the extents of some recorded archaeological sites are likely larger than initially reported and that a potentially new archaeological site is located on the edge of the EPAN zone, 70m inland of midden R11/2527. This new site has the potential to be impacted by the future development within the **FUZ**.

4.4 No further field survey was undertaken to confirm the results of the geotechnical testing, refine archaeological site locations, and identify further areas of heritage potential.

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<sup>14</sup> Section 32 2022. P. 105-107

<sup>15</sup> Section 32 2022: p. 32.

<sup>16</sup> See also Appendix 1: s24a memo – historic heritage (built), prepared by Megan Walker.

<sup>17</sup> Properties 680, 682, 692,702, 722, 732, 740, 746, 758, 770 Whitford-Maraetai Road.

<sup>18</sup> Attachment 11 - Policy B5.2.2. Historic Heritage Assessment

<sup>19</sup> Section 32 Assessment, Appendix 24

<sup>20</sup> Attachment 11 - Policy B5.2.2. Historic Heritage Assessment

- 4.5 Due to the number of recorded archaeological sites in the coastal environment, evidence of extensive defended and undefended settlement areas, proximity to water ways and presence of a historic building, there is potential for further historic heritage places to be present within these properties. At present, there is insufficient information to determine if further significant historic heritage places are located within the plan change area, specifically the proposed FUZ.
- 4.6 Provision should be made within the proposed precinct provisions to ensure that significant historic heritage places are identified and protected from inappropriate subdivision, use and development (see section 7.1 recommendation 6).
- 4.7 Further assessment of heritage significance against the AUP RPS B5 criteria may also be required depending on the outcome of any additional historic heritage field survey.
- 4.8 Recommendation two under section 7.1 requests additional survey and assessment to provide for the identification and protection of historic heritage places as per the AUP RPS B5.

Cultural Landscape Plan (Precinct Plan 4)

- 4.9 The latest Cultural Landscape Plan (Precinct Plan 4) dated 10 May 2022 contains inaccurate and out of date information of the recorded archaeological sites and the corresponding site extents. The plan should be updated to:
- show the corrected site locations and extents as shown in the archaeological assessment (Figures 56-59)
  - include places identified through additional field survey (section 7.1, recommendation 2).
- 4.10 While this plan is intended to provide indicative information only, additional wording should be provided to highlight the wider areas of historic heritage, specifically archaeological potential across the plan change area. Further that the extent of some archaeological sites, in particular those within 620 Whitford-Maraetai Road, are likely to be larger than indicated in the archaeological assessment.
- 4.11 Furthermore, it is important that the plan change documentation recognises that the cultural landscape plan also includes sites of European origin associated to historical gum digging and farming activities across the plan change area (i.e., former building foundations, possible gum digging pit (R11/1444) and the standing structure of potential historic heritage value at 740 Whitford-Maraetai Road).
- 4.12 See recommendations three to five under section 7.1.

Significance assessment and scheduling of Pā site (R11/1619)

- 4.13 The archaeological assessment evaluated the significance of historic heritage places within the plan change area against both the Auckland Unitary Plan (**AUP**) Historic Heritage Regional Policy Statement (**RPS**) and Heritage New Zealand Pouhere Taonga Act (**HNZPTA**). The archaeological assessment states:
- “...Overall, most of the coastal sites are of limited to moderate archaeological value based on their information potential and other criteria discussed. The pā site, R11/1619 is of considerable/high value in terms of its information potential and rarity in the local context. The possible pā or kāinga R11/344 (= R11/1620) is also considered to have potentially high heritage value based on its information potential and contribution to the archaeological landscape...<sup>21</sup>”
- 4.14 The CVA provided by Ngā Tai ki Tāmaki<sup>22</sup> indicates that the pā (R11/1619) and surrounds are part of a larger settlement area and is considered to be of high cultural significance. While further assessment by Mana Whenua would be required against RPS B5.5.2 criterion c (Mana Whenua), information provided in the CVA indicates that this place would have at least considerable values associated to this criterion.

<sup>21</sup> Bickler et al. 2022: p. 62-65 and cl 23 response Attachment 11 - Policy B5.2.2. Historic Heritage Assessment (1 June 2022).

<sup>22</sup> Appendix 28 – CVA, p18-19.



- 4.15 Possible pā or kāinga R11/344 (= R11/1620) is also considered to have potentially considerable knowledge and contextual values against the RPS criteria. However, recent removal of pine trees across the site observed during the site visit, has impacted the place's overall physical integrity, limiting the appropriateness of scheduling as a historic heritage place.
- 4.16 The RPS **B5. Ngā rawa tuku iho me te āhua – Historic heritage and special character** provides two objectives in relation to historic heritage:
- (1) Significant historic heritage places are identified and protected from inappropriate subdivision, use and development.
  - (2) Significant historic heritage places are used appropriately and their protection, management and conservation are encouraged, including retention, maintenance and adaptation.
- 4.17 As set out above in sections 4.9-4.11, the pā site (R11/1619) has been evaluated against the heritage criteria set out in policy B5.2.2.1 (a-h). From the assessments provided, it is considered that the pā site (R11/1619) has at least considerable Mana Whenua (c), knowledge (d) and context values (h) at regional and local levels.
- 4.18 Based on field survey results and examination of aerial LiDAR data, an extent of place has been mapped and provided in Precinct Plan 4 – Cultural Landscape<sup>23</sup>. It is considered that the extent mapped is consistent with policy B5.2.2.2 (a-b), where the defined extent of a significant historic heritage place identifies (a) *the area that contains the historic heritage values of the place*; and (b) *where appropriate, any area that is relevant to an understanding of the function, meaning and relationships of the historic heritage values*.
- 4.19 Policy B5: 2.2.3 states that places are eligible for inclusion in Schedule 14.1 Schedule if:
- (a) the place has considerable or outstanding value in relation to one or more of the evaluation criteria in Policy B5.2.2 (1); and
  - (b) the place has considerable or outstanding overall significance to the locality or greater geographic area.
- 4.20 It is considered that pā site (R11/1619) has at least considerable Mana Whenua (c), knowledge (d) and context values (h) at regional and local levels and would meet the threshold for scheduling as a Category B<sup>24</sup> Historic Heritage Place in AUP Schedule 14.1.
- 4.21 It is recommended that pā (R11/1619) is scheduled in AUP Schedule 14.1: Schedule of Historic Heritage Places, to provide further recognition of the place and management of a broader range of activities within the mapped extent of place through AUP Chapter D17 provisions. Amendments to the plan change to provide consistently with the AUP historic heritage provisions are also required (see section 7.1 recommendation seven).

#### Assessment of Alternatives – Section 32

- 4.22 The statements set out above in sections 3.13-3.14 that “no sites of historic heritage value within the plan change area”<sup>25</sup>, are incorrect and appear to reflect a misunderstanding of the definition of historic heritage as set out under Part 1, Section 2 of the RMA<sup>26</sup>. Archaeological sites are an important component of historic heritage and often have associated heritage and cultural values.
- 4.23 While provisions for archaeological places are included within the plan change provisions (as discussed below), this foundational position appears to have created a misunderstanding of how historic heritage (including archaeological sites) are managed under the RMA and HNZPT Act (2014).
- 4.24 Consequently, there is no assessment of the private plan change against the Auckland Unitary Plan Regional Policy Statement **B5 Ngā rawa tuku iho me te āhua - Historic heritage and special character** and critically an assessment of the proposed precinct provisions against those

<sup>23</sup> Bickler et al. 2022: p.44-47 and Attachment 7 - Beachlands South Precinct Provisions, September 2022.

<sup>24</sup> RPS B5:2.2.4 (c).

<sup>25</sup> Section 32 2022: p. 105.

<sup>26</sup> historic heritage includes historic sites, structures, places, and areas, archaeological sites, sites of significance to Māori, including wāhi tapu; surroundings associated with the natural and physical resources which contribute to an understanding and appreciation of New Zealand's history and cultures.



provided in the AUP under B5 and D17 Historic Heritage Overlay. This has weight when considering the significance of the pā site R11/1619 and the most appropriate management recommendations for this place<sup>27</sup>.

4.25 Through the CI 23 processes an assessment against the B5 objectives and policies was requested<sup>28</sup>. The applicant's response only addresses matters against RPS B6 Mana Whenua and the cascading provisions under D21 Sites and Places of Significance to Mana Whenua Overlay<sup>29</sup>. Comment against these Mana Whenua provisions, and the effect given to cultural values, is outside the scope of this memo.

4.26 More specific comment on the appropriateness of proposed Mana Whenua standard (1.7.10), with regards to the management of historic heritage places and values, is provide in section 5.

4.27 It is recommended the applicant provide an assessment of alternatives against the provisions set out in AUP B5 and D17 in relation to significant historic heritage places and values.

4.28 Furthermore, comment from Mana Whenua should be provided regarding an indication of support for scheduling of the pā site (R11/1619) in Schedule 14.1 and/or Schedule 12, to respond to the above comments and applicants cl 23 response<sup>30</sup>.

4.29 These points are also reflected in section 7.1 through recommendations nine and ten.

## 5 Proposed plan change

### Proposed provisions and Pā site R11/1619

5.1 The Beachlands South Precinct provisions set out the following objectives, policies and standards which have regard to historic heritage (archaeological) matters and specifically pā site R11/1619, as shown on the Cultural Landscape Plan (Precinct Plan 4):

#### I.3 Objectives (precinct-wide) [rp]/dp]

(5)

Mana Whenua cultural, spiritual, and historical values and their relationship associated with the Māori cultural landscape, including ancestral lands, water, waahi tapu, and other taonga, in the Beachlands South Precinct are **identified, recognised, protected, and enhanced** *[emphasis added]*.

(6)

The tangible and intangible mana whenua values of the pa site identified on Precinct Plan 4 are protected and enhanced.

#### I.4 Policies [rp]/dp]

(5) Recognise, protect and enhance the cultural, spiritual and historical values and relationships associated with the cultural landscape at Beachlands South. These values include but are not limited to:

(a) The pa site identified on Precinct Plan 4, wāhi tapu and other taonga; ...

#### I.7 Standards

I.7.10. Mana Whenua Purpose: To recognise and protect important sites associated with the cultural landscape at Beachlands South.

(1) No buildings or structures are permitted within the pa site and its surrounds as identified on Precinct Plan 4. Development that does not comply with this standard is a discretionary activity.

(2) Any modifications to the pa site or earthworks within its surrounds as identified on Precinct Plan 4 is a discretionary activity.

(3) Subdivision that results in the pa site as shown on Precinct Plan 4 extending across multiple contiguous lots is a discretionary activity.

<sup>27</sup> See also Section 5.1 – 5.11

<sup>28</sup> Beachlands South PPC Clause 23 Response 05-08-2022. #H5

<sup>29</sup> Beachlands South PPC Clause 23 Response 05-08-2022. #H5

<sup>30</sup> Beachlands South PPC Clause 23 Response 05-08-2022. #H5

- 5.2 While in principle the objective (I.3.5 and 6) and policy (I.4.5 a) could be supported in lieu of scheduling as a historic heritage place in schedule 14.1. It is considered that the provided standards do not provide an adequate cascading of provisions, particularly with regards to enhancement of historic heritage values.
- 5.3 There is concern in how the provided provisions could be implemented. Development and subdivision within a defined extent of a historic heritage (archaeological) site can be complex, particularly where proposals place a pā (or other archaeological sites) under multiple titles in private ownership<sup>31</sup>. Managing archaeological sites in residential subdivision is not simple and can place restrictions on the utilisation and development of residential land burdening landowners with management of archaeological features (including under the HNZPT provisions).
- 5.4 Furthermore, this can result in inconsistent site management across allotments with subsequent negative heritage outcomes, particularly where guidelines for ongoing management are not specified upfront. Examples in a rural environment include differing grazing regimes, and poor fencing alignments, which can exacerbate damage and inappropriate planting. Issues with access can also arise when a place is split over multiple lots.
- 5.5 There could also be additional constraints for property owners under the HNZPT Act authority requirements. Also reiterating “that it is Heritage NZ policy to grant authorities to modify pā sites only in exceptional circumstances (see 2.2.3 of this report, policy 9.4)”<sup>32</sup>.
- 5.6 Furthermore, the pā’s inclusion within the Future Urban Zone (**FUZ**) does not allow sufficient certainty of the place’s protection in perpetuity. Without certainty how the extent of the pā will be lived zoned at a future stage, there is insufficient evidence to determine if the provided provisions are consistent with RPS B5 objectives and policies.
- 5.7 In addition, the provided standards cover a narrow range of activities, which may occur within the extent of the pā, compared to what is provided under the Historic Heritage Overlay Provisions. For example, activities provided in Table D17.4.2 Activity table – Activities subject to additional archaeological rules [rcp/dp], for grazing, conservation planting, archaeological investigation and tree removals.
- 5.8 While I understand the intention of the provided standards outlined above, and appreciate that the applicant is taking a proactive approach to identifying, recognising, protecting and enhancing historic and cultural heritage values associated to archaeological sites, I cannot support the provisions at this stage.
- 5.9 As discussed above, I would support the scheduling of pā site (R11/1619) in Schedule 14.1, which would mitigate the concerns in relation to the provided provisions and provide greater recognition of the significance of the place and protection through the existing AUP provisions for historic heritage. A recommendation to this effect is provided in section 7.1, point seven.
- 5.10 Furthermore, a conservation management plan of the pā site (R11/1619) should be provided to give effect to the provided objective (I.3.5 and 6) and policy (I.4.5 a) and can be used as a base to inform any future live zoning of the site as shown in the cultural landscape plan. This could be developed as a special information requirement, by both a suitably qualified archaeologist and Mana Whenua, to recognise, protect and enhance the heritage and cultural values of the place, including options for on- and off-site interpretation. This would offer greater certainty of the sites long term protection and provide the enhancement (conservation) of its historic (archaeological) and cultural values (see section 7.1 recommendation eight).
- 5.11 Finally, as discussed above, there is no assessment of alternatives against the RPS B5 in the section 32 planning analysis, to support the proposed precinct provisions with regards to historic heritage matters (see section 7.1 recommendation nine).

#### Ecological Protection Area Network (EPAN)

- 5.12 As noted above (section 3.8 - 3.9), majority of the recorded historic heritage (archaeological) sites fall within the proposed EPAN. While this area is excluded from development, the

<sup>31</sup> Note: these applications for scheduled historic heritage places are often not supported at a consenting phase.

<sup>32</sup> Bickler et al. 2022: p. 76.

assessment has identified that vegetation removal and planting within the EPAN has the potential to adversely affect archaeological sites. To identify, avoid, remedy and/or mitigate effects an “*Archaeological Vegetation Management and Planting Plan*” is proposed under I.10 – Special information requirements (3).

- 5.13 This additional reporting requirement is supported. However, amendments should be made to EPAN provisions to ensure that the archaeological and cultural values within the EPAN are appropriately recognised and provided for.
- 5.14 Master planning documents indicate a network of walkways and coastal access points within the EPAN, also with the potential to adversely affect historic heritage sites. To ensure heritage effects are avoided, remedied and mitigated, heritage / archaeological assessments under the *I.10 – Special information requirements (3)* should be broadened to include other proposed or potential future land disturbance activities within the EPAN (i.e., walkways and coastal access points).
- 5.15 Furthermore, any additional reporting should be scoped to provide ongoing site condition monitoring and conservation measures to give further effect to the proposed precinct objective I.3 (5) and those archaeological places also identified in Precinct Plan 4 – Cultural Landscape Plan. These recommendations could also be reflected in conditions of the proposed covenant (or other legal protection mechanism) over the EPAN (Section 7.1 recommendation 11).

## 6 Submissions

6.1 Submission 330 – Heritage New Zealand Pouhere Taonga (HNZPT) seeks a number of relief points. These are provided in the table below with associated commentary relevant to my specialist area. I have provided comment on specific Mana Whenua provisions where there is a clear overlap with Historic Heritage, specifically archaeological matters.

6.2 This table also includes comments from Megan Walker (Appendix 1) regarding historic heritage (built heritage) matters.

| Heritage New Zealand Pouhere Taonga Submission Table to PC88 (Private) -Beachlands South |                               |                   |  |   | Council Comments on Submission Points.   |
|--|-------------------------------|-------------------|--|---|--|
| Sub point  | PC88 Proposed Plan Provision  | Support or Oppose | Reason for Submission  | Relief Sought   |  |
| I.1 Beachlands South Precinct  |                               |                   |  |   |  |
| 1  | I.1 Beachlands South Precinct | Oppose            | The wider historic heritage of the Beachlands South Precinct has not been fully considered to address the impacts and protection requirements of historic heritage from inappropriate use, development, and subdivision. | The preparation of a Heritage Impact Assessment, addressing built, cultural, and archaeological heritage to inform the final planning provisions for the Beachlands South Precinct. | <p>Support - A wider heritage assessment which includes more comprehensive historical research and field survey (Section 7.1 recommendations 1-2) is essential to appreciating the comprehensive history of the area.</p> <p>This will assist in understanding the built heritage at 740 Whitford-Maraetai Road.</p> <p>Note: The address 678 Whitford-Maraetai Road mentioned in the HNZPT submission is not a known address. It is believed this is referring to a former house site rather than an extant house site.</p> |

|                                |  |                 |  |   |   |
|--------------------------------|--|-----------------|--|---|---|
| 2                              | 1.2. Precinct Description  | Oppose          | The description of the Precinct's wider historic heritage landscape (historic heritage, cultural and archaeology), in addition to the existing description of the Mana Whenua Cultural Landscape, is required to provide for the wider heritage context of the Precinct. | The addition of a Precinct Description of the Historic Heritage Landscape incorporating the findings from the Heritage Impact Assessment.   | Support - the inclusion of this more encompassing description of the broader historic heritage values of this precinct. This enables better management of historic heritage values within the area (Section 7.1 recommendation five). |
| 3                              | 1.2. Precinct Description  | Oppose          | Historic Heritage, Cultural and Archaeological features are not identified through the descriptions of the descriptions of zoning and sub-precincts.   | The addition of relevant historic heritage, cultural and archaeological features in the description of the relevant sub-precincts from the findings from the Heritage Impact Assessment and the Cultural Values Assessment. | Support as above (Section 7.1 recommendation five)  |
| 4                              | 1.2 Precinct Description – Mana Whenua Cultural Landscape  | Support         | The statements reflect the direction set through the Cultural Values Assessment.   | Retain  |   |
| 1.3 Objectives (precinct-wide) |  |                 |  |   |   |
| 5                              | 1.3 Objectives   | Support in part | There are no objectives relating to historic heritage and archaeology.   | The addition of appropriate historic heritage and archaeological objective.   | Support –an additional objective should be included to cover places defined as historic heritage (Section 7.1 recommendation six).<br><br>Recommended wording it provided in Appendix 2   |
| 6                              | 1.3(5) Mana Whenua cultural, spiritual, and historical values and their relationship associated with the Māori cultural landscape, including ancestral lands, water, waahi tapu, and other taonga, in the Beachlands South | Support         | This objective provides the direction for the protection of the cultural landscape of Beachlands South Precinct to ensure mana whenua values are protected and enhanced.   | Retain  |   |

|               |  |         |  |  |   |
|---------------|--|---------|--|--|---|
|               | Precinct are identified, recognised, protected, and enhanced   |         |  |  |   |
| 7             | 1.3(6) The tangible and intangible mana whenua values of the pa site identified on Precinct Plan 4 are protected and enhanced.   | Support | This objective provides the direction for the protection of the cultural landscape of Beachlands South Precinct to ensure mana whenua values are protected and enhanced. | Retain   | Support and propose amendments to recognise the historic heritage values of the place which have been identified.<br><br>Recommended wording is provided in Appendix 2.               |
| 1.4. Policies |  |         |  |  |   |
| 8             | 1.4. Policies  | Oppose  | There are no policies relating to historic heritage and archaeology.   | The addition of appropriate historic heritage and archaeological policies. | Support - Additional policies should be included to cover places defined as historic heritage (Section 7.1 recommendation six).<br><br>Recommended wording is provided in Appendix 2. |
| 9             | 1.4.(5) Mana Whenua<br><br>(5) Recognise, protect and enhance the cultural, spiritual and historical values and relationships associated with the cultural landscape at Beachlands South. These values include but are not limited to:<br>(a) The pa site identified on Precinct Plan 4, wāhi tapu and other taonga;<br>(b) The key views and spiritual connection identified on Precinct Plan 4;<br>(c) Freshwater quality; and | Support | This policy provides guidance on the protection of Mana Whenua's cultural, spiritual, and historic values are protected and enhanced.                                    | Retain   |   |

|               |  |                 |  |   |  |
|---------------|--|-----------------|--|---|--|
|               | (d) Mauri, particularly in relation to freshwater and coastal resources. |                 |  |   |  |
| I.7 Standards |  |                 |  |   |  |
| 11            | I.7.6 Ecological Protected Area Network                                  | Support in part | PC88 documentation implies protection/acknowledgement of the known archaeological sites within the EPAN. However, that narrative has not be carried through into the proposed planning provisions relating to EPAN.  | Amendment of Rule I.7.6 to address the protection of the archaeological and cultural sites, identified in the Cultural Landscape Plan, which are located within the EPAN extents. | <p>Support in Part - This has been partially addressed under the special information requirements (I.7.10 (3)) requiring for additional archaeological assessment with regards to planting and vegetation removal. As per section 5.12 – 5.15 and 7.1 (11) this reporting should be expanded to cover broader activities in addition to vegetation management.</p> <p>However, Rule I.7.6. does not recognize the cultural and archaeological values within the EPAN, nor is the additional archaeological reporting referenced to ensure the appropriate cascading of provisions.</p> <p>Amendments to Rule I.7.6. are required. Recommended wording is provided in Appendix 2.</p> |
| 12            | I.7.10 Mana Whenua   | Support in part | <p>The purpose of I.7.10 Mana Whenua, is “to recognise and protect important sites associated with the cultural landscape at Beachlands South.” However, the provisions only relate to the management of effects on the Pa (R11/1619).</p> <p>The rule should manage the inappropriate use, development, and subdivision on all historic heritage.</p> | Amend Rule I.1.7.10 to expand the protection and management of effects on all historic heritage features within the Precinct.   | Support in part - See sections 5.1-5.11.   |



| Precinct Plan 4 – Cultural Landscapes       |   |                 |   |   |  |
|---|---|-----------------|---|---|--|
| 13  | Precinct Plan 4 – Cultural Landscapes             | Support in part | The Cultural Landscape provides relative information of known archaeological sites and areas of spiritual significance to Mana Whenua within the Beachlands South Precinct. It does not address any other/wider historic heritage or archaeology that may be present this matter is addressed above (Ref to point 1). | The formation and inclusion of a wider Historic Heritage Landscape Plan to the precinct plans.  | Support in part - As above and section 7.1 recommendations three - four.   |
| 14  | Precinct Plan 4 – Cultural Landscapes             | Support in part | The indicative depiction on Precinct Plan 4 to only serve as a reminder for future planning and development phases of the presence of archaeological sites, that should be avoided as far as practicable does not provide the required level of protection of historic heritage.                                      | Detailed historic heritage plans are provided for each sub-precinct to ensure clarity of the specific cultural elements to be considered when undertaken the development of the sub- precincts. | Support – see also section 7.1 recommendation three - four, plans should include corrected site location information, and any additional places identified through further field survey. |
| Schedule 14.1 Schedule of Historic Heritage |   |                 |   |   |  |
| 16  | Amend Schedule 14.1 Schedule of Historic Heritage | support         | HNZPT does not support the use of the Precinct Plan 4 and Standard<br><br>I.7.10 Mana Whenua as the most effective mechanise of protection the identified significant Pa (R11/1619).  | Amend Schedule 14.1 Schedule of Historic Heritage to schedule the Pa (R11/1619) as an overlay.<br><br>Consequential changes (e.g., statements/mapping) necessary in scheduling the Pa.          | Support - Sections 4.13 – 4.21 and section 7.1 recommendation seven.   |

## 7 Conclusions and recommendations

7.1 To address the key historic heritage issues set out in section two and in response to relevant submission points the following recommendations are made.

1. Update the archaeological assessment with additional historical research into the European occupation and activity within the plan change area.
2. Undertake a field survey of private properties along Whitford-Maraetai Road within the plan change area, and the locations of geotechnical testing with potential archaeological evidence along coastal margins of 620 Whitford-Maraetai Road to inform future development. Further assessment of heritage significance against the AUP RPS criteria may also be required depending on the outcome of any additional historic heritage survey.
3. Amend the Cultural Landscape Plan (Precinct Plan 4) to show:
  - corrected archaeological site locations provided in the archaeological assessment.
  - any additional sites recorded through further field survey (recommendation 2).
4. Provide additional explanatory text regarding the Cultural Landscape Plan to further clarify that the archaeological information provided is indicative only, and that there are wider areas of historic heritage (archaeological) potential across the plan change area. Also, that site extents mapped in the archaeological assessment are larger than the point location data that is portrayed. These areas will require further archaeological and Mana Whenua input when development and land disturbance activities are proposed.
5. Amend the precinct description to include recognition of the historic heritage values within the plan change area.
6. Include a relevant objective and policy and cascading provisions to ensure that significant historic heritage places are identified and protected from inappropriate subdivision, use and development.
7. Include the pā site (R11/1619) in Schedule 14.1 Schedule of Historic Heritage, as a Category B historic heritage place and amend the proposed plan change to ensure consistency with the AUP historic heritage provisions.
8. Prepare a conservation management plan for pā site (R11/1619). This is to be developed by both a suitably qualified archaeologist and Mana Whenua to recognise, protect and enhance (conserve) the heritage and cultural values of the place, including options for on- and off-site interpretation.
9. Provide an assessment of alternatives of the proposed plan change against the Regional Policy Statement B5 Ngā rawa tuku iho me te āhua - Historic heritage and special character.
10. Provide comment from Mana Whenua should be provided regarding an indication of support for scheduling of the pā site (R11/1619) in Schedule 14.1.
11. Amend the EPAN provisions to ensure that historic values within the EPAN are appropriately identified and considered. Include amendments to the special information requirements (I.10.3) to ensure that other development works within the EPAN, such as walkway development avoid, remedy or mitigate adverse effects on historic heritage places and values.
12. It would be beneficial if the applicant engages in expert conferencing to address historic heritage (built and archaeological) matters.

7.2 Proposed amendments to the precinct provisions are set out in Appendix 2.

7.3 Overall, providing the above modifications are accepted, I can support the private plan change.

## 8 Appendix 1: s42a memo – Historic Heritage (Built Heritage), prepared by Megan Walker.

*Attached separately.*

## 9 Appendix 2: Proposed Amendments to Precinct Provisions

9.1 Proposed amended to the precinct provisions are provide below in relation to historic heritage matters. Additions are shown with text underlined and removals ~~struck through~~.

### I.1. Beachlands South Precinct

#### I.2. Precinct Description

*Mana Whenua Cultural Landscape*

##### Historic Heritage

*Text to be added following additional historical research.*

*Wording here should support the cultural landscape description and significance to Mana Whenua, while also recognising that some places of significance also hold historic heritage value.*

##### *Zoning and Sub-precincts*

- *Sub-precinct D, Coastal*

Sub-precinct D, Coastal is zoned Residential – Terrace Housing and Apartment Buildings, Residential - Mixed Housing Urban and Residential – Large Lot. The sub-precinct is located along a coastal escarpment with significant landscape features including a central ridge sloping towards a densely vegetated gully of significant terrestrial and ecological value. Historic heritage places of historic and cultural value are located along the coastal edge which are to be protected and enhanced. Development in this sub-precinct will respect the natural rolling topography and landform character while ensuring people and property is protected from natural hazards. The coastal edge of this sub-precinct is celebrated with the provision of a high-quality public open space network for walking and cycling connections offering sweeping views of the Hauraki Gulf and Waikōpua Estuary. Residential densities in this sub-precinct are expected to be high to medium density closer to the Village Centre, in combination with terraced and detached housing, and provision for larger lots within the Large Lot Zone along the coastal edge which are subject to the Subdivision Variation Control.

#### I.3. Objectives (precinct-wide) [rp/dp]

(4) Development of Beachlands South creates a distinctive sense of place which maintains and enhances significant ecological features, and responds to natural site features, landform, ~~and~~ mana whenua and historic heritage values.

(5) Mana Whenua cultural, spiritual and historical values and their relationship associated with the Māori cultural landscape, including ancestral lands, water, waahi tapu, and other taonga, in the Beachlands South Precinct are identified, recognised, protected, and enhanced.

(6) The tangible and intangible mana whenua and historic heritage values of the pa site identified on Precinct Plan 4 are protected and enhanced.

(12) Subdivision and development are designed and located to avoid, or otherwise remedy or mitigate, adverse effects on ecological, historic heritage and cultural features within the Ecological Protected Area Network.

(13) Adverse effects on the receiving environment including the natural coastal environment, ~~and~~ significant ecological areas and historic heritage and cultural places are avoided as far as practicable, or otherwise minimised or mitigated.

(14) A high-quality coastal walkway and connected network of open spaces is established which recognises the need to protect and manage effects on the marine significant ecological areas and historic heritage and cultural places.

(XX) that significant historic heritage places are identified and protected from inappropriate subdivision, use and development

#### I.4. Policies [rp/dp]

##### Mana Whenua

(5) Recognise, protect and enhance the cultural, spiritual and historical values and relationships associated with the cultural landscape at Beachlands South. These values include but are not limited to:

- (a) The pa site identified on Precinct Plan 4, wāhi tapu and other taonga;

##### Sustainability

(6) Develop Beachlands South as a highly sustainable and low-carbon coastal town by:

- (c) Protecting and enhancing biodiversity values in the precinct with restoration and regeneration native planting, particularly within the Ecological Protected Area Network;

(XX) Protecting and enhancing historic and cultural values in the precinct, particularly within the Ecological Protected Area Network

##### Ecology and Biodiversity

(8) Enable the subdivision and development of land while protecting, restoring, maintaining and enhancing identified terrestrial, wetland, stream, coastal marine, ~~and~~ wetland ecological values and historic and cultural heritage values, particularly within the Ecological Protected Area Network.

Note 1 When having regard to Policy I.3(8), (9) and (10) above, the following documents or any updated version of them should be referred to:

##### Open Space Network

(18) Establish an integrated movement and public open space network within and across the precinct as indicatively shown on Precinct Plan 3, including:

- (d) Encourage provision of the indicative coastal walkway to enable access to and along the coast while avoiding adverse effects on the marine significant ecological areas and historic and cultural heritage places;

(XX) avoid significant adverse effects on significant historic heritage places. Where significant adverse effects cannot be avoided, they should be remedied or mitigated so that they no longer constitute a significant adverse effect.

#### I.7. Standards

##### I.7.6. Ecological Protected Area Network

Purpose: To protect and enhance identified significant terrestrial vegetation/habitat types, historic heritage sites, cultural values and significant ecological areas from subdivision and development and contribute to addressing residual ecological effects.

(3) Any application for subdivision within the precinct must include the following on the subdivision scheme plan, as identified on Precinct Plan 2:

- (a) Areas subject to the EPAN and proposed to be planted as part of any ecological offsetting or compensation package;
- (b) Areas subject to the Significant Ecological Area – Terrestrial overlay;
- (c) High Value Terrestrial Planting areas;
- (d) Wetland Margin Buffer Planting areas; and
- (e) Indicative Native Revegetation areas.
- (f) historic heritage sites

(4) The areas listed in Standard I.7.6(3)(a) – (ef) inclusive above must be legally protected and maintained by a covenant (or other legal protection mechanism) on the Certificate of Title for each site within the precinct.

(5) The covenant (or other legal protection mechanism) must require the areas listed in Standard I.7.6(3)(a) – (ef) inclusive above to be revegetated, maintained, restored and enhanced in accordance with the Biodiversity Management Plan and Historic Heritage Management Plan required in Special Information Requirement I.10.(1 -3).

(6) The covenant (or other legal mechanism) must require every landowner within the precinct to be a member of a Residents Association (or similar) that will manage the areas listed in Standard I.7.6(3)(a) – (ef) inclusive above and contribute a proportional sum each year to ensure the Biodiversity Management Plan and Historic Heritage Management Plan is implemented on an on-going basis.

I.7.10. Mana Whenua Purpose: To recognise and protect important sites associated with the cultural landscape at Beachlands South.

~~(1) No buildings or structures are permitted within the pa site and its surrounds as identified on Precinct Plan 4. Development that does not comply with this standard is a discretionary activity.~~

~~(2) Any modifications to the pa site or earthworks within its surrounds as identified on Precinct Plan 4 is a discretionary activity.~~

~~(3) Subdivision that results in the pa site as shown on Precinct Plan 4 extending across multiple contiguous lots is a discretionary activity.~~

*These provisions are replaced by the historic heritage overlay (D17) subject to the inclusion of pā site (R11/1619) in Schedule 14.1: Schedule of Historic Heritage Places.*

I.8. Assessment – controlled activities

I.10. Special information requirements

(2) Biodiversity Management Plan (a) Any application for subdivision in the precinct involving the Ecological Protected Area Network (EPAN) as identified on Precinct Plan 2 must be accompanied by a Biodiversity Management Plan for the EPAN addressing staged implementation of the following:

(3) ~~Archaeological Vegetation~~ Historic Heritage Management ~~and Planting~~ Plan

(a) An application for subdivision or development along the coastal edge of the EPAN identified on Precinct Plan 2 must be accompanied by a ~~vegetation~~ management plan and planting plan which takes into account the location of recorded archaeological historic heritage sites, prepared in consultation with a suitably qualified archaeologist and Mana Whenua. The management plan should cover, but is not limited to the following:

- Vegetation management and planting recommendations
- Site condition assessment and monitoring provisions
- Management recommendations for site protection and enhancement
- Opportunities for on- and off site heritage interpretation and education.

(XX) Conservation Management Plan – Pa Site (R11/1619)

(a) The conservation management plan for pā site (R11/1619) is to be developed by both a suitably qualified archaeologist and Mana Whenua to recognise, protect and enhance (conserve) the historic and cultural heritage values of the place, including options for on- and off-site interpretation.

# Memo (technical specialist report to contribute towards Council's section 42A hearing report)

18 August 2023

To: Chloe Trenouth, Consultant Planner

From: Megan Walker, Specialist Historic Heritage (Built Heritage) Auckland Council Heritage Unit

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**Subject: Plan Change 88 – Beachlands South – Historic heritage (built) assessment**

## 1.0 Introduction

1.1 I have undertaken a review of the private plan change on behalf of Auckland Council relating to effects on historic heritage. My review is focused on built heritage and includes addressing potential historic heritage interest. This advice does not address effects on archaeology, which is the subject of a separate review by Rebecca Ramsay, nor does it address effects on mana whenua cultural values.

1.2 My current role is Specialist – Historic Heritage in the Heritage Policy Team. I have held this role since April 2015. Prior to this role, I was employed as an architectural graduate by conservation architects, DPA Architects, from February 2009 for six years.

1.3 I have a Bachelor of Architecture (Honours) from the University of Auckland. I have six years of experience in conservation architecture and have researched and prepared over 70 conservation plans and heritage assessments. I have eight years of experience in heritage policy planning, which includes skills and experience in plan development and modifications, inputting into structure and area plans and resource consents, undertaking heritage surveys, and evaluating heritage places.

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

- PC 88 – Section 32 report
- PC 88 - Appendix 3 – Beachlands South Precinct Provisions
- PC 88 - Appendix 4 – Beachlands South Structure Plan
- PC 88 - Appendix 6 – Urban Design Assessment
- PC 88 - Appendix 27 - Archaeological Assessment

## 2.0 Key built historic heritage issues

2.1 The primary issue this memo addresses is the need to establish the potential historic heritage values of the early house at 740 Whitford-Maraetai Road. Brief historic research has determined this building is on the former property of early settlers in the district, the Kelly family, who purchased the property in 1898. They were already well established residents in the area and the property was retained by the family until the middle of 20<sup>th</sup> century. The archaeological assessment provided, does not include any background on the Kelly Family association to the Beachlands area.

Although yet to be determined, the place was possibly built prior to 1900 and would therefore be afforded a level of management and protection by the Heritage New Zealand Pouhere Taonga (HNZPT) Act (2014) as an archaeological site (building) associated with pre-1900 human activity.

- 2.2 It should be noted that although this place is not included in the Auckland Council Historic Heritage Schedule 14.1 or recorded on the Cultural Heritage Inventory, this has no reflection on the potential heritage value of the place. A heritage evaluation of the place is necessary to determine the heritage values and to avoid potential loss of the place.
- 2.3 More comprehensive historic research with regard to the European history of the Beachlands South entire Precinct, including the private properties, would be beneficial in understanding the historic heritage values of the area.

### **3.0 Applicant's assessment of 740 Whitford-Maraetai Road, Beachlands South**

- 3.1 The applicant has not addressed the CL23 request for a historic heritage assessment of the plan change area. The applicant's response contends that the property at 740 Whitford-Maraetai Road is in private ownership and is not part of the proposed development that is planned as part of this plan change process.
- 3.2 In the CL23 response<sup>1</sup> regarding Historic Heritage, the applicant acknowledges that 740 Whitford-Maraetai Road has potential heritage value. However, the applicant considers this should be assessed when the Future Urban Zone is rezoned for future urban development.
- 3.3 As we have limited information on the early house at 740 Whitford-Maraetai Road, it is important that an assessment is undertaken to understand the historic heritage values of the place to avoid loss of any significant historic heritage to the area.

#### *Heritage Assessment – Clough Report*

- 3.4 The archaeological assessment undertaken by Clough and Associates has a limited section on the European history of the area referring to the Fairburn Purchase and early farming in the area. There is no information on the property at 740 Whitford-Maraetai Road and its inhabitants, the Kelly family, despite the presence of an early cottage on the property.

#### *Section 32 and Structure Plan*

- 3.5 The section 32 report<sup>2</sup> states that 'there are no built/historic heritage or character items/areas identified within the PPC area.'<sup>3</sup> The Structure Plan refers to the archaeological report 'that has confirmed there are no sites of historic heritage within the Structure Plan area.'<sup>4</sup> (Noting that the Structure Plan covers the entire area of the Future Urban Zone, not just the area owned by the applicant).
- 3.6 Therefore, there is no acknowledgement of the house located at 740 Whitford-Maraetai Road and consequently no proposal to recognise the place as being a potential link to the early farming history of the area and the history of the Kelly family.

#### *Management options/ Precinct provisions*

- 3.7 The property at 740 Whitford-Maraetai Road, currently zoned Rural-Countryside Living and in the Beachlands South Precinct proposal the place will be changed to a Future Urban Zone.

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<sup>1</sup> PC 88 CL23 response prepared by Unio Environmental

<sup>2</sup> PC 88 Section 32 report. Prepared by Unio Environmental

<sup>3</sup> Ibid p44

<sup>4</sup> Ibid, p66



- 3.8 While this property is currently in private possession, and there are no current proposals for its development as part of Plan Change 88, this may not be the case in the future and given the rezoning of the area, there are likely risks that any potential historic/built heritage on this site will be lost as new development occurs.
- 3.9 Ideally a historic heritage evaluation of 740 Whitford-Maraetai Road should be undertaken as part of this plan change process to inform the future development of the place. However, if not now, then precinct provisions should be put in place to ensure a future historic heritage evaluation is undertaken.
- 3.10 Further historic research and physical examination of the building may also provide a more accurate or indicative date of construction to inform of any further requirements under the Heritage New Zealand Pouhere Taonga Act (2014).
- 3.11 There are no provisions in the Beachlands South Precinct that acknowledges European historic heritage including built structures and archaeological sites. If, following a more detailed report on the European history of the precinct, additional places are proven to have historic heritage value, then the provisions should be revised to reference those heritage values.

#### **4. Conclusions and recommendations**

- 4.1 I recommend additional historical research is undertaken to establish a better understanding of the European heritage values of the Beachlands South Precinct. This is necessary to determine the impact of development on the identified and potential historic heritage in the Beachlands South Precinct and will assist in informing the precinct provisions.
- 4.2 Should additional research provide evidence of European historic heritage, then these findings need to be addressed in the precinct provisions, to avoid any adverse effects on the Beachlands South Precinct's historic heritage. Identified sites are not just those that are listed in the Auckland Council's Historic Heritage Schedule 14.1, or those recorded in the Cultural Heritage Inventory, but also those that are yet to be identified through more detailed historic research as mentioned above.
- 4.3 As there is limited information on the early house and property at 740 Whitford-Maraetai Road, I recommend a heritage evaluation be undertaken to establish historic heritage values of the place. It is possible the place was built prior to 1900 and therefore subject to HNZPT protection. The place clearly has historic significance in its association with a prominent early Beachlands family. However, a heritage evaluation is necessary to establish the level of significance and to determine if it should be protected by its inclusion in Auckland Council's Historic Heritage Schedule 14.1. This should be done as soon as possible to avoid the potential risk of losing this tangible association with the Kelly family.
- 4.4 If this cannot be carried out as part of this plan change process, then I support the inclusion of a condition in the precinct provisions that the heritage evaluation is required prior to future development of this address. The property, 740 Whitford-Maraetai Road, is still part of the Beachlands South Precinct, and therefore should be acknowledged. This could include rules/activity table line items and assessment criteria within the provisions for Beachlands South Precinct to address the consideration of historic heritage on this site in relation to any future development.
- 4.5 Overall, I cannot support the current plan change unless there is some consideration to those recommendations made above.

## **Memo (technical specialist report to contribute towards Council's section 42A hearing report)**

22 August 2023

To: Chole Trenouth – Consultant Reporting Planner (on behalf of Auckland Council)

And to: Susan Andrews – Principal Planner, Auckland Council Healthy Waters

From: Amber Tsang – Consultant Planner (on behalf of Auckland Council Healthy Waters)  
Zheng Qian – Senior Healthy Waters Specialist, Auckland Council Healthy Waters

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**Subject: Private Plan Change (PPC) 88 – 110 Jack Lachlan Drive and 620, 680, 682, 702, 712, 722, 732, 740, 746, 758 and 770 Whitford-Maraetai Road, Beachlands (the site) – Stormwater Assessment**

### **1.0 Introduction**

This memo has been written between Amber Tsang, Senior Associate Planner at Jacobs and Zheng Qian, Senior Healthy Waters Specialist at Auckland Council Healthy Waters.

Amber Tsang has worked as a consultant planner for Healthy Waters since 2016. Ms Tsang holds a Bachelor of Planning (Hons) degree from the University of Auckland and has been a full member of the New Zealand Planning Institute since 2012.

Zheng Qian has an overseas Bachelor of Science degree and a Master of Engineering Studies (Hons) degree from the University of Auckland. Ms Qian has worked as senior Healthy Waters Specialist in the catchment planning team of Healthy Waters since 2010 and has 20 years of experience in infrastructure and catchment planning, mainly in the field of stormwater management.

We (Ms Tsang and Ms Qian) have assessed the Stormwater Management Plan (SMP) submitted as part of PPC 88, on behalf of Auckland Council Healthy Waters, in relation to stormwater effects against the plan change requirements. Comments have also been provided in relation to the Auckland Council Healthy Waters' Regionwide Network Discharge Consent (NDC).

In writing this memo, we have reviewed the following documents:

- Beachlands South Stormwater Management Plan by Harrison Grierson dated March 2022.
- The Applicant's Request for Information (RFI) response dated 30 June 2022.
- The Applicant's RFI response dated 6 October 2022.
- Beachlands South Precinct Provisions dated September 2022.
- Submissions received raising stormwater related issues.

The following sections are provided to assist the reporting planner's consideration of the plan change proposal in terms of stormwater effects.

The PPC 88 Applicant has indicated that it wishes its stormwater discharges to be covered by the NDC and intends to vest stormwater assets with Auckland Council. The Healthy Waters' NDC authorisation and SMP adoption process will be discussed in this memo.

### **2.0 Key Stormwater Issues**

PPC 88 seeks to rezone approximately 159.54 hectares of land south of the Beachlands township from Rural – Countryside Living zone under the Auckland Unitary Plan – Operative in Part 2016 (AUP(OP)) to a mixture of Residential – Mixed Housing Urban, Business - Local

Centre, Business – Light Industry, Business – Mixed Use, and Open Space zones, and to rezone a further 147.58 hectares of land from Rural – Countryside Living zone to Future Urban zone.

PPC 88 will enable greenfield development on the site and result in new stormwater discharges and diversions of stormwater flows. The primary stormwater management issues associated with PPC 88 are:

- Water quality – stormwater runoff from three sub-catchments within the site are proposed to discharge into the Waikopua Creek Estuary via streams within the site boundary. The other two sub-catchments will discharge into the Waikopua Creek Estuary via a modified watercourse along the northern side of Jack Lachlan Drive. The Waikopua Creek Estuary is identified as a Significant Ecological Area (SEA) under the AUP(OP). Appropriate treatment of stormwater is therefore required onsite prior to its discharge in order to avoid and/or mitigate water quality effects.
- Stream hydrology – development increases imperviousness and will therefore increase the flow rate and volume of runoff into the stream network while reducing ground infiltration unless mitigated. An equivalent of the Stormwater Management Area Flow 1 (SMAF1) hydrology mitigation is required to retain base flow and reduce the risk of erosion in the downstream watercourses.
- Flood management within the PPC 88 area – both primary and secondary stormwater systems shall be designed as per the Auckland Council Stormwater Code of Practice (SWCoP) and the proposed development lots shall be free from flooding.
- Flood hazard assessment and peak flow attenuation – flood risks associated with increased peak runoff being discharged from the PPC 88 area onto the downstream properties shall be mitigated.
- Precinct provisions shall be included to ensure the implementation of the stormwater mitigation measures proposed in the SMP.

### **3.0 Applicant's Assessment**

Section 6 of the SMP sets out the stormwater management proposed by the Applicant. The proposed management in relation to water quality and stormwater treatment, hydrology mitigation, stormwater network and flooding are summarised below.

#### **Water quality – stormwater treatment**

Table 13 of the SMP recommended the treatment train approach with treatment of stormwater runoff being provided at source and a second stage of treatment being provided prior to discharge.

As proposed in Section 6.3.3 of the SMP, runoff from public roads and other public impervious areas are to receive GD01 level of treatment through bioretention swales and raingardens within the road reserve.

The use of communal devices/basins/wetlands is proposed in Section 6.3.5 of the SMP to provide for a second stage of treatment. A total of 15 communal devices/basins/wetlands are proposed to achieve both stormwater treatment and peak flow attenuation.

In Section 6.3.4, the SMP stated that rainwater tank is the preferred solution for managing stormwater effects at source within private lots to provide retention (through non-potable reuse) and detention of runoff prior to discharge into the public stormwater network. Little information is provided on stormwater quality treatment for private access ways and parking areas.

Building materials of the roofs are to be inert as required by the stormwater quality standard proposed by the Applicant as part of the Beachlands South Precinct provisions (precinct provisions).

## Hydrology mitigation – stormwater detention and retention

The Applicant proposes to provide the equivalent of SMAF1 hydrology mitigation (i.e., E10 of the AUP(OP) by way of introducing the SMAF1 overlay for the plan change area). This comprises retention (5mm runoff to be removed from the discharge through reuse and/or infiltration) and detention (discharge of the 95<sup>th</sup> percentile rainfall event over a 24-hour period).

### Flood management within the PPC 88 area

A new pipe network is proposed to be constructed within the site to convey runoff from roads, other public areas and future development lots. The proposed network will have capacity for the 10% AEP storm events. Overland flow paths (OLFP) will be managed within engineered channels and drainage reserves. Minimum finished floor levels for new buildings are proposed to be established as per the SWCoP and the New Zealand Building Code (NZBC).

### Flood hazard assessment and peak flow attenuation

Hydraulic models for the pre and post development scenarios were developed by the Applicant using InfoWorks ICM v11 software to identify flood risks associated with the potential land development within the PPC 88 area. The Applicant has proposed to attenuate stormwater runoff from the northern stream catchments (i.e. Catchments 1 and 2) to the predevelopment level in the 1% AEP storm event to avoid flood risks on the downstream properties. However, the flood attenuation devices were not included in the hydraulic models. The Applicant's assessment with the hydraulic modelling undertaken to date does not ascertain that flood risks posed by PPC 88 to the properties at the lower part of the Jack Lachlan stream will be avoided or mitigated. This is discussed further in Section 4 of the memo below.

The Applicant has proposed peak flow attenuation in the 50% AEP storm event within Catchments 3, 4 and 5. There is no existing property downstream of these catchments and hence, attenuation for flood mitigation is not required. The purpose of the proposed 50% AEP peak flow attenuation is not explained in the SMP. The attenuation devices for the 50% AEP storm event may be proposed for stream erosion protection purposes, however this should be clearly stated in the SMP.

## 4.0 Assessment of Stormwater Effects

Based on the discussion in Section 3 above, the assessment of stormwater effects of PPC 88 are summarised as follows:

- Water quality – We agree that the stormwater management proposed in the Applicant's SMP will provide an appropriate level of stormwater treatment for the proposed public roads and other public impervious areas. However, limited information is provided on how treatment of runoff from private impervious areas will be catered for. Therefore, it is unclear how the proposed stormwater management will avoid or mitigate any actual and potential water quality effects from these areas.

The Applicant has proposed two stormwater management policies (Policies 22 and 23) and a stormwater quality standard (Standard I.7.7) as part of the proposed precinct provision. Policy 22 as proposed by the Applicant requires stormwater quality treatment of stormwater runoff from **all impervious areas**. However, the proposed standard only imposes requirements for some impervious (i.e. public and high contaminant generating roads and car parks) but not the others.

In order for PPC 88 to avoid or mitigate any actual and potential water quality effects on the sensitive receiving environment (i.e. Waikopua Creek being an SEA) and to give effect to the National Policy Statement for Freshwater Management – Amended 2020 (NPS-FM), the Regional Policy Statement (RPS) provisions for water quality<sup>1</sup> and integrated management

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<sup>1</sup> Chapters B7.3 and B7.4 of the AUP(OP).

objectives and policies in Chapter E1 of the AUP(OP), precinct provisions as recommended and outlined in **Attachment A** (as a minimum) should be required. More discussion on the need for precinct provisions are provided in Section 6 below.

- Stream Hydrology – Ms Qian considers that the introduction of the SMAF1 overlay for the plan change area will provide appropriate hydrology mitigation. However, the SMAF1 overlay should not apply to the plan change area where the Future Urban Zone is proposed. We recommend that the SMAF1 overlay is removed from that part of the plan change area.
- Stormwater Devices – The Applicant has proposed an estimated 1,500 lineal metres of bioretention rain gardens and 4,300 lineal metres of bioretention swales to provide hydrological mitigation and stormwater treatment for the proposed public roads. There are also 15 basins/wetlands proposed for peak flow attenuation and water quality treatment.

Stormwater devices can have multiple functions covering water quality treatment, retention and detention for hydrology mitigation, as well as flood attenuation. Therefore, the Applicant's SMP needs to clearly state the target performance requirements and intended catchment areas to be serviced by the proposed basins/wetlands, rain gardens and swales.

While we agree that the proposed treatment train approach will provide the desired stormwater outcomes to protect the receiving environment, it appears that the number of stormwater management devices proposed are more than that is required and will be expensive to operate and maintain from lifecycle costing perspectives. Ms Qian considers that the number of at source stormwater devices can be reduced by combining them into larger but fewer communal devices, and the devices shall have multiple stormwater management functions where possible to achieve the required stormwater outcomes in a cost-effective way throughout the lifecycle.

We also note that proposed Detention Basin number 8 is located on third party land, outside of the live zoning of the PPC 88 area. The Applicant will need to demonstrate the practicality of implementing stormwater management on third party land or consider alternative solutions.

- Flood risks – Flooding and potential stormwater runoff effects on the downstream properties could be significant. While these effects could potentially be avoided or mitigated (i.e. through sufficient peak flow attenuation and flood storage being provided within the plan change area), a revised flood hazard assessment by the Applicant is deemed necessary for the reasons outlined below.

Approximately 140ha of the PPC 88 area discharges stormwater runoff to the stream located north of Jack Lachlan Drive that runs mostly in parallel with the road. There are known existing flooding issues within the Pine Harbour Marina and the residential properties along Jack Lachlan Drive by the lower reach of the stream. The low-lying properties at 167 to 189 Jack Lachlan Drive have their habitable floor levels set at 5.9mRL or lower and are at risk of flooding in extreme storm events. Any increase of flood levels within the stream, as a result of the proposed land development in the PPC 88 area, could have significant effects on the properties.

In the flood hazard assessment, the Applicant used a constant water level of 4.5 mRL as the tidal boundary for the pre and post development scenarios. While it is a good practice to check inundation risks in a conservative scenario of 1% AEP coastal inundation event with two meters of sea-level-rise, this assumption is not appropriate to be used in an impact assessment. With this assumption, the land within Pine harbour marina that is below 4.5mRL was shown as inundated in the predevelopment scenarios. Therefore, impacts that may be imposed by the proposed land development within the PPC 88 area could have been masked and were not identified.

The Applicant has used future rainfall with climate change factors to assess the flood risks of the predevelopment scenario. Again, this assumption would indicate an elevated risk of



flooding of the predevelopment scenario as the future rainfall is 13.2% higher in peak than the current rainfall for the 10% AEP design rainfall event and 16.8% higher for the 1% AEP design rainfall event.

For both the pre and post development scenarios, the Applicant has used the 2013 LIDAR data as the ground model to undertake hydraulic modelling. The 2013 LiDAR data contains the former Formosa Dam within the Jack Lachlan stream which has been decommissioned since 2015. The Formosa Dam was a significant dam structure. According to the Potential Impact Classification (PIC) assessment undertaken by Beca in 2010 for the Formosa Country Club Dam, it was approximately 7m to 8m high with a reservoir storage of approximately 50,000 m<sup>3</sup> at the spillway crest level. The 2013 LiDAR data is therefore outdated and should not be used as the current landform to identify flooding risks for the pre and post development scenarios. The Applicant's modelling results showing the Jack Lachlan stream has no modelled flows in the 10-year storm event proves that the modelling undertaken and associated results do not reflect the current status of the stream.

Ground model is one of the fundamental basics for flood modelling. It is not clear why the Applicant has used the 2013 LiDAR data instead of the 2016 LiDAR which has been available since 2019. On this basis, detailed technical review of the Applicant's hydraulic model has not been undertaken by Healthy Waters. Since Oct 2022 Healthy Waters has requested revised flood modelling and assessment using up to date LiDAR data. To date, the Applicant has not provided the requested information.

The Applicant has listed in the SMP indicative attenuation volumes required for the 15 detention basins/wetlands based on the proposed land use change. Peak flow attenuation in the 1% AEP storm event is proposed for Catchments 1 and 2, and the 50% AEP storm event is proposed for the other three catchments. The Applicant stated that increases in downstream flood hazards identified through the hydraulic modelling can be mitigated by the use of the peak flow attenuation basins/wetlands. However, Ms Qian considers that basing the sizing of peak flow attenuation devices on imperviousness changes alone is not sufficient to address the potential flood risks posed by the proposed land development. There are existing depression areas within the current landform of the PPC 88 area that provide for ponding of water and flood storage. The flood storage function of these depression areas will need to be assessed and may require retention. And as discussed before, given that the Formosa dam is no longer in place, a flood assessment of the predevelopment scenario that represents the current landform of the area is required to confirm that the postdevelopment peak flow discharges from the PPC 88 area will cause no more than minor risks of flooding to the downstream properties.

Chapter E36 (Natural hazards and flooding) of the AUP(OP) imposes restriction on activities within the mapped flood hazard areas (i.e. 1% AEP floodplains and overland flow paths), but it does not address downstream flood risks resulting from an increase of impervious built development enabled by a greenfield plan change. It would be problematic to rely on Chapter E36 of the AUP(OP) alone to avoid or mitigate flood impacts of upstream greenfield developments on downstream properties.

## **5.0 Network Discharge Consent and Stormwater Management Plan**

Auckland Council Healthy Waters holds a region wide NDC for stormwater which commenced on 30 October 2019. Diversions and discharges of stormwater through the public network are permitted by the NDC provided that the discharges and network are authorised by an SMP, and the impervious area is lawfully established. This includes a privately built network that wants to connect to the public stormwater network.

The NDC authorisation applies through the adoption of SMPs into Schedule 10 of the NDC. If an SMP is adopted, then no other discharge consent is needed. If no SMP is adopted or Healthy Waters does not accept developer-built stormwater devices for vesting in Council, then a private

discharge consent is required. Necessary approvals to connect to the public stormwater network are still covered by the Stormwater Bylaw 2015 and infrastructure must meet the Stormwater Code of Practice.

The PPC 88 Applicant has indicated that it wishes its stormwater discharges to be covered by the NDC and intends to vest stormwater assets with Auckland Council.

For greenfield developments discharging to an SEA, including PPC 88, it is a requirement of the NDC that an SMP is notified with the plan change documents and meets the NDC's requirements.

The SMP must be consistent with the NDC's Schedule 2 (which sets out the NDC's strategic objectives, outcomes, and targets) and Schedule 4 (the performance requirements).

If an SMP is to be adopted following the approval of a notified plan change, the SMP must have been prepared to support the notified plan change and the plan change must be consistent with the SMP. The requirement that the plan change must be consistent with the SMP is to ensure that the precinct provisions are adequate to implement the management methods and mitigation measures set out in the SMP.

## **6.0 Need For Precinct Provisions**

The NDC is a discharge consent and cannot, on its own, require the implementation of necessary measures identified in an SMP. While SMPs are useful to inform the land development process, they cannot be enforced on their own as they are neither a rule nor a regulation. In addition, the suite of AUP(OP) Auckland-wide rules that relate to stormwater management are not by themselves sufficient for new greenfield development. For example, the only rules in the AUP(OP) relating to water quality are in Chapter E9 – Stormwater Quality – High contaminant generating car parks and high use roads.

Therefore, appropriate precinct plan provisions are necessary to ensure the SMP is implemented to manage stormwater discharges and associated effects (including water quality effects) in subsequent land development processes. The Applicant's SMP proposes a number of stormwater management measures (including stormwater quality treatment) which need to be supported by precinct plan provisions.

Based on the above, a suite of objectives, policies, standards and associated assessment criteria (with recommended amendments to the Applicant's proposed provisions), as outlined in **Attachment A**, is considered necessary to be included as precinct provisions within PPC 88. This is to ensure the implementation of the Applicant's SMP and mitigation of stormwater effects on the receiving environment, as well as to achieve the NDC's outcomes via appropriate land development controls.

## **7.0 Submissions**

The submissions received on PPC 88 which raised stormwater related issues are summarised in Table 1 in **Attachment B**. The submissions that address the same issues have been grouped under the following topic headings followed by our comments and recommendations.

### **A. Stormwater infrastructure needs**

A large number of submissions (Submissions 22.1, 28.1, 32.2, 46.4, 47.5, 62.2, 62.2, 95.2, 96.2, 97.2, 98.2, 99.2, 100.2, 101.2, 102.2, 103.2, 105.2, 106.2, 108.2, 133.2, 134.2, 135.2, 136.2, 137.2, 189.1, 190.1, 201.2, 346.5, 73.5, 83.4, 85.3, 86.5, 94.1, 104.2, 147.1, 150.2, 151.1, 152.2, 159.3, 163.2, 164.1, 167.3, 194.1, 215.2, 224.2, 233.4, 237.1, 241.3, 253.1, 254.2, 272.2, 274.1, 276.4, 295.6, 308.1, 344.7, 359.1, 380.5 and 382.1) raised concerns in relation to the need for infrastructure upgrade including stormwater infrastructure.

Stormwater infrastructure within the plan change area to manage the water quality and quantity effects arising from PPC 88 has been proposed by the Applicant. However, as discussed in



Sections 3 and 4 above, limited information is provided in the SMP to explain how water quality treatment for private impervious areas will be catered for. There is also a lack of information to demonstrate that downstream flood risks will be avoided or mitigated.

Amendments to the Applicant's precinct provisions are therefore recommended to address the relief sought and to ensure the implementation of appropriate stormwater management and treatment devices. A revised flood hazard assessment is also recommended to confirm that the stormwater infrastructure proposed by the Applicant will be appropriate.

Submission 344.7 by Auckland Transport requested precinct provisions to be added to provide direction on the timing and nature of any culvert upgrades across Jack Lachlan Drive to address the risk of damage to or flooding of the road.

No culvert capacity assessment has been provided by the Applicant. The flood modelling results mapped in the SMP showed that one of the culverts under Jack Lachlan Drive is undersized in the 100-year storm event post development scenario and the road would be overtopped. As flood attenuation to the predevelopment flow rates is proposed, a culvert upgrade is unlikely to be required for flood mitigation purposes. However, the proposed land development may result in changes in road classification and hence, the design requirements on culvert capacity. The Applicant should therefore provide a culvert capacity assessment to confirm if any upgrade would be required to meet the road safety design requirements as raised by Auckland Transport.

## **B. Flooding and stormwater runoff**

Submissions 104.2, 143.8, 194.2, 207.1, 212.4, 224.5, 225.3, 244.3, 272.9, 295.7, 318.1, 336.2, 338.3, 340.3, 342.3, 345.23 and 382.2 raised issues in relation to flooding and stormwater runoff.

The Applicant's SMP has stated that a new pipe network is proposed to be constructed within the site to convey runoff from roads, other public areas and future development lots. The proposed network will have capacity for the 10% AEP storm events. OLFP will be managed within engineered channels and drainage reserves. Minimum finished floor levels for new buildings will be established as per the SWCoP and NZBC. Therefore, developments within the PPC 88 area will in general avoid low lying flooding areas. However, little information has been given in the SMP on any proposed earthworks and areas that may be flooded in the post development scenario.

As discussed in Section 4 above, the potential flooding and stormwater runoff effects on the downstream properties could be significant and a revised flood hazard assessment by the Applicant is deemed necessary.

Submission 207.1 discussed the possibility of the Formosa golf course being a flood protection facility as specified in an existing resource consent.

In the late 1990's, ponds were constructed within the golf course to dam surface water for irrigation purposes. As a result, there are existing depression areas within the current landform of the PPC 88 area that provide for ponding of water and flood storage. The flood storage function of these depression areas will need to be assessed and may require retention to ensure that the proposed land development within the PPC 88 area will have no more than minor flood impacts on the downstream private properties and Pine Harbour Marina.

## **C. Water sensitive design, water quality and stormwater treatment**

Submissions 19.2, 217.2, 275.2, 336.2 addressed issues in relation to water sensitive design, water quality and stormwater treatment.

Water sensitive design is proposed in the Applicant's SMP with the proposed use of bioretention swales, raingardens and wetlands as stormwater devices to provide hydrological mitigation, treatment and peak flow attenuation for stormwater runoff generated within the PPC 88 area. The introduction of the SMAF 1 overlay and the recommended precinct provisions on water quality will address the relief sought.

#### **D. Stormwater devices proposed by the Applicant**

Submission 307.1 addressed the need for suitable stormwater devices.

As discussed previously, the number of stormwater management devices proposed appears to exceed those required and will be expensive to operate and maintain from lifecycle costing perspectives. The number of at source stormwater devices needs to be reduced by combining them into larger but fewer communal devices with multiple stormwater management functions where possible to achieve the required stormwater outcomes in a cost-effective way throughout the lifecycle of the devices.

Submission 344.29 by Auckland Transport has requested a new standard be added to the precinct provisions to require stormwater devices or networks within the road reserve to meet the Auckland Transport 'Transport Design Manual' and design requirements. This can be added as a separate standard in addition to the new water quality standard we recommend to replace Standard I.7.7 Stormwater Quality proposed by the Applicant.

Auckland Transport has also requested the consideration of whole of life costs and effectiveness of treatment over time associated with publicly vested stormwater assets. Our recommended amendments to the Applicant's proposed precinct provisions have considered and accepted Auckland Transport's request (refer to **Attachment A** below).

#### **8.0 Amended Precinct Provisions**

Amended precinct provisions have been provided by the Applicant post notification of the plan change. The Applicant has accepted the request by Auckland Transport (Submission 344.29) to add a new standard to require stormwater devices or networks within the road reserve to meet the Auckland Transport 'Transport Design Manual' and design requirements. As discussed in Section 7 above, we agree with the inclusion of such standard.

No other amended precinct provisions by the Applicant are relevant to stormwater.

#### **9.0 SMP Adoption under the Regionwide NDC**

While it is acknowledged that the SMP adoption and NDC authorisation process is a separate process to the plan change process, the SMP must be prepared to support the notified plan change and the plan change must be consistent with the SMP (as discussed in Section 5 above). The SMP as currently drafted is not acceptable in accordance with Healthy Waters' NDC requirements. Key areas of concern are:

- Significant site features and hydrology are the key elements that are required to be addressed to support proposed land development in SMPs prepared under Healthy Waters' NDC process. As the Applicant used outdated LiDAR data in the hydraulic modelling assessment and has not addressed this correctly in the SMP submitted to support the proposed private plan change, it is considered that the SMP in its current form does not meet the performance requirements in Schedule 4 of the NDC.
- Based on the hydraulic modelling undertaken by the Applicant to date the SMP does not ascertain that flood risks to the lower part of Jack Lachlan stream posed by the proposed plan change could be mitigated.
- The SMP has not proposed efficient and cost-effective stormwater management devices for water quality treatment, hydrology mitigation and flood attenuation.

The Applicant can submit a revised SMP taking into account the matters outlined above to Healthy Waters for review and consideration.

## 10.0 Conclusions and Recommendations

The Applicant's proposed stormwater management, subject to the recommended amendments to the precinct provisions as outlined in Attachment A, will ensure that future developments enabled by PPC 88 will avoid or mitigate any actual and potential water quality effects on the sensitive receiving environment.

While the introduction of the SMAF1 overlay for the plan change area will provide appropriate hydrology mitigation, we recommend that the SMAF1 overlay is removed from the plan change area where the Future Urban Zone is proposed.

The potential flooding and stormwater runoff effects from future developments enabled by PPC 88 on the downstream properties could be significant. While these effects could potentially be avoided or mitigated through sufficient peak flow attenuation and flood storage to be provided within the plan change area, a revised flood hazard assessment by the Applicant is deemed necessary for the reasons outlined in Section 4 above. Until a revised flood hazard assessment and updated hydraulic modelling are provided by the Applicant to confirm that any potential flooding and stormwater runoff effects will be avoided or appropriately mitigated, we do not support PPC 88 from a stormwater and flooding perspective.

## Attachment A – Recommended Precinct Provisions:

1. The below new objective is recommended to be added:

### **Objective**

*Stormwater quality and quantity is managed to maintain the health and well-being of the receiving environment where it is excellent or good and is enhanced over time in degraded areas.*

2. The below new standard and associated assessment criteria are recommended to replace Standard I.7.7 Stormwater Quality and associated assessment criteria proposed by the Applicant:

### **Standard I.7.7**

#### **(1) Water Quality**

*(a) Stormwater runoff from all impervious areas other than roofs must be either:*

- i. treated at-source by a stormwater management device or system that is sized and designed in accordance with 'Guidance Document 2017/001 Stormwater Management Devices in the Auckland Region (GD01)'; or*
- ii. treated by a communal stormwater management device or system that is sized and designed in accordance with 'Guidance Document 2017/001 Stormwater Management Devices in the Auckland Region (GD01)' that is designed and authorised to accommodate and treat stormwater from the site.*

*(b) Stormwater runoff from roofs must be:*

- i. From inert building materials and directed to an approved stormwater management device.*

### **Assessment Criteria I.9.2(9)**

- (a) Assessment criteria E9.8.2(1) apply\*.*
- (b) Whether development and/or subdivision is in accordance with an approved Stormwater Management Plan and policies E1.3(1) – (14)#.*
- (c) Whether a treatment train approach is implemented to treat runoff so that all contaminant generating surfaces are treated, including cumulative effects of lower contaminant generating surfaces\*.*
- (d) The design and efficiency of infrastructure and devices (including communal devices) with consideration given to the likely effectiveness, whole lifecycle costs, ease of access and operation and integration with the built and natural environment.*

\* Original wording proposed by the Applicant.

# Original wording proposed by the Applicant doesn't include Policy E1.3(11). It is unclear why this policy was not included. Policy E1.3(11) is considered relevant and should be included.

## Attachment B – Submissions Table

| Sub. No.   | Name of Submitter  | Relevant stormwater issues raised by the Submitter  |
|--|--|---|
| 19.2   | Martina Katharina Toebosch   | Decline the plan change because building and disturbing the natural flow of the land and building many hectares of hard surfaces will be detrimental to sea water quality, sea life and recreational activities in and on the water.  |
| 22.1   | Hilary Frances Hetherington  | Decline the plan change because the area and infrastructure (e.g. wastewater, water supply, roading, stormwater) cannot support the level of proposed development.  |
| 28.1   | Micaela Watson   | Decline the plan change due to lack of infrastructure, including water, footpaths, drainage, high school and roads.   |
| 32.2   | Mathew Guadagni  | Require infrastructure to be upgraded before development is approved.   |
| 47.5   | Angus James Scott-Knight   | Decline the plan change because other infrastructure such as sewage, drinking water and stormwater lack capacity for increased population.  |
| 62.2<br>95.2<br>96.2<br>97.2<br>98.2<br>99.2<br>100.2<br>101.2<br>102.2<br>103.2<br>105.2<br>106.2<br>108.2<br>133.2<br>134.2<br>135.2<br>136.2<br>137.2<br>189.1<br>190.1<br>201.2<br>346.5 | Allan Henry McGilvray<br>Scott Jason Marsden<br>Gregory Bannan<br>Stephen Gregory Marsden<br>Christine Bannan<br>Sean Patrick Cleary<br>Michelle Marie Pietras<br>Cheryl Lynette Marsden<br>Ian Reid Marsden<br>Chrissy Willcocks<br>Hunter Willcocks<br>Zach Willcocks<br>Shaun Bannan<br>Kurt Willcocks<br>Leonard Smith<br>Charmaine Smith<br>Angela Heenan<br>Russell Heenan<br>Julio de Faria<br>Corinne Jean de Faria<br>Nicola Poad<br>Lesa Freeman | The proposal should be rejected until such time as agreement is reached with Beachlands South Limited that they will provide at their cost, all infrastructure (including but not limited to roading, water, sewerage, flood management, waste management, power, transport, telecommunications) and associated services that Auckland City Council deem appropriate to support the additional 3900 plus dwellings that are proposed subsequent to this proposed plan change. |
| 73.5   | Sam Benson   | Decline the plan change because the current infrastructure (water, wastewater and power) is not suitable to support the development.  |
| 83.4   | Edith Anne Riddick & Christopher John Riddick  | Require water supply, wastewater and stormwater infrastructure to be improved before any dwellings are planned.   |
| 85.3   | Geoff Bignell  | Amend the plan change to include upgraded infrastructure i.e. reading [roading], sewerage, stormwater.  |
| 86.5   | Stephen George Pawsey  | Require infrastructure improvements detailed above to be an integral part of the approval.  |
| 94.1   | Stacy Joseph Shramana  | Decline the plan change, but if approved improve the infrastructure before any developments, including the roads.   |

| Sub. No. | Name of Submitter                              | Relevant stormwater issues raised by the Submitter  |
|----------|--|---|
| 104.2    | Kevin Andrew Saunders and Brenda Mary Saunders | <p>The proposed development is to be built on a known flood plain and flood prone area. The catastrophic impacts of Cyclone Gabrielle should have taught us one thing – that building housing on this type of land without making sure it can withstand the challenges of severe weather events and climate change in the future is foolhardy and irresponsible. The developers seem to have the attitude that infrastructure is “not their problem”, so will Council step up and lead the way with some innovative and forward thinking to benefit future generations?</p> <p>I call for an immediate moratorium on the proposal to allow a thorough review of the plans and time to ensure that the requisite infrastructure be built before any new development starts. I note that Mayor Wayne Brown himself said in an interview published in the NZ Herald on February 19, 2023 that we need a fresh approach:</p> <p>“We need to have a big, grown-up conversation. The events of the last two weeks have drawn big questions about building on cliffs, which is generally wealthy people, and bigger questions about intensification in stormwater paths, which generally affects poorer people.” There are examples of new developments on floodplains where stormwater infrastructure prevented flooding, like a Kainga Ora development at Northcote, but in Māngere, there were rushed developments before the infrastructure was put in and homes got flooded, Brown said. “I think the last council did their best to limit the impacts of Plan Change 78, but I think it’s time to review that again. Did we do enough because we have learned some very severe lessons in the last two weeks,” he said. The UK, for example, has already learned the harsh lessons of building on flood plains and is now taking a more cautious approach to planning as this UK Guardian article shows: Building new homes on land prone to flooding 'making damage worse'   Planning policy   The Guardian</p> <p>My objection can be summarized as “Infrastructure first, development second”</p> |
| 143.8    | Steven Lucas                                   | Given the recent storms and their impact- will the ground support the development given that significant areas of previously absorbent ground will be covered with houses and concrete etc. What about the runoff into the Gulf compounded by the out flows from the expanded sewage works required for the development.  |
| 147.1    | Linda Whickman                                 | There is already insufficient infrastructure for the existing Beachlands population and therefore an increase in population of this magnitude is not feasible.  |
| 150.2    | Yvonne Clare                                   | Require infrastructure to be added and upgraded before development is allowed.  |
| 151.1    | Karen McKnight                                 | Decline the plan change because the existing infrastructure is not adequate to sustain all the plans the council is submitting.   |
| 152.2    | Lesley Pearce                                  | Decline the plan change because the infrastructure needed for the proposed Beachlands South development is ad hoc at best.  |
| 157.1    | Michaela Campbell                              | Decline the plan change because infrastructure is inadequate to meet the demands of the development.  |
| 159.3    | Jacob MacKenzie                                | Require infrastructure to be developed before housing development is allowed, as demonstrated by recent events.   |
| 163.2    | Karen Carter                                   | Vastly reduce the number of proposed dwellings. Ensure that the development size is aligned with existing infrastructure capacity and limitations. Ensure any additional infrastructure is funded by the developers not rate payers and in place before housing is complete.  |

| Sub. No. | Name of Submitter      | Relevant stormwater issues raised by the Submitter  |
|----------|------------------------|---|
| 164.1    | Katie Pike             | Decline the plan change because there is insufficient infrastructure.   |
| 167.3    | Peter John Williams    | Decline the plan change because this areas infrastructure cannot support anymore development on this scale. The proposals released by the developers regarding water supply, sewage disposal and storm water appear to be little more than fanciful and corner cutting.   |
| 194.1    | Peter John Reilly      | I am concerned about the ability of the Whitford-Maraetai Road & infrastructure to cope with the resulting increase in population and resulting traffic congestion from the proposed urban residential development in Beachlands.<br>I am also concerned about sustainability of the water supply, wastewater and stormwater systems.<br>The Whitford-Maraetai Road and infrastructure must be improved to cope with future increase in population.   |
| 194.2    | Peter John Reilly      | Conclusive technical evidence must be provided to confirm that the water supply, wastewater and stormwater systems are sustainable with minimal environmental impact such as too higher demand on ground water supply and flooding  |
| 207.1    | Michael John Dagg      | The Formosa Auckland Country Club golf course is unique in the North Island of New Zealand. It is the only Bob Charles designed course in close proximity to a major metropolitan centre. To destroy such a unique facility is tantamount to destroying a priceless work of art for the insurance money. Yes, you get a financial return, but the world is deprived of the work for eternity. One of our greatest sportsmen, who will not be with us for ever to vandalize this work could easily be described as unkiwi. The loss to the local community of recreation space is also unacceptable, once it is gone it will never be replaced. Topically, the water catchment this facility provides is an important part of flood protection. I think you will find this specified in the original resource consent. |
| 212.4    | Lew Gerick Hansen      | Undertake further research into the impacts of what is planned and an increase in spongy areas rather than vast amounts of concrete, to understand the pressures on the wastewater system and effects of flooding.  |
| 215.2    | Nerina Carol Groves    | Amend the plan change so that infrastructure is in place before subdivision development.  |
| 217.2    | Colleen Agnes Drummond | Stormwater needs particular action - already we have pollution on our beaches because of poor drainage.   |
| 224.2    | Elisabeth Van Stiphout | Decline the plan change because there are no clear plans on how to deal with stormwater and wastewater capacity constraints and the impact this may have on the surrounding environment.  |
| 224.5    | Elisabeth Van Stiphout | The developer to demonstrate how it will contain all stormwater and sewage from the new development now and in the future   |
| 225.3    | Mr Dirk De Jong        | There are no clear plans to contain stormwater and sewage and no available independent reviews available to assess local impact on the community and environment.   |
| 233.4    | David & Angenieta Rose | Should the development go ahead the roading & service infrastructure needs to be in place beforehand, not arrive afterwards.  |
| 237.1    | Nigel Ewels            | Decline the plan change because it will put significant strain on the transport, water, wastewater and other infrastructure in the Area.  |



| Sub. No. | Name of Submitter  | Relevant stormwater issues raised by the Submitter   |
|----------|--|--|
| 241.3    | David Powley   | Decline the plan change because the proposal is too big and does not allow the community to grow at a reasonable pace with regard to the infrastructure and services required to meet the expected growth.   |
| 244.3    | Mr Neil Woolridge  | Conclusive technical evidence must be provided to confirm that the water supply, wastewater and stormwater systems are sustainable with minimal environmental impact such as too higher demand on ground water supply and flooding.  |
| 253.1    | Nicholas Scott Groenewegen                                 | Before developing new housing areas, infrastructure needs to be in place. The area is low-lying so have a think about weather events and flooding.   |
| 254.2    | Judith Elaine Groenewegen                                  | Decline the plan change because of a lack of infrastructure.   |
| 272.2    | Whitford Coast Society Incorporated [Anthony John Hopkins] | Finally, what protects ratepayers (and future dwelling owners and inhabitants) from defaults on water provision, roading, pest control, waste and stormwater systems as these systems fall into disrepair or prove inadequate  |
| 272.9    | Whitford Coast Society Incorporated [Anthony John Hopkins] | <p>The plans seem focused on “1-in-100 year” scenarios. Some early 2023 Auckland floods may have been 1-in-2,000-year events. Given the huge potential for damaging runoff from Beachlands South due to density and huge areas of concrete and roading, perhaps the planning threshold should be raised to 1-in-500-year events. We cannot have intensification without appropriate infrastructure.</p> <p>Due to the dense nature of the development, we assume there will be large impermeable surface area (roofs, tarmac, footpaths etc.). This adds further weight for a large margin for error in storm water management.</p> <p>The electrical supply to the Pohutukawa Coast is already fragile with frequent outages due to weather and car accidents on the single road through the area. A major upgrade is required. Storm water and sewage systems will be at their most stressed during a storm when there is likely to be no electricity and reduced access to the area due to the poor roading for maintenance staff. Therefore, there is even more reason to consider very rare weather events rather than “common” “1-in-100 year” scenarios.</p> <p>The plan oddly sets up five areas for development which defy natural watercourses, which surely is rosy thinking. The sleight of hand has a benefit to the developers in that, given the application for 5 Ha of open ground make a possible 25 Ha of sediment runoff in a storm with 5 Ha in each area. By contrast the nearby landfill has an “open” limit of about 900 square metres given the potential for noxious runoff.</p> |
| 274.1    | Jonathan Adair Ashby                                       | <p>I propose major infrastructure is installed prior to that development. This includes for private and public transport, and the provision of energy, potable water, sewage treatment, stormwater capture and disposal, and communications eg: (fibre and cellular). In addition, the downstream effects of these infrastructure items should be accommodated and for some time into the future after the completion of this development, otherwise those residents downstream will also suffer detrimentally from avoidable issues.</p> <p>What is being considered is the development of a new town in a rural environment that has not in the past had to consider catering for such a demand as currently planned for Beachlands South.</p>   |

| Sub. No. | Name of Submitter  | Relevant stormwater issues raised by the Submitter  |
|----------|--|---|
| 275.2    | Royal Forest and Bird Protection Society of New Zealand Inc. [Carl Morgan] | <p><b>Nature Based Solutions: Water Sensitive Design (WSD)</b></p> <p>The presence of healthy freshwater features such as wetlands and open streams, as well as planted areas provide habitat for indigenous species. However, they also provide numerous ecosystem services to the urban environment and human population that occupies it. The function of a natural feature and/or system as an infrastructure asset is known as a nature-based solution, which is defined as “actions to protect, conserve, restore, sustainably use and manage natural or modified terrestrial, freshwater, coastal and marine ecosystems, which address social, economic and environmental challenges effectively and adaptively, while simultaneously providing human well-being, ecosystem services and resilience and biodiversity.</p> <p>WSD is one of the many ways in which we can implement nature-based solutions. WSD is defined by Auckland Council as “an approach to freshwater management, it is applied to land use planning and development. WSD seeks to protect and enhance natural freshwater systems, sustainably manage water resources, and mimic natural processes to achieve enhanced outcomes for ecosystems and our communities. WSD is a holistic design philosophy which enables urban development while imitating predevelopment hydrology, leading to better water quality and healthier aquatic ecosystems as compared with traditional, or grey, infrastructure. WSD also provides for social and cultural factors essential for the establishment of new communities. In this context, the execution of nature-based solutions, in the form of WSD infrastructure, may include some of the following</p> <ul style="list-style-type: none"> <li>• Making room for rivers</li> <li>• Permeable paths</li> <li>• Urban forests</li> <li>• Green roofs</li> <li>• Green corridors</li> <li>• Rain gardens</li> <li>• Swales</li> <li>• Floodable parks</li> <li>• Wetland Restoration</li> </ul> <p>The six principles of Te Mana o te Wai should be front of mind for anyone interacting with natural freshwater sources. Many of the principles are reflected in the AUP which has several policies relating to WSD. E3.2 gives numerous objectives relevant to the protection, maintenance and enhancement of Auckland’s natural freshwater features and systems. While policies under E3.3. promote the objectives, for example through (3) <i>Enable the enhancement, maintenance and restoration of lakes, rivers, streams and (11) Encourage the planting of plants that are native to the area.</i> As highlighted earlier, the Auckland Plan also has numerous directions and focus areas which reflect the requirements of the AUP.</p> <p>This proposal will enable a significant increase the impervious surface area throughout the site. Increasing the area of impervious surfaces in a catchment can have detrimental effects on water quality, surface flows, infiltration, groundwater levels, and temperatures. This occurs because water goes straight from</p> |

| Sub. No. | Name of Submitter       | Relevant stormwater issues raised by the Submitter  |
|----------|-------------------------|---|
|          |                         | <p>rooves, driveways, and footpaths to stormwater networks, and down into nearby streams, lakes, and rivers. This water is often polluted with heavy metals and can be much warmer than water in the receiving body.</p> <p>To mitigate the adverse effects of increased paved surface area, the development needs to be built around the concept of WSD. That is, it should incorporate things like stormwater filtration (through constructed wetlands and/or treatment systems), surge tanks for stormwater (ideally ones that can also be used to water gardens), maintaining a high percentage of 'unpaved' or 'unroofed' surfaces across the development, and involving the planting of vegetation that is suitable for the area, in both public and private spaces (i.e. planting eco-sourced natives that will promote water retention and 'soften' the peaks and troughs of storm flows, as well as remaining resilient during dry periods). WSD will also contribute to ensuring the health of downstream waterbodies (including the Waitemata Harbour) will not be as adversely affected. The overall design of the development must address the negative effects of increasing the impervious area within the catchment on the natural hydrology of downstream receiving environments</p> <p>Given the current state of New Zealand's wetlands, landowners and developers must understand and champion their roles as stewards of New Zealand's freshwater, aligning with the principals of Te Mana o te Wai.</p> <p>Forest &amp; Bird seek that the PC includes provisions that:</p> <ul style="list-style-type: none"> <li>• require water sensitive design giving effect to Te Mana o te Wai</li> <li>• require stormwater treatment/filtration to a high level, prioritising nature-based solutions</li> <li>• limit the proportion of the development that can be impermeable (paved, covered) surfaces</li> <li>• implement a minimum riparian planting width of 20m for all streams and wetlands as recommended by the Auckland Design Manual</li> <li>• ensure monitoring and maintenance of the freshwater bodies is to a high standard, enhancing rather than maintaining water quality. This should include appropriate levels of erosion control, replanting and weed management</li> </ul> |
| 276.4    | Emily May               | Amend the plan change as the development is too big for current infrastructure.   |
| 295.6    | Dennis Raymond Bartlett | <p>At 307 Ha this development is as large as the existing Beachlands area and it would be one of the largest developments in Auckland, without the necessary infrastructure to support it.</p> <p>At this stage, only a very reduced area of development, if any at all, should be approved until the necessary infrastructure is in place to support the development.</p>  |
| 295.7    | Dennis Raymond Bartlett | Given our recent unprecedented States of Emergency and extreme damage and hardship brought about by rushed developments on flood plains (as this site contains), without the correct infrastructure in place. I believe a stop should be put on this development until an independent review of these type of developments (as Proposed by our Mayor Wayne Brown), is carried out.  |

| Sub. No. | Name of Submitter | Relevant stormwater issues raised by the Submitter   |
|----------|-------------------|--|
| 307.1    | Simone J Beesley  | <p>The proposed stormwater management device options (Table 14, Pg 63) are unrealistic and untested in the existing Beachlands urban environment. Further I am not aware of any living roofs in the wider area of Whitford or Maraetai. Existing wetlands, wet ponds, dry ponds and swales are poorly maintained and suffer from a combination of neglect and deferred maintenance.</p> <p>Stormwater management is essential to maintain the quality of water in our catchments and the receiving environment.</p> <p>Calculations based on the potential uptake of unsuitable stormwater management devices need to be revised to reflect a more realistic future scenario. Suitable devices need to be constructed in accordance with best practice guidelines and operation and maintenance must be strictly adhered to.</p>   |
| 308.1    | Rina Tagore       | <p>The challenges on waste management, stormwater systems will not be able to meet the consequences of more housing. Auckland as a whole is way behind in meeting the aspirational targets set out in its Climate Action Plan and such private plan changes, if accepted are backward steps.</p>   |
| 318.1    | Andrea Martin     | <p>The infrastructure for the roading is not suitable for this development. There are already over 17,000 trips on the road between Beachlands and Whitford DAILY. This is a single lane road. After the recent climate change related cyclone in Auckland, surely the council needs to be looking at also building on a flood plain, no significant changes in the Storm Water, tapping into local bores as there are no mains water. I am not opposed to change; however, I am opposed to things not being thought through correctly at the detriment of the people currently living in the area as well as the overall environment impact. I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested.</p> <p>Details of amendments: Undertake the major infrastructure needs on the roads, real consideration for building on a flood plain and the water infrastructure.</p> |
| 336.2    | Katja Kershaw     | <p>The plan change allows for many more houses where the runoff goes to the Waikopua estuary and catchment. A sensitive area that already suffers from sediment collection interfering with the canal leading in and out of Pine Harbour. Studies or modelling do not show the impact and have not been included in the information.</p> <p>There is a lack of detail on the stormwater predictions or quality of water to prevent beaches from closing. Currently in heavy rainfall the beaches in the area are unsafe to swim. This situation would be exacerbated. Where is the current bacterial count and how this would be mitigated.</p>  |
| 338.3    | Wendy Hansen      | <p>What is the stormwater plan - slippage and flooding needs to be urgently taken into consideration especially in the light of the recent weather disasters. The amount of concrete needs to be reduced and spongy areas used.</p>  |

| Sub. No. | Name of Submitter  | Relevant stormwater issues raised by the Submitter   |
|----------|--|--|
| 340.3    | Pine Harbour Marina Limited [Craig Shearer C/- Shearer Consulting Ltd] | <p>The potential for stormwater flooding on Marina property</p> <p>Pine Harbour Marina is located at the bottom of a reasonably extensive catchment, which drains into the sea via a watercourse running through land owned by PHML. When the marina was developed, there was virtually no urban development in the upper catchment, but with the development proposed by PPC88, nearly all the contributing catchment will be developed. Auckland Council flood hazard maps show parts of the marina, especially those closest to the watercourse as potentially being prone to flooding in extreme weather events. This effect can be exacerbated by the influence of high tides coinciding with peak flows occurring through the stream close to its outlet into the sea. This reinforces results of previous flood studies.</p> <p>Although there has been one discussion with Beachlands South Limited Partnership on the results of the flood assessment and modelling work they have completed prior to lodging the plan change, PHML has not had the opportunity to assess these results in detail. Until we have been able to do so and determine that adequate measures are being proposed to avoid an/or mitigate any effects upon Marina holdings, we are opposed to the stormwater management and flood control proposals proposed by Beachlands South Limited Partnership.</p> |
| 342.3    | Ivan Sidney Boshoff [Owner of 8 Tui Brae]                              | <p>All the plans seem to mention is that infrastructure will need to be upgraded but it does not say who will be responsible for doing this, who will pay for this and when this will happen. The water plan they have should be properly considered and well-developed wastewater system is required and one that is flood proof. Who will pay for the wastewater drainage etc. if this plan does not work? Floods, slippage etc is also something that is not clear in the proposal. We live in the adjoining houses below the golf course and if there is high density housing, we need to ensure our houses are protected from any slips, flooding etc. - we don't want a repeat of Hawkes Bay or other Auckland areas from recent times.</p>  |
| 344.7    | Auckland Transport [Chris Freke]                                       | <p>The supporting material notes the need for culvert upgrades across Jack Lachlan Drive. In regard to the replacement, relocation or upgrade of any culvert structures, Auckland Transport considers that these need to be incorporated as part of the suite of road network upgrade mitigation measures and coordinated with the overall staging of the PPC 88 build out. Without this there is a risk of flooding and/or damage to the key route into and out of the plan change area.</p> <p>Decline PPC 88 or in the event the plan change is approved, include within PPC 88 precinct provisions direction on the timing and nature of any culvert upgrades across existing roads so as to address the risk of damage to, or flooding of the road. This could include raising of the existing road where required.</p>   |
| 344.29   | Auckland Transport [Chris Freke]                                       | <p>An amendment is requested to reflect that Auckland Transport has additional requirements for any stormwater devices or networks which will be vested to the organisation as asset owner.</p> <p>The applicant is also advised that Auckland Transport expects industry wide safety guidance to be issued which will alter the shape, size and depth of rain gardens. These changes are likely to mean that the indicative rain gardens shown in <i>1.12. Appendix 1: Beachlands South Precinct, Road Design and Cross Section</i></p>   |

| Sub. No. | Name of Submitter  | Relevant stormwater issues raised by the Submitter   |
|----------|--|--|
|          |  | <p><i>Details</i> would no longer be suitable, and that additional areas/width would need to be provided for stormwater management.</p> <p>Auckland Transport seeks stronger stormwater provisions which require consideration of whole of life costs and effectiveness over time and use of communal devices to treat road runoff.</p> <p>Decline PPC 88 or in the event the plan change is approved, amend as follows:</p> <p>Administrative matter: Correct subsections so they commence with (a) rather than (f) and include additions as shown.</p> <p>(1) <i>Stormwater runoff from new or redevelopment of, existing high contaminant generating carparks and all publicly accessible carparks exposed to rainfall and all roads must be treated with a stormwater management device(s) meeting the following standards:</i></p> <p>(f) [...]</p> <p>(h) <i>For all other trafficked impervious surfaces, water quality treatment in accordance with the approved stormwater management plan must be installed; <b>and</b></i></p> <p>(i) <b><u>for all roads proposed to be vested in Auckland Transport, the Auckland Transport 'Transport Design Manual' and design requirements.</u></b></p> <p>Amend Plan Change provisions to include whole of life costs and effectiveness of treatment over time associated with publicly vested stormwater assets as a matter for discretion and policy.</p> |
| 345.23   | Auckland Council [Warren MacLennan/Matthew Allan]                            | <p>The Auckland region recently experienced two closely-timed severe weather events: the Auckland Floods (January 2023) and Cyclone Gabrielle (February 2023). These events have prompted the Council to direct further work to investigate the regional and localised impacts of flooding, and the implications for land use planning, regulatory, current plan changes to the Auckland Unitary Plan (including Plan Change 78), infrastructure and other policy settings.</p> <p>In light of these severe weather events, ACS considers that it would be prudent for the natural hazards / stormwater management aspects of PPC 88 to be fully reviewed and re-assessed. Such review and re-assessment should extend to the need for revised and more robust precinct provisions (whether to the precinct objectives, policies, rules and other provisions including amendments to maps/plans), should PPC 88 be approved.</p>   |
| 359.1    | Judith Clarke  | <p>Decline the plan change as there is insufficient and substandard infrastructure to cope today. Proposals do not demonstrate robust and peer reviewed modelling on all the infrastructure issues or offer sufficient infrastructure improvements and contributions to justify significantly increasing the population by developing such a large site.</p>   |
| 380.5    | Whitford Residents and Ratepayers Association Incorporated [Nick Williamson] | <p>There have been many plans in place over recent history to provide transport, three waters, social and recreational infrastructure in a coordinated and comprehensive manner. The objective and policy assessment set out in the application omits some of those that seek to ensure that development does not have a detrimental effect on existing infrastructure. We remain of the view that these have not been properly considered.</p>  |

| Sub. No. | Name of Submitter        | Relevant stormwater issues raised by the Submitter   |
|----------|--------------------------|--|
| 382.1    | Mrs Angela Gwenda Reilly | Require that the Whitford-Maraetai Road and infrastructure must be improved to cope with future increase in population. I am concerned about the ability of the Whitford-Maraetai Road & infrastructure to cope with the resulting increase in population and resulting traffic congestion from the proposed urban residential development in Beachlands |
| 382.2    | Mrs Angela Gwenda Reilly | Require conclusive technical evidence to confirm that the water supply, wastewater and stormwater systems are sustainable with minimal environmental impact such as higher demand on groundwater supply and flooding.  |



**Memo (technical specialist report to contribute towards Council’s section 42A hearing report)**

7 September 2023

To: Chloe Trenouth, Consultant Planner  
From: David Russell Senior Development Engineer South

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**Subject: Private Plan Change – PC88– Water and Wastewater Assessment**

## **1.0 Introduction**

- 1.1 I have undertaken a review of the private plan change request by Beachlands South Partnership Ltd (the applicant), on behalf of Auckland Council in relation to water and wastewater infrastructure effects.
- 1.2 I hold a Bachelor of Engineering (Cant) degree, graduating in 1976. I am a full member of IPENZ. I have 35 years’ experience in development engineering roles within the Council and a consultancy specialising in land development.
- 1.3 In writing this memo, I have reviewed the following documents:
- Beachlands South Water Supply Concept Design, GWE Consulting Engineers, March 2022
  - Beachlands South Wastewater Reticulation and WWTP Concept Design, GWE Consulting Engineers, March 2022
  - Supplementary information relating to water and wastewater supplied with the submissions.
  - Watercare submission to the application

## **2.0 Key infrastructure Issues**

- 2.1 The question is how to supply water and wastewater services to this plan change area.

## **3.0 Applicant’s assessment**

- 3.1 Water Supply Concept Design report prepared by GWE Consulting Engineers indicates that the plan change area can be viably serviced for water through different stages of development (250 household units equivalents per year) through groundwater takes. The report indicates that there is sufficient potable water for the live-zoned part of the plan change area, and does not identify any reasons why urbanisation cannot be supported.
- 3.2 Initial water supply is proposed to be from the existing consented water takes for the Formosa Golf Course and Pine Harbour Living Limited. The report identifies a total demand of between 1,245 m<sup>3</sup>/day (150 l/day/person) to 1,424 m<sup>3</sup>/day (175 l/person/day) to be met through the following water supply sources:
- Water supply agreement with Pine Harbour Living Limited (PHLL) = 765 m<sup>3</sup>/day
  - The existing Formosa water take permit = 300 m<sup>3</sup>/day
  - The proposed water take permit from the existing 620 Whitford Maraetai Road test bore = 250 m<sup>3</sup>/day

- A proposed water take permit from an additional bore at 620 Whitford Maraetai Road = 250 m<sup>3</sup>/day

3.3 The Wastewater Reticulation and WWTP Concept Design report prepared by GWE Consulting Engineers indicates that a low-pressure sewer system is preferred for reticulation. A high-level assessment is provided of options for wastewater treatment.

3.4 The Beachlands-Maraetai Wastewater Treatment Plant (WWTP) is identified to currently have insufficient capacity to service the proposed plan change, with no existing plans for expansion. Therefore a standalone treatment option is proposed, while indicating the potential for future upgrades to the Beachlands-Maraetai WWTP to be able to service the plan change area.

3.5 A membrane bioreactor (MBR) treatment plant is proposed for wastewater treatment to service development for the following reasons:

*“MBR treatment systems are able to reliably provide a high degree of contaminant removal, including nutrients and are expected to outperform alternative treatment technologies while maintaining a small footprint. MBR’s are a maturing, robust and well understood technology that is increasingly being employed across NZ and accepted by Watercare where best-practice treatment is required, particularly for discharges to sensitive receiving environments.”<sup>1</sup>*

3.6 A high-level assessment of suitable wastewater disposal options was also undertaken, concluding that there are several feasible options and there are no constraints to suggest that the land within the plan change area is not suitable for urbanisation. Options include tertiary polishing wetlands and:

- Disposal of treated wastewater to land
- Disposal of treated wastewater to a permanent stream in the western catchment and subsequently to the coastal marine area.

3.7 The precinct provisions include Standard I.7.4 requiring adequate water and wastewater infrastructure to be provided at the time of subdivision or development. Standard I.7.13 requires rainwater reuse for all new dwellings as well as water efficiency fixtures.

#### **4.0 Assessment of Water, Wastewater effects and management methods**

4.1 The applicant has proposed 2 options to upgrade the network. Each option will be considered separately but together in reviewing the suitability of the applicant’s proposal and Watercare’s submission.

4.2 There is a fundamental difference between Watercare Services Ltd (**WSL**) expectations and the information provided by the applicants. The applicants have examined the local environment and decided there is capacity with some upgrading. WSL on the other hand have looked at the big picture from the water rights they have to take water, and to treat, and discharge wastewater and the effects of this application being out of the coverage area on the infrastructure within the coverage area.

4.3 WSL have found that they do not have capacity to service this plan change area for wastewater. They have advised that

- 1 The water takes are not adequate for the demands from the out of zone land when considered against the now allowed greater intensity of development in zone.
- 2 The water treatment infrastructure is not adequate for the more intensive developments allowed under the legislative changes now being finalised.

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<sup>1</sup> Beachlands South Wastewater Reticulation and WWTP Concept Design, GWE Consulting Engineers, March 2022 (page 1).

- 3 WSL have acknowledged that they need to apply for a new consent to upgrade the existing wastewater plan and are keen to talk to the developer about including everything in one site and one application.
  - 4 Watercare does not have a water supply in this area.
- 4.4 Separately I have had some discussions with the Council's Coastal and water allocations team on the subject of water availability. There does appear to be some water available but there is uncertainty about whether there is enough available to service the full development area. The applicant proposes to draw additional water from the aquifer. At this point there is no clarity as to the extent to be drawn from this, versus the amount to be taken from other sources (being consented bores).
  - 4.5 My discussions with the Council's water allocations team indicates that aquifer is reaching capacity. I note that the applicant is proposing to apply for the water takes necessary to service the development area and intensity proposed. The availability of water for this application needs to be confirmed before this plan change can be adopted in order to confirm serviceability.
  - 4.6 Councils water allocations team are aware of consented bores. However, there are likely to be a number of domestic bores that they are not aware of as they are permitted and thus do not need a consent. The Council monitoring bores monitor the effective groundwater level and have noted similar draw down effects as some of the submitters have identified. Draw down is a consequence of local excessive extraction, or a general overall excessive take considering the replenishment ability of the aquifer. No research has been carried out to establish what the cause is in this area. This will form part of the requirements of any significant increase in take to ensure that other users are not adversely impacted.
  - 4.7 I do note that there is the option of extending the existing Watercare network to service the area. However both parties have agreed that it is a very costly option and probably not financially viable. I do not believe the option should be considered as a fallback position should bore water not be available.

## **5.0 Submissions**

- 5.1 WSL (#354) have submitted. The findings on the issues in that submission, are summarised above. WSL concludes that the water sources (not WSL assets) and treatment plant cannot cope with this area being added to the service area.
- 5.2 WSL identify that the wastewater options are viable and indicates that the Beachlands wastewater treatment plant could be upgraded in time. Therefore I am comfortable that the plan change can be serviced for wastewater subject to the necessary resource consents.
- 5.3 A number of submissions indicate capacity issues with the water supply. They do not detail the nature of the issues except that the system will need to be updated. This is supported by the present supply company (PHML submission 340) advising that they do not have the capacity to service the development area and that either an expansion of their consent, or another consent will be required to service the development area.
- 5.4 A number of submissions, advise that there are already a number of bores in the area, and that the impact of another bore has not been accessed. This includes the issue of salt water incursion due to any increase in water take from the aquifer. I have not found any details in the application indicating that such investigations have been carried out. There are also submissions advising that there is significant drawdown in some bores.

This implies that there is more water take than there is water available. Increasing the overall water take (through new bores or expansion of existing bores) will further increase the drawdown issue and thus adverse effects on existing bore owners.

## 6.0 Conclusions and recommendations

6.1 I make the following recommendations in relation to the plan change:

- The applicant has not adequately assessed the private plan change effects on the environment related to water and wastewater network effects.
- The information provided is incomplete to allow a full assessment of the impact on the WSL network.
- The development area is presently outside of the scope of the standard infrastructure growth charges. The applicant and WSL need to work together to confirm and agree servicing options for the catchments that can be serviced if they wish to be serviced by the WSL wastewater network.
- There is no certainty from either the present water supply company or Councils water allocations team, that the additional water required for the plan change area is available
- The applicant needs to be aware that they will be responsible for designing, constructing and funding the network upgrades necessary to service the development of the plan change area.

6.2 Overall recommendation

- That WSL and the developers need to work together to ensure the wastewater infrastructure necessary to service the plan change area are adequately met by the developers in accordance with the Watercare CoP should the applicant wish to connect to the WSL network.
- That given the above *“Watercare considers that satisfactory wastewater servicing options can be arrived at and do not present a reason to decline the Plan Change.”*
- That wastewater infrastructure matters do not provide a reason to decline this plan change.
- It is essential that all parties work together to resolve the issues above.
- Considering the submission from PHML and verbal feedback from the Water Allocations team within Council, there is no certainty that the necessary water take consent will be approved. This needs to be addressed prior to the Plan Change being adopted

Overall it is recommended that the applicant needs to confirm water availability for the plan change area prior to the plan change being adopted. The known wastewater disposal issues can be addressed by the applicant by various options during development application processes once the plan change has been approved (applicant reports and WSL submission)

David Russell

Senior Development Engineer (south)

15 August 2023

To: Chloe Trenouth - Reporting Planner  
From: Jason Smith, Senior Environmental Scientist, Consultant to Auckland Council (As Regulator)

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**Subject: Beachlands South – Ecology Assessment**

## 1.0 Introduction

- 1.1 My name is Jason Graham Smith, and I am a Senior Environmental Scientist at Morphum Environmental Limited.
- 1.2 I have undertaken a review of the application material (as notified) and the subsequent Clause 23 responses (parts 1 and 2) for the Private Plan Change 88: Beachlands South on behalf of Auckland Council (As Regulator) in relation to ecological effects (terrestrial, freshwater and coastal/marine).
- 1.3 I hold the qualification of Bachelor of Science (Hons.) – Geography (2011) from the University of Auckland.
- 1.4 I have 12 years' experience as a professional Environmental Scientist, including 8 specialising in ecology with the previous 4 focused on water quality. My experience includes undertaking ecological assessments, preparing and peer reviewing ecological impact assessments, and providing technical advice to support district and regional plan changes, including multiple private plan changes.
- 1.5 In my current role I regularly provide advice to Auckland Council, as well as, several other district and regional councils, in relation to earthworks, streamworks, and ecology.
- 1.6 Prior to my employment with Morphum Environmental, I was employed by Auckland Council as an Earthworks and Streamworks Specialist in a similar role providing technical input primarily on resource consent applications.
- 1.7 I have completed the Ministry for the Environment 'Making Good Decisions Course'.
- 1.8 I am a member of the New Zealand Freshwater Science Society and International Erosion Control Association.

## Expert witness code of conduct

- 1.9 I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence. Other than where I state that I am relying on the advice of another person, this evidence is within my area(s) of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.
- 1.10 I have qualified my evidence where I consider that any part of it may be incomplete or inaccurate, and identified any information or knowledge gaps, or uncertainties in any scientific information or mathematical models and analyses that I am aware of, and their potential implications. I have stated in my evidence where my opinion is not firm or concluded because of insufficient research or data or for any other reason, and have provided an assessment of my level of confidence, and the likelihood of any outcomes specified, in my conclusion.

## 2. Overview and scope of technical memorandum

- 2.1 I have reviewed the application with reference to the requirements and provisions in the Auckland Unitary Plan (Operative in Part) (**AUP:OP**) to assist the preparation of the Council's reporting planner's reports.
- 2.2. More specifically, my technical memorandum assesses the effects on ecology associated with the Application and will cover the following matters:
- a. The current ecological values of the site and receiving environment.
  - b. The actual and potential environmental effects of the proposal.
  - c. The adequacy of the effects management proposed.
  - d. Commentary regarding the National Policy Statement for Indigenous Biodiversity.
  - e. Summary of the submissions received.
  - f. Conclusions and recommendations.
- 2.3 In writing this memo, I have reviewed the following documents:

**Application material (as notified):**

- a. *Beachlands South Precinct Private Plan Change Request Section 32 Assessment Report*, prepared by UNIO Environmental, dated 31 March 2022 (superseded).
- b. *Ecological Effects Assessment: Executive Overview*, report prepared by Tonkin & Taylor, dated March 2022 (**EclA - EO**).
- c. *Stream Ecological Effects Assessment*, report prepared by Tonkin & Taylor, dated March 2022 (**EclA: Freshwater**).
- d. *Terrestrial Ecological Effects Assessment*, report prepared by Tonkin & Taylor, dated March 2022 (**EclA: Terrestrial**).
- e. *Freshwater Wetland Effects Assessment*, report prepared by Tonkin & Taylor, dated March 2022 (**EclA: Wetlands**).
- f. *Marine Ecological Effects Assessment*, report prepared by Tonkin & Taylor, dated March 2022 (**EclA: Marine**).
- g. *Ecological Effects Assessment Volume 2: Appendices*, report prepared by Tonkin & Taylor, dated March 2022 (**EclA: Appendices**).
- h. *Beachlands South Structure Plan Change Water Quality & Sedimentation Modelling Report*, report prepared by Tonkin & Taylor, dated March 2022 (**Water Quality Report**).
- i. *Beachlands South ESCP Report*, report prepared by Harrison Grierson, dated December 2021 (**ESCP Report**).
- j. *New Zealand Coastal Policy Statement Assessment*, report prepared by Unio Environmental, dated March 2022.
- k. *Wastewater Reticulation and WWTP Concept Design*, report prepared by GWE, dated March 2022.
- l. *Beachlands South Structure Plan change Geotechnical report*, report prepared by Tonkin & Taylor, dated January 2022.
- m. *Beachlands South Stormwater Management Plan*, report prepared by Harrison Grierson, dated March 2022.



### Clause 23 Response Part 1:

- a. *I.1 Beachlands South Precinct* (updated September 2022)
- b. *Re: Beachlands Souths Private Plan Change Response to Clause 23 Request for Further Information*, memorandum from UNIO Environmental, dated 22 July 2022 (**CI.23 Response July 2022**).
- c. *Re: Beachlands Souths Private Plan Change Response to Clause 23 Request for Further Information*, memorandum from UNIO Environmental, dated 5 August 2022 (**CI.23 Response August 2022**).

### Clause 23 Response Part 2:

- a. *Beachlands South Precinct Private Plan Change Request Section 32 Assessment Report*, prepared by UNIO Environmental, dated 3 September 2022 (**AEE**).

2.4 At the date of preparing this memorandum, I have not taken part in formal expert witness conferencing.

2.5 During the pre-application phase I attended the site visit arranged by the applicant on 3 May 2022.

2.6 The assessment in this technical memorandum does not cover:

- a) Stormwater or flooding matters.
- b) Coastal processes and coastal water quality.

## 3 Key Ecology Matters

3.1 I consider that the:

- a. Methodologies, standards and guidelines used to assess the ecological values are appropriate and conform to industry best practice.
- b. Effort expended in the site investigations is appropriate for the scale of proposed works and potential effects.
- c. Reported results are transparent, accurate and a fair representation of the ecological values.

3.2 I concur with the Applicant's description of the current ecological values, the potential effects, and the magnitude of those effects on freshwater, wetlands, terrestrial and coastal ecology.

3.3 In my opinion, sufficient evidence has been provided to demonstrate that the proposed effects management measures would appropriately manage any effect on ecological values that may arise from the plan change.

3.4 The only point in contention has arisen through the Clause 23 response, where the applicant has sought to amend the precinct provisions to:

3.4.1 Remove the requirement to plant the riparian yard setback; and

3.4.2 Specifically allow any riparian planting to be counted towards any biodiversity offsetting or compensation that may be required (including that require by any precinct standard).

This is discussed further below.



- 3.5 It is also noted that many of the activities that would enable development would still require regional consents under the regional provisions of the Auckland Unitary Plan: Operative in Part (AUP:OP). Potential reasons for consent that relate to ecology could be found in the following chapters of the AUP:OP for:
- a) Works in, on, under and over streams and wetlands (E3).
  - b) Land disturbance - Regional (E11).
  - c) Vegetation alteration and removal (E15).
  - d) Activities in the coastal marine area (Chapter F)
- 3.6 Consents may also be required under the National Environmental Standards: Freshwater (**NES:FW**).
- 3.7 The provisions of the Wildlife Act (1953) would also remain in place and require a permit for the disturbance to many of the native wildlife potentially inhabiting the site.
- 3.8 These reasons for consent and additional permitting requirements have been recognised in the EclA's.

#### 4 Applicant's Assessment

- 4.1 The National Policy Statement: Freshwater Management (2020) (**NPS:FM**), through the effects management hierarchy, recognises that as a first step adverse effects should be *avoided* where practicable.
- 4.2 The New Zealand Coastal Policy Statement (2010) (**NZCPS**) also contains provisions related to safeguarding the integrity, form, functioning and resilience of the coastal environment and sustain its ecosystems. Of specific relevance to this plan change and the scope of this assessment relevant provisions including objective 1 and policies 6, 11, 12, 22.
- 4.3 Similar provisions are contained within the AUP:OP. Including B7.2.1(2), B7.3.1(2)(3), B7.3.2(4)), B7.4.1(1)(4)(5) and B7.4.2(1)(2)(4)(7 -10).
- 4.4 All EclA's discuss avoiding adverse effects on ecological values throughout. As it relates to ecological matters, I consider avoidance to have been demonstrated to the extent practicable.
- 4.5 The EclA's utilise the Environmental Institute of Australia and New Zealand (**EIANZ**) Ecological Impact Assessment (2018) guidelines to describe the current ecological values, the magnitude of the effects and derive the level of effect.
- 4.6 I consider that the methodology, as well as the standards and guidelines used are appropriate and conform to industry best practice. I also consider that the effort expended in the site investigations is appropriate for the scale of proposed works and potential effects, and that the reported results are transparent, accurate, and a fair representation of the ecological values.
- 4.7 The assessment methods used for determining ecological values used by the Applicant is detailed in the various EclA's:
- a) Freshwater: Section 2 (beginning on page 5)
  - b) Terrestrial: Section 2 (beginning on page 4)
  - c) Wetlands: Section 2 (beginning on page 4)
  - d) Coastal: Section 6 (beginning on page 6)

4.8 The reporting of the ecological values is detailed in the various EclA's:

- a) Freshwater: Section 3 (beginning on page 14)
- b) Terrestrial: Section 3 (beginning on page 9)
- c) Wetlands: Section 4 (beginning on page 11)
- d) Coastal: Section 4 (beginning on page 17)

## **5 Assessment of Ecological Effects and Management Methods**

### **Effects assessment**

5.1 The reporting of the ecological effects, and the measures proposed to address identified effects, is detailed in the various EclA's:

- a) Freshwater: Section 4 (beginning on page 26)
- b) Terrestrial: Section 4 (beginning on page 22)
- c) Wetlands: Section 5 (beginning on page 15)
- d) Coastal: Section 4 (beginning on page 42)

5.2 I consider that the EclA's have identified a range of actual and potential ecological effects beyond what is actually proposed through the plan change, considering a number of activities that would still require consents at the time of development.

5.3 The reporting of the EclA's, also recognises that there will be residual adverse effects:

- a) Freshwater: Section 5 (beginning on page 39)
- b) Terrestrial: Section 5 (beginning on page 34)
- c) Wetlands: Section 6 (beginning on page 25)
- d) Coastal: Section 6 (beginning on page 61)

5.4 I consider that the EclA has identified the likely actual and potential ecological effects that are envisioned through the plan change and appropriately included measures to address the effects.

### **Riparian planting**

5.5 Through the Clause 23 Response, and in their submission, the applicant has proposed amendments to the precinct provisions that:

- 5.5.1 Remove the requirement to plant the riparian yard setback; and
- 5.5.2 Specifically allow the riparian planting proposed to be counted towards any biodiversity offsetting or compensation that may be required.

5.6 The changes are to the Clause 23 (September 2022) revision to the precinct plan:

- a) Standard I.7.5 Riparian Margins purpose and section (2).
- b) Standard I.7.6 Ecological Protected Area Network purpose and section (3)(a).

5.7 The submission points are detailed and assessed below in section 6.

5.8 The requirement to plant the riparian yard is now proposed to be removed.

- 5.9 It was understood that the planting of the riparian yard was part of the effects management as it would address the effects of the change in the land use (including visual, urban design, contaminant profile changes and biodiversity impacts).
- 5.10 Any planting being put forward as a means to address the effects from the change in land use and the plan change, must not be counted again for any residual adverse effects from any specific activities.
- 5.11 Such an approach would not be consistent with the principle of 'additionality', the idea that any measure put forward to address a significant residual adverse effect has to be additional to what would otherwise occur. Refer to AUP:OP Appendix 8 Biodiversity Offsetting point 2:
- (2) *Restoration, enhancement and protection actions undertaken as a biodiversity offset are demonstrably additional to what otherwise would occur, including that they are additional to any avoidance, remediation or mitigation undertaken in relation to the adverse effects of the activity.*
- 5.12 In this case the planting of riparian margins and the EPAN are being proposed to address the effects of the change in the land use (including visual, urban design, contaminant profile changes and biodiversity impacts), and therefore would already occur as a result of the plan change not any specific activity (such as stream or wetland reclamation) where a biodiversity offset or compensation may be put forward as part of the effects management package as part of a resource consent application.
- 5.13 This is Auckland Council's standard interpretation and approach, and was upheld in early 2023 through the Plan Change 69: Spedding Road decision, where similar provision were removed from the final precinct.
- 5.14 As far as I am aware such an approach as sought by the applicant has always been rejected by Council, going back to the decision of Flat Bush sub-precinct 3 (plan Variation 8). Points 82 – 84 of the decision are relevant to this consideration:

***Riparian planting as mitigation planting***

82. *In tidying up the PV8 provisions related to riparian margins to clarify their nonapplication to road crossings (accepted by Council), Mr Tollemache proposed a new rule 11.5.4.4 as follows: For the avoidance of doubt, planting required by Rule 11.5.4.1 [riparian margins of streams] can be utilised as part of any environmental compensation requirements associated with works and/or structures in a stream.*
83. *Council disagreed with this amendment on the ground that I had "the potential to detract from potential mitigation planting required in the future" by the PAUP.*
84. *We agree with Council that the proposed rule conflates two requirements – being that of planting the riparian margins of streams as a matter of course upon proximate subdivision, and the requirement for mitigation where works / structures occur in streams. Clearly adopting the proposed rule opens up the prospect of double-counting mitigation. Accordingly we find the proposed rule inappropriate.*
- 5.15 There is no specific rationale provided, or considered appropriate, to vary from existing precedent and standard practice.
- 5.16 Both the Resource Management Act and AUP:OP provide for a range of different approaches to addressing adverse effects including avoidance and biodiversity offsetting including via in-stream enhancements, and off-site actions.
- 5.17 The restoration of riparian margins align with the AUP:OP RPS Objectives B7.2.1(2), B7.3.1(1) and B7.3.1(3), as well as, NPS:FM policies 1, 3, 7, 9 and 13. Broadly these provisions seek that ecological values are at least maintained and enhanced where they are degraded; which can be given effect to through riparian planting delivered through the plan change process.

## **6 National Policy Statement for Indigenous Biodiversity**

- 6.1 The National Policy Statement for Indigenous Biodiversity (NPS:IB) came into effect in July 2023, after the plan change had been notified.
- 6.2 Accordingly the gazetted version of the NPS:IB is not specifically addressed in the application material.
- 6.3 Without repeating the objective and all of the policies, from a technical ecological perspective I could consider the plan change consistent with the NPS:IB. This, however, is subject to the resolution of the additionality matter raised above.
- 6.4 Should the additionality matter be addressed as proposed within this assessment:
- 6.4.1 Indigenous biodiversity would be expected to be maintained.
  - 6.4.2 Significant indigenous vegetation and significant habitats of indigenous fauna are identified as Significant Natural Areas (SNAs) (through the EPAN).
  - 6.4.3 SNAs are protected by avoiding or managing adverse effects from new subdivision, use and development.
  - 6.4.4 Restoration of indigenous biodiversity is promoted and provided for.
- 6.4 Furthermore, I would not identify any other areas where the plan change would be contrary to the NPS:IB.

## **7 Submissions**

- 7.4 The plan change has been publicly notified, and a number of submissions have been received.
- 7.5 I have been directed to a number of key submissions that relate to ecology for further analysis by Auckland Council.
- 7.6 I have also been provided with a summary of the submissions by Auckland Council where I have identified a number of other submissions that raise matters related to ecology.
- 7.7 The submissions that relate to ecology have been assessed in Appendix 1 and, at Auckland Council's request, have been arranged by key themes.

## **8 Conclusions and recommendations**

- 8.4 I have reviewed the Application with reference to the requirements and provisions in the Auckland Unitary Plan (Operative in Part) to assist the preparation of the Council's reporting planner's reports from a terrestrial and freshwater ecology perspective.
- 8.5 I consider that the:
- a) Methodologies, standards and guidelines used to assess the terrestrial ecological values are appropriate.
  - b) Effort expended in the site investigations is appropriate for the scale of proposed works and potential effects.
  - c) Reported results are transparent, accurate and a fair representation of the on-site values.
- 8.6 I concur with the Applicant's description of the current ecological values, the potential effects, and the magnitude of those effects on ecology.

- 8.7 The only point in contention is the amendments proposed through the Clause 23 response and the applicant's submission that seek to vary the standards related to riparian planting.
- 8.8 Overall, I would support the plan change, as it was notified. I would not be supporting the plan change with the amendments sought by the applicant through the Clause 23 response that relates to the riparian planting.

**Appendix 1: Submission Assessments**

**Council Identified**

| Submitter No. | Name              | Submission Point /Issue Raised | Relief Sought   | Technical Assessment  |
|---------------|-------------------|--------------------------------|---|---|
| 266           | Three Pines Trust | 266.9                          | Amend earthwork catchments to follow natural watershed boundaries.  | <p>Precinct Plan 7 – Earthworks Catchments, shows the earthworks catchments.</p> <p>In considering the appropriateness of the catchments identified, I utilised Auckland Council GeoMaps geospatial information. The earthworks catchments <u>do</u> follow the natural watershed boundaries as can be seen by the contours, and overland flow path layers.</p>   |
|               |                   | 266.10                         | Apply 5 ha open limit to entire plan change area.   | <p>Note that the Beachlands South Precinct (I.7.11) is for a 4 ha limit in each catchment.</p> <p>I acknowledge that a smaller area of earthworks open and exposed to erosion at any one time would have the correspondingly lower volume of sediment generation should erosion occur. However, as the AUP:OP recognises in E11.1: <i>even with the use of best practice techniques, it is not possible to prevent all sediment entering water bodies.</i></p> <p>There is also a practical element to undertaking the earthworks operation (i.e. balancing of cut-to-fill) that would need to be considered.</p> <p>I am comfortable that the modeling shows the receiving environment could handle the anticipated level of discharge and that the 4 ha per catchment is appropriate.</p> |
|               |                   | 266.11                         | Amend the earthworks controls to be tightened, and employ a precautionary approach, to protect these significant natural resources. | <p>The earthworks proposed would also require regional earthwork consents under the provisions of AUP:OP chapter E11.4.1.</p> <p>The provisions of the AUP:OP contain sufficient provision to enable any more detailed effects assessment once the earthwork designs have been further refined.</p>   |

| Submitter No. | Name                        | Submission Point /Issue Raised | Relief Sought   | Technical Assessment  |
|---------------|-----------------------------|--------------------------------|---|---|
|               |                             |                                |   | Common measures applied to regional earthworks consents include the provision of Adaptive Management Plans, which could be designed to operate on the precautionary basis sought.   |
| 272           | Whitford Coast Society Inc. | 272.1                          | Mitigation measures should be implemented before construction begins  | The specific mitigation measures of concern are identified and assessed in submission point 272.3 below.  |
|               |                             | 272.3                          | <p>Request that the developers take steps to restore the shoreline prior to start of construction:</p> <ul style="list-style-type: none"> <li>a. Ensure silt run-off is minimised both during and after development.</li> <li>b. Manage the mangrove stands to revitalise the shell banks to provide a suitable home for dotterel and other birds: Auckland Council are already taking similar measures near Waiuku.</li> <li>c. Fence off the shoreline permanently from horses, motorcycles, dogs and walkers in the interest of birds because humans and their toys and pets kill dotterel populations.</li> <li>d. Make Beachlands South “cat free”: 3-5,000 new dwellings will surely add at least 1,500 new cats to the area. Cats are significant predators.</li> <li>e. Implement a long term weed and pest control programme.</li> </ul> | <ul style="list-style-type: none"> <li>a. Erosion and sediment controls, in accordance with GD05, are proposed and would ensure that sediment-laden flows are managed appropriately during works; and earthworked areas stabilised upon completion.</li> <li>b. The Marine EclA notes:<br/><br/>Selective removal of mangroves and ongoing maintenance of seedlings is proposed to maintain quality foraging habitat at the mouth of the Waikopua Creek. Without intervention it is likely that mangroves will continue to expand seawards in this location and compromise foraging habitat quality.<br/><br/>To give effect to this the precinct plan does include policy I.4(10):<br/><br/><i>Encourage the restoration, maintenance and enhancement of biodiversity values in the coastal marine environment by...</i><br/><br/><i>(b) Selective mangrove management for the restoration and enhancement of coastal bird inter-tidal habitat.</i><br/><br/>Therefore, I consider that the Marine EclA recognises the values of mangroves to act as habitat; and also other habitat types which could be altered by an expansion of the mangrove forest. This is further recognised by the inclusion of a policy in this regard.</li> </ul> |



| Submitter No. | Name | Submission Point /Issue Raised | Relief Sought   | Technical Assessment   |
|---------------|------|--------------------------------|---|--|
|               |      |                                | <p>f. The “not less than 10 m riparian setback” should increase by a factor of three.</p> | <p>Whilst the precinct contains no further specific rules to give effect to this, the AUP:OP already has specific rules that regulate mangrove clearance (chapters E3 for streams and E18 for the coastal environment).</p> <p>c. This issue is larger than ecology. It is likely that any fencing requirement would be questioned by other specialists, concerned with amenity, landscape and access. It is unlikely that a general fence would discourage any disturbance or predation on nesting dotterels to a significant degree; and the requirement for a more robust predator proof fence would not be justified based on the ecological values present and the applied standard elsewhere in the AUP:OP.</p> <p>Further mitigation is proposed by aligning the walkway to avoid sensitive areas, signage and dog restrictions as well as a specific dog park.</p> <p>Not all of these measures have been specifically included in the precinct plan; however I consider policy framework (objectives I.3 (11 and 13); and policy’s I.4 (8, 9, and 10) sufficient provision.</p> <p>d. That cats do predate on coastal birds is acknowledged in the Marine EclA. I would also concur with the Marine EclA’s assessment that this may appear negligible in nature, but cumulatively with a range of anthropogenic factors could impact coastal avifauna values. I would also note that this is likely to already be occurring.</p> <p>The pest control proposed extends to the coastal edge to provide a buffer and level of protection to coastal fringe bird species from predation. A ban on cats is also proposed for coastal properties.</p> |

| Submitter No. | Name | Submission Point /Issue Raised | Relief Sought   | Technical Assessment  |
|---------------|------|--------------------------------|---|---|
|               |      |                                |   | <p>Not all of these measures have been specifically included in the precinct plan; however, I consider policy framework (objectives I.3 (11 and 13); and policy's I.4 (8, 9, and 10) sufficient provision.</p> <p>e. Pest (animal and vegetative) control would be secured in the long-term through the legal protection mechanism. This would be required through the Biodiversity Management Plan (I.10(2)), and standard I.7.5 Riparian Margins and I.7.6 Ecological Protected Area Network (4, 5 and 6).</p> <p>f. Whilst a greater setback distance would allow more space for riparian planting, and correspondingly an increase the ecological benefit derived from any such planting, 10 m is consistent with the zoning provision.</p> |
|               |      | 272.4                          | <p>Some strongly worded conditions on limiting light pollution would be much welcomed, and if planned may well not incur any additional costs</p> <p>There is currently a population of moreporks (and some bats probably visiting from Hunua colonies) living in the established bush just south of the planned development and further inland on the Waikopua estuary. Cormorants also live up the estuary, none of which will prosper if there is too much light. Obviously, streetlights are one consideration, but also perhaps the throw of house porch lights etc., and especially to the yards of any light industrial developments in the area</p> | <p>The Terrestrial EclA recognises the potential for an increase in light disturbing species and degrading habitat values. This is included within the 'edge effects' discussion. To address edge effects, a minimum 10 m vegetation buffer around native vegetation types (within the EPAN) is proposed. Given the nature of the vegetation being highly aggregated and already along the waterways, this is considered sufficient without the need for specified downward facing lights or similar lighting mitigation measures.</p>  |
|               |      | 272.5                          | <p>There are native skinks in the area which need protecting.</p>   | <p>The terrestrial EclA acknowledges the potential for a range of native herpetofauna to inhabit the site.</p>  |

| Submitter No. | Name | Submission Point /Issue Raised | Relief Sought  | Technical Assessment   |
|---------------|------|--------------------------------|--|--|
|               |      |                                |  | <p>Potential effects are acknowledged (including mortality, injury) during vegetation clearance; increased edge effects and disturbance associated with the change in land use).</p> <p>All native herpetofauna are protected under the Wildlife Act, and a permit would be required for their disturbance (this is acknowledged in the terrestrial EclA).</p> <p>The Terrestrial EclA notes that a series of commonly applied, industry best practice measures would be applied, mainly a search, salvage and relocation of lizards governed by the Lizard Management Plan (<b>LMP</b>).</p> <p>The precinct includes in I.10 Special Information Requirements (5) a requirement for a LMP triggered by bulk earthworks.</p> <p>A LMP would be required under the Wildlife Act and any regional resource consent triggers for vegetation alteration/removal.</p> <p>I consider this sufficient provision for the protection of lizards.</p> |
|               |      | -                              | <p>The plan oddly sets up five areas for development which defy natural watercourses, which surely is rosy thinking. The sleight of hand has a benefit to the developers in that, given the application for 5 Ha of open ground make a possible 25 Ha of sediment runoff in a storm with 5 Ha in each area. By contrast the nearby landfill has an “open” limit of about 900 square metres given the potential for noxious runoff.</p> | <p>Note that the Beachlands South Precinct Standard (I.7.11) is for a 4 ha limit in each catchment.</p> <p>I acknowledge that a smaller area of earthworks open and exposed to erosion at any one time would have the correspondingly lower volume of sediment generation should erosion occur. However, as the AUP:OP recognises in E11.1: <i>even with the use of best practice techniques, it is not possible to prevent all sediment entering water bodies.</i></p> <p>There is also a practical element to undertaking the earthworks operation (i.e. balancing of cut-to-fill) that would need to be considered.</p>   |

| Submitter No. | Name                                | Submission Point /Issue Raised | Relief Sought   | Technical Assessment   |
|---------------|-------------------------------------|--------------------------------|---|--|
|               |                                     |                                |   | <p>I am comfortable that the modeling shows the receiving environment could handle the anticipated level of discharge and that the 4 ha per catchment is appropriate.</p> <p>I have not reviewed the landfill's consent, but would suspect that the open area being referenced is for the active tip face which I would anticipate being limited to reduce nuisance effects such as odor, and attracting vermin; with runoff generation a secondary concern.</p> |
|               |                                     | 272.11                         | We therefore ask that the wetlands and gullies be physically fenced with long term pest control measures in place (as well as along the foreshore).   | As covered above, long term pest control measures are proposed. Given the change in landuse it is considered that a lack of larger browsing herbivores (i.e. stock) would also be reduced, negating the need for fencing.  |
|               |                                     | -                              | Finally, as we mentioned earlier, how can wetlands and gullies be protected if the five zones identified for development do not match natural watercourses? Surely that would make wetland management impossible if the five zones are developed at different rates?  | <p>Precinct Plan 7 – Earthworks Catchments, shows the earthworks catchments.</p> <p>In considering the appropriateness of the catchments identified, I utilised Auckland Council GeoMaps geospatial information. The earthworks catchments <u>do</u> follow the natural watershed boundaries as can be seen by the contours, and overland flow path layers.</p>  |
| 275           | Royal Forest and Bird Society of NZ | 275.1                          | <p>Forest and Bird seek that the PC include provisions that:</p> <ul style="list-style-type: none"> <li>i. implement a perpetual commitment to pest control with the goal of eradication</li> <li>ii. place a ban on domestic cats</li> <li>iii. require installation of signage to require dogs on leads in all riparian areas and conservation zones</li> <li>iv. provide suitable fencing to reduce predator access to indigenous habitat areas</li> </ul> | <p>I consider that:</p> <ul style="list-style-type: none"> <li>i. The commitment to pest control has been made. It is not practical to make a commitment to total eradication.</li> <li>ii. The threat domestic cats pose to wildlife is capture in the ban on coastal properties, pest management and measures to enhance indigenous biodiversity.</li> <li>iii. Signage for dogs is proposed.</li> <li>iv. The benefits of fencing are negligible.</li> </ul>  |

| Submitter No. | Name | Submission Point /Issue Raised | Relief Sought   | Technical Assessment  |
|---------------|------|--------------------------------|---|---|
|               |      |                                | <p>Forest &amp; Bird seek that the PC includes provisions that:</p> <ul style="list-style-type: none"> <li>i. require water sensitive design giving effect to Te Mana o te Wai</li> <li>ii. require stormwater treatment/filtration to a high level, prioritising nature-based solutions</li> <li>iii. limit the proportion of the development that can be impermeable (paved, covered) surfaces</li> <li>iv. implement a minimum riparian planting width of 20m for all streams and wetlands as recommended by the Auckland Design Manual</li> <li>v. ensure monitoring and maintenance of the freshwater bodies is to a high standard, enhancing rather than maintaining water quality. This should include appropriate levels of erosion control, replanting and weed management.</li> </ul> | <p>I consider that:</p> <ul style="list-style-type: none"> <li>i. From an ecological effect the plan change gives effect to Te Mana o te Wai</li> <li>ii. The stormwater management measures are appropriate, noting that a more comprehensive technical review will be undertaken by others under separate cover.</li> <li>iii. The zoning provisions include limits for impervious surface coverage.</li> <li>iv. The 10 m riparian yard setback, and the planting requirements proposed are appropriate.</li> <li>v. Any water quality monitoring that would be proposed is best addressed through the resource consenting process.</li> </ul> |
|               |      |                                | <p>Forest &amp; Bird seek that the PC include provisions that:</p> <ul style="list-style-type: none"> <li>i. ensure all mature existing trees are retained</li> <li>ii. require planting in the development to be eco-sourced natives appropriate for the climate</li> </ul>  | <p>I consider that:</p> <ul style="list-style-type: none"> <li>i. It would not be practical for the plan change to maintain all mature trees, rather the recognition of areas of existing significant vegetation and the provisions offered through the precinct confer an appropriate level of protection.</li> <li>ii. This recommendation would be considered by Council in the consideration of any riparian planting plan (see the</li> </ul>  |

| Submitter No. | Name                         | Submission Point /Issue Raised | Relief Sought  | Technical Assessment   |
|---------------|------------------------------|--------------------------------|--|--|
|               |                              |                                | <ul style="list-style-type: none"> <li>iii. ensure canopy cover reaches a minimum of 30%, aligning with Auckland’s Urban Ngahere (Forest) Strategy</li> <li>iv. retains and enhances connectivity of indigenous vegetation and indigenous species habitat</li> </ul>   | <p>guidance provided in Appendix 16 of the AUP:OP). It is also included through the precinct provisions (see policies 6, 7 and special information requirement (2)).</p> <ul style="list-style-type: none"> <li>iii. I have not done a detailed analysis to confirm the exact values; however, consider the canopy coverage would be a significant proportion of the precinct.</li> <li>iv. I consider that the retention and enhancement of existing vegetation is provided for to an adequate degree.</li> </ul>   |
|               |                              |                                | <p>Forest &amp; Bird seek that council set out in the plan change how the development will give effect to these directions, including:</p> <ul style="list-style-type: none"> <li>i. requirements for adequate surveys of existing indigenous flora and fauna before works are undertaken and that appropriate protection measures are subsequently put in place.</li> <li>ii. measures required to enhance the natural character of the coastal environment</li> <li>iii. having regard to the directive requirements of Policies 11, 13 and 15. taking in to account the results of surveys</li> </ul> | <p>I consider that:</p> <ul style="list-style-type: none"> <li>i. The various EclA’s submitted with the plan change request adequately recognises potential wildlife presence and envisions various search and salvage undertaking in accordance with best practice. This process would be managed through a series of management plans provided to Council for review which would ensure the effort expended in any searches is appropriate.</li> <li>ii. Measures are proposed through the plan change that enhance the natural character of the coastal environment (as it relates to ecological matters).</li> <li>iii. This submission point is presumed to be referring to policies 11, 13 and 15 of the New Zealand Coastal Policy Statement. I consider these provisions to have been adequately incorporated into the plan change.</li> </ul> |
| 319           | Whitford Study Working Group | 319.1                          | <p>This is a private plan change application that has already been objected to vigorously by the community. It failed in the environment court court of appeal and the High Court. It was declined as an application to the fast track housing accord. It is completely non complying as an urban development in a rural area in S Plan</p>  | <p>I have no knowledge of any previous application for this site; having reviewed the application material submitted for this plan change request I consider that effects on the coastal environment (as they relate to ecology) have been appropriately recognised and potential measures to address those effects, this includes for any birds at Formosa Golf Club.</p>   |

| Submitter No. | Name   | Submission Point /Issue Raised | Relief Sought  | Technical Assessment  |
|---------------|--|--------------------------------|--|---|
|               |  |                                | Change that is world leading environmental and ecologically based. It was recognised as having significant outcomes on the coastal environment. There are highly protected bird species on the Formosa Golf Club this would mean a disruption to their habitat.                                  |   |
| 351           | Beachlands South Limited Partnership (applicant) | 351.5, 351.6                   | Update standards I.7.5 Riparian Margins and I.7.6 Ecological Protected Area Network to reflect amendments supplied in the Clause 23 response that any riparian planting proposed within the riparian yard setback can be considered as part of any ecological offsetting or compensation package | <p>This submission point is addressed in my primary assessment. For the avoidance of doubt this submission point not supported.</p> <p>The planting is being proposed in part to mitigate the effect of the change in land use given by the plan change.</p> <p>It is not appropriate for this planting to be ‘double-counted’ and also included for specific adverse effects.</p> <p>The results of enabling such “double-dipping” would be that the adverse effect would not be offset or compensated for, and no-net-loss of ecological function would not be realised as this positive effect would be realised any way and therefore would not be considered additional to what would otherwise occur.</p> <p>Standards that require the planting of riparian yards and margins are common in the AUP, and in this case would give effect to the positive effects envisioned in the plan change.</p> |
|               |  | 351.8                          | Update Precinct Plan 2 – Natural Features and mapping of indicative natural wetlands based on the revised definition of ‘natural inland wetland’ to incorporate recent amendments to this definition that took effect from 5 January 2023  | It would be appropriate for this precinct plan to be updated to reflect the change in definition; however, it is considered that this change on the map should be provided for agreement with Council prior to being included in the precinct plan.   |



### General Ecological Issues

| Submitter No. | Name                   | Submission Point /Issue Raised | Relief Sought  | Technical Assessment  |
|---------------|------------------------|--------------------------------|--|---|
| 8             | Justine Benson         | 8.3                            | Decline the plan change  | The plan change would not in and of itself lead to any adverse ecological effects. Such activities would still be subject to the resource consenting requirements of the AUP:OP which I consider contain sufficient provision to address potential effects and ensure they are appropriately managed. |
| 25            | Glenis Clapham         | 25.2                           | Decline the plan change  |   |
| 36            | Terry ray Honey        | 36.1                           | Decline the plan change  |   |
| 75            | Mark Clapham           | 75.2                           |  |   |
| 217           | Colleen Agnes Drummond | 217.3                          | Decline the plan change, but if approved make the amendments that I request. | A range of mitigations measures have been identified which are considered appropriate to address any adverse environmental effects that have been identified.   |
| 329           | Tracey Bothwell        | 329.2                          | Decline the plan change  |   |

**Wastewater and Stormwater Discharges**

| <b>Submitter No.</b> | <b>Name</b>                            | <b>Submission Point /Issue Raised</b> | <b>Relief Sought</b>   | <b>Technical Assessment</b>  |
|----------------------|--|---------------------------------------|--|--|
| 19                   | Martina Katharina Toebosch             | 19.2                                  | Decline the plan change  | <p>From an ecological perspective, provided that the earthworks and stormwater management is implemented in line with best practice (which is assessed by others under separate cover). It is not considered that the increase in impervious surfaces would lead to a decline in freshwater or coastal water quality.</p> <p>Any such activities would still be subject to the resource consenting requirements of the AUP:OP which I consider contain sufficient provision to address potential effects and ensure they are appropriately managed.</p> <p>It is considered that the plan change has, subject to technical review, demonstrated feasible wastewater disposal options appropriate for the plan change level of detail.</p> <p>Any of the options would require resource consent. At the time of resource consenting, further detail on potential effects would be required to inform the effects assessment. It is considered that the AUP contains sufficient provision to enable this assessment at the time of resource consenting.</p> <p>There is no evidence to suggest that the land-disposal of treated wastewater would harm the breeding grounds of any endangered birds.</p> <p>In forming this technical assessment I do not think it reasonable to hold the applicant to account for the actions (or inactions) of past owners.</p> <p>Additional impervious surfaces could lead to a decline in freshwater or coastal water quality; however as recognised through the plan change there are a range of commonly applied industry best practice measures that could be utilised to address this concern. From an ecological perspective it is considered that</p> |
| 48                   | Murray R Stevens                       | 48.3                                  | Decline the plan change  |  |
| 56                   | Jean Alphonsus Philippus Toebosch John | 56.6                                  | Decline the plan change, but if approved make the amendments that I request. |  |
| 144                  | Christine Jansen                       | 144.2                                 |  |  |
| 163                  | Karen Carter                           | 163.7                                 | Decline the plan change, but if approved make the amendments that I request. |  |
| 166                  | Stephen Melrose                        | 166.1                                 | Decline the plan change  |  |
| 189                  | Julio de Faria                         | 189.3                                 | Decline the plan change, but if approved make the amendments that I request. |  |
| 208                  | Carl Shelley                           | 208.2                                 | Decline the plan change, but if approved make the amendments that I request. |  |
| 217                  | Colleen Agnes Drummond                 | 217.2                                 | Decline the plan change, but if approved make the amendments that I request. |  |
| 233                  | David Rose                             | 233.3                                 | If the plan change is not declined make the amendments that I request.       |  |
| 294                  | Wayne List                             | 294.4                                 | Decline the plan change  |  |
| 336                  | Katja Kershaw                          | 336.1, 336.2, 336.3                   | Support the plan change  |  |

| Submitter No. | Name | Submission Point /Issue Raised | Relief Sought | Technical Assessment   |
|---------------|------|--------------------------------|---------------|--|
|               |      |                                |               | the final level of detail can be provided through the resource consenting process. |

#### Mangroves

| Submitter No. | Name                     | Submission Point /Issue Raised | Relief Sought           | Technical Assessment   |
|---------------|--------------------------|--------------------------------|-------------------------|--|
| 47            | Angus James Scott-Knight | 47.7                           | Decline the plan change | It is noted in the application material that the mangrove forest is already expanding. The plan change includes open area limits for earthworks, which would still be subject to resource consenting requirements, to reduce sediment generation and discharges. The plan change also includes provisions for selective clearance of mangroves to reduce their spread as a further measure that could be used to address any potential effect. |

#### Covenancing

| Submitter No. | Name               | Submission Point /Issue Raised | Relief Sought           | Technical Assessment  |
|---------------|--------------------|--------------------------------|-------------------------|---|
| 323           | Nigel Coyle Hannan | 323.1                          | Decline the plan change | This submission is opposed. It is acknowledged that the proposed covenant provisions would place restrictions on future landowners. However, the purpose of these restrictions is to ensure that the ecological benefits intended to be provided for in this area are realised. Such covenanting provisions are a normal practice in developments to ensure such ecological benefits are continued in perpetuity. |

**Extension of the Plan Change Area**

| <b>Submitter No.</b> | <b>Name</b>    | <b>Submission Point /Issue Raised</b> | <b>Relief Sought</b>                                      | <b>Technical Assessment</b>  |
|----------------------|----------------|---------------------------------------|---|--|
| 206                  | Sielia Limited | 206.2 – 206.11                        | Accept the plan change, with the modifications I suggest. | This assessment is neutral with extending the plan change, and the associated provisions to the submitters property. |

**Memo (technical specialist report to contribute towards Council's section 42A hearing report)**

14 August 2023

To: Chloe Trenouth – Planner, Auckland Council

From: Dr Pete Wilson – Principal Coastal and Water Quality Scientist, 4Sight Consulting Ltd

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**Subject: Private Plan Change – PC88 Beachlands South – Marine Sediment and Water Quality Technical Review**

**1.0 Introduction**

1.1 I have been requested to undertake a technical review of the private plan change, on behalf of Auckland Council in relation to marine sediment and water quality effects. The intent of this review is to confirm the appropriateness of the adopted methodologies, issues and conclusions and confirm suitability for Auckland Council and decision makers in approving this application.

1.2 I have a PhD in marine biogeochemistry from Auckland University of Technology, and a Master of Science (Hons) and Bachelor of Science in chemistry from the University of Waikato. I have over 12 years of experience in local government, consulting, and academia and am experienced in resource management; ecological impact assessments; and designing, implementing, and reporting on monitoring programmes, including regional state of the environment programmes. My expertise is primarily in marine sediment and water quality.

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

- Beachlands South Structure Plan Change: Water Quality & Sedimentation Modelling Report. Prepared by Tonkin & Taylor Ltd (dated March 2022).
- Relevant sections of the Marine Ecological Effects Assessment – Beachlands South prepared by Tonkin & Taylor Ltd (dated March 2022).
- Relevant sections of the s32 Assessment Report – Beachlands South Precinct: Private Plan Change Request. Prepared by Unio Environmental for Beachlands South Limited Partnership (31 March 2022) [primarily sections 9.9 (Coastal Hazards) and 9.13 (Coastal Water Quality and Sedimentation)].

**2.0 Key issues**

2.1 The CMA adjacent to the site is classified as a Marine Significant Ecological Areas (SEA-M1) under the Overlay section of the AUP as it provides significant wading areas for a variety of coastal bird species. The remainder of the Whitford Embayment is classified as an SEA-M2.

2.2 There is the potential to generate elevated levels of sediment during construction, which may be subsequently deposited into the CMA. This can result in the smothering of benthic habitats and fauna if the deposition layer is thick and remains for an extended period, which could reduce the availability of food for wading birds recognised by the SEA-M1.

2.3 Stormwater management will result in the discharge of water into the CMA via wetlands. This discharge has the potential to contain elevated levels of contaminants (e.g., sediment, nutrients, and metals).

2.4 An upgraded wastewater treatment plant (WWTP) is required to accommodate the increased population and generation of wastewater in Beachlands. The specifics regarding the WWTP and the quality of its discharge are outside of the scope of this private plan change and will be refined during a separate consenting process; however, a feasibility study has been conducted and shown that upgrades to the existing facility are possible and an assessment of effects has been conducted using anticipated contaminant concentrations in the discharge. The overall

quality of discharge from the proposed subdivision is dependent on the quality of the discharge from the WWTP, making these two aspects interlinked.

### **3.0 Applicant's assessment**

3.1 This section presents a review of sediment and water quality aspects of the Water Quality & Sedimentation Modelling Report by T+T. To clarify, this is a review of the potential effects on sediment and water quality in the receiving environment predicted by the modelling and not a review of the modelling itself. I note that the potential effects of the proposed development on water quality are also discussed in the Stream and Marine Ecological Assessment reports, also by T+T.

3.2 The potential adverse effects described in the report relating to the modelled sediment and water quality include:

- Deposition of terrigenous sediment in the marine environment during and after the development phase; and
- Long-term increase in heavy metal concentrations (copper, lead, and zinc) in marine sediments.

3.3 There is also a brief section on the potential effects of the wastewater discharge.

3.4 The assessment of each of these effects in the Water Quality & Sedimentation Modelling Report and additional comments are discussed separately in the following sub-sections.

#### **Sediment deposition**

3.5 To contextualise the predicted sediment deposition rates during and after development, the authors use two "effects thresholds" (Gibbs and Hewitt, 2004<sup>1</sup>) that relate to the thickness of sediment deposits and the time they remain on marine soft-sediment habitats following a single event:

- 20-mm thick deposit remaining for longer than five days. This threshold is indicative of conditions that are likely to result in the death of all resident benthic invertebrates (except for mobile crabs and shrimp) due to a lack of oxygen; and
- 4-mm thick deposit remaining for longer than 10 days. This threshold is indicative of conditions that will reduce the number of benthic invertebrates and the number of species, thereby changing the structure of the benthic community.

3.6 The report also uses a further trigger for sediment accumulation rates of 2 mm per year above the natural annual sedimentation rate, which has been adopted in the ANZG (2018) guidelines.

3.7 In our opinion, these are appropriate thresholds and triggers to assess modelled results against to determine the potential level of effect on benthic habitats from sedimentation.

#### During development

3.8 The predicted 24-h loading of TSS into the marine environment is dependent on the amount of rainfall. The approximate heaviest typical rainfall throughout the year is predicted to result in up to double the TSS 24-h TSS load than pre-development [p24]. Heavier rainfall events have higher predicted 24-h TSS loads, with the highest estimate provided being 14 times greater than pre-development for a 100-y ARI event (10% chance of occurrence within 10 years) [p24].

#### After development

3.9 The modelling predicts a reduction in TSS loads by about 64% [p25] after development. This is due to the reduction in vegetated areas such as the existing grassed areas of the golf course

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<sup>1</sup> Gibbs and Hewitt (2004) TP264 Effects of sedimentation on macrofaunal communities: a synthesis of research studies for ARC

and farmland. The creation of bioretention rain gardens, swales, and wetlands are also likely to assist with this reduction [Freshwater Ecology Report, p 33].

- 3.10 Assuming that the estimated deposition predicted by the model is similar to the actual likely deposition post-development, the effects of the development on deposited sediment in the CMA in the long-term is likely to be positive (i.e., reduction of sediment deposited into the CMA relative to the existing land use).

#### **Sediment heavy metal accumulation**

- 3.11 In the Water Quality & Sedimentation Modelling Report, sediment metal concentrations are assessed against the Auckland Council Environmental Response Criteria (ERC; ARC, 2004). The ERC are more regionally appropriate and more conservative than those specified in the ANZG (2018) guidelines, which are commonly used in New Zealand and Australia. The report also presents the ANZG (2018) guidelines values for reference. I consider this an appropriate approach.
- 3.12 After development is completed, the mass of copper and zinc discharged into the marine environment is predicted to increase by about three and four times, respectively, from existing levels [p25]. Consequently, metal concentrations in marine sediments are predicted to increase by about 3.5 times for copper and 2.5 times for zinc until a new equilibrium is established in the next 50–100 years [p53]. The estimated increases in sediment metals are estimated to be below the amber ERC (i.e., within the green ERC category), which means there is a low risk of adverse effects on the marine environment due to heavy metals.
- 3.13 The scenario for lead (another typical urban contaminant) was not calculated; however, its concentrations are likely to be of a similar magnitude and follow a similar pattern to that of copper and zinc and, therefore, unlikely to be of concern if the modelled sediment metal concentrations are correct.

#### **Wastewater discharge**

- 3.14 The existing WWTP discharges into a stream that subsequently discharges into the CMA adjacent to the proposed development area. To accommodate the proposed increase in population, upgrades to the WWTP will be required. The feasibility study and concepts proposed by GWE (2022)<sup>2</sup>, indicate that a suitable option is possible.
- 3.15 Any wastewater discharge has the potential to contribute contaminants (nutrients, suspended solids, metals and bacteria) into the environment and must be managed to minimise and/or avoid adverse effects.
- 3.16 Brief commentary on the treated wastewater discharge is included in Section 6 of the Water Quality & Sedimentation Modelling Report Section 6 briefly. It notes that Option 2 of the GWE (2022) report involves mixing of the discharge with the upper reaches of a small stream, which then mixes through a series of wetlands before discharging to the CMA. The discharge location is north of the Waikopua Creek and the report notes that it is in a relatively exposed location within the Whitford Embayment, offering suitable opportunities for mixing and dilution.
- 3.17 The Marine Ecological Effects Assessment incorporates the potential effects of the wastewater discharge based on anticipated effluent quality. I consider the key potential contaminants appropriate, which are identified in the report including:
- Nutrient enrichment (nitrogen and phosphorus);
  - Elevated suspended solids;
  - Microbial pathogens;
  - Heavy metals; and
  - Emerging organic contaminants (EOCs).

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<sup>2</sup> GWE (2022) Wastewater Reticulation and WWTP Concept Design, V3



- 3.18 The Marine Ecological Effects Assessment concludes that the magnitude of effects of the proposed activities on a range of marine habitats is no more than low. This takes into account the potential WWTP discharge, but it is not assessed separately. This is considered appropriate as the details of the WWTP discharge including location and quality will be identified and decided upon during the consenting process for the WWTP.

### **Coastal water quality**

- 3.19 No site-specific water quality sampling was conducted. Instead, state of the environment monitoring results were obtained for the mouth of the Wairoa River; a location approximately 20km east, around the headland. The Wairoa River mouth location was classified as having 'fair' water quality and is likely to provide a general indication of likely water quality in the Whitford Embayment.
- 3.20 I consider this broad approach appropriate as the most likely potential adverse water quality effects are likely to be chronic rather than acute. Monitoring of chronic contamination can be addressed by sediment monitoring as they accumulate contaminants over time. This has been considered in the Water Quality & Sedimentation Modelling Report regarding copper and zinc, and not anticipated to be of concern.
- 3.21 Further, the greatest potential water quality effects are likely to arise from the WWTP discharge, which is anticipated to be assessed in more detail during its consenting process.
- 3.22 Limited assessments of the effects of the development on water quality in the CMA have been conducted. Stormwater discharges are proposed to be discharged into streams via wetlands prior to discharging to the CMA. The Freshwater Ecology Assessment concluded that the overall level of effects on freshwater quality is no more than low. If the quality of the discharges is managed to meet freshwater standards, I consider potential adverse effects on water quality in the CMA to be unlikely.

## **4.0 Assessment of effects and management methods**

- 4.1 The Water Quality & Sedimentation Modelling Report concludes that the proposed activities will result in elevated levels of sediment discharging to the CMA during the development period and then a reduction relative to the existing levels due to the capture and diversion of stormwater through wetlands prior to discharging to the CMA. I agree with this finding. The Marine Ecological Assessment concludes that the effects of sediment deposition in the CMA are likely to have no more than a low magnitude of effects. Due to the very high ecological values associated with some marine habitats (i.e., firm muddy sand flats / cockle shell covered flats and shellbanks) the overall effects on these particular habitats were considered to be moderate. Accordingly, a compensation package was proposed to address the residual effects, including enhancing avifauna habitat and mangrove management. This approach is considered appropriate as the marine habitats are notably of high importance to avifauna.
- 4.2 The loading of heavy metals (notably copper and zinc) was concluded to increase relative to current conditions following the proposed development; however, modelled sediment metal concentrations were predicted to be within the green ERC category, indicating a low risk to aquatic organisms.
- 4.3 The details of the WWTP discharge are not in scope in this assessment; however, the overall effects of the proposed precinct are interlinked with and dependent on the quality of the WWTP discharge. The T+T Marine Ecological Assessment has considered the potential quality of the discharge from one of the feasibility options and has considered the appropriate contaminants. As mentioned, I consider that adverse effects on water quality in the CMA are unlikely if the discharges are managed to meet freshwater values. If an alternative discharge option is chosen, such as a direct discharge to the CMA, a specific assessment of the effects on marine water quality would be required.

## **5.0 Submissions**

- 5.1 Submissions relating to marine sediment and water quality predominantly raised concerns about the WWTP and its discharge. This is a complex issue as the details of the WWTP discharge will

be determined during its consenting process; however, the overall effects of the proposed development are dependent on the quality of the WWTP discharge. Some submissions recommend decline due to a lack of information or the current inability of the existing plant to treat the proposed increase in population. Based on the information provided, there are a number of feasible options to upgrade the existing WWTP to accommodate the increased population. A wastewater discharge into the stream via wetlands, which is managed to meet freshwater standards, is unlikely to have adverse effects on the marine environment. Direct discharge to the marine environment, however, would require a specific marine assessment to determine the level of effect.

- 5.2 Two submissions raised concerns about potential adverse effects on recreation values in the harbour (e.g., swimming and kite-surfing). Key factors that could affect these values are increased levels of sediment (making the water more turbid) and pathogens.
- 5.3 The Water Quality & Sedimentation Modelling Report concludes that there may be elevated levels of sedimentation during construction. Erosion and Sediment Control is proposed during construction to limit these effects. In the long term, it is predicted that the amount of sediment entering the CMA from this area will be lower than the current land use due to the reduction of vegetated areas and the discharging of stormwater via rain gardens, swales, and wetlands.
- 5.4 The most likely source of pathogens would be from a wastewater discharge. The proposed upgrades to the WWTP are likely to result in a greater volume discharge than currently occurs, but of a higher quality. I expect that monitoring of the quality of the discharge and the receiving environment would be required for such a discharge.

## **6.0 Conclusions and recommendations**

- 6.1 With regard to marine sediment and water quality, the applicant has assessed sedimentation and sediment quality in the CMA and, at a higher level, the potential effects of the proposed development on marine water quality.
- 6.2 The effects of sedimentation are predicted to be most elevated during construction. Residual effects on high-valued ecological habitats are proposed to be addressed by the compensation package focusing on avifauna habitats. Post-construction, sediment loads are predicted to be lower than they are currently due to the reduction of vegetated areas and the discharging of stormwater via rain gardens, swales, and wetlands.
- 6.3 Sediment contaminant loading was modelled and estimated to be three and four times higher for copper and zinc than they are now. Estimated long-term sediment metal concentrations are anticipated to be within Auckland Council's green ERC category, indicating a low level of risk to aquatic fauna.
- 6.4 Limited assessments were conducted on the potential effects of the proposed development on coastal water quality; however, managing discharges to meet freshwater standards is unlikely to cause adverse effects in the CMA. Long-term effects of heavy metals discharge into the CMA have been considered in the Water Quality & Sedimentation Modelling Report, noted above.
- 6.5 An upgraded WWTP is necessary to accommodate the proposed increase in population. Feasible options were identified and the effects of the potential water quality on the marine environment were assessed at a high level. The level of detail included at this stage is considered appropriate. Details of the discharge quality and location will be determined during its respective consenting process; however, the overall effects of the proposed precinct are interlinked with and dependent on the quality of the WWTP discharge.
- 6.6 Overall, I consider the potential effects of the development to be assessed appropriately and that identified residual effects are addressed by the proposed compensation.

## **Memo (technical specialist report to contribute towards Council’s section 42A hearing report)**

11 July 2023

To: Chloe Trenouth – Planner, Auckland Council

From: Alison Clarke – Principal Coastal Consultant, 4Sight Consulting Ltd

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**Subject: Private Plan Change – PC88 Beachlands South – Coastal Hazard Assessment**

### **1.0 Introduction**

- 1.1 I have undertaken a technical review of the private plan change, on behalf of Auckland Council in relation to coastal hazard effects. The intent of this review is to confirm the appropriateness of the adopted methodologies, issues and conclusions and confirm suitability for Auckland Council and decision makers in approving this application.
- 1.2 Alison holds a Master of Science degree (Hons) in Earth and Ocean Science, from the University of Waikato. She has approximately 13 years’ professional experience in the field of coastal science and is a Certified Environmental Practitioner through the Environment Institute of Australia and New Zealand (EIANZ).
- 1.3 In writing this memo, I have reviewed the following documents:
  - Coastal Hazard Assessment – Beachlands South Private Plan Change. Prepared by Tonkin & Taylor Ltd (dated January 2022).
  - Coastal Hazard Cross Section Drawings prepared by Tonkin & Taylor Ltd (dated July 2022).
  - Relevant sections of the s32 Assessment Report – Beachlands South Precinct: Private Plan Change Request. Prepared by Unio Environmental for Beachlands South Limited Partnership (31 March 2022) [primarily sections 9.9 (Coastal Hazards)].

### **2.0 Key Issues**

- 2.1 The subject site is located within the ‘coastal erosion hazard area’ as defined within the Auckland Unitary Plan – Operative in part (2016) (AUP). Lower parts of the site are also shown to be located within the ‘coastal storm inundation 1 per cent annual exceedance probability (AEP) area’ and the ‘coastal storm inundation 1% AEP plus 1m sea level rise area’.
- 2.2 E36.9 (Chapter E36 Natural Hazards and Flooding) of the AUP requires that a hazard risk assessment is undertaken when subdivision, use or development requiring a resource consent is to be undertaken on land that may be subject to natural hazards, including coastal erosion and coastal storm inundation. It states that an assessment of coastal hazards should include consideration of the effects of climate change over at least a 100-year timeframe and cover storm inundation of the 1 percent AEP plus 1m of sea level rise.
- 2.3 While the AUP provides for 1m of sea level rise over the next 100 years (based on best available information at the time of AUP development), the New Zealand Coastal Policy Statement (NZCPS, 2010) requires assessment of the hazard over at least a 100-year timeframe. The latter should consider the most up-to-date climate change and sea level rise information. More up to date sea level rise projections are currently provided by the Ministry for the Environment (MfE, 2017 and 2022)<sup>1,2</sup>.

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<sup>1</sup> Ministry for the Environment. (2017). Coastal hazards and climate change: Guidance for local government. Prepared for Ministry for the Environment.

<sup>2</sup> Ministry for the Environment. (2022). Interim guidance on the use of new sea level rise projections. August 2022. Wellington: Ministry for the Environment.

### **3.0 Applicant's assessment**

- 3.1 Tonkin & Taylor has undertaken a site-specific coastal hazard and issues assessment to inform the structure planning and private plan change for rezoning of the land for future urban development. The assessment has considered general coastal processes largely based on a desktop review and the susceptibility of the site to coastal inundation, tsunami and erosion hazard. Key review findings from the Tonkin & Taylor assessment are set out below.

#### **Coastal Setting and Processes**

- 3.2 A review of the coastal environment and coastal processes has been undertaken generally based on existing published information which has been supported by site observations.
- 3.3 Tidal and storm surge water level data are presented from existing sources, and the results of a SWAN hindcast model of the Tamaki Straight to define the local wave climate. The information described above is not, however, used in the hazard assessment and has not been considered further. Additional analysis has been undertaken on shoreline position using historic aerials, the results of which have been used to derive long-term shoreline regression rate for input into site-specific coastal erosion hazard equations.

#### **Coastal Inundation Hazard**

- 3.4 An assessment of the coastal inundation hazard of the site has been made using the inundation scenarios mapped by Auckland Council. This mapping is based on storm surge modelling carried out by NIWA and is considered the best available information in relation to extreme sea levels for the Auckland Region. As well as the present-day scenario, the Tonkin & Taylor assessment considers the potential consequence of up to 2m sea level rise. We consider this an appropriate allowance for new coastal subdivisions and development and is in keeping with the precautionary approach promoted by the MfE Coastal Hazards and Climate Change guidance (2017, 2022).
- 3.5 The coastal cliffs at the site are on average 20m high. The elevation of the majority of the coastal frontage means that it is generally only the low-lying beach and saltmarsh areas which are susceptible to coastal inundation. The Tonkin & Taylor assessment concludes that coastal inundation is not considered a hazard to residential or commercial land or road corridors at the site.
- 3.6 The associated coastal inundation extents are shown on Geomaps (Figure 1), which confirm that, owing to the sites generally high topography, only the coastal margin of the site is exposed to coastal inundation as a result of a future coastal storm surge event. The coastal inundation flooding level for the site is comprised of the 1% AEP level (RL2.18m) plus 2m sea level rise, which equates to a coastal inundation flooding level of RL4.18m excluding an allowance for freeboard. While such water level is not expected to flood the site landward of the cliff sections, it is noted that an area of low-lying reserve may be periodically inundated (Figure 1). We understand that the low-lying areas around the coastal edge have only been considered for recreational amenity purposes and that no habitable buildings shall be located on these areas.
- 3.7 Overall, we agree with the methodology used and accept the findings of the coastal inundation assessment.

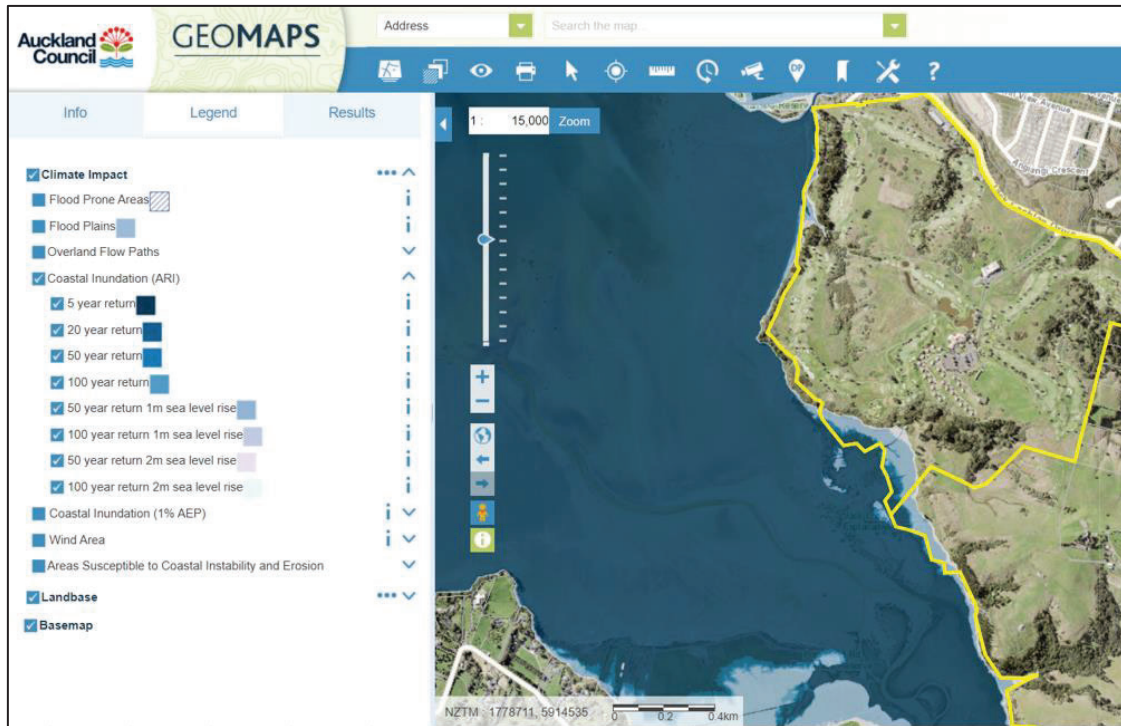


Figure 1: Auckland Council GeoMaps showing coastal inundation levels for 1% AEP plus 2m sea level rise (Auckland Council GeoMaps).

### Tsunami Hazard

- 3.8 Tsunami hazard was considered based on published tsunami inundation mapping used for civil defence purposes and is considered appropriate for this site. The Tonkin & Taylor assessment concludes that all key infrastructure and developments are located beyond the mapped tsunami inundation extents. We agree with this finding.

### Erosion Hazard

- 3.9 Tonkin & Taylor has undertaken a local-scale assessment of Areas Susceptible to Coastal Instability and Erosion (ASCIE) using the methodologies outlined in the Technical Report 2020/021 'Areas Susceptible to Coastal Erosion and Instability in the Auckland Region' (Roberts et al., 2020)<sup>3</sup>. The site-specific assessment is intended to provide a greater level of detailed analysis than the regional study, and thus presents the input parameters and results at a higher resolution to improve the accuracy of results.
- 3.10 Two different erosion methodologies have been applied to determine the current and future ASCIE: one suitable for the consolidated (cliff/terrace) sections of the site and another for the unconsolidated (beach) shoreline sections. It is noted that these are the correct equations as recommended in Auckland Council's supporting Coastal Hazard Assessment Guidance Document (Carpenter, 2021)<sup>4</sup>. Because of the length of subject shoreline (~2.5km), the site has been divided into eight coastal cells (A to H) based on shoreline behaviours which can influence the resultant erosion hazard. The local parameters that are used in the erosion hazard equations for the site are listed in Appendix F of the Coastal Hazard Assessment.
- 3.11 In reviewing the results of the overall coastal erosion hazard distances and the specific parameters used in the ASCIE calculations, the following comments are noted:

<sup>3</sup> Roberts, R., Carpenter, N. and Klinac, P. (2020). Predicting Auckland's exposure to coastal instability and erosion, Auckland Council, technical report, TR2020/021. December 2020.

<sup>4</sup> Capenter, N. (2021). Coastal Hazard Assessment in the Auckland Region. Auckland Council Guideline Document GD2021/010. August 2021.



### Cliff Shorelines

- 3.12 The methodology utilised by Tonkin & Taylor to derive the ASCIE for the coastal cliff sections (Cells B and D-H) is appropriate, where the hazard to the site would be induced by cliff erosion and instability. The critical values for this method are height of slope, stable slope angle and a long-term cliff toe erosion rate.
- 3.13 The assumed height of the cliff/terrace slopes appear to have been derived from the Auckland Council 2016 aerial LiDAR dataset and appear reasonable.
- 3.14 A detailed assessment was undertaken to define site-specific slope angles for each of the cliff/terrace coastal cells. This involved the height and angles of both the rock and soil layers being derived from the LiDAR data, which were then analysed and combined to derive combined slope angles for each lithology. The results from the rock, soil and combined slope angles were graphed and tabulated, identifying the Medium (50%), Unlikely (10%) and Exceptionally Unlikely (1%) probabilities.
- 3.15 For simplicity in approach, Tonkin & Taylor have assumed a stable slope angle of 23° for the toe projection for 5 out of 6 of the coastal cliff/terrace cells, which they note is based on the 'Unlikely' (10%) composite slope angle (Appendix A Table 1 refers). The selected stable angle seems reasonably conservative for the cliff materials at the site, and upon review appears to trend more towards the Exceptionally Unlikely (1%) composite slope angles for most of the coastal cells. In consideration of the Greenfield nature of the pre-developed site, we support the precautionary approach of adopting a conservative slope angle into the erosion equations in this instance.
- 3.16 Cliff Cell D (noted in the geotechnical supporting data in Appendix A as "Cell B" but we have assumed this is a typo) was identified as having the steepest slope angle across the subject frontage. During the site walkover, this section of coast was also considered to be the most recently unstable with a series of rockfalls observed at the toe. The assessment notes that due to the size of the blocks being released (i.e. 0.03 to 0.15m<sup>3</sup>), the rock falls are high probably events with a low consequence for coastal instability, and therefore, the cell has the potential to be over steepened and closer to equilibrium. We note that a higher stable slope angle of 36° has been adopted here, however references to Table 1 of Appendix A confirms this represents the "Unlikely" (10%) composite slope angle for this particular coastal cell. The adopted slope angle for Cell D is therefore considered appropriate and in accordance with the conservative approach applied for the remaining cliff/terrace sections.
- 3.17 Additional slope stability analysis has been undertaken as part of the geotechnical investigations for the slope instability that was observed within Cell D so as to validate the results of the statistical approach (as detailed above) and also to confirm compliance with Auckland Council Code of Practise (2013). We note, however, that the modelling did not appear to have been validated with intrusive ground investigations to confirm material properties and groundwater conditions. A re-assessment of the slope stability at coastal Cell D may be necessary at subdivision design stage to confirm if any specific geotechnical design or remediation is required.
- 3.18 The long-term erosion rate has generally been set to 0.05m/year which has been derived from a quantitative assessment of historic aerial imagery between 1955 and 2017. We note that for one section of the coastline (Cell E) the rate increases to 0.1m/year, although there is no explanation as to why a higher rate has been adopted, nor is it clear from the mapped historic shorelines in Appendix D. In any case, given the value is more conservative than that determined through the GIS analysis and applied to the other sections of coastline, we do not see this being a cause for concern and it simply produces a more conservative output.
- 3.19 Given the sheltered and relatively low energy setting of the subject site, the assumed long term erosion rate of 0.05m/year is considered reasonable. It also aligns with the typical range proposed by Tonkin & Taylor in their regional assessment (TR2020/021) for the lithologies present. For areas where the shoreline position appears relatively unchanged from the historic aerial photographs (i.e. Cells G and H), a long-term erosion rate of 0 has been specified in the input parameters table in Appendix F. This is considered a reasonable assumption given the south-west orientation of the shoreline, and chenier ridge and dense mangrove growth seaward of the shoreline suggesting a depositional environment rather than erosional.

### Beach Shorelines

- 3.20 The methodology utilised by Tonkin & Taylor to derive the ASCIE for the beach sections (Cells A and C) is appropriate, although we note that an additional Factor of Safety (FoS) of 2.0 has been applied which is not used in the equivalent model described by the regional assessment (TR2020/021) nor is it recommended by Auckland Council's supporting Coastal Hazard Assessment Guidance. We assume this FoS has been adopted due to the Greenfield nature of the site dictating a precautionary approach should be applied. The key components for coastal erosion for unconsolidated beaches are short-term erosion related to storm events and dune fluctuations, long-term erosion rate and predicted shoreline retreat due to sea level rise.
- 3.21 The Tonkin & Taylor assessment notes a short-term erosion distance of 3m in the input parameter table in Appendix F, however no information is included to support this estimate. From inspection of TR2020/021 it appears that 2-3m is typical for estuarine beaches with similar exposures to the subject site. The values adopted in the TR2020/021 are rationalised from beach profile analyses undertaken as part of the regional assessment and/or its predecessor (Reinen-Hamill et al., 2006<sup>5</sup>). Given the relatively sheltered nature of the site, with a maximum fetch distance of approximately 8-9km, we consider 3m an appropriate allowance for the short-term erosion component.
- 3.22 We note that the Current ASCIE distance, calculated as the sum of the short-term change in horizontal shoreline position and the dune stability allowance, appear to be quite high compared to those determined as part of this peer review. The above two key components are noted as being 3m and 1.7m respectively in the parameter table in Appendix F, however a Current ASCIE of 9m is presented in the results table (Table 5.2). This suggests a FoS of 2.0 has similarly been applied to the Current ASCIE calculations.
- 3.23 The long-term erosion component adopted for the beach cells is noted as being '0m/year'. We agree with this and consider it a reasonable and conservative approach given the northern section of coastline is characterised by an accretionary sand and shell spit.
- 3.24 In considering the beach response to a rise in mean sea level, again very limited information is presented within the assessment to describe how the parameters identified in Table 1 Appendix F were arrived at. The two critical components are future sea level rise and closure slope.
- 3.25 Tonkin & Taylor note that a future sea level rise value of 1.23m to 2130 was adopted for the unconsolidated beach shorelines, which appears reasonable based on the current guidance at the time the hazard assessment was prepared. We note that more up to date sea level rise projections are now provided by the NZ SeaRise Programme<sup>6</sup> which additionally account for vertical land movement and are generally more conservative than previous estimates. This latest information suggests a site-specific future relative sea level rise value of up to 1.94m (to 2130) along the subject coastline.
- 3.26 We note that the closure slope value adopted by Tonkin & Taylor (0.11) appears quite high for this type of beach. As a sensitivity test, we have adopted a more conservative value of 0.08 in our calculations. Nonetheless, the overall ASCIE values calculated as part of this technical review consistently come out below those determined by Tonkin & Taylor, and this largely because of the conservatism applied through the adoption of a FoS of 2.0 to their ASCIE distances. Even when applying the most contemporary sea level rise information as per the MfE 2022 guidance and NZ SeaRise Programme, the Future ASCIE distances are less than those determined by the applicant's assessment.

### Resulting ASCIE

- 3.27 The resulting Future ASCIE distances are presented in Table 5.2 as a distance in metres from the existing cliff/dune toe. These values have also been presented in cross-section and plan

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<sup>5</sup> Reinen-Hamill, R, Hegan, B., Shand, T. (2006). Regional Assessment of Areas Susceptible to Coastal Erosion. Prepared by Tonkin & Taylor Ltd for Auckland Regional Council. Auckland Regional Council Technical Report 2009/009.

<sup>6</sup> <https://www.searise.nz/>



view to demonstrate that none of the proposed housing zones are at risk of erosion over the 100-year planning timeframe considered.

- 3.28 We note that despite the adoption of a FoS of 2.0, there remains a wide buffer between the Future ASCIE and the housing zones and coastal walkway for the beach cells (Cell A and C).
- 3.29 Similarly, the areas for residential development appear to be set back sufficiently to ensure they should not be affected by cliff stability. From the cross-section drawings, it appears that the coastal walkway within Cells D, E and F may be exposed to erosion hazard towards the end of the century. However, we note that this type of structure is easily adaptable and can be relocated/removed when the time comes if deemed necessary. It is also recognised that Tonkin & Taylor have determined a more conservative estimate of erosion hazard in the long-term across the entire study frontage, which has been sense checked as part of this review and against the latest sea level rise guidance.
- 3.30 Overall, it recognised that the development is not expected to be affected by coastal erosion, nor will the proposals exacerbate erosion risk at the site. Given the Greenfield nature of the pre-developed site and the uncertainty around future cliff/beach response to sea level rise, we approve of the conservative approach adopted by Tonkin & Taylor in their ASCIE calculations. We therefore accept the conclusions reached in the applicant's assessment in relation to coastal hazards.

#### **4.0 Assessment of effects and management methods**

- 4.1 The Tonkin & Taylor assessment concludes that coastal inundation is not expected to occur within property parcels, key assets and infrastructure – even with the consideration of 2m future sea level rise – and therefore no specific mitigation is required. We agree with this finding. We note that the coastal pathway through the wetland area could be impacted by future coastal inundation once sea level rise exceeds +1.5m. This means that the usability of the walkway may be compromised for a short period at high tide under future extreme events, although due to the relatively mild energy setting no significant damage is expected. We do not consider it necessary to accommodate future sea level rise into the design of the pathway at this stage, noting that it can be raised or relocated in the future to address a rise in sea level as required.
- 4.2 The Tonkin & Taylor assessment considers the tsunami hazard to be low with respect to the location of future residential/commercial development and key infrastructure. The assessment notes that the AUP framework for addressing hazards will be sufficient for addressing tsunami hazard and therefore no specific mitigation is required. We agree that the potential effects of tsunami can be better addressed through measures put in place by civil defence (e.g. education around emergency preparedness, tsunami warning and evacuation procedures) rather than land use planning.
- 4.3 With respect to coastal erosion hazard, the Tonkin & Taylor assessment demonstrates that all property parcels, key assets and infrastructure are located landward of the 2130 ASCIE, and therefore no specific mitigation is required. We agree with this finding.

#### **5.0 Submissions**

- 5.1 There were no submissions relating to coastal hazard matters that warrant further comment.

#### **6.0 Conclusions and Recommendations**

- 6.1 Overall, we consider that the Tonkin & Taylor Coastal Hazard Assessment for Beachlands South Private Plan Change has used appropriate methodologies and has adequately assessed the private plan change effects on the environment related to coastal hazards.
- 6.2 The applicant has likely identified an appropriate area susceptible to coastal erosion hazard. The assessment demonstrates that all development and structures will be located landward of the erosion susceptibility extent, complying with the rules in Chapter E36 of the AUP.

- 6.3 The location of key infrastructure and future residential and commercial development are situated to avoid coastal inundation and tsunami hazard. The only structure located within the future inundation area (a coastal walkway through the wetland) is considered able to accommodate or be adaptable to coastal inundation hazard once future sea level rise is realised, thus complying with the rules in Chapter 36 of the AUP.
- 6.4 Overall, it is considered that the proposed development will not exacerbate or accelerate any of the existing coastal hazards present.
- 6.5 For the above reasons and in the context of coastal hazards, we support the private plan change without modifications to the precinct provisions.

To: Chloe Trenouth, Auckland Council Consultant Planner

From: Gerard McCarten, Auckland Council Consultant Parks Planner, on behalf of Parks Planning, Parks & Community Facilities

Subject: **Private Plan Change 88 (Beachlands South)**  
**Parks Planning Assessment**

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## 1.0 Introduction

- 1.1 My name is Gerard McCarten. I hold a Bachelor of Planning (hons) from the University of Auckland. I am a full member of the New Zealand Planning Institute and have held a Making Good Decisions certification with charring endorsement since 2013. I have 23 years' professional planning experience from both public and private sectors of New Zealand and the United Kingdom. I am currently Planning Manager at Sentinel Planning Limited. I have been providing consultant planning services to the council's Parks Planning team since September 2022.
- 1.2 I have undertaken a review of this private plan change (**PPC88**), on behalf of Auckland Council's Parks Planning team in relation to open space matters. My involvement with this plan change commenced in mid-June, after the Clause 23 information request process and after the close of the submission period.
- 1.3 I have not been able to undertake a site visit prior to preparing my report and have relied on aerial photos and the application material to understand the environment at present.
- 1.4 In writing this memo, I have reviewed the following documents:
- Section 32 Assessment Report (**S32 Report**)
  - Plan Change Zoning Maps
  - Beachlands South Precinct Provisions – March 2022
  - Beachlands South Structure Plan
  - Masterplan Design Report
  - Urban Design Assessment
  - Beachlands South Sustainability Strategy
  - Beachlands South Neighbourhood Design Statement
  - AUP RPS Objective and Policies Assessment Table
  - Clause 23 response table 5 August 2022
- 1.5 Auckland Council documents I have referred to include:
- Auckland Unitary Plan – Operative in Part, 2016 (**Unitary Plan**)
  - Pohutukawa Coast Trails – An Aspirational Plan, 2017 (**LPP**)
  - Parks and Open Space Acquisition Policy, 2013
  - Open Space Provision Policy, 2016 (**OSPP**)
- 1.6 I have consulted with the council's Senior Policy Advisor - Community Investment and Principal Sports Parks Advisor – Sport & Recreation team.

## 2.0 Assessment of open space provision by the plan change

### Council provision policy and expectations

- 2.1 The council's Open Space Provision Policy 2016 (OSPP) set's out provision targets for different types of recreational and social open space across the region. It is intended to give effect to the council's Parks and Open Spaces Strategic Action Plan, which is referenced in Appendix 1 of the Unitary Plan.
- 2.2 Relevant to this plan change, the OSPP includes the provision of Neighbourhood Parks, Suburb Parks and Connection and linkage open space.
- 2.3 The applicant's Beachlands South Structure Plan and Masterplan Design Report both refer to the OSPP with regard to informing their designs for open space provision. The broad approach taken by the Plan Change is supported, in that it aligns with most of the plan's network principles, in particular:
  - Create distinctive places
  - Celebrate the coast
  - Conserve areas of natural or cultural value
  - Create a green network
  - Link open spaces together
  - Create esplanade reserves
  - Integrate with green infrastructure
  - Consider resilience
  - Support greater urban density

### Civic Space

#### *Location and size*

- 2.4 The OSPP indicates that for a local centre one small civic space (<0.1 hectares) is appropriate. It also says that they should be located in prominent locations in a centre to form an integral part of the movement network. PPC88 makes provision for a civic space but its location is unclear:
  - Section 1.2 Precinct Description describes a destination civic space under the heading 'Sub-precinct C, Community'.
  - Precinct Plan 3 shows the indicative location of the civic space but does not overlay the sub-precincts, although it appears it would accord with Sub-precinct B: Village Centre shown in the Zoning and Sub-precincts Plan
  - Proposed policy 18(d) refers to providing open space as indicatively shown in Precinct Plan 3, with a civic space being '*adjacent to the Village Centre*' which could be interpreted as outside but next to the village centre sub-precinct, or within the sub-precinct but adjacent to the commercial buildings.
  - Proposed policy (29) provides for a civic space withing Sub-precinct B.
  - Proposed assessment criterion I.8.1.2(2)(c) refers to a civic space being located and designed to enhance the distinctive coastal village character of sub-precinct B Village Centre – which could be interpreted as not needing to physically be within the sub-precinct provided it enhances

sub-precinct's character (presumably informed by the precinct description, which puts the civic space in sub-precinct C).

- 2.5 While the final location and size of the civic space is best refined through the resource consent process, it is recommended that the ambiguous wording of PPC88 be amended to provide greater certainty over its location – that it is to be within sub-precinct B.

### *Function*

- 2.6 The OSPP describes civic space as providing spaces for meeting, socialising, play and events in Auckland's urban centres, and encompass a network of public space including squares, plazas, greens, streets and shared spaces.
- 2.7 PPC88 describes the civic space in section I.2 Precinct Description as being a "destination civic space" within sub-precinct C to reinforce the Village Centre and public open spaces for informal recreation. This description is somewhat nebulous that mixes different types of open space (destination v civic) and describes the civic space in terms that is unclear whether it is separate to the Suburb Park shown close by. Coupled with the uncertain location established by proposed policy 18(d) outlined earlier, there is a concern that the provision of suitable civic space might be lost or subsumed by other spaces, which serve different functions.
- 2.8 It is recommended that the description of the civic space is refined to distinguish it from other types of open spaces in the area.

## Suburb Park

### *Location and size*

- 2.1 The OSPP indicates Suburb Parks are typically between 3 and 5 hectares in size for informal recreation or up to 10 hectares for organised sports. They are provided within a 1 km walk distance (750 m radial proxy) in high and medium density residential areas and 1.5 km walk distance (1125 m radial proxy) in low density residential areas. They are also not provided for rural and residential large zones.
- 2.2 Precinct Plan 3 indicates a Suburb Park located close to the Village Centre on the northwestern quarter of the plan change area. This location appears to match those shown in the Structure Plan and Masterplan and is stated to connect with/adjoin a future school.
- 2.3 This indicative position would not be supportable for acquisition due to the proximity of Suburb Park and active recreation provision at Beachlands Domain and Te Puru Park.
- 2.4 It is recommended that the indicative position for the Suburb Park is shifted further to the south away from the Beachlands Domain catchment. This would place it more centrally within the plan change area and facilitate equitable access and accord with OSPP metrics.

### *Function*

- 2.5 A Suburb Park's function is described in the OSPP as providing informal recreation and social experience for residents from across an entire suburb. They should be located in prominent locations

and help form the identity of the suburb. They will often accommodate organised sport facilities, such as sports fields.

- 2.6 With respect to the needs for sports field provision and acquisition in the plan change area, until the outcome of Plan Change 78 in the existing urban-zoned area of Beachlands is known the council does not have a position. This is because potential sports field demand needs to be assessed taking all potential intensification in the vicinity into account. Once the potential demand can be accurately calculated based on a clear understanding of future population numbers the council can be more definitive.

### *Zoning*

- 2.7 In addition to the OSPP metrics, the positioning of the Suburb Park is made less indicative and largely defined by proposing an area of c.4.2 hectares as Open Space – Active Sport and Recreation Zone, shaped to align with the park and playing fields shown in the underlying Masterplan. This is problematic. Open space acquisition is not delegated to staff and is subject to political decision-making. However, the approach of the PPC to live zone it for open space which requires its location and extent to be more or less defined and which is contrary to the applicant's responses that the location is indicative only. Open space is also invariably refined in its location, extent and shape as development proceeds through a consenting process.
- 2.8 Therefore, the proposed zoning of potential open space before its final location is not supported. Parks Planning's preference is for any open space zoning to occur after its location has been confirmed and established, as part of the council's regular mop-up plan changes for new open space land.

### Neighbourhood Parks

- 2.9 A Neighbourhood Park's function is described in the OSPP as providing basic informal recreation and social opportunities within a short walk of surrounding residential areas. These are typically between 0.3 and 0.5 hectares in size and provided within a 400 m walk distance in high and medium density residential areas (centre, mixed use and THAB zones) and 600 m walk distance in low density residential areas (single house and rural & coastal settlement zones). They are not provided outside urban areas and in large-lot residential zones.
- 2.10 Precinct Plan 3 indicates eight Neighbourhood Parks spaced around the precinct. Consultant with the council's Community Investment team indicated that against the OSPP's provision metrics indicates there is a need for five Neighbourhood Parks across the plan change area, with potentially only two within those areas proposed to be live-zoned. The PPC, therefore, indicates an overprovision of open spaces, which means some spaces are unlikely to be accepted for acquisition by the council.
- 2.11 Precinct Plan 3 also shows the indicative location of one Neighbourhood Park within an area to be zoned as Residential –Large Lot Zone. This is not supported by the OSPP, which says that provision targets do not apply to large lot zones and rural zones and that residents in these areas are expected to travel to access Suburb and Neighbourhood Parks.

## Connection and linkage open spaces

- 2.12 Aligned with the direction of Parks and Open Space Strategic Action Plan, the OSPP seeks to provide contiguous networks of open space that establish recreational, walking, cycling and ecological connections integrated with on-street connections.

### *Local Paths Plan*

- 2.13 The Franklin Local Board's local paths plan (**LPP**) for the area is "The Pohutukawa Coast Trails – an Aspirational Plan, June 2017" (formerly known as a Greenways Plan). It aims to provide aspirational cycling and walking connections, as well as improve ecology and access to recreational facilities. The majority of the PPC88 area is not identified in the plan as providing opportunities for connections, primarily because it is outside the defined urban area and largely given over to the Formosa Golf Course. The precinct plans nevertheless indicate spatial provisions for an open space green network throughout the plan change area.

### *Coastal pathway*

- 2.14 The LPP identifies an opportunity to provide part of a connection between Pine Harbour around the coastal edge where topography would make access via the existing esplanade reserve difficult. In that regard, PPC88 provides for this connection as an Indicative Coastal Pathway in Precinct Plans 3 and 5. This is supported.

### *Connections to existing identified urban connections*

- 2.15 The LPP identifies an urban connection north of the plan change area, from Pine Harbour to Beachlands Road. This is also identified signalled in Precinct Plan 1 of the Unitary Plan's Chapter I403 Beachlands 1 Precinct. The southern portion of this connection closest to the plan change has been constructed. It does not yet connect to Beachlands Road to the north as that land is privately owned and yet to be developed.
- 2.16 Precinct Plan 3 displays the uncompleted section as an 'Indicative Future Green Linkage' north of Jack Lachlan Drive, and shows an Indicative Open Space Linkage within the plan change area that would connect to it. This generally aligns with the existing public open space that has been created on the north side of Jack Lachlan Drive and so is supported. For clarity, further investment would be required to connect this to the pathway network and is outside this scope of this private plan change.

### *Fairway Reserve*

- 2.17 PPC88 proposes a linear park, Fairway Reserve, within the Marina Park sub-precinct. The reserve indicated in Precinct Plan 1 is approximately 1.7 ha and required to be at least 20 m wide by the proposed precinct standards. Precinct Plan 3 shows an indicative Open Space Linkage in this location, and Precinct Plan 5 shows an Indicative Shared Path Link. Its provision is a requirement of policies (18)(c) and (25) and standard I.7.8 Fairway Reserve. Its non-provision would be a discretionary activity under rule IX.4.1(A26), and non-compliance with standard I.7.8 would be a discretionary activity under rule IX.4.1(A27).
- 2.18 Standard I.7.8 requires the reserve to be at least 20 m wide and vested with the council, or otherwise maintained by way of a legal protection mechanism that ensures public access. The wording is supported because it does not predetermine the council's acquisition of the open space.



- 2.19 The reserve as shown on Precinct Plan 1 is substantially larger than the Neighbourhood Park requirements set out in the OSPP, but its identified role as providing open space/shared path linkage gives weight to part of it being considered a connection/linkage open space. However, public acquisition of the entire route cannot be predetermined.
- 2.20 Part (3) of the standard requires public use unless written approval is obtained from the council. It clarifies that in all circumstances (presumably such as if it were not vested with the council) public use must be provided between 7am and 11pm. It is noted that this limited access would run contrary to the public route function that it is expected to serve – especially given it forms part of a link to Pine Harbour Ferry. Even then, public access is not required to be secured legally. It is recommended that this provision is changed to provide unrestricted access.
- 2.21 The wording of part (4) of the standard is vague. It is not clear what “preservation of the reserve” means in relation to an “access easement”. Nor why the owners would require an access easement for the ongoing maintenance of its own land. The standard appears to be redundant. If the land is not vested in the council its provision as privately-owned land is covered by standard (1). If it is vested in the council, no other person should require access for maintenance. Therefore, it is recommended that this standard be deleted.
- 2.22 Part (5) seeks to limit heights of fences and walls adjoining the reserve. This is supported as it is consistent with Parks Planning’s aspirations to provide and maintain visually open public open spaces.

#### *Ecological Protection Area Networks*

- 2.23 PPC88 shows several Ecological Protected Area Networks (**EPANs**) shown in Precinct Plan 2 that are required to be protected in accordance with proposed standard I.7.6. and which encompass the existing natural stream and wetland areas within the plan change area.
- 2.24 The applicant has confirmed that esplanade reserves will be vested in accordance with section 230 of the RMA through future subdivision undertaken in accordance with this PPC. This is appropriate.
- 2.25 The EPANs are extensive and cover areas that would either now qualify as requiring esplanade reserve provision or extent beyond the 20 m width. There is no certainty given over ownership of this land and land acquisition by the council cannot be pre-determined, as explained earlier.
- 2.26 Part (4) of the standard requires EPANs to be legally protected and maintained by a covenant or other mechanism on their titles, regardless of land ownership. There is no reference to possible vesting of land with the council. This is supported as it avoids creating any sort of implication or expectation.

#### *Riparian Margins*

- 2.27 Proposed standard I.7.5 Riparian Margins applies to all land within 10 m of an intermittent and permanent streams. This is supported because the underlying riparian yard found in underlying zones is otherwise removed by the proposed provisions.
- 2.28 It is unclear why subpart (2) says riparian planting must be vested in the council or indeed how ‘planting’ (i.e. not the land itself) could be vested. It would also operate like a reduced *de facto* esplanade requirement. The council’s acquisition process for land should not be predetermined by

the Unitary Plan. It is recommended this standard is amended to avoid creating a legitimate expectation that such land would be accepted for vesting by the council.

2.29 I note that the Requestor has made a submission proposing this section be reworded entirely (submission point 315.5). The comments above still apply to that alternative wording.

2.30 The rationale for preventing walkways and cycleway within the riparian planting area in part (3) is unclear. The standard will apply to all land within the precinct area that within 10 m of a stream – regardless of its ownership, zone or use. Parks Planning is concerned that this blanket restriction on cycleways and accessways runs contrary to PPC88’s aspirations for public access and green connections throughout the plan change area, promoted in Policy I.4(18) and indicated in Precinct Plan 5 and in proposed rules Ix.4.1(A17) and (A18), which provide for their establishment and maintenance as permitted activities. It would also be inconsistent with other parts of the Unitary Plan. For example, once vested, esplanade reserves are usually zoned Open Space – Conservation, in which parks infrastructure (H7.4.1(A46)) and recreation trails (A49) are permitted activities.

- It is recommended that the wording of this standard is changed so it does not apply to land vested with the council where public access and connections are expected to be provided, in accordance with the precinct plan and with the OSPP.
- It is also recommended that the terminology of part (3) is amended to be consistent with part (1), which it cross references. Part (1) says “riparian yard setback”. There is no use of the term “riparian planting area” which is used by part (3).

2.31 Part (4) appears to be an attempt to protect future esplanade reserve-qualifying land from being fettered by buildings being placed on them before esplanades are taken.

- It is not clear how this relates to the stated purpose of the standard or any proposed objective or policy for the precinct. Although the principle of protecting future esplanade reserve is laudable, this is not consistent with the rest of the Auckland Region and does present implementation problems such as defining/measuring the stream width (potentially prematurely relative to a later subdivision). A building being within the 20 m setback would also not restrain the council from taking the full esplanade entitlement in a future subdivision.
- There is also a concern that by providing for a setback that specifically relates to esplanades, it suggests that the council will entertain resource consent applications for reductions in the building setback, which could infer/imply a premature assessment of esplanade reserve requirements ahead of any future subdivision.

It is therefore recommended that part (4) be deleted.

### Zoning for open space

2.32 With the exception of the Suburb Park, PPC88 relies on the proposed underlying zoning, and existing provisions within Chapter E38 Subdivision, and section 230 of the RMA for esplanade reserves, to establish public open spaces. This is considered appropriate and supported.

2.33 Concern with the open space zoning of the Suburb Park has been discussed above.

2.34 The proposed 9-hole golf course is proposed to remain a private operation and zoned MHU. It has not been considered as part of the broader plans for a publicly-accessible open space network for the community. This approach to its zoning is supported.

### 3.0 Assessment against key statutory planning documents

- 3.1 The regulatory framework for parks and open space assessment is set out below with key points noted:

#### National Policy Statement on Urban Development 2020

- 3.2 Policy 2.2 of the National Policy Statement Urban Development (NPSUD) 2020 requires urban environments to have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport.
- 3.3 Policy 3.5 requires local authorities to be satisfied that additional infrastructure (including public open space) to service the proposed development capacity will be available.
- 3.4 The current proposal has demonstrated in its S32 Report and Structure Plan that a suitable open space network can be provided for the community within the plan change area. However, the indicative locations of Suburb, Neighbourhood and Civic parks should be modified and clarified to ensure they do not create unrealistic expectations that inform future subdivision processes.

#### National Policy Statement for Freshwater Management (NPS:FM)

- 3.5 Policies 6 and 7 of the NPS:FM require that there is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted, and the loss of river extent and values is avoided to the extent practicable.
- 3.6 The current proposal, through the EPAN, provides for an appropriate connected green network that would incorporate existing streams and wetlands within the plan change area.

#### Auckland Regional Policy Statement (ARPS)

- 3.7 The relevant policies for open space provision are contained in chapter B2.7 Open spaces and recreation facilities. These set out in full here:

##### **B2.7.1. Objectives**

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

##### **B2.7.2. Policies**

- (1) Enable the development and use of a wide range of open spaces and recreation facilities to provide a variety of activities, experiences and functions.
- (2) Promote the physical connection of open spaces to enable people and wildlife to move around efficiently and safely.
- (3) Provide a range of open spaces and recreation facilities in locations that are accessible to people and communities.
- (4) Provide open spaces and recreation facilities in areas where there is an existing or anticipated deficiency.
- (5) Enable the development and use of existing and new major recreation facilities.

- (6) Encourage major recreation facilities in locations that are convenient and accessible to people and communities by a range of transportation modes.
- (7) Avoid, remedy or mitigate significant adverse effects of land use or development on open spaces and recreation facilities.
- (8) Avoid, remedy or mitigate significant adverse effects from the use of open spaces and recreational facilities on nearby residents and communities.
- (9) Enable public access to lakes, rivers, streams, wetlands and the coastal marine area by enabling public facilities and by seeking agreements with private landowners where appropriate.
- (10) Limit public access to and along the coastal marine area, lakes, rivers, streams and wetlands by esplanade reserves, esplanade strips or other legal mechanisms where necessary for health, safety or security reasons or to protect significant natural or physical resources.

3.8 The S32 Report explains that PPC88 provides a range of open spaces, that will give effect to the ARPS provisions. I agree with this assessment insofar as a connected range of open spaces are provided for. But I do note that several recommended changes necessary to ensure that the provision of these spaces align with the council's OSPP and other technical aspects and give effect to the above policies.

### Auckland Unitary Plan

3.9 The applicable provisions of the Unitary Plan are found in Chapter E38 Subdivision – Urban:

#### **Objective E38.2.3**

- (2) Land is subdivided in a manner that provides for the long-term needs of the community and minimises adverse effects of future development on the environment.
- (3) Land is vested to provide for esplanades reserves, roads, stormwater, infrastructure and other purposes.

#### **Policy E38.3(18)**

- (18) Require subdivision to provide for the recreation and amenity needs of residents by:
  - (a) providing open spaces which are prominent and accessible by pedestrians;
  - (b) providing for the number and size of open spaces in proportion to the future density of the neighbourhood; and
  - (c) providing for pedestrian and/or cycle linkages.

3.10 PPC88 provisions are expected to work in coordination with the above provisions of the Unitary Plan when land is subdivided. The S32 Report explains that the precinct provisions specify the character, activity and built form outcomes for the plan change area and that these will be connected through integrated ecological corridors and open space framework. I agree with this assessment and am of the opinion that the precinct provisions as changed by the recommendations in section 6.0, will work in conjunction with the above provisions to deliver an appropriate open space network.

### Esplanade reserves

3.11 Sections 229 and 230 of the Resource Management Act 1991 (**RMA**) require the provision of esplanade reserves or strips by qualifying subdivisions for the purposes of:

- contributing to the protection of conservation values;
- enabling public access to or along any sea, river, or lake; or

- enabling public recreational use of esplanade reserves and strips and the adjacent sea, river or lake where it is compatible with conservation values.

3.12 PPC88 anticipates esplanade provision in accordance with the RMA during the resource consent process. This is supported as it is consistent with esplanade provision across the rest of the region. It appears proposed standard I.7.5(4) is also intended to protect against development that occurs prior to subdivision which may compromise esplanades by preventing buildings from being places within the 20 m setback. As discussed earlier it is recommended this is removed..

## 4.0 Submissions

4.1 Responses to submission points that raised parks and open space matters are tabled below.

| Sub Point | Submitter              | Summary   | Response  |
|-----------|------------------------|---|---|
| 143.7     | Steven Lucas           | Decline plan change as it will result in the lost of one of the best golf courses in the country.   | <b>Neutral.</b> The land is a private golf course.  |
| 148.1     | Robert Jaffrey Gray    | Decline the plan change as infrastructure such as transport, water, parks and community facilities are not in place to accommodate this growth  |   |
| 217.3     | Colleen Agnes Drummons | Amend the plan change to require more trees to replace those already demolished because of other developments in the area and restore-our bird population, and provide a more appropriate use of the area such as a sports field, park or garden. | <b>Neutral.</b> As discussed in this report there are existing sports fields in the Beachlands Area and potential sports field demand needs to be assessed taking all potential intensification in the vicinity into account, which cannot be determined at this time |
| 234.2     | Freddy Brignone        | Consider the Formosa golf course could be a real asset to the area and Auckland is it was turned into a public park.  | <b>Neutral.</b> The use of the entire golf course as a public park is not the subject of this plan change and the acquisition of land for parks is a separate process to a plan change.   |
| 243.7     | Harry Stephen Jones    | Require greenbelt areas to be part of the plan, such as open spaces for different types of recreation.  | <b>Neutral.</b> PPC88 provides for open space within the plan change area that generally accords with the OSPP.   |
| 245.1     | Sean Patrick Omeara    | Decline the plan change because it will remove part of the green space between the urban areas of Howick and Beachlands which was agreed as part the unitary plan.  | <b>Neutral.</b> PPC88 provides for open space within the plan change area that generally accords with the OSPP.   |
| 245.2     | Sean Patrick Omeara    | Retain the area as green space.   | <b>Neutral.</b> PPC88 provides for open space within the plan change area that generally accords with the OSPP.   |
| 308.3     | Rina Tagore            | Decline plan change as the additional pressure on public parks in the wider catchment like Omana Regional Parks will affect rubbish, maintenance and coastal slips.   | <b>Neutral.</b> Regional parks cater for visitors from the entire Auckland Region. PPC88 provides for open space within the plan change area that generally accords with the OSPP.  |

|        |                      |  |  |
|--------|----------------------|--|--|
| 332.4  | Matthew Gray Cockram | "Amend plan change proposal to provide more detail on the Golf Sub Precinct - e.g., who will run it, how will its maintenance be funded and how can there be assurance that it will remain as a functioning golf course for a reasonable time in to the future. It is interesting and will be an attractive amenity but at 9 holes the course will not be an economic enterprise." | <b>Neutral.</b> The operation of the golf course would be a private endeavour and has not been considered as part the open space provisioning under the OSPP.  |
| 344.30 | Auckland Transport   | Amend I.7.8(3) to ensure 24 hour access, regardless of Reserve ownership.<br>(3) The Fairway Reserve must be available for public use at all times. <del>Unless written approval has been obtained from the council. In all circumstances the Fairway Reserve must be available for public use between the hours of 7am and 11pm.</del>  | <b>Support in part.</b> Incorporated into changes recommended in section 7 of this report as discussed in paragraph 2.20.  |
| 344.31 | Auckland Transport   | Amend I.7.8(4) to apply where reserve is not vested in Council:<br>(4) <u>Where the Fairway Reserve is not vested in Council,</u> the registration of an access easement on the title to which the Fairway Reserve applies is required to ensure preservation of the reserve and its ongoing maintenance by the owner(s) of the land concerned."                                   | <b>Support in part.</b> Further changes recommended in section 7 of this report.   |
| 345.16 | Auckland Council     | Amend the Precinct Description to include a statement that open spaces / reserves depicted in the precinct plans are indicative only, and that open spaces other than esplanade reserve may be privately owned, owned by the Crown, or (subject to Council approval) vested in the Council;  | <b>Support.</b> Aligns with the council's approach to open space provisioning and ensures no 'reasonable expectation' that land will be vested with the council. Recommended wording set out in section 5 below.                             |
| 345.17 | Auckland Council     | Amend Precinct Plans 1 and 3 to draw attention to the above statement [open spaces / reserves are indicative only];  | <b>Support.</b> Precinct Plan 1 already labels Fairway Reserve as indicative and Precinct Plan already labels open spaces and parks as indicative. However, proposing OSSAR zone to a specific area runs contrary to this indicative notion. |
| 345.18 | Auckland Council     | Amend [Precinct Plans] to depict the Sport and Active Recreation zoned land as indicative open space (rather than as live open space zoning);  | <b>Support.</b> Aligns with recommendation in this report.   |
| 348.19 | Auckland Council     | Amend indicative locations of open spaces depicted on the precinct plans to achieve consistency with the Open Space Provision Policy 2016 to the greatest extent possible (e.g. to remove indicative open space from the Large Lot Zone);  | <b>Support.</b> Aligns with recommendation in this report.   |
| 345.20 | Auckland Council     | Amend I.7.8(3) to delete any wording potentially limiting public access to the Fairway Reserve;  | <b>Support.</b> Aligns with recommendation in this report.   |
| 345.21 | Auckland Council     | Amend I.7.8(4) to add the words "Where the Fairway Reserve is not vested in Council, ..."  | <b>Support.</b> Aligns with recommendation in this report.   |
| 373.1  | Darci Shelley        | Retain the golf course due to the leisure and open space benefits this provides to the surrounding communities.  | Neutral.   |

## 5.0 Recommended changes to PPC88 text

5.1 Based on the above assessment I recommend the following changes to the open space provisions of PPC88:

1. Remove the Open Space- Active Sport and Recreation Zoning from the proposed planning map.
2. Shift the indicative location of the Suburb Park in Precinct Plan 3 further to the south, away from the Beachlands Domain catchment and instead place it more centrally within the plan change area.
3. Reposition the indicative locations of the Neighbourhood Parks in Precinct Plan 3 so that they are distributed more evenly throughout the plan change area and reduced in number to better align with the OSPP.
4. Remove the indicative Neighbourhood Park in Precinct Plan 3 that is within the area of Residential – Large Lot Zone.
5. Change the text of PPC88 as set out below:

## I.2 Precinct Description

...

A high-quality built environment is planned for the Beachlands South Precinct. To ensure this high-quality design outcome, the resource consent process will enable a qualitative design assessment against the relevant matters of discretion and assessment criteria. Development in this precinct will also be externally assessed by the Beachlands South Design Review Panel to ensure the specific placemaking design outcomes for Beachlands South are achieved. **Open spaces and reserves depicted in the precinct plans are indicative only and may be privately owned, owned by the Crown, or (subject to council approval) vested in the council.**

...

- **Sub-precinct B, Village Centre** is located on the central circulation spine and zoned Business – Local Centre and Business – Mixed Use. It is intended to provide for high density residential opportunities, employment, **civic space** and a range of commercial activities for the local convenience needs of surrounding residential areas...

...

- **Sub-precinct C, Community** is zoned Residential – Mixed Housing Urban, ~~Open Space – Active Sport and Recreation~~ and Business – Mixed Use. This sub-precinct is intended to be the focal point for ~~civic and community facilities including a destination civic space to reinforce the Village Centre~~ and public open spaces for informal recreation.

...

## I.4 Policies [rp/dp]

...

### *Open Space Network*

- (18) Establish an integrated movement and public open space network within and across the precinct as indicatively shown on Precinct Plan 3, including:

...



- (d) Enabling the provision of a high-quality civic space adjacent to within the Village Centre;

...

### 1.7.5 Riparian Margins

...

- (2) Any riparian planting proposed within the riparian yard setback required in Standard 1.7.5(1) as part of any ecological offsetting or compensation package must be native species and, **if not on land that is** vested in the Council, or protected and maintained in perpetuity by an appropriate legal mechanism.
- (3) **For land that is not vested in the council,** walkways and cycleways must not be located within the riparian ~~planting area~~ **yard setback** required in standard 1.7.5(1) above.
- (4) ~~A building, or parts of a building, must be setback at least 20m from the bank of a river or stream measuring 3m or more in width, consistent with the requirements of E38.7.3.2~~

....

### 1.7.8 Fairway Reserve

...

- (3) The Fairway Reserve must be available for public use at all times. ~~In all circumstances the Fairway Reserve must be available for public use between the hours of 7am and 11pm.~~ **Where the reserve (or parts thereof) is not vested in the council, unrestricted public access must be secured by registration of an access easement in favour of the council on the title/s of the reserve,**
- (4) ~~The registration of an access easement on the title to which the Fairway Reserve applies is required to ensure preservation of the reserve and its ongoing maintenance by the owner(s) of the land concerned.~~

...

## **Memo (technical specialist report to contribute towards Council's section 42A hearing report)**

To: Chloe Trenouth, Chloe Trenouth Consulting, Reporting Planner

From: Wes Edwards, Arrive, Technical Specialist - Transport

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**Subject: Private Plan Change – PC88 Beachlands South – Transport Assessment**

### **1 Executive Summary**

- 1.1 The proposed change seeks to rezone land to provide for urban development that would approximately double the population of the existing Beachlands settlement and provide a similar quantity of land to be zoned Future Urban.
- 1.2 The principal road access to the area is Whitford-Maraetai Road, which the application material acknowledges is currently operating over capacity with recognised safety deficiencies.
- 1.3 The plan change transport assessment has been undertaken on the basis of a highly self-sufficient community being developed, supported by improvements to public transport.
- 1.4 A key issue is the ability of the proposed precinct provisions to ensure that a highly self-sufficient community with high use of public transport is developed. In my view the proposed provisions could not ensure that outcome to the degree relied on in the assessment, even if the provisions were modified.
- 1.5 The proposed planning provisions are said to ensure a transit-oriented community is developed; a characteristic relied on in the transport assessment. In my view the provisions would not ensure a transit-oriented community. In addition, only a small part of the plan change area is within the walkable catchment of the ferry service, which I consider to be a lower frequency “local” service, and not a rapid or frequent transit service.
- 1.6 If the assumed nature of the proposed development is not achieved, development of the land as enabled by the plan change would significantly increase private-vehicle travel on Whitford-Maraetai Road and other locations to the south and east.
- 1.7 A key issue is the ability of Whitford-Maraetai Road to accommodate the additional traffic that would be generated by development enabled by PC88, particularly if the aspirations espoused in the assessment material are not realised. In my view it could not unless substantial additional transport infrastructure is provided. The most likely outcome is significant adverse effects on the safe and efficient operation of the transport network.
- 1.8 Another key issue for this plan change is the timing, funding and delivery of transport infrastructure. I understand case law has established the provision of bulk transport infrastructure is the responsibility of Auckland Transport and not the plan change applicant; however, proposed development should not exacerbate existing transport issues.
- 1.9 Auckland Transport does not have sufficient funding to deliver all of the projects it wishes to provide, with the result that the provision of additional transport infrastructure and services to support growth must be subject to prioritisation, so the provision of infrastructure often lags behind demand in areas deemed to have lower priority. The Council has developed growth strategies and plans to help the efficient allocation of funding for growth infrastructure. This plan change is not consistent with those documents.
- 1.10 In my view the transport assessment of the plan change is based on multiple optimistic assumptions that cumulatively produce an overly optimistic view of the likely transport effects, and the ability of the proposed provisions to address those effects.
- 1.11 For those reasons my recommendation is that the plan change be declined on transport grounds.

## 2 Introduction

- 2.1 At the request of Auckland Council I have undertaken a review of Private Plan Change 88 Beachlands South (PC88) in relation to transport effects.

### Qualifications and Experience

- 2.2 I hold a New Zealand Certificate in Civil Engineering, and a Bachelor's degree in Civil Engineering. I am a Chartered Professional Engineer and an International Professional (APEC) Engineer.
- 2.3 I am an Engineering New Zealand Fellow, a Chartered Member of Engineering New Zealand, and a Professional Member of the Institute of Transportation Engineers.
- 2.4 I am a road safety auditor, have experience in collision investigation, am accredited by KiwiRail as a Level Crossing Safety Impact Assessor, and have formerly been accredited by Waka Kotahi New Zealand Transport Agency (WK-NZTA) as a Traffic Controller, Inspector, and Site Traffic Management Specialist.
- 2.5 I was formerly accredited by the Ministry for the Environment as a Resource Management Act Hearings Commissioner.
- 2.6 I have over 38 years engineering experience, with 32 of those years specialising as a traffic engineer based in Auckland. My current role is Transportation Advisor and Director of Arrive Limited, a company which I founded in 2002.
- 2.7 I have experience in traffic matters associated with resource management, including:
- a) resource consents, structure plans and plan changes, and notices of requirement for road and rail infrastructure, and for schools;
  - b) the design of traffic infrastructure and facilities such as roads, intersections, bus facilities, and parking facilities;
  - c) road safety engineering, street design, computer analysis and modelling; and
  - d) providing specialist opinions on traffic and transport matters as an expert witness in council hearings, District Court, Environment Court, Land Valuation Tribunal, Environmental Protection Agency Board of Inquiry, and High Court hearings.
- 2.8 My work experience relevant to this matter includes:
- a) Advising Auckland Council on several private plan changes, with some enabling significant growth and proposing significant transport infrastructure, and/ or in a rural area, including:
    - i) An abandoned plan change for land west of Clevedon village, 2019-21;
    - ii) PC45 278 Clevedon-Kawakawa Road, 2019-21;
    - iii) PC55 Patumahoe South, 2019-22;
    - iv) PC61 Waipupuke (Drury West), 2020-21;
    - v) PC89 Clevedon Quarry, 2023; and
    - vi) PC91 McLarin Rd, Glenbrook Beach, 2021-.
  - b) Advising a number of councils on Notices of Requirement (NoRs) for schools, rail, and arterial road infrastructure projects including:
    - i) NoRs for widening of State Highway One in Whangarei, 2010-18;

- ii) NoRs for Drury West station and interchange, 2021-; and
- iii) NoRs for Pukekohe Arterials, 2023-;
- c) Advising private clients on numerous resource consents, plan changes and NoRs including:
  - i) Pokeno Village, 2007-22;
  - ii) Paerata Rise (Franklin 2 Precinct), 2016-20;
  - iii) PC25 Warkworth North, 2019-22;
  - iv) Alternate State Highway, Kumeu, 2021;
  - v) Warkworth – Te Hana motorway, 2021;
  - vi) Rally New Zealand and World Rally Championship, Jacks Ridge, Brookby, 2021-22.

### **Involvement in this Matter**

- 2.9 I was engaged by Council in April 2022 to advise on this plan change following the lodging of the application. I visited the road network around the site in April 2022.
- 2.10 In writing this memo, I have reviewed the following documents relating to the Plan Change:
- a) private plan change request and the Assessment of Environmental Effects (AEE);
  - b) Integrated Transport Assessment (ITA);
  - c) further information responses relating to transport (July, August, and October 2022); and
  - d) submissions.
- 2.11 I have also reviewed a number of other documents including:
- a) the ITA prepared for PC30 Beachlands New Avenues (2010);
  - b) Whitford-Maraetai Road Upgrade Draft Scheme Assessment Report (SAR) (2010);
  - c) Auckland Future Urban Land Supply Strategy (FULSS) (2017);
  - d) Draft Auckland Future Development Strategy (Draft FDS) (2023);
  - e) Limited material in relation to Plan Change 78 and the Beachlands Transport Infrastructure Constraint (BTIC) proposed in that plan change (2023).

### **Exclusions**

- 2.12 The consideration of some matters is outside the scope of this report or my expertise. I do not consider:
- a) Matters relating to noise, dust, or light spill generated by vehicle movements;
  - b) Matters relating to stormwater runoff, including from roads or parking areas;
  - c) the affect of traffic on amenity, except in the general context of street design;
- 2.13 I am not a specialist in the design, assessment, or maintenance of road pavements, but have some knowledge of the responsibilities and funding for road maintenance. I do not have

expertise in marine engineering including the ability for ferry vessels of various sizes to manoeuvre in waterways or channels.

## **Outline**

- 2.14 The outline of this report broadly follows the Council specialist report pattern and includes the following sections:
- a) an overview of the key transport issues for this plan change (Section 3);
  - b) a summary of the applicant's transport assessment (Section 4);
  - c) additional description of the transport environment (Section 5);
  - d) my assessment of transport effects and management methods (Section 6);
  - e) a review of the proposed plan change provisions (Section 7);
  - f) my assessment of the planning and strategy framework (Section 8);
  - g) a review of transport matters raised in submissions (Section 9); and
  - h) conclusions and recommendations (Section 10).

## **3 Key Transport Issues**

- 3.1 The proposed change seeks to rezone land to provide for urban development that would approximately double the population of the existing Beachlands settlement and provide a similar area of land to be zoned Future Urban.
- 3.2 The principal road access to the area is Whitford-Maraetai Road, which the application material acknowledges is currently operating over capacity with recognised safety deficiencies.
- 3.3 While Auckland Transport has designations in place for the Whitford Bypass project and realignment of Whitford-Maraetai Road with widening to four lanes, no funding for either project is currently allocated. The ITA expects those projects to occur beyond the development timeframe of PC88, and the additional information expects those projects will never occur.
- 3.4 The transport assessment and other material relies heavily on a large proportion of travel remaining within the Beachlands settlement, and on the proportion of travel carried by the ferry doubling. Those assumptions lead to around one quarter of all peak-period travel generated by the development being assigned to and from the south on Whitford-Maraetai Road. In my view the transport assessment is excessively optimistic about the internalisation and ferry transport assumptions with the result that the volume of traffic likely to be added to Whitford-Maraetai Road is significantly under-estimated.
- 3.5 The proposal links development thresholds to a number of transport infrastructure items which include adding larger vessels to the ferry fleet and undertaking capacity improvements to some intersections. The proposal documentation describes how private funding is proposed to contribute to ferry improvements and the intersection improvements.
- 3.6 In my view, as the traffic volume that would be carried by Whitford-Maraetai Road and the three feeder routes beyond Whitford have been significantly under-estimated, the proposed improvements would be insufficient to deal with all of the adverse effects generated on those routes. Additional upgrades, such as the realignment and widening of Whitford-Maraetai Road, the implementation of the Whitford Bypass, and potentially others, are likely to be required as a result of developing the land as proposed.
- 3.7 Auckland Council has recently considered the potential intensification of the existing Beachlands settlement as a result of government directions and concluded there are significant

constraints to providing sufficient transport infrastructure for an increased population at Beachlands. Plan Change 78 Intensification (PC78) as notified proposes to limit intensification at Beachlands through the introduction of the Beachlands Transport Infrastructure Constraint (BTIC) Qualifying Matter.

- 3.8 PC78 was notified on 18 August 2022, after PC88 was lodged on or about 1 April 2022, and before PC88 was notified on 26 January 2023. Decisions on PC78 are not expected to be made prior to PC88 being heard.
- 3.9 While the separate PC78 process will decide on the BTIC and how any intensification in Beachlands will be managed, the reports prepared by Council in relation to the BTIC are informative for this PC88 process. For that reason, information from the PC78 Section 32 Infrastructure – Beachlands Transport Constraint report (PC78 report) is referenced in this report.

## 4 Applicant's assessment

- 4.1 The proposal involves rezoning 307 hectares of land currently zoned Rural – Countryside Living that is located south of the existing Beachlands settlement.
- 4.2 The Integrated Transport Assessment (ITA) has followed the typical approach of describing the existing and expected future transport environment, describing the proposed plan change, assessing the expected effects, and recommending measures to manage effects.
- 4.3 The ITA was prepared in 2021 and updated in early 2022 when travel behaviour was affected by Health Orders issued in response to Covid-19. The ITA notes "*There is still considerable uncertainty about the long-term impacts of the Covid-19 pandemic on travel patterns..*".

### Transport Environment

#### Travel Patterns

- 4.4 The ITA describes features and characteristics of the existing transport environment including travel patterns from the 2018 Census, and the public transport services which include a bus service to Botany Town Centre and a ferry service to the Auckland CBD.
- 4.5 The ITA notes the 2018 Census data on travel to work or education recorded from the existing Beachlands-Maraetai area showed 1% of that travel was made by bus and 6% was made by ferry. The ITA describes Beachlands as "*heavily reliant on private vehicles*".

#### Road Network

- 4.6 The ITA describes Whitford-Maraetai Road as the "*main arterial route from Whitford to Beachlands*" and recognises it is "*currently operating at over-capacity with safety issues*".
- 4.7 The ITA also states (emphasis added):<sup>1</sup>

*The Plan Change area currently has limited vehicle access to the external road network. Private vehicles must currently access the proposed site via Whitford-Maraetai Road. With the exception of Whitford-Maraetai Road, the other roads are either local or collector roads. Accordingly, **private vehicles have limited options to reach a variety of destinations within the local and wider road network** with Whitford-Maraetai Road being the most direct connecting route to the Auckland City Centre.*

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<sup>1</sup> Page 25, ITA.

### *Traffic Volumes*

- 4.8 The ITA provides traffic count data from Auckland Transport's database from 2018 and 2019, supplemented by counts of seven intersections in the week of 2 November 2020. In that week Auckland was at Alert Level 1 of the Covid-19 Alert System.
- 4.9 The 12 July 2022 additional information provides some additional analysis comparing November 2022 counts with the same period in 2018 to 2021 for the Ormiston Road/ Murphys Road intersection which shows traffic flow at that intersection in 2021 was slightly higher than in previous years.

### *Road Safety*

- 4.10 The ITA considered the road safety record of Jack Lachlan Drive, Whitford-Maraetai Road between Beachlands and Whitford, Whitford Park Drive between Whitford Village and Sandstone Road, and the intersection of Whitford Road / Point View Drive / Somerville Road. The ITA considered ten years of crash data (2011-2020) plus the first half of 2021. The speed limit on most of Whitford-Maraetai Road was reduced from 100km/h to 80km/h in June 2020. The ITA notes "*The majority of the crashes (73%) occurred within mid-blocks and not at intersections*".
- 4.11 This analysis was extended in additional information (12 July 2022) to include Whitford Road and Sandstone Road – Ormiston Road, with the majority of crashes occurring at mid-block locations. The analysis considered data from 2021 and some of 2022 which shows a significant reduction in the number of crashes which Stantec attributed to the reduced speed limit. This analysis recommended measures to further improve safety near the Mangemangeroa Bridge (Whitford Gorge) due to two fatal head-on crashes there.

### Future Environment

#### *Traffic Volumes*

- 4.12 Historical traffic counts between 2015 and 2018 were reviewed in the ITA to determine a rate of traffic growth. The ITA states the variability in this data (1% to 113%) "*means that this data cannot be reliably used to predict the future background traffic growth*"
- 4.13 The Auckland Forecasting Centre<sup>2</sup> maintains computer models of the Auckland Region used to forecast travel in response to various high-level development assumptions including the Macro Strategic Model (MSM). The MSM is the multi-modal (vehicles and passenger transport) travel demand model of the Auckland region. It incorporates land-use forecasts from the Auckland Council with assumptions about future economic conditions, transport policies and investments, which are used to forecast typical weekday peak period travel demands over the next three decades (2028, 2038, and 2048).
- 4.14 The ITA rejected the traffic volumes forecast by the MSM, considering it too coarse for this area, but reviewed the population forecasts contained within it to inform expected rates of traffic growth. The ITA interpretation of that data provides for growth rates of 1.08% p.a. to 2024, then decreasing over time with no growth after 2038.

#### *Transport Infrastructure*

- 4.15 The ITA considers the future transport network and notes (emphasis added):<sup>3</sup>

*A Draft Scheme Assessment was undertaken by WSP (formerly Opus International Consultants Limited) in 2010 which provided capital costings for a staged upgrade of Whitford-Maraetai Road to a four-lane road. The corridor has subsequently been designated for four lanes.*

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<sup>2</sup> A partnership between Auckland Council, Auckland Transport and Waka Kotahi New Zealand Transport Agency.

<sup>3</sup> Page 40, ITA



A bypass (Whitford Bypass) that connects the existing Whitford Park Road/Sandstone Road roundabout from Saleyard Road through to Trig Road (north) via the greenfield site was also investigated. The new Whitford Bypass would cross Turanga Creek.

As the speed limits in this area were confirmed to be reduced in June 2020, a revised due diligence design has been undertaken by WSP for both the Whitford-Maraetai Road and Whitford Bypass.

*There is currently no allocated funding for the upgrade of either Whitford-Maraetai Road to four lanes or the construction of the new Whitford Road bypass. However, it is anticipated that in three decades (2051) government funding would have been allocated for these improvements.*

4.16 The ITA also states (emphasis added):<sup>4</sup>

*... it can be assumed that as the general background traffic increases and there are no upgrades to the infrastructure due to no government funding allocated, the performance of the network would only worsen with time.*

4.17 The 12 July 2022 additional information states in relation to Whitford-Maraetai Road (emphasis added):

*No significant capacity improvements are planned for this road and are considered unlikely to happen considering the Te Tāruke-ā-Tāwhiri:Auckland's Climate Plan in place to achieve the reduction in transport emissions. The exception being intersection upgrades to mitigate the effects of the development.*<sup>5</sup>

## Proposed Plan Change

### Zoning and Development

4.18 The ITA provides a map (Figure 20) of the proposed zoning of land within the plan change area, with the southern area shown as Future Urban Zone (FUZ) and the northern 'live-zoned' area with residential zones of varying intensity, business zones including Business – Local Centre Zone (BLCZ), Business – Mixed Use Zone (BMUZ), and Business – Light Industrial Zone (BLIZ).

4.19 Six sub-precincts are proposed, along with other controls such as overlays, landscape buffers and height controls.

4.20 The ITA analysis and assessment are based on one possible development scenario informed by a master plan prepared for the area including a number of dwellings and retirement units, a variety of retail and commercial activities, a school, and a golf course. The ITA assumes development of the land proposed to be live-zoned would be completed by 2038.

4.21 The ITA states the development scenario accounts for amendments to the RMA to provide more intensive residential development. The ITA has not assessed the potential impact of intensification within the existing Beachlands and Maraetai settlements as PC78 had not been notified when the ITA was prepared.

4.22 The ITA provides a potential development scenario for the FUZ land and assumes development of that area would be completed by 2051. It provides a summary of likely upgrades based on high level modelling of that development scenario.

### Travel Patterns

4.23 Development of the PC88 area is intended to be a "Transit Oriented Community" (TOC) which is described in the ITA as "a type of compact community development which focuses on planning mixed-use and high-density development near a significant public transport station or corridor"

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<sup>4</sup> Pg 64, ITA

<sup>5</sup> Pg 9, 12 July 2022 additional information

- 4.24 The ITA notes that census data shows 8% of Beachlands-Maraetai residents travel to the Auckland CBD, and as 25% of Auckland's jobs are located in the Wāitematā Local Board area the ITA posits travel to the CBD by ferry must increase in future.
- 4.25 The ITA has projected future ferry patronage at Beachlands informed primarily by some data from Hobsonville Point which has 14% mode share for public transport (ferry and bus) with the mode share increasing as the population of that area increased. The ITA draws from its analysis of Hobsonville Point to predict that doubling the population of Beachlands would likely triple the ferry patronage.
- 4.26 The ITA assessment is based on bus patronage increasing from 1% now to 2% from 2024 to 2038, with 4% mode share beyond 2038 as a result of additional operating hours and a new shuttle service connecting the existing bus route with the ferry. The 12 July 2022 additional information revised this to 2.5% by 2038 which was said to produce a negligible impact on the analysis results.
- 4.27 The assessment is based on ferry patronage increasing from 6% in 2024 before development of PC88 is assumed to commence, to 11% for the first half of the assumed PC88 development period until 2031, and then to 13% beyond 2031 as a result of additional and/ or larger vessels being used.

#### Transport Network

- 4.28 A Movement Plan (Figure 22 / Precinct Plan 5) shows a proposed transport network for the PC88 area including a bus route, roads, and active mode (walking, scooting, cycling) links through both the live-zoned and FUZ areas. A Movement Plan showing only the live-zoned area is provided in additional information (pg 7, 12 July 2022)
- 4.29 The ITA assumes Auckland Transport would increase bus services in the area in response to the increased residential catchment.
- 4.30 The ITA notes "*The existing ferry terminal location and marine conditions places constraints on vessel size and capacity*" and they cause "*reliance on private vehicles, lower ferry mode share and increase in congestion. If these problems are not addressed then the existing network will not be able to accommodate the proposed development.*"<sup>6</sup> The ITA recommends additional ferry sailings and larger vessels be provided.
- 4.31 The ITA does not recommend any changes to the ferry berth location or any measures to address the constraints on marine conditions, presumably as it expects the proposed vessels to be accommodated within the constraints.
- 4.32 The ITA mentions a "*new ferry terminal*" but does not describe or assess one. It does note Auckland Transport has investigated investment options and that no funding has been allocated within the next decade. The additional information notes the plan change requestor is not proposing to increase the capacity of the ferry car parking area.
- 4.33 (In this report I use the term "berth" to refer to the marine infrastructure associated with the ferry service and the ramps used for passenger access to and from the ferry vessels. I use the term "terminal" to include passenger shelters and other passenger facilities, and parking for motor vehicles and cycles).
- 4.34 The ITA provides a table of indicative cross-sections for various roads which are said to be subject to further development. A cross-section for Jack Lachlan Drive is provided in the 12 July 2022 additional information showing how the proposed provision of active mode facilities (footpath and cycle path) could be provided on one side of the road.

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<sup>6</sup> Pg 24, ITA.

## Traffic Effects

### Baseline Traffic Volumes

- 4.35 Various transport planning models forecasting travel in the Auckland Region are available, but the ITA considered those models to have insufficient detail for assessing the plan change. The modelling methodology used traffic volumes forecast in a spreadsheet. The scenarios included a 2020 Existing, 2024 Baseline, three development scenarios (2024, 2031 and 2038), and a FUZ scenario.

### Development Traffic Volumes

- 4.36 The ITA estimates the traffic generated by the development based on the assumed development scenario, and peak-hour trip generation rates obtained from guidelines.
- 4.37 The spreadsheet includes historical traffic volumes at key intersections plus development traffic calculated from assumptions about the scale and type of development, the travel demand generated by that development, the share of travel using public transport, and the proportion of private vehicle traffic remaining within Beachlands.
- 4.38 The ITA assumes that as development in Beachlands progresses a greater proportion of traffic generated by Beachlands would be internalised (remain within Beachlands).

### Traffic Modelling

- 4.39 The scope of the ITA analysis includes modelling three existing and two new intersections along Whitford-Maraetai Road, one along Jack Lachlan Drive, the two Whitford roundabouts, and the Whitford Road/ Somerville Road/ Point View Drive intersection. This was extended in additional information to include the intersections of Whitford-Maraetai Road with Henson Road, Clifton Road, and Trig Rd (north) in the August additional information based on counts in June 2022.
- 4.40 Each of those intersections is modelled with the forecast traffic volumes. The models predict poor performance for existing intersection layouts, and the ITA provides model results for concept designs of improvements to some of the intersections.

### Infrastructure Upgrades

- 4.41 The modelling and assumed ferry upgrade program have formed the basis for development thresholds linked to the provision of various infrastructure improvements.
- 4.42 The ITA does not recommend widening of Whitford-Maraetai Road. It describes that approach as “*conscientious*” because poor network operational performance is seen as creating “*circumstances conducive to public transport uptake*.”<sup>7</sup> The ITA does recommend upgrades to some intersections along Whitford-Maraetai Road, and recommends “*additional safety measures, such as signage and delineation should be considered in addition to any road infrastructure upgrades*.”<sup>8</sup> The additional safety measures are not included in the proposed transport infrastructure upgrades.

## Integration with Transport Policy

- 4.43 The ITA reviews a number of policy and strategy documents and evaluates PC88 against them. It describes PC88 as having “*relatively good alignment*” with those documents.
- 4.44 Alignment with the Regional Policy Statement, included with the AUP, is not explicitly assessed in the ITA, but is addressed in the Section 32 assessment.

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<sup>7</sup> Pg iv, ITA

<sup>8</sup> Pg 33, ITA

## ITA Conclusions

4.45 The ITA concludes (emphasis added):

*To support the TOC approach, address the existing network issues (refer to Section 3.3.5) and enable the development, **significant upgrades to the existing PT (buses and ferries) network are required.***<sup>9</sup>

*...the Plan Change area's public transport [bus] network will be significantly better connected to the wider Beachlands area and to Auckland City Centre than it is at present.*<sup>10</sup>

*...the project aligns with many of the larger policy documents by providing **high-density development**, increasing the integration of ferry and bus services to the development area, and providing quality walking and cycling facilities in order to promote a mode shift away from private vehicles.*

*The ATAP does not identify any Council led investment within the Beachlands area within the next ten years, however, growth in this area is anticipated and the existing roading network and ferry services are already at capacity. Therefore, **this area will soon become underserved.***

*The improved public network and roading infrastructure upgrades proposed to enable the Plan Change area creates a more integrated transport system and a financially feasible way. Further, the nature and scale of the development potential will **positively influence the viability** of and confidence in the **public and active transport infrastructure investments** that are planned in the area.*<sup>11</sup>

*Descriptions, analyses and assessments provided in the ITA has shown that the Beachlands South Precinct will enhance accessibility of the Plan Change area by various transport modes: public transport, walking and cycling, and private vehicles. The extent of development enabled by the plan change can be accommodated on the surrounding road network while maintaining acceptable levels of safety and efficiency through the next three decades, based on the proposed public transport investments and additional roading infrastructure upgrades mentioned. **The upgrades proposed provide funding opportunities that may have otherwise been unavailable.** The plan change precinct provisions set out the basis for these triggers.*

*The development enabled by the Plan Change is consistent with current government transport policies.*

*In summary, there is no traffic engineering and transport planning reason to preclude acceptance of the proposal. The full extent of live zoning proposed that would be enabled by the Plan Change will be appropriately supported by the future wider and local network upgrades, as identified in the ITA.*<sup>12</sup>

## Structure Plan

4.46 Appendix 4 of the plan change material is the Beachlands South Structure Plan. That document notes (emphasis added):

*In terms of transport infrastructure, **only localised improvements and upgrades** to the transport network **are required** to service the areas that will be sought to be live zoned via the future plan change and these improvements will be **fully funded and delivered by the applicant.***<sup>13</sup>

4.47 The Structure Plan describes the proposal as "Transit-Adjacent Development" and states:

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<sup>9</sup> Pg 49, ITA

<sup>10</sup> Pg 59, ITA

<sup>11</sup> Pg 89, ITA

<sup>12</sup> Pg 90, ITA

<sup>13</sup> Pg 9, Structure Plan

*Intensive residential development should be located in close proximity to high-frequency public transport, local centres and access to off-road walking and cycling connections<sup>14</sup>.*

- 4.48 The Structure Plan document also describes the anticipated form of residential development including “*higher density development with reduced parking options*”<sup>15</sup>, “*car-free housing typologies*”, and an assumed development sequence.

### **Infrastructure Funding**

- 4.49 The Structure Plan states some infrastructure is to be funded with CIP and recouped through a targeted levy.
- 4.50 Appendix 2 of the plan change material contains an indicative Draft Funding Plan based with estimated costs and timeframes for \$75 million of transport infrastructure, including a \$16 million contribution towards ferry services and infrastructure.
- 4.51 The plan change material includes a letter from Crown Infrastructure Partners (CIP). CIP is a government agency with a purpose that includes co-investing with the private sector to achieve Government objectives for the deployment of water and roading infrastructure to support a timely increase in housing supply. CIP is the government-appointed facilitator for the Infrastructure Funding and Financing (IFF) Act.
- 4.52 The CIP letter notes a possible IFF solution has been discussed with the plan change requestor and mentions a per-dwelling levy and infrastructure connection fees. Any solution would require the approval of government Ministers and Cabinet.

### **Proposed Provisions**

- 4.53 The plan change proposes that a Beachlands South Precinct with six sub-precincts apply to the PC88 area.
- 4.54 In addition to a number of Objectives and Policies, the activity table proposes that development or subdivision that does not comply with Standard I.7.3 Staging of Development with Transport Upgrades be a Discretionary Activity.
- 4.55 Standard I.7.3 has three parts:
- (1) Prior to the operation of any light industrial activities in sub-precinct F or education facility in sub-precinct C, Jack Lachlan Drive must be upgraded to provide two-way walking and cycling active modes along the full length of one side of the road.
  - (2) Subdivision and development within the precinct must not exceed the thresholds in Table 2 until such time that the infrastructure upgrades described in Column 2 and as shown on Precinct Plan 6 are constructed and operational.
  - (3) The subdivision or development of land for more than 2,918 dwellings or residential allotments, 18,000m<sup>2</sup> light industrial GFA, 5,695m<sup>2</sup> retail GFA and 5,100m<sup>2</sup> commercial GFA precinct-wide is a discretionary activity.
- 4.56 Part (2) refers to Table 2 which contains five development thresholds which are linked to required items of transport infrastructure. For example, row (b) reads:<sup>16</sup>

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<sup>14</sup> Pg 24, Structure Plan

<sup>15</sup> Pg 74, Structure Plan

<sup>16</sup> September 2022 Provisions as notified.

| <b>Column 1<br/>Land use enabled ...</b> |   | <b>Column 2<br/>Transport infrastructure required ...</b>   |
|--|---|---|
| (b)                                      | A provision of: <ul style="list-style-type: none"> <li>i. More than 250 and up to 550 dwellings or residential lots; and</li> <li>ii. Up to 3,500m<sup>2</sup> light industrial GFA;</li> </ul> | Provision for an additional capacity of 100 ferry passengers (total capacity of 600 passengers) from Pine Harbour during the two-hour peak period between 0645 -0845 on weekdays; and |

- 4.57 The provisions include two Special Information Requirements relevant to transport.
- 4.58 Provision I.10.(4) Integrated Transport Assessment requires an ITA to be prepared for an application to infringe Standard I.7.3, and that ITA must include a register of development and subdivision that has been previously approved under that Standard.
- 4.59 Provision I.10.(6) Travel Management Plan<sup>17</sup> requires a TMP to be prepared for any commercial activity greater than 500m<sup>2</sup>. This must include operational measures to encourage reduced vehicle trips and restrict the use of employee parking areas during peak periods. It must include details of the management structure for the building or site, and methods for assessing the effectiveness of the proposed measures.
- 4.60 Precinct Plans include 5 – Movement Network which shows the indicative location of roads and paths, and 6 – Transport Staging and Upgrades which shows the locations of transport upgrades listed in Table 2.
- 4.61 Appendix I.12 is a table and illustrations of road design and cross-section details.

### **Review**

- 4.62 I consider the methodology used for the ITA to be typical; however, I consider many of the assumptions are not robust, and the scope of the assessment is too limited for properly understanding the potential effects of PC88 on the transport environment.
- 4.63 The ITA makes several assumptions about the transport environment, the development likely to occur, and the effects of that development on the transport environment. In some cases the adopted assumptions are reasonably robust, but others are less robust and not subject to sufficient sensitivity assessment.
- 4.64 In my view, the assumptions or analysis about the following matters are not sufficiently robust or tested, and most are overly optimistic:
- a) future rates of growth in traffic volumes;
  - b) the type and scale of development the proposed zoning and provisions would enable and/or ensure;
  - c) the trip generation of the assumed development and the level of internalisation;
  - d) the accessibility of the proposed centre; and
  - e) the mode share for bus and ferry;
- 4.65 There are also a number of omissions from the transport assessments, including:
- a) a description of the only alternate road route to and from Beachlands (via Maraetai and Clevedon), and addressing resiliency of the two road routes;

<sup>17</sup> Included in the September 2022 Updated Provisions



- b) changes to the ferry berth, terminal and parking required to support an increase in vessel size, sailings, and patronage, and how required changes will be funded beyond the contribution in the draft funding plan;
  - c) modelling of the baseline transport environment (without PC88) in 2031 and 2038; and
  - d) analysis of the effects arising from additional traffic volume on mid-block locations along key roads including Whitford-Maraetai Road.
- 4.66 I address these matters in more detail below, and then consider the adequacy of the proposed provisions.
- 4.67 To summarise, for the reasons set out above I do not accept many of the assumptions made in the applicant's assessments, and therefore do not accept the conclusions reached, or the proposed precinct provisions.
- 4.68 I have not undertaken a complete analysis of likely traffic volumes or undertaken my own modelling of intersections, although I have undertaken some analysis of the mid-block performance of Whitford-Maraetai Road. I consider the applicant's analysis of future traffic volumes on that road to be significantly under-estimated as a result of compounding conservative assumptions.
- 4.69 In the absence of additional analysis, as a guide I expect the future volumes could be up to double the ITA projections. For that reason I expect the infrastructure required for various stages of development may be required at levels of development around half of the levels indicated by the ITA analysis. The ITA presents some limited analysis for development of the land proposed to be FUZ with a similar scale of development to the land proposed to be live-zoned. For that reason the FUZ analysis is likely to represent development enabled by the proposed live-zoned land.

## 5 Transport Environment

### Existing Environment

#### Access

- 5.1 The settlement of Beachlands is accessed by:
- a) A scheduled ferry service running between Pine Harbour and Downtown Auckland;
  - b) Whitford-Maraetai Road to Whitford village (9km / 8-12 minutes by car), and then on to:
    - i) Somerville and Botany Town Centre (7km, 9-14 min) via Whitford Road;
    - ii) Flat Bush and Ormiston (6km, 7-12 min) via Sandstone Road and Ormiston Road;
    - iii) Brookby and Takanini (17km, 18-24 min) via Whitford Park Road and Brookby Road;
  - c) Maraetai Road to Maraetai, then Maraetai Coast Road and North Road to Clevedon, referred to as the coastal route, with options to travel on to Brookby, Takanini or Papakura. That route has a significantly longer distance and travel time.
- 5.2 Ferry sailings are sometimes cancelled in poor weather, and some roads in the area are subject to closures because of flooding, slips, and serious crashes.
- 5.3 At a more localised level, access to land from portions of Jack Lachlan Drive and Whitford-Maraetai Road does not have sufficient sightlines to enable safe access at intersections or driveways. As the sufficiency of sightlines is related to traffic speed, an eventual reduction in the speed limit as a response to development may reduce the areas with inadequate sightlines, but I expect some areas unsuitable for access would remain.



- 5.4 These constraints are reflected in a standard within the nearby I403 Beachlands 1 Precinct. Standard I403.6.7 (3) prohibits direct vehicle access from Whitford-Maraetai Road, and direct vehicle access from part of Jack Lachlan Drive.

#### Travel Patterns

- 5.5 The Census 2018 journey to work and education information presented in the ITA is a useful indicator of travel patterns, and the application material provides a good level of detail on that data.
- 5.6 The data includes travel from the three census areas in the broader Beachlands-Maraetai area to other areas for work or employment. It does not record trips made for other purposes such as visiting friends, shopping, medical appointments, etc.
- 5.7 Excluding the Maraetai census area, there were 714 jobs and 2055 occupied dwellings in the Sunkist Bay and Te Puru areas that make up Beachlands, an average of one job for every 2.9 dwellings. Three-quarters (74%) of employment for residents is outside the area.

#### Public Transport

- 5.8 Auckland Transport classifies public transport services as Rapid, Frequent, Connector, Local, and Peak based on their service frequency and hours of operation.

#### *Ferry*

- 5.9 The Pine Harbour – Auckland ferry service is a Local service that runs at 20-minute intervals during peak periods, and less often during other times of the day. Two sailings are provided on Friday evenings, six sailings on Saturdays, and four sailings on Sundays and Public Holidays. The travel time is approximately 35 minutes.
- 5.10 The ferry berths within the Pine Harbour Marina are located near a small building that provides timetable information, an AT HOP Card machine, limited under-cover seating, and cycle racks.
- 5.11 The Pine Harbour ferry service currently uses up to four vessels, two with a capacity of 50 passengers and two that can carry 99 passengers each.
- 5.12 As noted above, Census 2018 data indicates that 6% of all travel out of the Beachlands-Maraetai area for work and employment purposes was made by ferry. This includes residents of the wider area who drive to the marina to then travel by ferry.
- 5.13 The census data shows that on census day 2018, nobody travelled to the Beachlands-Maraetai area by ferry for work or education, 147 workers left the area using the ferry, and 41 students left by ferry. While people likely used the ferry for other purposes, students represent somewhere around 22% of census ferry passengers travelling out of the area.
- 5.14 The ferry service is supported by park and ride parking. This includes an area of around 174 car parking spaces located 200-350m (2-4 minutes) walk from the berth.

#### *Bus*

- 5.15 Bus route 739 Maraetai - Botany is a Local service that runs between Maraetai and Botany Transport Centre via an anticlockwise loop with Beachlands and via Whitford and Ormiston. The service runs at 60-minute intervals between 6:00 a.m. and 8:00 p.m. on weekdays, and 7:00 a.m. to 7:00 p.m. on weekends. The journey between Beachlands and Botany is scheduled to take between 32 and 42 minutes depending on the time of day.
- 5.16 The PC78 report notes the existing 739 service is provided for accessibility reasons rather than reducing vehicle traffic, and that patronage of that service is low. Prior to Covid the service averaged 8.6 boardings per hour.

## Road Safety

- 5.17 When the KiwiRAP road safety risk maps<sup>18</sup> were last updated in 2014, Whitford-Maraetai Road had a High Collective Risk<sup>19</sup> and a Medium Personal Risk<sup>20</sup>. The three roads accessing Whitford had Medium-High or Medium risk ratings.
- 5.18 In the five years 2017 to 2021, there were 113 crashes on Whitford-Maraetai Road between Whitford and Beachlands, which included 10 crashes with serious injuries, and 31 with minor injuries. Of the 113 reported crashes, 86% were the result of loss-of-control. Alcohol was a factor in 45% of the crashes and speed was a factor in 36% of crashes. Of the crashes, 27% occurred in the dark, and 59% on a wet road.
- 5.19 As noted in the ITA, most crashes occurred at locations away from intersections, which is consistent with the high proportion of loss-of-control crashes.

## Traffic Volumes

- 5.20 Auckland Transport has regularly counted traffic volumes on Whitford-Maraetai Road and other roads in the area. This regular data is summarised in the appended charts<sup>21</sup>. The data show distinct drops in traffic volume in the 2020-2022 period which I attribute to the Covid-19 Health Orders.
- 5.21 Prior to 2020 all five count stations along the road show a relatively consistent trend in average weekday traffic volume, with rates of growth between 3.9% and 9.8% per annum at various locations along the road, with an average of 6.5% per annum.
- 5.22 The charts show similar reasonably consistent trends for the a.m. and p.m. peak hours prior to 2020. The change in the a.m. peak hour ranges from 1.3% to 6.4%, averaging 3.2% p.a. The change in the p.m. peak hour ranges from 1.9% to 10.8%, averaging 4.5%.
- 5.23 It is common for peak-hour growth rates to be lower than daily growth rates in areas where congestion constrains peak-hour travel, and in these situations it is common for the peak periods to extend over a longer period of time.
- 5.24 The ITA acknowledges that Whitford-Maraetai Road is operating near capacity during peak periods, based on a capacity of 1,700 vehicles per hour per lane.
- 5.25 Austroads, an organisation of state road controlling authorities including WK-NZTA, publishes guidelines that are widely used in New Zealand. The relevant guideline<sup>22</sup> provides a method for calculating the capacity of a two-way two-lane rural road like Whitford-Maraetai Road using the North American *Highway Capacity Manual 2016* (HCM) which provides formulae based on extensive research.
- 5.26 For ideal road conditions (wide lanes, wide shoulders, no areas where overtaking is not possible, level terrain, no heavy vehicles, and no impediments such as turning vehicles), the capacity is 1,700 passenger-cars per hour per lane. The HCM provides a Level of Service (LOS) metric<sup>23</sup> which deteriorates as volumes increase due to speed reductions from following slower vehicles.
- 5.27 As many parts of Whitford-Maraetai Road are not ideal and the traffic flow contains heavy vehicles the actual capacity of the road would be less than 1,700 v/h. I have used software to calculate the HCM formulae for Whitford-Maraetai Road using the 2020 and 2022 count information contained in the ITA with the results are summarised in the following table. As noted elsewhere the 2022 counts were generally lower than the 2020 counts.

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<sup>18</sup> <https://roadsafetyrisk.co.nz/>

<sup>19</sup> Collective Risk is determined by the number of death and serious injury crashes per kilometre.

<sup>20</sup> Personal Risk is determined by the number of death and serious injury crashes per vehicle-kilometre of travel

<sup>21</sup> The traffic count data reviewed here excludes special purpose "HC" counts.

<sup>22</sup> Guide to Traffic Management – Part 3 – Traffic Study and Analysis Methods, Austroads, 2020.

<sup>23</sup> Level of Service (LOS) is a measure of performance, with LOS A representing good conditions and LOS F representing poor conditions and a facility that is over-capacity. For intersections LOS is determined from average delay, and LOS D is a typical design target for peak-periods.

*Table 1: Performance of Whitford-Maraetai Road in peak direction 2020/ 2022*

| Location                   | a.m. westbound |     | p.m. eastbound |     |
|----------------------------|----------------|-----|----------------|-----|
|                            | % of capacity  | LOS | % of capacity  | LOS |
| South of Jack Lachlan 2020 | 96%            | E   | 81%            | E   |
| North of Henson 2022       | 85%            | E   | 76%            | E   |
| Between Trig and Trig 2022 | 90%            | E   | 80%            | E   |

Analysis based on uninterrupted flow, Class I road, rolling terrain, 10% heavy vehicles, 3.3m wide lanes, 1.3m shoulders, 6.7 accesses per kilometre, no passing lanes, 80km/h free speed, peak hour factors from pg 30 of ITA

- 5.28 The results confirm that Whitford-Maraetai Road is currently operating at or beyond its practical capacity and I expect it would be operating beyond theoretical capacity on some busier days.

## Future Transport Environment

### Future Traffic Volumes without PC88

- 5.29 As noted above, the rate of traffic growth on Whitford-Maraetai Road has been reasonably consistent over the 2017-2019 period with peak-hour traffic growing at an average of 3.2 - 4.5% p.a.. Due to this consistency I do not accept the ITA's rejection of this data based on excessive variability.
- 5.30 The ITA used forecast population growth as a proxy for traffic growth and adopted peak-period growth rates of 1.08% to 2024, then 0.67% to 2031, 0.52% to 2038, and no growth beyond 2038.
- 5.31 I acknowledge that the Council forecasts are for population growth to slow in future; however, this method does not take account of economic and other factors that contribute to growth in traffic volumes and is subject to inaccuracies in the population forecasts which have historically been lower than actual population growth in Auckland.
- 5.32 Inspection of the modelling reports in the ITA and additional information show lower rates of growth than stated have been used in the analysis. At the Whitford-Maraetai Road / Trig Road (east) intersection, for example, the through movements along Whitford-Maraetai Road stated in the model results are as set out in the following table.

*Table 2: Summary of modelled traffic volumes on Whitford-Maraetai Road west of Trig Rd (east)*

| Scenario                                    | a.m. peak |           |       | p.m. peak |           |       |
|---|-----------|-----------|-------|-----------|-----------|-------|
|   | Westbound | Eastbound | Total | Westbound | Eastbound | Total |
| 2022 Count                                  | 1134      | 393       | 1527  | 501       | 1018      | 1514  |
| 2024 Base                                   | 1157      | 401       | 1558  | 511       | 1034      | 1545  |
| 2038 Base                                   | 1231      | 427       | 1658  | 544       | 1099      | 1643  |
| Change in baseline<br>2024-2038 (per annum) | 0.46%     | 0.46%     | 0.46% | 0.46%     | 0.45%     | 0.45% |

Volumes are input volumes from the modelling results for Site 10 Whitford-Maraetai / Trig East (August 2022 Info)

- 5.33 From this model data it is evident the analysis has used an average growth rate of only 0.46% per year between 2024 and 2038, which is lower than the rates provided in Table 15 of the ITA. That rate of growth is also significantly lower than historical growth rates.
- 5.34 If growth in peak-hour traffic volumes without PC88 is just half of the 4% rate seen in the 2017-2019 period, at say 2% p.a., that would increase the baseline volumes significantly beyond what has been used in the ITA analysis. The following table compares the 2038 baseline volumes from the Stantec modelling with what I consider to be a more appropriate baseline calculated from the 2022 count plus 32% (16 years growth to 2038 at 2% per year). This assumes there is no period of higher 'rebound' traffic growth post-Covid in the short term.

*Table 3: Comparison of 2038 Baselines at Trig Rd*

| Scenario            | a.m. peak |           |       | p.m. peak |           |       |
|---------------------|-----------|-----------|-------|-----------|-----------|-------|
|                     | Westbound | Eastbound | Total | Westbound | Eastbound | Total |
| 2022 Count          | 1134      | 393       | 1527  | 501       | 1018      | 1514  |
| 2038 Base – Stantec | 1231      | 427       | 1658  | 544       | 1099      | 1643  |
| 2038 Base - Arrive  | 1497      | 519       | 2016  | 661       | 1344      | 2005  |

- 5.35 In my view the growth rates adopted in the ITA are too low leading to an overly optimistic assessment, and a value of 2% p.a. for the peak hours is a more appropriate assumption.
- 5.36 I have used software to calculate the HCM formulae for Whitford-Maraetai Road using both 2038 Baseline estimates, and the results are summarised in the following table.

*Table 4: Performance of Whitford-Maraetai Road (at Trig Rd) in peak direction for 2038 without PC88*

| Scenario              | a.m. westbound |     | p.m. eastbound |     |
|-----------------------|----------------|-----|----------------|-----|
|                       | % of capacity  | LOS | % of capacity  | LOS |
| Stantec 2038 Baseline | 97%            | E   | 87%            | E   |
| Arrive 2038 Baseline  | 118%           | F   | 106%           | F   |

- 5.37 These analysis results show that in 2038 without development of PC88 Whitford-Maraetai Road would have poor performance at LOS E based on the Stantec estimate and at LOS F based on my estimates. I would expect the performance on busier days to be worse and highly sensitive to any form of disruption.
- 5.38 To summarise, Whitford-Maraetai Road is currently at capacity during peak periods and has little to no ability to accommodate additional peak-period travel. Additional travel demand is expected to occur in future years without PC88.

### Road Upgrades

- 5.39 In 2003 Manukau City Council (MCC) commissioned a strategy study to identify transport issues due to possible new development. The study recommended widening Whitford-Maraetai Road to four lanes (two lanes each way) between Whitford and Beachlands with improved geometry and intersection designs. MCC then commissioned an assessment of that work resulting in the publication of a Draft Scheme Assessment Report (SAR) in July 2010. A separate SAR assessed the Whitford Bypass project.
- 5.40 The Whitford-Maraetai SAR was based on a medium growth scenario of 4% for a 30-year period (to 2040). The report found four laning was warranted when the daily volume reached 15,000 v/d. The report expected the traffic volumes to reach that level between Trig Road West and Clifton Road by 2020, between Jack Lachlan Road and Beachlands Road by 2022, and between Clifton Road and Jack Lachlan Road by 2024.
- 5.41 The average weekday volume exceeded 15,000 v/d north of Trig Road and in Whitford Village in 2019. Based on recent trends in the AT traffic counts, the volume would have exceeded 15,000 v/d at both other count locations between Whitford and Beachlands by mid-2020 except for the reductions attributed to the Covid-19 Health Orders.
- 5.42 The SAR calculated a benefit to cost ratio of 6.9 and a first-year rate of return of 43%. Based on these studies MCC designated land for the widening of Whitford-Maraetai Road (Designation 1806) and for the Whitford Bypass (Designation 1807).
- 5.43 Funding for transport in Auckland is set out in the Auckland Regional Land Transport Plan (RLTP) which covers a ten-year period and is updated every three years. The current 2021-2031 RLTP has no funding for these projects, or any other transport project in the area.
- 5.44 The PC78 report states Whitford-Maraetai Road is expected to reach capacity prior to the development of any additional dwellings in Beachlands, with an estimated cost for the upgrading of more than \$200 million<sup>24</sup>.
- 5.45 For the reasons set out in this report, I consider the ITA estimates of future traffic volumes on Whitford-Maraetai Road are underestimated with and without PC88. That, along with a flawed view of congestion and public transport, has led the ITA to erroneously conclude that widening of Whitford-Maraetai Road is not required to accommodate development of PC88.

<sup>24</sup> Pg 9, PC78 S32 BTIC

## Public Transport Improvements

- 5.46 The additional information responses note that Auckland Transport is proposing to introduce a new bus service between Maraetai and the Pine Harbour ferry in 2023-2024, and notes that improved off-peak service frequencies may also be implemented by AT in the future.
- 5.47 The low patronage of the bus service suggests that the ITA expectations of a significant increase in the use of this service are misplaced, a matter addressed in more detail later in this report.
- 5.48 AT's website states that weekend ferry services were trialled in March and April 2022 and those services have now been implemented on a permanent basis. An AT report notes "*The next step [is] to look at providing a connecting bus service at Pine Harbour when funding and resources allow.*"<sup>25</sup>
- 5.49 The PC78 report states the ferry terminal "*could provide for ferries catering for up to 150 seats*" and to cater for additional housing development a new ferry berth and terminal would be required. An estimate for a proposed development of 1500-2000 dwellings found the costs to develop an appropriate ferry berth would be \$10-13 million. Upgrading the ferry fleet would have additional capital and operating costs.
- 5.50 The AT assertion that a new berth and significant dredging would be required to accommodate vessels with more than 150 seats is in conflict with the ITA that asserts the existing terminal could accommodate vessels with 200 seats. I do not have the necessary marine engineering expertise to provide an independent opinion on that matter and I rely on the AT information.
- 5.51 The PC78 report concludes the cost to improve public transport in Beachlands would be significant with little return given the difficulties accessing employment, education and community services.

## Planning for Growth

### *Future Urban Land Supply Strategy*

- 5.52 The Auckland Future Urban Land Supply Strategy 2017 (FULSS) is a non-statutory planning document intended to identify the sequencing and timing of future urban land for development readiness over 30 years, principally based on the ability to provide supporting bulk infrastructure. The purpose is to allow infrastructure providers to plan for growth and indicate when various areas are expected to have bulk infrastructure provided so that growth is enabled.
- 5.53 Beachlands was excluded from the FULSS. Some land near Maraetai was included as a Rural Settlement area.

### *Draft Future Development Strategy*

- 5.54 In June 2023 the Council released the Draft Auckland Future Development Strategy 2023-2053 (FDS) for consultation. When finalised the FDS will replace the Auckland Plan 2050 Development Strategy and the Future Urban Land Supply Strategy.
- 5.55 The Draft FDS does not include any growth areas at Beachlands.

### *Intensification and Beachlands Transport Infrastructure Constraint*

- 5.56 In considering the potential implications of the PC78 changes, Council determined that there are significant constraints to providing transport infrastructure for intensification of the existing Beachlands settlement.

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<sup>25</sup> Pine Harbour Ferry Weekend trial report, Auckland Transport, September 2022.

- 5.57 As explained in the PC78 report, Council’s analysis led to the inclusion of the Beachlands Transport Constraints Control, now referred to as the Beachlands Transport Infrastructure Constraint (BTIC) Qualifying Matter. As proposed, the BTIC limits further residential intensification in Beachlands, except for the existing Residential – Terraced Housing and Apartment Buildings (R-THAB) zone and business zones as they are small.
- 5.58 The PC78 report states that without the BTIC intensification could result in 18,788 - 21,202 additional dwellings in Beachlands. If the BTIC is implemented as notified, Council estimates an additional 430 dwellings would result, which could be accommodated by the transport infrastructure.
- 5.59 Council’s analysis of an intermediate “Status Quo” option stated 2,844 dwellings could be provided, but with high social and environmental costs due to travel time and traffic congestion with little benefit, leading it to reject that option. For reference, that is less than the number of dwellings the ITA analysis expects would be developed on the land PC88 proposes to live-zone.

## 6 Assessment of Transport Effects and Management Methods

### Proposed Plan Change

- 6.1 The proposed plan change would rezone land to provide for dwellings, retail, commercial and industrial activity; and rezone additional land as Future Urban.
- 6.2 The ITA assumes that the live-zoned area would provide 2,724 houses and 194 retirement units (total 2,918 dwelling units), 5,695 m<sup>2</sup> gross floor area (GFA) of retail activity, 5,100m<sup>2</sup> GFA of commercial activity, and 18,000m<sup>2</sup> GFA of light industrial activity. The ITA also notes that a hotel with conference centre is also anticipated.
- 6.3 Assuming average occupancies of 2.2 people per house, and 1.2 people per retirement unit, the estimated yield could potentially support a population of around 6,200 people which is the same as the population of the existing Beachlands settlement.
- 6.4 The scale of development assumed appears to have been derived from other PC88 material including the Structure Plan, Masterplan and Economic Assessment. While those estimates are a possible outcome, and perhaps the most likely outcome, it is important to note that the actual yields when developed could vary.
- 6.5 A secondary school (including intermediate/ junior high years 7 and 8) with 2,200 students is anticipated.
- 6.6 The description of sub-precinct C Community notes it is intended to provide for a range of activities including visitor accommodation and education. Objective 23 and Policy 30 provide for and enable education in sub-precinct C, where Education facilities are a Permitted activity. That is regardless of scale, particularly as the proposed provisions exclude the Auckland-wide trip generation threshold standard.
- 6.7 Despite those planning provisions for a school, they are enabling rather than requiring, and provide no guarantee that a school will be provided. The lack of a school could result in additional housing and would result in more travel outside of Beachlands. The late delivery of a school could also result in more travel outside of Beachlands until a school is operational.
- 6.8 A nine-hole golf course is anticipated. The proposed provisions include Sub-Precinct E “Golf” and a “Golf Course Overlay.” The land in this sub-precinct is zoned R-MHU which is described as “*providing opportunities for residential development in the future*<sup>26</sup>”. The purpose of those controls is to provide for and enable a golf course, but they do not require or guarantee a golf course be provided or retained in the long term. PC88 would enable the land anticipated for

<sup>26</sup> Page 4, Proposed Precinct Provisions.



the golf course to be developed for additional residential activity which has not been allowed for in the ITA analysis.

### Development Pattern

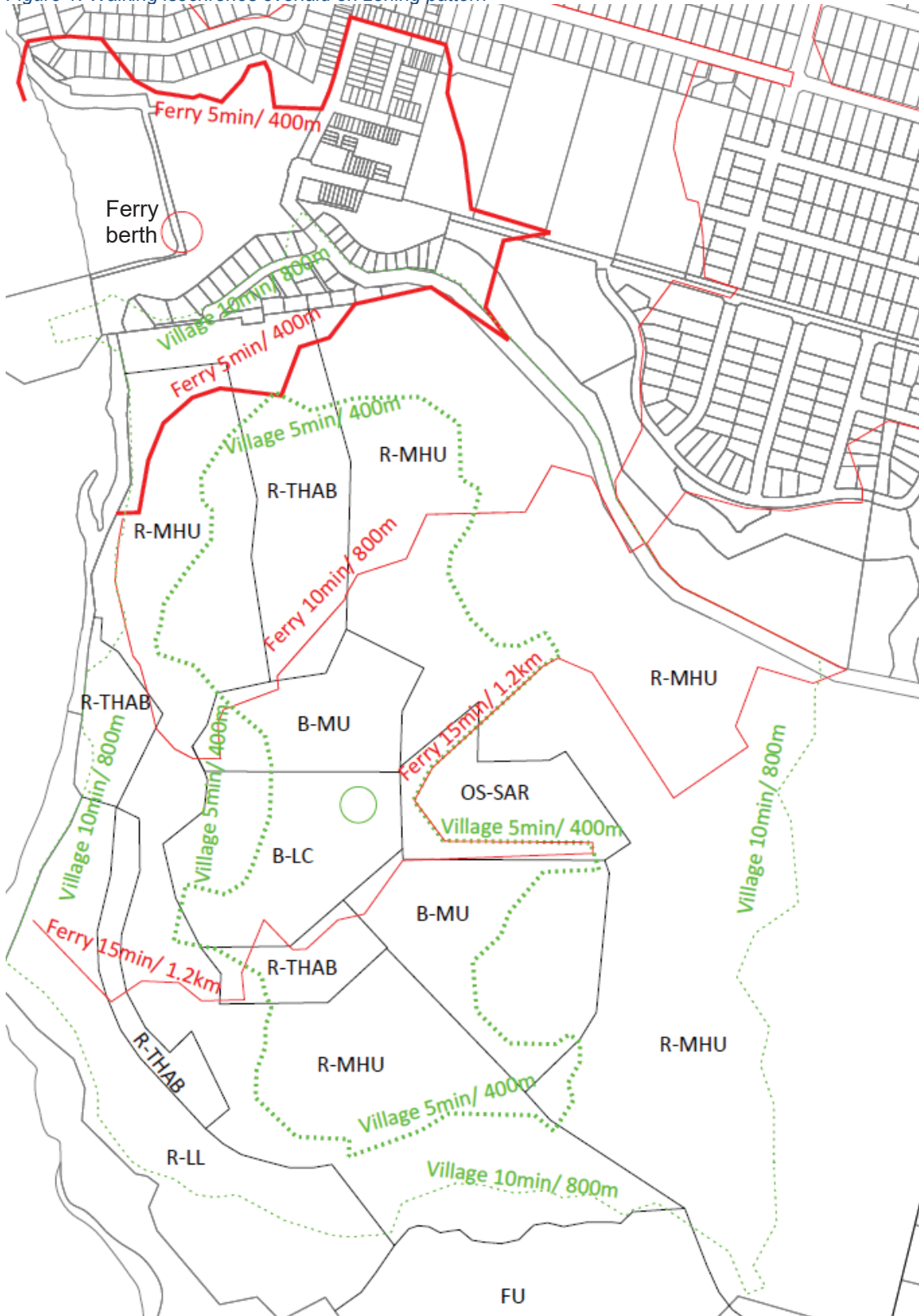
- 6.9 The proposal is variously described in the plan change documentation as a “*public-transport focussed community*”, a “*transit-adjacent development*”, and a “*Transit Oriented Community*” (TOC).
- 6.10 The documentation refers to encouraging modal shift (away from private car travel); prioritising active modes (walking, scooting and cycling), public transport, and car-sharing. The provision of a compact and walkable precinct is noted, as is residential density located in response to the proximity to high-frequency public transport.
- 6.11 The ITA provides a definition of a TOC as “*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 design for pedestrians [and cyclists] without excluding the auto.*”
- 6.12 Accessibility of public transport is a key metric for assessing the location, density, and zoning of future development to ensure good integration between transport and land-use. The National Policy Statement on Urban Development (NPS-UD) requires Council to enable more people to live in areas that are near a centre zone or areas well-served by public transport and refers to walkable catchments.
- 6.13 The Auckland Council Planning Committee has endorsed a definition of “walkable catchment” as including, among other things, development within 800m walking distance of a metropolitan centre or a rapid transit stop, considering terrain and other matters. This definition is consistent with other documents such as Ministry for the Environment (MfE) guidance on the topic.
- 6.14 The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act requires council to apply Medium Density Residential Standard (MRDS). Council has indicated that the response to that requirement may be that large local centres with “good access” have the R-THAB zone applied to land generally within 200m of the centre. The AUP description of the Local Centre zone says centres are generally located in areas of “good public transport”.
- 6.15 The terms “good access” and “good public transport” are not defined, but it suggests that the quality of access and public transport to the local centre should be assessed. Any assessment of public transport must include consideration of the service frequencies.
- 6.16 The August additional information suggests the proposed centre “*will not qualify as a full metropolitan centre, [but] it will operate as such within the context of Beachlands*”. I do not accept that statement.
- 6.17 Given the capacity and safety issues identified with Whitford-Maraetai Road and the considerable travel distances, I would not classify the PC88 area as having “good access” from the wider area, but the proposed roading pattern within PC88 could provide good access at a local level.
- 6.18 The plan change material outlines how the existing bus service could be rerouted through the precinct, although with one-hour service frequencies I do not consider that to be sufficient to provide “good public transport” to this area.
- 6.19 In my view the ferry service could be considered to be “good public transport”, but it is a Local service not rapid transit, and is not “high frequency” as claimed in the ITA. As a result, the ferry service would not enable dense development under the NPS-UD, but it could support provision of a local centre zone within a walkable catchment of the ferry.
- 6.20 The lodged and additional material includes a proposed zoning plan, Transport Movements Plan, and maps showing walking isochrones (walking time contours). The proposed zoning pattern is largely focussed on the proposed local centre. The proposed local centre is not located in an area of good public transport.



- 6.21 With respect to the walking isochrones shown in the diagrams, on level ground a walking time of 2.5 minutes is equivalent to a walking distance of 200m, 5 minutes is equivalent to 400m, and 10 minutes is equivalent to 800m.
- 6.22 The PC88 land has land I would describe as rolling terrain and most, if not all, walking routes to and from the ferry or village are expected to have significant grades. The applicant considers this to be a detailed design matter not appropriate for consideration at this stage<sup>27</sup>. I consider this to be relevant as it is at this stage that the broad location of various land use activities is determined. The grades would increase the walking time and reduce the size of the walkable catchments.
- 6.23 The northern edge of the precinct is within a 400m walk of the ferry. The proposed village centre is a 15-minute walk (1200m walking distance) from the ferry, well outside the normal definition of walkable catchment, so not in an area of good public transport.
- 6.24 The following diagram shows the proposed zoning pattern overlaid by the 5 min/ 400m, 10 min/ 800m and 15 min/ 1.2km walking isochrones.
- 6.25 The northern R-THAB area is up to 800m from the ferry and 800m from the village centre. The R-THAB along the coast is between 800m and 1.5km from the ferry and within 800m of the village centre. The southern R-THAB area adjoins the village centre but is more than 1.2km from the ferry.
- 6.26 The B-MU zone also enables higher-density residential development. The B-MU adjoining the northern side of the village centre is over 800m from the ferry. The B-MU area south-east of the village centre is over 1.2km from the ferry.
- 6.27 The proposed zones that provide for denser development (R-THAB, B-LC and B-MU) are all located outside the walkable catchment of the ferry with the exception of the northern fringe of the northern R-THAB area.
- 6.28 The August additional information states (emphasis added):
- “With reference to the NPS-UD walkable catchment classification around a **rapid transit stop** (800m), it is noted that the majority of the high-density residential developments proposed within the plan change fall **within a 10-minute (800m) walk of the ferry terminal**. Again, in the context of Beachlands it is considered that high density development within the 10-15-minute (800m-1,200m) catchment guidance provided by Council would be acceptable here as Beachlands is located in a relatively peripheral area of Auckland where residents are likely to have expectations of longer average trip lengths and times compared with residents choosing to live in more central locations. For example, the ferry service travelling between Pine Harbour and the Auckland Downtown Ferry Terminal has a trip length of approximately 35 minutes and covers a distance of approximately 20km. In this context, a longer ‘first mile’ trip to high-quality public transport may be more acceptable than in more central locations”.*
- 6.29 I do not accept that argument. In my view the proposed zoning pattern is “village-focussed” not “public-transport focussed”. It is neither “transit-adjacent”, nor a “Transit Oriented Community” due to the lack of Rapid or Frequent public transport services in the area, and the relatively poor proximity to the ferry berth for walking.
- 6.30 I do not accept that residents of the proposed dwellings should expect longer walking times to public transport, and in my view this aspect is likely to discourage residents from using public transport and encourage them to use private vehicles.
- 6.31 Much of the area is within reasonable cycling distance of the ferry and the village centre, so the provision of cycling facilities within the site could result in a good level of cycling for local trips, but that is somewhat dependent on grades. If a high standard of cycling facilities was provided, that may support use of the ferry for commuting to the central city; however, this is likely to be already reflected in the existing ferry mode-share for the area as much of the existing development area could already access the ferry by bicycle and cycling does not appear to be a well-used mode at present.

<sup>27</sup> July additional information, response to request T9.

Figure 1: Walking isochrones overlaid on zoning pattern



Ferry walking isochrones in red, village walking isochrones in green. Walking times not adjusted for grades.

### Need to Improve Public Transport

6.32 The ITA states (emphasis added):<sup>28</sup>

<sup>28</sup> Pg 49, ITA

*While the Plan Change would introduce additional employment and a high school for the Beachlands area, the level of internalisation of traffic is likely to be insignificant compared to the expected growth in traffic should the current public transport provision be retained. **Without improvements in the current PT system, the increase in demand may lead to significant increase in on road traffic volume, which would add pressure onto the already congested road network and contribute to further increase in transportation related emissions.***

*To support the TOC approach, address the existing network issues ... and enable the development, significant upgrades to the existing PT (buses and ferries) network are required.*

- 6.33 The ITA acknowledges that without adequate improvements to public transport development of the land would add pressure onto the already congested road network. Two critical matters for this assessment are therefore the ability for the public-transport mode-share to be significantly increased, and the ability for the proposed provisions to ensure that public transport improvements would be provided.

### **Travel by Bus**

- 6.34 The ITA analysis is based on public bus service mode share increasing from the current 1%, to 2% from 2024, and to 2.5% from 2038. The analysis assumes that Auckland Transport would improve the bus service, for example halving the service frequency from 1 hour to 30 minutes, and that Auckland Transport would introduce bus priority measures along Whitford-Maraetai Road.
- 6.35 Bus priority measures include features such as bus lanes or pre-emption of traffic signals. The introduction of bus lanes would require significant road widening, and the pre-emption of traffic signals can only occur at intersections that are signal-controlled. I consider it unlikely that Auckland Transport would introduce bus priority measures for one local service with low utilisation.
- 6.36 The additional information refers to a 2004 Transfund research report that is said to suggest better service frequencies can result in a 30-50% increase in patronage in the short to medium term. The additional information has over-stated the change in demand.
- 6.37 The Transfund report provides elasticity factors. If the service frequency is halved, the report suggests the short-term (within one year) demand is most likely to increase by 17.5%<sup>29</sup> (range 10 to 25%), and that long-term (typically 10-12 years) changes are typically 1.5 to 2.5 times greater. Based on the Transfund report, if the service frequency of the bus service was halved from 60 minutes to 30 minutes, the bus mode share would likely increase from 1% to 1.2% in the first year, and to between 1.3% to 1.4% in the longer term.
- 6.38 In my view the mode-share for bus transport is likely to increase by a small amount as the result of improvements such as increased service frequency. As Auckland Transport currently have no plans or funding for improving the service within the 2021-2031 period, in my view the appropriate bus mode-share is 1%, and the ITA is too optimistic in assuming mode shares of 2% and 2.5%.

### **Travel by Ferry**

- 6.39 The ITA supplies Census 2018 data showing that 6% of people in the wider Beachlands-Maraetai area used the ferry to travel to work or education and notes this ferry mode share is higher than average for Auckland.
- 6.40 The ITA adopts ferry mode share of 6% initially, increasing to 13% by 2038. This is principally based on assumptions made from evaluating data from Hobsonville Point.

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<sup>29</sup> <https://www.nzta.govt.nz/assets/resources/research/reports/248/248-Review-of-passenger-transport-demand-elasticities.pdf>. Table 4-1 provides a most-likely elasticity factor of 0.35, so if the service frequency is halved, demand would change by  $(0.5 \times 0.35 = .175 = 17.5\%)$ .

6.41 To put a ferry mode share of 13% in context, that is higher than all other areas of Auckland served by ferry except for Waiheke Island (average 18%), Bayswater (15%) and Devonport (21%), none of which are like Beachlands.

#### Hobsonville Point

- 6.42 The ITA uses Hobsonville Point as a case study for ferry patronage rather than the existing Pine Harbour patronage.
- 6.43 The applicant considers the current Pine Harbour ferry mode share to be an inappropriate guide to ferry use from development enabled by PC88. It considers the existing Beachlands environment has lower density development close to the ferry, a poorer environment for cycling and lower-frequency bus service than it expects for PC88 development.
- 6.44 Data on Hobsonville Point population and ferry patronage over four years is provided, where ferry mode share increased from 0.4% to 1.3%. The ITA suggests the Hobsonville Point data shows that ferry patronage increased faster than population, in particular that a doubling of the population resulted in the ferry mode share tripling. The ITA suggests that the same pattern would occur at Beachlands South.
- 6.45 Features of Hobsonville Point that are not present or proposed at Beachlands have contributed to the significant growth in ferry patronage there. These include:
- a) the location of development over time in relation to the ferry berth location (development started at the far end of the area and progressed towards the ferry wharf);
  - b) the introduction of additional ferry sailings during the weekday;
  - c) changes to bus timetables so the bus connects with (and waits for) the ferry instead of arriving just after the ferry departed;
  - d) the introduction of integrated ticketing (HOP card) for use on both bus and ferries;
  - e) the addition of evening and weekend sailings, funded by a developer; and
  - f) the introduction of hospitality, office, and market activities at the ferry wharf that attract significant ferry patronage.
- 6.46 The additional information provides additional reasons why characteristics of Hobsonville Point might be present in the plan change area, but many other aspects would not be present.
- 6.47 Hobsonville Point is more conveniently located to several employment areas than Beachlands. Those areas include New Zealand Defence Force Base Auckland at Whenuapai, and the Henderson, North Harbour, Rosedale, and Albany areas.
- 6.48 The 2018 Census Journey to Work data for Hobsonville Point and Beachlands-Maraetai are reasonably similar. Both areas have 10% of residents working from home. The ferry mode share for employment trips is 8% at Hobsonville Point and 5 to 7% across the three census areas that make up Beachlands-Maraetai with an average of 6%. When education trips are included the ferry mode share is 6% at Hobsonville Point and 5-6% (average 6%) at Beachlands.
- 6.49 The Pine Harbour ferry runs at 20-minute intervals in peak periods with a journey time of 35 minutes. The Hobsonville ferry runs at 40-minute intervals with a journey time of 30 minutes.
- 6.50 The higher ferry mode share for Hobsonville Point is in my view likely to be a result of two inter-related factors:
- a) The CBD and fringe attract 24% of Hobsonville Point employment trips compared with 10% for Beachlands-Maraetai;
  - b) The Hobsonville Point ferry service is more attractive as it is contained within the inner harbour so less sensitive to adverse weather.

- 6.51 In my view, the Hobsonville Point case study does not supply sufficient information to support the hypothesis that significant increases in population alone cause significant increases in the proportion of the population using a ferry service using peak periods as correlation is not sufficient evidence of causation.
- 6.52 In any case, when the overall ferry mode share at Hobsonville Point is considered it is closer to the existing ferry mode share for Beachlands-Maraetai than the mode share adopted for the ITA.

#### Questionnaire Survey

- 6.53 Additional information to support the ferry mode share assumptions was requested, and the applicant team elected to undertake a questionnaire survey of 189 Pine Harbour ferry passengers over two days.
- 6.54 Of those questioned most travelled to the ferry berth by car with 73% driving, 6% dropped-off, and 1% ride-sharing, a total of 80%. The other transport modes were 16% walk, 2% (four people) cycle, and 2% (4 people) travelled by bus.
- 6.55 Of the 73% who drove a car, 43% suggested they may use a bus to the ferry if one was provided, although it appears no bus route was suggested, so if a new bus service did not pass close to their house or the service had a long travel time, that level of change is unlikely to be realised.

#### Other Factors

- 6.56 The August additional information states that several features would contribute to increased use of the ferry, bus and active modes:
- a) population growth;
  - b) larger vessels providing additional capacity;
  - c) new active mode infrastructure;
  - d) more diverse land-use including a new school, more retail, hospitality, and employment;
  - e) better travel options beyond Botany once the Eastern Busway and Airport to Botany projects are completed;
  - f) denser housing near the ferry wharf improving accessibility.
  - g) traffic congestion reducing attractiveness of private vehicle use;
- 6.57 In my view the Hobsonville Point data, or any other data, does not provide evidence for the ITA assertion that public transport would become more popular solely due to an increase in population.
- 6.58 Larger vessels are a response to increased demand and would not normally produce more demand in and of themselves. The information provided includes statistics on the number of ferry passengers left behind based on interpretation of HOP card data; however it is not evident if those passengers were left behind because the ferry was full, or if they arrived at the berth after the ferry had left. In my view, larger vessels are not a reliable factor for increasing demand.
- 6.59 New active mode infrastructure could potentially make the ferry more attractive if there was a lack of access from residential areas within active mode range. Given the current availability of connections I do not expect a lack of active mode connections is a significant factor in attractiveness of using the ferry, particularly as park-and-ride use is already included in the ferry use statistics.
- 6.60 A more diverse range of activities would be a key factor in the level of trip internalisation and could potentially result in a small increase in trips made into Beachlands by all modes in the



morning, and leaving in the afternoon, but this is unlikely to make any significant difference to demand for peak-direction travel.

- 6.61 Better bus travel options from Botany may increase the attractiveness of the bus service, but as the service essentially provides accessibility for those unable to drive rather than presenting a more attractive option than driving, I expect any impact of this change would be negligible in the context of travel to and from Beachlands.
- 6.62 Better bus travel options from the local area to the ferry are recommended by the applicant but said to be the responsibility of AT. While additional bus services through the area and linking with the ferry could improve ferry patronage to a small extent, I consider it unreasonable to rely on such a service being provided by AT.
- 6.63 The land closest to the ferry wharf is zoned R-THAB and relatively dense housing is already provided near the Pine Harbour ferry. The provision of similar housing a similar distance from the ferry is unlikely to make the ferry more attractive. The proposed development of PC88 would have a few houses within the walkable catchment of the ferry, and most would be located well outside the catchment, just like the existing Beachlands settlement.
- 6.64 Increasing travel times by road as a result of increased congestion is likely to make travel by ferry more attractive in the long-term; however given the difference in travel time by car and public transport between Beachlands and most destinations Beachlands residents travel to, travel times would need to increase dramatically in order for the public transport journey to be quicker and more attractive. For that reason I consider the impact of this factor would be relatively minor.
- 6.65 I also consider that increased congestion and longer travel times by road are an adverse outcome, that could only partly be offset by the level of public transport proposed or expected for Beachlands.
- 6.66 Another potential factor is an increased number of off-peak sailings. The ITA provides a recommendation to provide some additional interpeak, evening, and weekend ferry sailings, but that recommendation is not reflected in the proposed precinct provisions. In my view an increase in ferry services would likely make the ferry a more attractive option overall, but any increase in peak-period travel would be relatively minor.
- 6.67 One factor not discussed in the application material is that the provision of a secondary school would be expected to result in a reduction in travel to Auckland via ferry. As noted above, somewhere in the order of 22% of existing ferry travel is for education, which I assume is predominantly for secondary and tertiary education. If secondary students represented say half of the education ferry trips, and 90% of them stayed in Beachlands once a secondary school is operating, the loss of secondary school ferry travel could represent an overall reduction in ferry use of around 10%, reducing the existing 6% mode share to 5.4%.

### Summary

- 6.68 The applicant has confirmed that "*it is not BSLP's responsibility to provide the ferry services*"<sup>30</sup>. The Draft Funding Plan includes a contribution towards some of the cost of providing an improvement in services.
- 6.69 Despite any increase in vessel sizes, the ferry service will have a similar journey time, and serve the same single destination, so in my view it would not be any more attractive than the current service.
- 6.70 The sort of changes required to achieve a doubling in ferry mode share are likely to include significantly faster vessels providing a much-reduced travel time, and services to additional destinations with high levels of employment, and reduced fares.
- 6.71 The potential impact of the proposed development on the demand for parking at the ferry park and ride carpark. The implications of parking demand possibly exceeding the supply of parking

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<sup>30</sup> July additional information, response to request T18.

is not assessed by the applicant who has stated “*BSLP are not intending to increase the size or capacity of the park and ride*”<sup>31</sup>.

- 6.72 In my view growth in ferry patronage in numerical terms would be largely self-limiting unless significant expansion of passenger facilities and car parking capacity were provided. There is little scope for increasing parking capacity other than construction of a parking building at significant cost, and AT has no funding for such expansion. That is likely to provide downward pressure on the ferry mode share over time.
- 6.73 The ITA recommends that a shuttle bus service be provided to take passengers to and from the ferry, but no further details on who would fund the operation of this service, schedule or route are provided, and this recommendation is not reflected in the proposed precinct provisions. It is not clear to what extent assumptions around the provision of such a service have influenced the numerical transport analysis.
- 6.74 At present, 11% of residents travel to employment and education in the CBD and fringe areas such as Newmarket, and Eden Terrace, and ferry mode share is at 6%. While worsening road travel times may result in a modest increase in ferry mode-share, that data suggests that achieving a ferry mode-share in the order of 13% might require the proportion of all residents of the wider Beachlands-Maraetai area working in Central Auckland to double.
- 6.75 If the existing Beachlands population retained their current employment locations, that would suggest that around 40% of all new residents would need to be employed in the central city. I consider that to be highly unlikely.
- 6.76 To summarise, the plan change transport assessment is predicated on the ferry service being twice as attractive to residents in the area as the current ferry service is. In my view that assumption is excessively optimistic and is not adequately supported by the available data.
- 6.77 A sensitivity assessment using the current ferry mode share was requested but was not provided as the requestor considered it to be unwarranted and unrealistic as it would require increases in road capacity.
- 6.78 For the above reasons I conclude:
- a) doubling a population would not cause a significant increase in ferry mode share;
  - b) Hobsonville Point is not a better indicator of future Pine Harbour ferry use than the existing Pine Harbour ferry behaviour.
  - c) the most appropriate ferry mode share for PC88 is close to the existing mode share of 6% and the ITA analysis is too optimistic.
- 6.79 If PC88 is approved as proposed, in my view, there is a significant risk that larger ferry vessels may be provided at significant cost, they would be under-utilised, resulting in a poor financial return on AT’s investment of public funds. Instead, the poor conditions on roads connecting to Beachlands (primarily Whitford-Maraetai Road) would be exacerbated. That in turn would require significant expenditure by Auckland Transport to address.

## **Trip Generation**

### Residential

#### *Number of dwellings*

- 6.80 The estimates of residential development yield assume a secondary school will be constructed, and a nine-hole golf course would be retained in the long term, despite the proposed zoning enabling residential development of that land. If such development did occur the trip generation from residential development would be higher than assumed

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<sup>31</sup> Ibid, request T20.



### *Residential trip generation rate*

- 6.81 The ITA residential trip generation estimate is based on data from surveys of medium and high-density residential development in Australian cities including sites in metropolitan sub-regional centres, which is not appropriate for this location.
- 6.82 The July additional information accepts that “*High-density accommodation has historically not been provided in areas outside of metropolitan areas and therefore there is no data.*”<sup>32</sup> That document also posits that Beachlands South “*will become comparable to [a metropolitan sub-regional centre] in that it will operate as a largely self-contained system, with an ability to provide its own retail, services, employment, recreation, education, etc. Further, like a sub-regional centre, it will have good accessibility to public transport (predominately via ferry services, supported by buses)*”.
- 6.83 In the Auckland context, metropolitan sub-regional centres include Manukau, Henderson, Takapuna, and Albany. Those centres are served by rapid and/ or frequent public transport. I would classify those centres as having “good access” and “good public transport”. For the reasons set out earlier, I do not agree that Beachlands or Beachlands South have good access or good public transport or would become like those centres with respect to transport.
- 6.84 The July information goes on to state:
- The use of the 2013 RMS data is likely to result in an over-estimate of peak vehicle trips, as the patterns of travel in the sites surveyed are largely ‘unconstrained’ in terms of vehicle travel, notwithstanding the availability of public transport services. This differs from Beachlands, which currently is, and will continue to be, within a constrained system where peak hour travel by car is highly disincentivised by the limited capacity of Whitford-Maraetai Road.*
- 6.85 I do not accept that point, as private car travel in metropolitan centres is far from unconstrained, as these locations typically have significant traffic congestion during peak periods in addition to poorer access to parking on residential properties. The primary reason for high-density metropolitan dwellings having lower vehicle trip rates is the easy access to excellent public transport with short journey times to a high number of locations, together with a wide range and high number of services and jobs within walking distance. Neither of those factors would be present at scale at Beachlands.
- 6.86 Another point made in the July information in defence of the low trip generation rates used is (emphasis added):
- Further in regard to these points is the fact that this development will be one that will be progressively realised over the next 20-30 years or more. While **it is impossible to know** how peak hour car travel trip rates will continue to evolve into the future, **what is known** is that due to a myriad of factors, (changing work patterns with more WFH, more flexible work hours, rising fuel prices, growing disincentivisation of personal travel due to climate/carbon effects, reduced parking availability at destinations, etc etc), **it is inevitable** that peak hour car-based trip rates will continue to reduce.*
- 6.87 I do not consider those factors are “known” or that it is “inevitable” that trip rates will reduce. While it is probable that peak-hour private-vehicle based travel will reduce in future, a primary reason for that is the increasing societal and environmental cost of travel.
- 6.88 By locating significant population growth a significant travel distance from urban Auckland, PC88 is increasing the demand for travel (as measured in vehicle kilometres travelled (VKT), for all modes including private-car travel. Locations closer to the existing urban area, particularly those located in areas with “good access” and “good public transport” would have significantly lower travel demand, and fewer adverse effects.
- 6.89 Both the rate and amount of future change in private vehicle travel is unknown, and as stated “is impossible to know”. For that reason, a prudent robust analysis would provide a sensitivity analysis that reflects low rates of change. The applicant has declined to provide such analysis.

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<sup>32</sup> Pg 16, July additional transport information

6.90 For those reasons I consider the residential trip generation estimates to be too low.

#### Industrial

6.91 The trip generation rates assumed for industrial activities are lower than comparable industrial areas.

6.92 Comparing the scale of industrial development assumed, the trip rate, and the traffic volume calculated in the ITA, the actual trip rate used in the analysis is 10% lower than that stated in the report.

#### Overall

6.93 The information provided states that by 2038 the development would generate 2,458 vehicle movements in the a.m. peak hour and 2,725 in the p.m. peak hour.

6.94 The analysis considers a mid-point of 2031 with development assumed to occur linearly, i.e. by halfway through the expected development period in 2031 half of the assumed development would be complete. The peak-hour trip generation forecast for 2031 is 38% of that forecast for 2038, suggesting that nearly two-thirds of the development is assumed to be realised in the second half of the development period.

6.95 Overall, the trip generation estimates are likely to be too low, and they are likely to be too heavily weighted towards the second half of the development period.

6.96 The potential variation in the scale of development is moot to some degree due to the proposed precinct provisions linking the availability of transport improvements to a scale of development rather than a particular time period.

#### **Trip Distribution**

6.97 There are two aspects of trip distribution relevant to this assessment

- a) internalisation - the proportion of travel that remains within Beachlands;
- b) the distribution of traffic that does travel outside Beachlands;

#### Internalisation

6.98 For the 2038 scenario when all live-zoned land is assumed to be developed, the assessment assumes the following proportions of peak-hour vehicle trips would be internalised, so remain within the local area and would not use Whitford-Maraetai Road.

*Table 5: Proportion of 2038 peak-hour vehicle trips remaining within local area*

| <b>Activity</b>      | <b>Internal Proportion</b> |
|----------------------|----------------------------|
| Residential          | 50%                        |
| Retirement           | 60%                        |
| Education            | 73%                        |
| Commercial           | 60%                        |
| Industrial           | 45%                        |
| Retail – supermarket | 95%                        |
| Retail – other       | 90%                        |

6.99 I consider it likely that as the population of a settlement increases that economic drivers would mean a wider range of services are likely to be located within the settlement, making the settlement more self-sufficient. I also expect that larger settlements with more services and employment would tend to attract more traffic from other locations which would reduce the internalisation to some degree.

6.100 I am not aware of any data that could be used to ascertain appropriate values for internalisation or self-sufficiency of a settlement. When there is a lack of data it is best practice to adopt conservative estimates or to undertake sensitivity analysis. Neither has been provided.

### *Retail and commercial activities*

- 6.101 I consider the internalisation proportions for retail and commercial could be towards the upper end of the probable range, so potentially slightly optimistic, as the increased scale of retail offerings in the new development could make it a more attractive shopping destination for residents of other areas such as Maraetai and Whitford.

### *Education*

- 6.102 The proportion assumed for education is likely to be reasonable if a secondary school is provided but would be too high until one is provided.
- 6.103 The provision of a secondary school capable of internalising the majority of secondary school travel would usually be provided by the Ministry of Education. There is significant demand for new schools across Auckland due to population growth, and the opening of schools often lags behind growth in demand. As a result the provision of a secondary school may not occur in the short to medium term.
- 6.104 The education trip generation for the assumed school is 829 v/h in the a.m. peak, of which 605 v/h are assumed to remain within Beachlands. If all of that traffic were assigned to the south via Whitford-Maraetai Road instead, that would increase the assumed development volume on that road by 76%. In practice I expect some external school travel would use school buses and the ferry, but the absence of a secondary school would still have a dramatic impact on the volume of traffic using Whitford-Maraetai Road.

### *Residential*

- 6.105 The assessment assumes that 50% of all peak-hour trips made to and from the dwellings would remain within the Beachlands area and would not use Whitford-Maraetai Road.
- 6.106 The 2018 Census showed that 26% of employment trips made by local residents were made to local destinations, and that there was one job for every 2.9 dwellings. The proposed live zoning is estimated to produce 2,724 new dwellings. To maintain roughly the same level of employment self-sufficiency the live zoning would need to enable around 940 new jobs.
- 6.107 The economic assessment provided with the lodged material notes that in total (including the Future Urban Zone area) *“the Structure Plan is estimated to provide upwards of 960 local employment opportunities”*, and *“At capacity, the development has the potential to increase the local employment base to over 6,000 workers who in absence of jobs being made available locally, would increase daily commute levels of Beachlands.”*
- 6.108 From the economics assessment it appears development enabled by the proposed zoning would maintain the existing level of employment self-sufficiency of Beachlands, so I would expect the proportion of residents leaving the area for employment would remain around the existing level of 74%.
- 6.109 As trips generated by dwellings during the a.m. peak hour are most likely to be for employment and education activities, the ITA assumption that only 50% of trips would leave the area is an overly optimistic assumption in my view.
- 6.110 If the residential internalisation proportion was reduced from 50% to 30%, that alone would result in the volume of traffic assigned to the south on Whitford-Maraetai Road increasing from 1012 to 1261 v/h in the a.m. peak, an increase of 25%.

### *Industrial*

- 6.111 The industrial peak-hour trips are most likely to be employees, and the assessment assumes that 45% of all peak-hour trips are local (within Beachlands). Based on the 2018 Census information, and allowing for PC88 enabling more local employment, I consider the assumption to be too optimistic.

## Summary

6.112 The assumptions around how much of the traffic would be contained within the local area are too optimistic and in addition are dependant on a secondary school being provided. No sensitivity analysis without a secondary school or with other more conservative internalisation rates is provided.

### External Distribution

6.113 The ITA sets out the assumptions for where travel outside Beachlands would occur in Table 19, with between 13% and 35% of traffic travelling to and from the north, i.e. Maraetai. The remaining 40% to 87% of traffic is assigned to the south, i.e. Whitford.

6.114 The ITA states these proportions were determined from “*the averaged survey data for Beachlands Road / Whitford - Maraetai Road intersection and Jack Lachlan Drive / Whitford-Maraetai Road intersection*”<sup>33</sup>.

6.115 In my view, simply averaging the turning volumes at those two intersections is not a robust methodology for determining the distribution of traffic as it does not allow for traffic travelling between Beachlands Road (or Kouka Road) and Jack Lachlan Drive.

6.116 An alternative methodology is to consider the Census 2018 journey information, for which some summaries are published. That data is summarised below with Beachlands represented by the Sunkist Bay and Te Puru census areas. The data excludes travel within and between the two areas and is only available for travel to work and education, which would be predominant in the a.m. peak period. Travel to the north is to the Maraetai and Kawakawa Bay-Orere census areas, and travel to the south is for all other areas.

Table 6: Census 2018 Travel Direction (All Modes)

| <u>Direction</u> | <u>To/ From North</u> | <u>To/ From South</u> |
|------------------|-----------------------|-----------------------|
| From Beachlands  | 9%                    | 91%                   |
| To Beachlands    | 84%                   | 16%                   |

6.117 This data is for all modes of travel, but it is assumed that the only mode of travel to and from the north would be private vehicle, so it should be comparable with the ITA assumptions, albeit only for the a.m. period.

6.118 The ITA assumptions and the Census data are similar for traffic leaving Beachlands in the morning (a 13/87 north/south split in the ITA, a 9/91 split in the census), but the ITA analysis is more optimistic with respect to the effects on Whitford-Maraetai Road and other locations to the south. The differences are greater for traffic entering Beachlands in the morning (35/65 in the ITA, 84/16 in the census). Given the likely greater attraction of Beachlands if PC88 is developed, the ITA assumptions for the a.m. peak appear reasonable or a little conservative.

6.119 The ITA has slightly different north/ south splits for the p.m. peak, allowing for the peak flow to be reversed. This change results in more traffic travelling to and from the north, and less traffic to and from the south than expected based on the Census and a.m. peak data, so is again more optimistic with respect to impacts south of Beachlands.

### **Traffic Volumes**

6.120 After allowing for vehicles remaining within the area and vehicles travelling to and from Maraetai, the ITA assessment assigned the remaining trips to the south along Whitford-Maraetai Road and assessed the impact on several intersections through the use of computer models.

### Additional Volume on Whitford-Maraetai Road

6.121 No summary of the traffic volume added to Whitford-Maraetai Road is provided, but this can be derived by comparing volumes in the intersection modelling results that are provided, and the

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<sup>33</sup> Pg 66, ITA.

total trip generation values in ITA Table 18. At the Whitford-Maraetai / Trig Road (east) intersection, for example, the through movements along Whitford-Maraetai Road stated in the model results are as set out in the following table.

*Table 7: Summary of modelled traffic volumes on Whitford-Maraetai Road west of Trig Rd (east)*

| Scenario         | a.m.      |           |       | p.m.      |           |       |
|------------------|-----------|-----------|-------|-----------|-----------|-------|
|                  | Westbound | Eastbound | Total | Westbound | Eastbound | Total |
| 2038 Base        | 1231      | 427       | 1658  | 544       | 1099      | 1643  |
| 2038 Development | 1659      | 723       | 2382  | 851       | 1454      | 2305  |
| Difference       | 428       | 296       | 724   | 307       | 355       | 662   |

Volumes are input volumes from the modelling results for Site 10 Whitford-Maraetai / Trig East (August 2022 Info)

- 6.122 The difference between the Stantec 2038 models is 724 v/h in the a.m. peak hour and 662 v/h in the p.m. peak hour. Those volumes are 29% of the total a.m. peak hour trip generation, and 24% of the total p.m. peak hour trip generation.
- 6.123 That summary demonstrates that only a small proportion of the new peak-hour trips generated by PC88 (which I consider to be too low) are assigned to Whitford-Maraetai Road. That reflects the overly optimistic ITA assumptions with both high levels of public-transport use and high-levels of internalisation and self-sufficiency.
- 6.124 I consider it more likely that the public transport mode-share would remain closer to current levels. In addition, while the development of the land as proposed would provide some employment and a secondary school is possible, the settlement is highly unlikely to become as self-sufficient as assumed.
- 6.125 If, for example, public transport accounted for 8% of all trips and the peak-hour trip internalisation was 33%, then 59% of all trips would be external on Whitford-Maraetai Road, most of which would travel past Trig Road.
- 6.126 This suggests that the proportion of traffic assumed to be added to Whitford-Maraetai Road is about half of what it could be, at best, as that rough estimate does not allow for the initial trip generation estimate or the adopted rate of traffic growth being too optimistic.
- 6.127 If the volume of traffic added to Whitford-Maraetai Road doubled, instead of the a.m. peak hour having traffic volumes increase from nearly 1,700 v/h to nearly 2,300 v/h, they could instead increase to nearly 2,900 v/h.
- 6.128 The ITA peak-hour estimate suggests the daily volume might be in the order of 15,500 v/d. That marginally exceeds the 15,000 v/d threshold for four-laning (two in each direction) at mid-block locations used in the Whitford-Maraetai SAR.
- 6.129 With more appropriate assumptions, the increase in peak hour volume would be around two-thirds of the existing volume, and the daily volume would likely be in the order of 20,000 v/d by 2038.
- 6.130 Without four-laning of Whitford-Maraetai Road the road and intersection capacity would be insufficient, and it is widely recognised that Whitford-Maraetai Road and its feeder routes already have capacity and safety deficiencies in peak periods.

### Road Safety

- 6.131 The Stantec analysis provided as Attachment 8 to the July additional information response notes that many of the crashes that occurred on the roads used to access Beachlands were the result of driver error such as driving under the influence of alcohol or drugs, evading enforcement, losing control when overtaking, or travelling too fast for the environment.
- 6.132 The July additional information references the Stantec analysis and then states (emphasis added):<sup>34</sup>

<sup>34</sup> July additional information, response to request T1

*In summary, the majority of crashes resulted in minor or no injuries and occurred as a result of human error and/or illegal driving. **These have no link to elements of road design, which suggests that additional safety improvements are not required.** The exception may be Whitford Road on Mangemangeroa Bridge which may require ongoing attention by Auckland Transport to address two fatal crashes during the study period. However, the future development that will be enabled by **the proposed Plan Change is not expected to exacerbate any road safety issues.***

6.133 I do not agree with those statements and they reflect a poor understanding of road safety. In my view it is wrong to say that none of the crashes had any link to the road design. Design elements such as broader curves and overtaking lanes provide a more consistent speed environment and reduce the incidence of crashes occurring as a result of poor judgement around appropriate speed and overtaking. Design elements such as wider shoulders, clear zones and barriers can significantly reduce the severity of injuries that occur when drivers do lose control. Road design can make a significant difference to both the number and severity of crashes, including those where driver error was a contributing factor.

6.134 It is also wrong to state development enabled by PC88 would not exacerbate any road safety issues. Road safety research both internationally and within New Zealand shows a strong correlation between increases in traffic volume and increases in crashes. An increase in the traffic volume using the road is almost certain to result in a proportional increase in the number of crashes occurring on the road unless mitigation measures are undertaken, and PC88 is likely to result in the volume increasing by two-thirds.

#### FUZ Land

6.135 The ITA provides some limited analysis of the potential development of the FUZ land assuming a similar level of development to the land proposed to be live-zoned. This analysis suffers from the same excessively optimistic assumptions as the analysis for the live-zoned land, but as it represents approximately twice as much external traffic as the live-zoned scenario it is a useful proxy for a less optimistic analysis of the live-zoned land.

6.136 The ITA recommends that several additional transport infrastructure projects would be required to accommodate additional development, including four-laning of Whitford-Maraetai Road.

#### Summary

6.137 To summarise, in my view the transport assessment is excessively optimistic due to:

- a) insufficient allowance for traffic growth from other sources;
- b) the assumed public transport mode-share for bus and ferry being too high;
- c) trip generation of PC88 development being too low;
- d) too much travel assumed to remain within Beachlands;
- e) not considering the impact of the proposal on mid-block locations along Whitford-Maraetai Road and feeder roads,
- f) insufficient assessment of the increase in crashes that would arise from the additional traffic;

#### **Proposed Movement Network**

6.138 Proposed Precinct Plan 5 Movement Network and associated provisions are intended to influence and control the spatial layout of the paths and roads that make up the transport network.

6.139 Neither the ITA or the proposed precinct provisions discuss the limited sight lines available along some of the existing road frontages, nor contain any provisions to avoid adverse effects



from direct property access in those areas. In my view, prohibitions on access similar to those in I403 are warranted.

## Transport Improvements

### Public Transport

- 6.140 The ITA notes “*To support the TOC approach, address the existing network issues ... and enable the development, significant upgrades to the existing PT (buses and ferries) network are required.*”
- 6.141 With respect to bus services, it notes “*In response to greater residential catchment, it is appropriate to assume that AT will increase the bus frequency during both peak and off-peak periods to/from Auckland City.*”
- 6.142 The applicant has stated “*BSLP will not be funding or contributing to the capital cost of providing new public transport.*”<sup>35</sup>
- 6.143 I accept that increasing the frequency of bus services is possible. I do not accept that this would significantly increase the bus mode-share.
- 6.144 AT has no funding allocated to the improvement of this service, and the demand for improvements to transport infrastructure and services exceeds AT’s ability to provide such improvements for growth areas that are already in place in a timely manner. I therefore do not accept that the provision of additional bus services would be likely.
- 6.145 With respect to ferries the ITA notes:
- “It is proposed to expand and improve on the existing ferry network to enable increased capacity, increased frequency, and improved customer Level of Service (LoS). A number of interventions are recommended to achieve this, including:*
- *Fleet improvement for Pine Harbour service.*
  - *Additional interpeak and evening sailings for Pine Harbour*
  - *An introduction of Pine Harbour weekend service*
- 6.146 The ITA provides a recommended investment plan and timings for introducing larger vessels to increase the capacity of the ferry service by providing larger vessels. The application material notes that may allow a contribution towards the cost of improvements to ferry services.
- 6.147 I understand that to mean that AT would need to fund some or all of the capital cost of new or improved berths, terminal facilities, vessels, and potentially parking, along with all of the operating costs. AT has limited funds and multiple demands for improvements across Auckland so the provision of these improvements may be delayed or not happen at all.
- 6.148 The ITA recommendations for ferry vessels and intersection projects are reflected in proposed precinct provisions that enable various levels of development as specific ferry vessel and road intersection projects are completed. The recommendations for additional off-peak sailings are not reflected in the provisions.

### Roading Projects

- 6.149 The ITA included the outcome of analysis for nine intersections, and the further information provided the outcome of analysis of another three intersections. The ITA recommends that four of the twelve intersections are upgraded over time for the live-zoned development and notes additional improvements would be required to support development of the FUZ land.
- 6.150 Two new intersections on Whitford-Maraetai Road to access development enabled by PC88, at #712 and #650 Whitford-Maraetai Road are proposed. These intersections are located on the inside of horizontal bends in Whitford-Maraetai Road which have the potential to constrain the sight distances required to provide for safe operation. The applicant is of the view this is a

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<sup>35</sup> July additional information, response to request T56.



matter for detailed design<sup>36</sup>. I disagree at this is a matter that is relevant to the ability of the environment to accommodate the proposed development.

6.151 A summary of the intersection analysis is presented as Level of Service (LOS) in the following table. The table presents the overall LOS for the entire intersection and the LOS for the worst movement is shown in brackets.

6.152 As noted above, the intersection modelling results are considered be excessively optimistic due to the assumptions used around traffic growth, trip generation and trip distribution.

*Table 8: Summary of ITA modelling results - Level of Service*

| Location  | Existing                    |              | Proposed Live-Zoned (2038) |  |              |          |
|---|-----------------------------|--------------|----------------------------|--|--------------|----------|
|   | Form                        | LOS          |                            | Changes  | LOS          |          |
|   |                             | Avg (worst)  |                            |  | Avg (worst)  |          |
|   |                             | a.m.         | p.m.                       |  | a.m.         | p.m.     |
| Whitford-Maraetai Rd                                | Two lanes                   | Not provided |                            |  | Not provided |          |
| Whitford-Maraetai Rd /<br>Beachlands Rd/ Kouka Rd   | Roundabout                  | B (E)        | A (B)                      |  | C<br>(F)     | B<br>(C) |
| Jack Lachlan Dr/<br>Kahawairahi Rd                  | Stop                        | A (A)        | A (A)                      |  | A<br>(C)     | A<br>(C) |
| Whitford-Maraetai Rd/<br>Jack Lachlan Dr            | Give Way                    | E (F)        | D (F)                      | Signals added  | C<br>(D)     | B<br>(D) |
| Whitford-Maraetai Rd/<br>Trig Rd (south)            | Give Way                    | A (F)        | A (F)                      | Signals added  | B<br>(E)     | B<br>(E) |
| Whitford Rd/ Whitford Park<br>Rd/ Whitford Wharf Rd | Roundabout                  | E (F)        | F (F)                      | Two-lane roundabout<br>three lanes on<br>southern approach | C<br>(F)     | C<br>(F) |
| Whitford Park Rd/<br>Sandstone Rd/ Saleyard Rd      | Roundabout                  | B (D)        | A (B)                      | Second lane on<br>southern approach                        | B<br>(C)     | B<br>(D) |
| Whitford Rd/ Somerville Rd/<br>Point View Dr        | Roundabout with<br>metering | C (D)        | B (B)                      |  | C<br>(F)     | C<br>(C) |
| Proposed 712 Access/<br>Whitford-Maraetai Rd        |                             |              |                            | Give-Way. Left-in,<br>left-out only                        | A<br>(B)     | A<br>(A) |
| Proposed 650 Access/<br>Whitford-Maraetai Rd        |                             |              |                            |  |              |          |
| Whitford-Maraetai Rd/<br>Henson Rd                  |                             | A (C)        | A (C)                      |  | A<br>(F)     | A<br>(F) |
| Whitford-Maraetai Rd/<br>Clifton Rd                 |                             | A (C)        | A (C)                      |  | A<br>(F)     | A<br>(F) |
| Whitford-Maraetai Rd/<br>Trig Rd (north)            |                             | A (C)        | A (C)                      |  | A<br>(F)     | A<br>(F) |

6.153 The transport infrastructure projects that are linked to development of the live-zoned land are listed in Table 2 of proposed precinct provisions. Subdivision or development not in accordance with the staging table is proposed to be a Discretionary activity.

Whitford-Maraetai Road / Jack Lachlan Drive

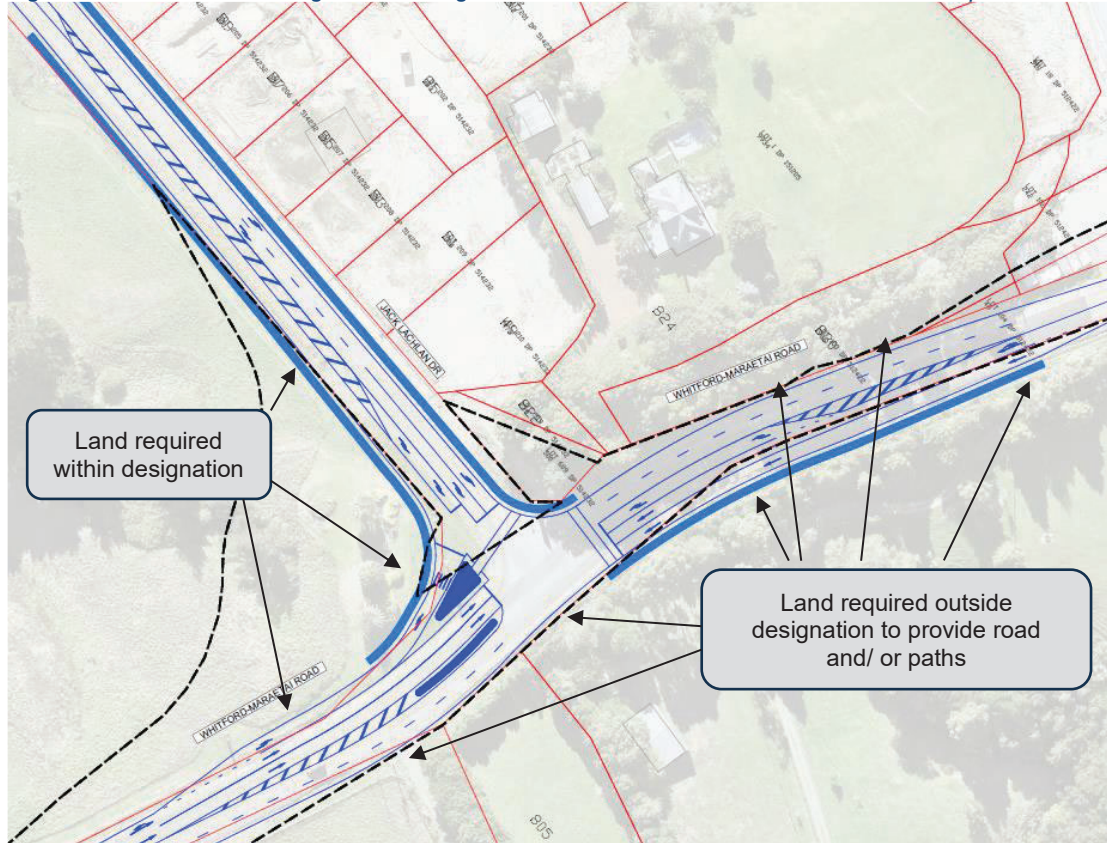
6.154 I understand the intent of the proposed precinct provisions is to require this intersection to be upgraded including the use of traffic signals to enable more than 250 dwellings or residential lots or any non-residential activity. A concept design to show how an upgrade could be realised is provided in the ITA.

6.155 The concept design shows that land outside the current road reserve (red lines) but within the road widening designation (dashed black lines) would be required to achieve the upgrade. The acquisition of that land would have to be undertaken by AT (as the requiring authority).

6.156 The design also shows land outside the AT designation would also be required to widen the eastern side of Whitford-Maraetai Road north of Jack Lachlan Drive.

<sup>36</sup> July additional information, response to request

Figure 2: Extract from ITA High Level Design for Whitford-Maraetai Rd/ Jack Lachlan Dr Improvements



6.157 The applicant has stated that “all transport, wastewater, water supply and stormwater requirements for the ‘live’ zoned land will be provided within land owned by BSLP. Therefore, BSLP has full control to deliver the necessary infrastructure to support future urban development on the live zoned land”<sup>37</sup>.

6.158 That statement was queried, and the October additional information response only discussed funding arrangements. It did not clarify if BSLP controlled all land required to implement the transport infrastructure projects identified in Standard I.7.3.

6.159 The design shows some paths next to the road, but not others. No paths are shown on the western side of Whitford-Maraetai Road, or on the eastern side south of the intersection. The provision of a path in either of those areas would require the acquisition of land outside the designation.

6.160 The application material does not explain how any of the land outside the designation could be acquired. If the land needs to be designated or compulsorily acquired AT would need to demonstrate that it is reasonably required. Those processes would involve additional time and cost for Auckland Transport, and the material is not clear if those costs have been accounted for in the draft funding plan.

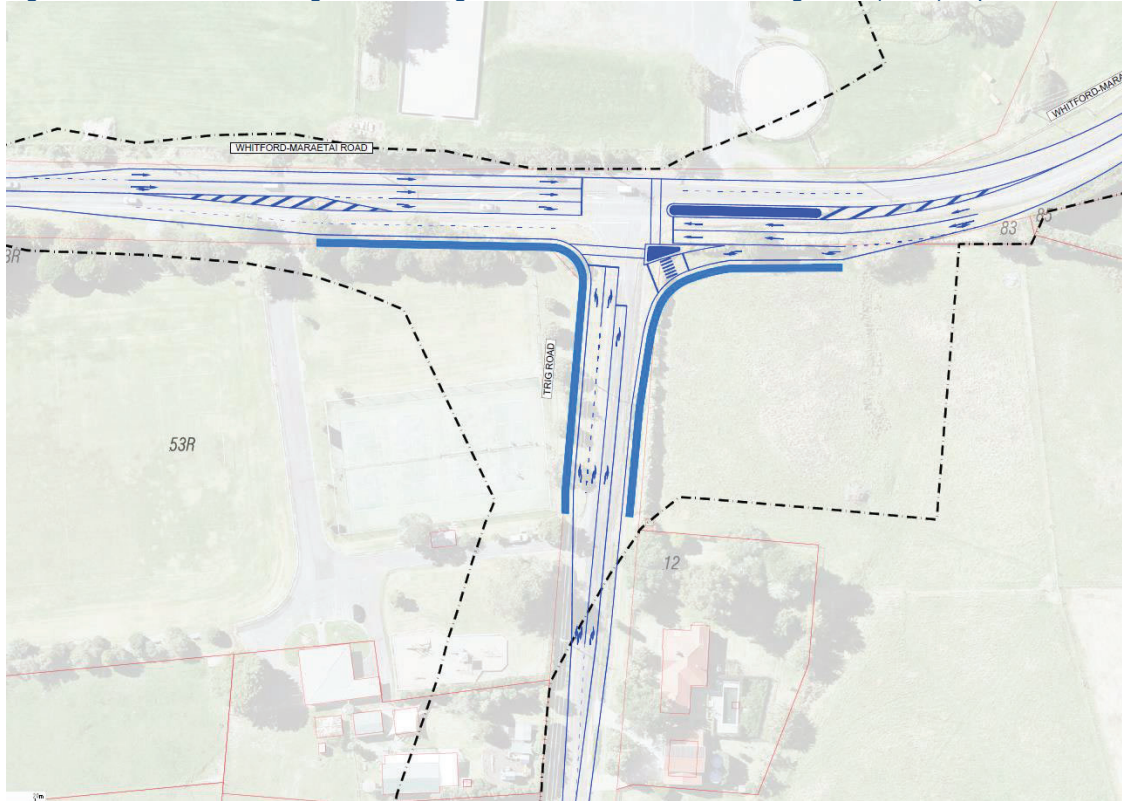
6.161 The model results for this intersection show it operating at LOS B or C (worst movements LOS D) during peak hours, which would be acceptable; however, as noted above the model results are considered to be overly optimistic.

#### Whitford-Maraetai Road / Trig Road (South/ West)

6.162 The concept design for this project shows the roads widened to provide additional lanes. The widening is accommodated within the AT designation (which provided for Trig Road to form part of the Whitford Bypass). No allowance is made for paths on the north side of Whitford-Maraetai Road.

<sup>37</sup> July 2022 Additional information, response to request P8, P15.

Figure 3: Extract from ITA High Level Design for Whitford-Maraetai Rd/ Trig Road (West) Improvements



Whitford-Maraetai Road / Whitford Road / Whitford Park Road

- 6.163 The recommended changes to this intersection within Whitford Village include converting the roundabout from a one-lane roundabout to a two-lane roundabout, and a concept drawing is provided.
- 6.164 There are several aspects of that concept design that are sub-standard with respect to industry standard design guidelines including insufficient deflection on the approaches and the proposed use of zebra pedestrian crossings on approaches with more than one lane.
- 6.165 The sub-standard deflection is a significant deficiency with respect to safety, and the design proposes to offset that by the introduction of speed tables across some of the approaches to slow traffic down. The presence of speed tables on the approaches is likely to significantly reduce the capacity of each approach below default values. The additional information states:<sup>38</sup>

*A 5% capacity adjustment was made to the approach capacities at the Whitford roundabout approaches. The tweaks were made to consider any capacity constraints introduced by pedestrians and/or by the road hump.*

*This methodology was recently used and peer reviewed in the recently approved Drury East private plan changes (PC 48, 49 and 50) which has been established as an acceptable method of replicating actual conditions*

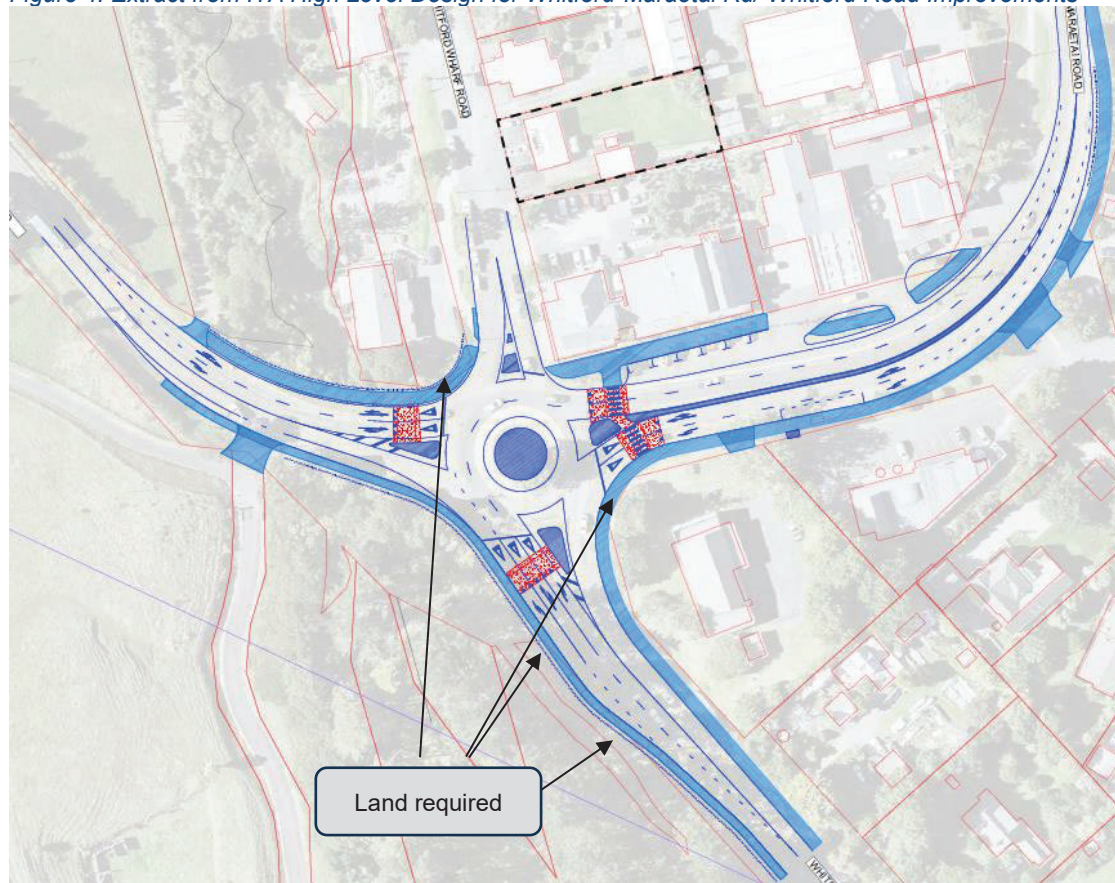
- 6.166 I was not involved in the Drury East plan changes but have spoken with Council's transport specialist for those plan changes, who said he did not undertake a review of the roundabout modelling as he considered roundabouts to be inappropriate, and the provisions now provide for traffic signals.
- 6.167 I am not aware of any data or research that could inform a suitable capacity adjustment. Subject to additional information being provided, I am not confident that a 5% adjustment appropriately accounts for the used of raised tables (with or without zebra crossings). As a result I have no confidence in the modelling results for this intersection.

<sup>38</sup> July additional information, response to request T44.



- 6.168 The proposed use of zebra crossings on Whitford-Maraetai Road at the roundabout is contrary to all guidelines and standards for pedestrian crossings as based on research in New Zealand zebra crossings are considered to be unsafe on roads with more than one lane in each direction.
- 6.169 The design shows that land outside the current road reserve would need to be acquired, and no detail is provided on how that is proposed to be achieved, or if the associated land acquisition costs are included in the draft funding plan.

Figure 4: Extract from ITA High Level Design for Whitford-Maraetai Rd/ Whitford Road Improvements



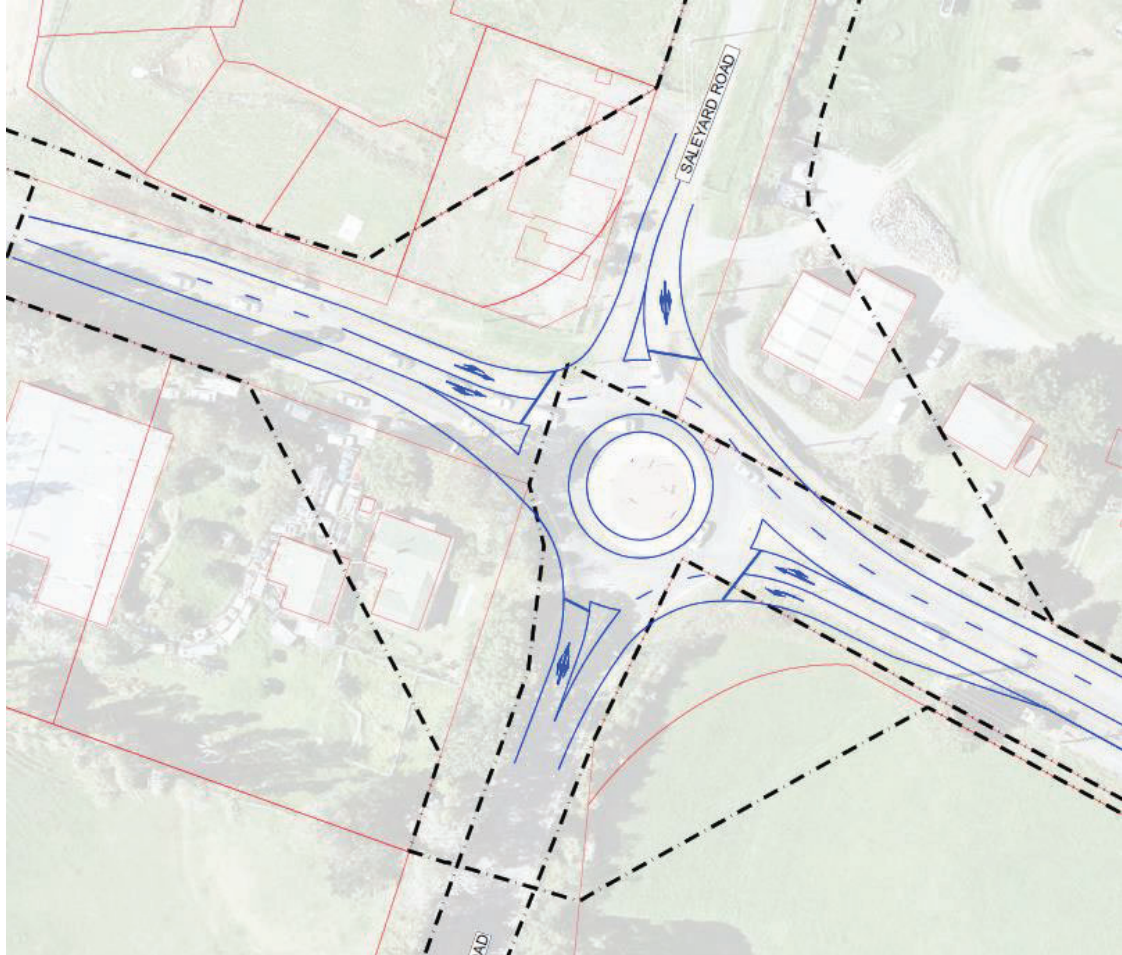
- 6.170 There are no road widening designations in place within Whitford Village as the MCC proposals included a bypass of the village to reduce the volume of traffic passing through it.
- 6.171 The roundabout design includes a number of features such as a loss of parking and a median island along Whitford-Maraetai Road that would prevent right turns in and out of properties. The effect of that change on those properties has not been addresses, nor have the adverse safety effects of that change including U-turns occurring on the bend.
- 6.172 The model results show this design operating at LOS C overall with some movements at LOS F, but as noted earlier these results are considered to be excessively optimistic. If more realistic assumptions were adopted the analysis would show significantly poorer operation.
- 6.173 The additional information notes that traffic signals were considered but *“discounted due to poorer performance and space requirements.”*<sup>39</sup>
- 6.174 I consider it is far from certain that an appropriate intersection design could be provided at this intersection. I do consider an alternative is possible – the Whitford Bypass project.

<sup>39</sup>July additional information, response to request T44

## Whitford Park Road/ Sandstone Road / Saleyard Road

- 6.175 The concept design for this intersection shows the addition of a short second lane on the southern Whitford Park Road approach, and this is projected to result in acceptable performance. As noted above, the modelling is considered to be overly optimistic and worse performance is expected. There is however some additional capacity available, and there is more than sufficient land available within the Whitford Bypass designation to provide for an intersection with higher capacity provided additional funding was available.

*Figure 5: Extract from ITA High Level Design for Whitford Park Rd/ Sandstone Road Improvements*



## Whitford-Maraetai Road

- 6.176 The ITA notes “Minor safety improvements, such as additional signage and markings, along Whitford-Maraetai should be considered in conjunction with the upgrade of the identified intersections”. This recommendation is not reflected in the precinct provisions or draft funding arrangements.
- 6.177 The ITA notes that development of the proposed FUZ land is likely to require four-laning of Whitford-Maraetai Road, completion of the Whitford Bypass, an additional lane added to the Beachlands Road roundabout, and a new signalled intersection at 620 Whitford-Maraetai Road.
- 6.178 The ITA anticipates that government funding would have been allocated for the four-laning of Whitford-Maraetai Road and the Whitford Bypass by 2051. No basis for that expectation is provided.
- 6.179 The additional information considers it is unlikely that Whitford-Maraetai Road would ever be widened as a result of climate policy. This is discussed below when considering the Climate Plan.

## 7 Review of Plan Change Provisions

- 7.1 As noted above, the assessment of transport effects is considered to be excessively optimistic. As a result, the solutions proposed to mitigate transport effects are not sufficient to mitigate transport effects.

### Road Upgrades

- 7.2 Some of the proposed road upgrades would require the acquisition of third-party party land, and/ or may not be geometrically feasible. Some changes may not be acceptable to Auckland Transport or the local community.
- 7.3 More conservative assumptions around traffic growth, trip generation and trip distribution would result in the proposed roading projects being required at lower levels of development (approximately half the level of development), and in additional roading projects being required.
- 7.4 The effects on the transport network would gradually worsen as development occurs. The ITA has forecast poor performance at two intersections on Whitford-Maraetai Road at Jack Lachlan Drive and Whitford Road at the beginning of the development period, and in my view it would be necessary to implement changes at these intersections on “day one” as proposed in the staging provisions.
- 7.5 The ITA has not adequately assessed the impact of the proposal on road safety. For mid-block locations, the number of crashes is proportional to the volume of traffic using the road. Increasing the volume of traffic on Whitford-Maraetai Road by one to two thirds is expected to result in a corresponding increase in crashes on that road unless significant realignment work is undertaken.
- 7.6 The ITA recommends that safety improvements to Whitford-Maraetai Road are likely to be required, but does not identify, detail, or quantify the changes that are likely to be required or identify a source of funding for this work. In my view minor upgrades such as increased signage are unlikely to offset the increase in crashes. Significant upgrades, such as those proposed by MCC, are likely to be required.
- 7.7 The ITA has identified a safety issue on Whitford Road and has suggested this be addressed by Auckland Transport but has not quantified the increased risk that would arise from development of PC88, nor demonstrated that a viable solution is available.
- 7.8 The list of upgrades suggested in the ITA as likely to be necessary to support development of the FUZ land are likely to be required to facilitate development of the land proposed to be live-zoned. These additional upgrades include:
- a) implementation of the Whitford Bypass, for safety, efficiency and other reasons;
  - b) four-laning and realignment of Whitford-Maraetai Road between Beachlands and Whitford, for safety and efficiency reasons;
  - c) upgrading the Sandstone Road roundabout to a two-lane roundabout for efficiency reasons, which would also be addressed by the Whitford Bypass;
  - d) additional lanes at the Beachlands Road/ Whitford-Maraetai Road roundabout for efficiency reasons;
  - e) Potential changes to the intersections at Henson Road, Clifton Road and Trig Road (north), primarily for safety reasons.
  - f) Safety improvements on Whitford Road near the Mangemangeroa Bridge.



## Public Transport Upgrades

- 7.9 In my view the ITA assumptions about the ferry mode share are overly optimistic, and based on information from AT, there may need to be significant upgrades to facilities at Pine Harbour to enable the larger vessels and increased patronage. Those upgrades are not included in the proposal.
- 7.10 As a result of both factors, I expect the larger vessels proposed would likely be under-utilised resulting in poor allocation of resources, and in my view the proposed increases in ferry vessel capacity could be halved.

## Access to Properties

- 7.11 The proposed provisions contain no controls on access to properties from arterial roads such as Whitford-Maraetai Road. Controls to prevent such access are included in some other precincts and are intended to preserve the safe and efficient operation of those roads.
- 7.12 District-wide provisions include E27.6.4.1 (3)(c) which makes any new activity or new access a Restricted Discretionary activity (E27.4 (A5)) allowing effects to be addressed.
- 7.13 I consider the district-wide provision to be adequate for the current form of Whitford-Maraetai Road, but that it may not be adequate if the road is realigned and widened.

## Framing of Provisions

### Activity Table

#### *Subdivision*

- 7.14 Activity table row (A25) provides that “*Subdivision for 1 or more residential units per site in a residential zone*” is a Controlled activity. That is significantly different from other provisions in the AUP where subdivision is a Restricted Discretionary or potentially Discretionary activity.
- 7.15 I do not support residential subdivision being a Controlled activity and am of the view that such activity should be a Restricted Discretionary activity so that proper assessment of transport effects can be made. As a result I recommend row (A25) be deleted and the provisions of chapter E38 Subdivision should apply.

#### *Staging and Transport Upgrades*

- 7.16 The provisions provide rule *1.7.3 Staging of Development with Transport Upgrades* making subdivision or development exceeding certain levels to only be enabled once specified transport infrastructure is available. Development or Subdivision that does not comply with that table is proposed to be a Discretionary activity.
- 7.17 Part 3 of standard 1.7.3 provides for subdivision or development beyond a stated scale to be a Discretionary activity, but this is not reflected in the Activity Table.
- 7.18 I have reviewed a small number of recent precincts with similar staging provisions as summarised in the following table.

*Table 9: Activity Status for proposals not complying with a Staging and Transport Infrastructure standard*

| Precinct             | Complying | Not Complying | E27.6.1 excluded                     |
|----------------------|-----------|---------------|--------------------------------------|
| I447 Waipupuke       |           | D / NC*       | No                                   |
| I448 Drury 2         |           | NC            | No                                   |
| I450 Drury Centre    |           | NC            | Only for listed activities           |
| I451 Drury East      |           | D / NC*       | Only for listed activities           |
| I452 Waihoehoe       |           | D / NC*       | Only for listed activities           |
| I553 Warkworth North | RD        | NC            | No, and E27.6.1(2)(b) not applicable |
| I554 Albany 10       |           | RD            | No                                   |



|                            |    |    |    |
|----------------------------|----|----|----|
| 1555 Warkworth McKinney Rd | RD | D  | No |
| 1616 Spedding Block        |    | NC | No |

\* Non-Complying for some rows of the table, Discretionary for other rows

- 7.19 The activity status varies from Restricted Discretionary to Non-Complying with the latter being the most prevalent. Some precincts have Non-Complying status in relation to some rows of the table and Discretionary for other rows. I expect the different statuses allow for some items of transport infrastructure that are more or less critical than other items. I consider this further below.

*Visitor Accommodation*

- 7.20 As noted above the application material expects visitor accommodation including a conference facility to be provided. Row (A30) of the Activity Table provides for Visitor Accommodation to be a Permitted Activity in Sub-Precinct C.
- 7.21 If the visitor accommodation and/ or conference components of those activities are large they have the potential to make a significant contribution to peak-period travel demand. The effects of such development have not been considered in the ITA.
- 7.22 The Auckland-wide standard E27.6.1 would capture any such activity generating more than 100 vehicles per hour, but that standard is proposed to be excluded from this precinct. I recommend that Standard E27.6.1 apply to the proposed precinct, but in the event it does not, I recommend that Visitor Accommodation and/ or conference activities for more than 100 people be Restricted Discretionary activities.

Standards – General

*Excluded Auckland-Wide Standards*

- 7.23 As noted above, the proposed precinct provisions exclude the Auckland-wide standard E27.6.1 Trip Generation. As a result PC88 would not require assessment for high trip generating activities as required across the rest of Auckland. The additional information states the reason for this exclusion is that Standard I.7.3 contains specific development thresholds which would apply instead<sup>40</sup>.
- 7.24 As noted in the table above, the only recent precincts I reviewed that contain an exclusion from E27.6.1 are the Drury East precincts (I450, I451 and I452), and in those cases only activities listed in the Activity Table are exempted.
- 7.25 I do not support that standard being excluded for all activities, but an exclusion limited to the activities listed in both the Activity Table and in Table 2 may be warranted.

*Potential New Standard*

- 7.26 The proposed provisions include Precinct Plan 5 Movement Network, and the application material implies development is proposed to be in accordance with that plan. The construction of non-residential buildings refers to the plan as a matter of discretion, and it is mentioned as an assessment criterion for subdivision. There is no rule or provision that requires any other activity to be in accordance with the plan. Ideally a new standard would require all subdivision and development to be in accordance with Precinct Plan 5, that standard would be referenced in the Activity Table, and additional matters of discretion and assessment criteria would be added.

Standard I.7.3 Staging of Development with Transport Upgrades

- 7.27 The standard has a purpose and three parts.

<sup>40</sup> July additional information, response to request T53.

### *Part 1*

- 7.28 Part 1 requires that Jack Lachlan Drive be upgraded to provide a two-way active mode facility along the full length of one side of the road before any light industrial activity in sub-precinct F or education facility in sub-precinct C is permitted to operate.
- 7.29 In my view, the reference to the sub-precincts should be removed so that the standard applies to any light industrial or educational facility anywhere in the precinct.
- 7.30 It may be appropriate to allow a lower activity status, for example Restricted Discretionary or Discretionary, to apply to this requirement with a more onerous status applying to Part 2.

### *Part 2*

- 7.31 Part 2 requires subdivision and development to not exceed the thresholds in Table 2.
- 7.32 I understand the intention of the table is that the transport infrastructure in the upper rows is also required to enable the development listed in lower rows, but the proposed wording does not realise that intention.
- 7.33 For example, a proposal for say 2,000m<sup>2</sup> GFA of retail activity in the Business – Local Centre zone would be a Permitted Activity as long as 900 passengers could be transported by ferry on weekday mornings and the Trig Road (South) intersection upgrade had been completed. I understand the intention of the control is that the road upgrades in the rows above should also be in place.
- 7.34 The thresholds also use the word “and” between each type of activity, which provides some ambiguity if say 4,000m<sup>2</sup> GFA of light industrial activity is already present, and a proposal seeks to increase residential activity from 500 to 600 dwellings.
- 7.35 Some activities envisaged in the application material are not represented in the table. This includes the envisaged hotel and conference centre activity, which could be a “Residential – Visitor Accommodation” activity (not measured in dwellings), which is provided for as a Permitted activity in Sub-Precinct C. Alternatively, a convention centre might potentially be a “Community – Place of Assembly” activity, which is also permitted in Sub-Precinct C. Both activities could generate a significant number of vehicle movements and would not be addressed by proposed standard I.7.3.
- 7.36 In the AUP nesting tables, the “Commercial” category includes offices, retail, commercial services, and entertainment activities. Table 2 has separate thresholds for Commercial and Retail.
- 7.37 It is not clear if retirement living, or any other activity providing multiple dwelling units on a single lot would be captured by Table 2 thresholds specifying a number of dwellings and/ or residential lots.
- 7.38 If Standard I.7.3 and Table 2 or similar controls are adopted, I would recommend the transport infrastructure for each row in Table 2 explicitly include the infrastructure items in rows above and use the word “or” between different types of activity.
- 7.39 As noted above, I would also recommend the scale of development in each row be halved to allow for the transport characteristics of the development to be less optimistic than assumed in the transport assessment.
- 7.40 I also recommend the table refer to “commercial other than retail” as the AUP definition of commercial includes retail activity.
- 7.41 As noted earlier, if PC88 is approved, I recommend that additional transport infrastructure projects be added to this standard, including the widening and realignment of Whitford-Maraetai Road and provision of Whitford Bypass.

7.42 The last row of the table enables a considerable increase in development; however, the only infrastructure required to enable the additional development is the provision of additional ferry capacity, which does not adequately address the traffic effects generated by the additional development. As there is no additional road infrastructure there is, in my view, no justification for the additional development, and I recommend the development enabled by the last increase in ferry capacity be removed.

### *Part 3*

7.43 Part 3 of the standard is intended to make provision of more than a certain level of development a Discretionary Activity. As notified the standard states:

- (3) The subdivision or development of land for more than 2,918 dwellings or residential allotments, 18,000m<sup>2</sup> light industrial GFA, 5,695m<sup>2</sup> retail GFA and 5,100m<sup>2</sup> commercial GFA precinct-wide is a discretionary activity.

7.44 In my view this provision is poorly worded and ambiguous, as the connection between each type of activity is either unclear, or the word “and” suggests that all values need to be breached in order for the standard to apply.

7.45 I recommend this standard is redrafted to separate out each type of activity, make exceeding each separate values a Discretionary Activity, and replace “and” with “or”. For example:

- (3) The subdivision or development of land for more than any of the following in the precinct is a discretionary activity:
  - a) 2,918 dwellings or residential allotments;
  - b) 18,000m<sup>2</sup> light industrial GFA;
  - c) 5,695m<sup>2</sup> retail GFA; or
  - d) 5,100m<sup>2</sup> commercial GFA.

7.46 As noted elsewhere, in the event PC88 is approved, I am of the view that the stated thresholds either need to be reduced, or the infrastructure required to provide that level of development is increased.

### Standard I.7.8. Fairway Reserve

7.47 The proposed provisions also include a rule with the purpose of providing an open space which includes an active mode connection between the Village Centre and the Pine Harbour Ferry. Development within Sub-Precinct A that does not comply with this standard is a Discretionary activity; however there is no similar activity status for subdivision, and subdivision would normally be required in order to provide a public open space area.

### Matters of Discretion and Assessment Criteria

7.48 A “*Design and sequencing of upgrades to the existing road network and ferry services*” matter is provided at I.9.1.(3)(d) for new non-residential buildings, and I.9.1(4)(a) for subdivision that complies with I.7.3.

7.49 There are no assessment criteria listed in I.9.2 (4) for new non-residential buildings that assist in assessing that matter. For subdivision, assessment criteria I.9.2(3)(a) for includes “*The extent to which any staging of subdivision will be required due to the co-ordination of the provision of infrastructure.*”

7.50 Several other criteria are also intended to apply to subdivision, as listed in I.9.2.(7) (d) to (h). These criteria allow consideration of how the proposed subdivision accords with Precinct Plan 5, and the how the design of some roads in some proposals accords with the details provided in I.12 Appendix 1.

- 7.51 Appendix 1 is relevant to Policy 15 and Assessment Criterion I.9.2 (7)(e). The only precinct-specific Matter of Discretion that might relate to the appendix is *“the design of upgrades to the existing road network”* for:
- a) new non-residential buildings in (3)(d); or
  - b) subdivision that complies with I.7.3;
- 7.52 Subdivision that does not comply with I.7.3 is proposed to be a Discretionary activity, with unlimited discretion. The majority of roads are provided as part of a subdivision, but there may be some larger developments that have private roads and do not involve subdivision. As notified, residential buildings in residential zones do not bring assessment criterion I.9.2 (7)(e) and Appendix 1 into play.
- 7.53 Auckland-wide Matter of Discretion E38.12.1(7)(e) would allow the design of roads to be considered, but only *“in so far as they contribute to enabling a liveable, walkable and connected neighbourhood”*.
- 7.54 In my view the provisions should be amended to ensure there is a clear matter of discretion that provides for consideration of the design of all roads in the precinct and allow for consideration of safety and efficiency in addition to the matters in E38. An additional criterion is recommended for I.9.2 (7).
- 7.55 Precinct Plan 5 Movement Plan (PP5) is referred to in Policies (12) and (14). Establishment of the Coastal Pathway shown indicatively on the plan is proposed as a Controlled activity, and vegetation removal is proposed as a Permitted activity to form shared paths shown on it. PP5 is included as a matter of discretion (I.9.1(3)(f) for new non-residential buildings, but not for subdivision or any other form of development.
- 7.56 I would have expected the Activity Table to make subdivision and all forms of development not in general accordance with PP5 to be a restricted discretionary activity with appropriate matters of discretion, or a full Discretionary activity to ensure that accordance with PP5 is able to be evaluated.

#### Special Information Requirement

- 7.57 Proposed Special Information Requirement 4 requires an ITA to be provided for an application to infringe Standard I.7.3 Staging of Development with Transport Upgrades. The ITA must include a register of development and subdivision that has *“been previously approved under Standard I.7.3 Staging of Development with Transport Upgrades”*.
- 7.58 In my view, the register must include all development in the precinct, including permitted activities, not just that previously approved under that standard. This is because the thresholds in Standard I.7.3 are for all development and subdivision, not just proposals that required consent for breaching the standard. This should include any other subdivision or development proposals that are currently being processed or about to be lodged so that the full cumulative effect can be considered by Council.

#### I.12 Appendix 1 Road Design

- 7.59 The appendix provides a table of road characteristics and an illustration of each type of road. As noted above this is only relevant to Policy 15 and Assessment Criterion I.9.2 (7)(e).
- 7.60 It is common for similar tables and illustrations to be provided within other precincts, but in my view they are not required as the Auckland Transport Design Manual provides a suitable Auckland-wide reference, albeit one that is subject to review and change.

## 8 Planning and Strategy Framework

- 8.1 As a plan change, I understand the primary documents for consideration are National or Government Policy Statements and the Regional Policy Statement. There are other documents that may also be relevant to consider.

### Government Policy Statement on Land Transport 2020

- 8.2 This policy is summarised and assessed in the ITA, and the four strategic priorities of the GPS-LT are assessed below.

#### Safety

- 8.3 The GPS safety priority is developing a transport system where nobody is killed or seriously injured.
- 8.4 The ITA does not assess this GPS priority. In my view PC88 would enable significant increases in travel on Whitford-Maraetai Road and other rural roads including Whitford Road. That travel would produce a corresponding increase in crashes. The ITA acknowledges there are safety concerns on these routes, but proposes no improvements to address safety, other than recommending AT provide some safety improvements.
- 8.5 As noted earlier, I consider that more significant improvements would be required to address the increased risk of crashes enabled by PC88.
- 8.6 PC88 is not consistent with this priority.

#### Better Travel Options

- 8.7 This priority is summarised as providing people with better transport options to access social and economic opportunities. The ITA describes the new opportunities expected to be provided in Beachlands, and the proposed additional ferry capacity. As noted earlier, the proposed employment opportunities are likely to retain the existing jobs to population ratio, at best. The ferry service still provides access to a single destination with a similar travel time.
- 8.8 In my view travel options are not significantly improved as a result of PC88 and would be more than offset by increased travel time by road. While new social and economic opportunities would be provided by additional development, the range of those opportunities would still be limited and require travel to other locations.
- 8.9 PC88 is not consistent with this priority.

#### Climate Change

- 8.10 The GPS seeks to develop low carbon transport systems that support reductions in carbon emissions while improving safety and inclusive access.
- 8.11 The PC88 provisions do not propose or enable any change in vehicle or ferry fuel sources beyond those already enabled, so any reductions in emissions would need to be a result of reduced travel and/ or reduced congestion.
- 8.12 I consider increasing the population of Beachlands would result in an increased demand for travel and would result in increased congestion.
- 8.13 Despite any incentive provided by additional congestion to increase ferry use and reduce carbon emissions, the additional travel and congestion would not result in improvements to safety or more inclusive access.
- 8.14 PC88 does not assist in meeting this priority.

### Improving Freight Connections

- 8.15 The GPS seeks to prioritise the improvement of freight connections for economic development. PC88 proposes no improvements to freight connections or movements, and increased travel times on Whitford-Maraetai Road and feeder routes would degrade freight connections.
- 8.16 PC88 is not consistent with this priority.

### Summary

- 8.17 In my view the proposal does not assist in achieving any of the GPS priorities and is contrary to them. As a result I consider PC88 is inconsistent with the GPS.

### **National Policy Statement on Urban Development 2021**

- 8.18 The NPS-UD is not assessed in the ITA but is assessed in the s32 analysis.
- 8.19 The NPS-UD sets out several objectives and policies and obliges Council to take several matters into account when deciding to zone land. Following direction from the Environment Court, I understand Council's current position is that Policies 3 and 4 should not be applied in the processing of private plan changes.

### Well-Functioning Urban Environments

*Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:*

- ...
- (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*

- 8.20 A small part of the PC88 area in the north is within the walkable catchment of the local ferry service, which is a low-frequency service with one destination, albeit it one with jobs and services and public transport links to the rest of the city. I consider that small part of the area to have moderate accessibility by public transport.
- 8.21 The plan change material envisages a range of jobs and services being developed in the area, and the proposed provisions enable that outcome, with varying levels of accessibility by active transport. There are also varying levels of accessibility by active transport to natural and open spaces.
- 8.22 Given the expected and enabled level of employment and services, there would still be a need for residents to travel outside Beachlands, which involves a relatively lengthy journey on rural roads which are acknowledged as having capacity and safety issues.
- 8.23 In my view the proposed urban environment would not have good accessibility, so PC88 is contrary to this policy.

### Infrastructure Readiness

*Policy 2: Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.*

- 8.24 NPS-UD Policy 2 requires Council to provide sufficient development capacity for housing and business land, and that development capacity must be "infrastructure ready".
- 8.25 Council must also be satisfied that additional infrastructure (not controlled by Council) to service the development capacity is likely to be available. With respect to transport this could include the provision of arterial road and public transport infrastructure by AT, state highway infrastructure by WK-NZTA, or rail infrastructure by KiwiRail.



- 8.26 The NPS-UD has infrastructure requirements for short term (3 years), medium term (3 to 10 years), and long term (10 to 30 years). The short and medium terms are within the 10-year planning horizon of the AUP and are more relevant to the zoning of land for development, with the long-term period being of greater relevance to FUZ land.
- 8.27 With respect to the short term, development capacity is infrastructure-ready if there is adequate existing development infrastructure. The existing transport infrastructure is not adequate to support development of PPC88 in the short term, primarily due to the capacity and safety deficiencies of Whitford-Maraetai Road.
- 8.28 For medium-term capacity, existing infrastructure must be adequate or funding for adequate infrastructure is to be identified in a long-term plan. In my view, existing infrastructure is not adequate to service the transport demands expected over the next ten years without PC88.
- 8.29 None of the infrastructure required to make it adequate to service development enabled by PC88 is funded in a long-term plan.
- 8.30 The plan change requestor has indicated that alternative funding sources may be available, but the draft funding plan provided does not include all of the transport infrastructure I consider is necessary to provide an adequate transport environment.
- 8.31 For those reasons I consider the proposed live-zoning does not meet the requirements of the NPS-UD.
- 8.32 With respect to the proposed FUZ land, the NPS-UD considers development capacity is infrastructure-ready in the long term if it is ready in the short-term or medium-term, or infrastructure is identified in the Council's infrastructure strategy. As in my view none of these apply, I do not consider the proposal to apply FUZ to land to be consistent with the NPS-UD.

#### Density

*Policy 5: Regional policy statements and district plans applying to tier 2 and 3 urban environments enable heights and density of urban form commensurate with the greater of:*

- (a) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or*
- (b) relative demand for housing and business use in that location.*

- 8.33 As noted above, the proposed provisions enable a range of commercial activities and community services to be provided locally. It is not practical for the proposed local centre and other proposed areas to provide the full range of commercial and community services, and that would be true for most areas. A key difference between the PC88 area and other development areas is the travel required to access facilities not provided locally.
- 8.34 Some parts of the plan change area would have good active mode access to local services, and some parts further away would have poorer active mode access. Public transport access to local services would be poor, but northern parts would have moderate public transport access to services in central Auckland via the ferry.
- 8.35 Overall, with reference to this policy I consider the level of density commensurate with the level of accessibility would be medium density in the areas close to the ferry and potentially the local centre, with lower density in other areas.

#### Parking

*Policy 11: In relation to car parking:*

- (a) the district plans of tier 1, 2, and 3 territorial authorities do not set minimum car parking rate requirements, other than for accessible car parks; and*
- (b) tier 1, 2, and 3 local authorities are strongly encouraged to manage effects associated with the supply and demand of car parking through comprehensive parking management plans.*

- 8.36 The proposed provisions do not provide a parking management plan, and do not address effects associated with the supply and demand of car parking, as they rely on the Auckland-

wide provisions for these matters. The proposed provisions, as modified, include a Travel Management Plan which includes measures intended to manage parking.

### **Regional Policy Statement**

8.37 Relevant objectives and policies that are relevant to transport are identified below.

#### B2 Urban Growth and Form

8.38 This section identifies a number of issues and states:

*Growth needs to be provided for in a way that does all of the following:*

- (1) enhances the quality of life for individuals and communities;*
- (2) supports integrated planning of land use, infrastructure and development;*
- ...*
- (5) enables provision and use of infrastructure in a way that is efficient, effective and timely;*
- (6) maintains and enhances the quality of the environment, both natural and built;*
- ...*

8.39 In my view the adverse effects of additional traffic on Whitford-Maraetai Road and other roads does not enhance quality of life, supported integrated planning, enable efficient or effective use of infrastructure, or maintain the quality of the environment.

8.40 These issues are reflected in a number of Objectives including:

#### *Objective B2.2.1 (1)*

*A quality compact urban form that enables all of the following:*

- ...*
- (c) better use of existing infrastructure and efficient provision of new infrastructure;*
- (d) improved and more effective public transport;*
- ...*
- (g) reduced adverse environmental effects.*

8.41 In my view PC88 does not enable better use of existing infrastructure, other than increased use of the existing ferry berth in the short to medium term. In the medium to long term it is likely new ferry infrastructure would be required.

8.42 In my view PC88 does not enable the efficient provision of new infrastructure as the infrastructure required (additional to that proposed) has very high cost and could delay the efficient provision of infrastructure in other areas.

8.43 I note AT and the Council have reviewed the provision of infrastructure to support growth at Beachlands as part of their investigations informing PC78 and determined it would be inefficient.

8.44 PC88 could provide some improvements to public transport, but in my view any contribution towards that public transport being more effective would be minimal.

8.45 In my view, PC88 would not provide a compact urban form that enables all of the transport items.

#### *Objective B2.2.1 (5)*

*The development of land within the Rural Urban Boundary, towns, and rural and coastal towns and villages is integrated with the provision of appropriate infrastructure.*

8.46 In my view PC88 does not provide appropriate infrastructure.

### B2.2.2 Policies

- (4) *Promote urban growth and intensification within the urban area 2016 (as identified in Appendix 1A), enable urban growth and intensification within the Rural Urban Boundary, towns, and rural and coastal towns and villages, and avoid urbanisation outside these areas.*
- (5) *Enable higher residential intensification:*
  - (a) *in and around centres;*
  - (b) *along identified corridors; and*
  - (c) *close to public transport, social facilities (including open space) and employment opportunities.*

8.47 PC88 proposes higher residential intensification in and around the proposed local centre, but most of those areas are not close to public transport, with the exception of a small area at the northern end which is within the walkable catchment of the local ferry service.

### B2.3 A Quality Built Environment

#### B2.3.2. Policies

- (1) *Manage the form and design of subdivision, use and development so that it does all of the following:*
  - ...
  - (b) *contributes to the safety of the site, street and neighbourhood;*
  - (c) *develops street networks and block patterns that provide good access and enable a range of travel options;*
  - (d) *achieves a high level of amenity and safety for pedestrians and cyclists;*
  - ...

8.48 I expect the form and design of development within the PC88 area would be consistent with this policy.

- (2) *Encourage subdivision, use and development to be designed to promote the health, safety and well-being of people and communities by all of the following:*
  - (a) *providing access for people of all ages and abilities;*
  - (b) *enabling walking, cycling and public transport and minimising vehicle movements;*
  - and
  - ...

8.49 PC88 would be consistent with this policy at the local level; however in my view it would not minimise vehicle movements overall. Development enabled by PC88 would enable significant increases in vehicle movements, particularly on Whitford-Maraetai Road and its feeder routes.

### B2.4. Residential Growth

#### B2.4.2 Policies – Residential Intensification

- (2) *Enable higher residential intensities in areas closest to centres, the public transport network, large social facilities, education facilities, tertiary education facilities, healthcare facilities and existing or proposed open space.*
- (3) *Provide for medium residential intensities in area that are within moderate walking distance to centres, public transport, social facilities and open space.*
- (4) *Provide for lower residential intensity in areas:*
  - (a) *that are not close to centres and public transport;*
  - (b) *that are subject to high environmental constraints;*
  - (c) *where there are natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage and special character; and*
  - (d) *where there is a suburban area with an existing neighbourhood character.*

- 8.50 PC88 proposes higher residential intensities in areas close to the proposed local centre. The higher intensity areas are not close the public transport network, with the exception of a small area within the walkable catchment of the ferry service.
- 8.51 With reference to this policy, most of the PC88 area would be suitable for medium or lower residential intensity, and PC88 is not consistent with this policy.

(6) *Ensure development is adequately serviced by existing infrastructure or is provided with infrastructure prior to or at the same time as residential intensification.*

- 8.52 In my view PC88 is not adequately serviced by existing infrastructure, and the proposed infrastructure is not adequate to service the proposed development.

### B2.5. Commercial and Industrial Growth

(4) *Enable new metropolitan, town and local centres following a structure planning process and plan change process in accordance with Appendix 1 Structure plan guidelines, having regard to all of the following:*

...

(e) *any significant adverse effects on existing and planned infrastructure;*

(f) *a safe and efficient transport system which is integrated with the centre; and*

...

- 8.53 In my view the proposed new local centre is not integrated with a safe and efficient transport system as insufficient upgrades to the road network are proposed.

### B2.6 Rural and coastal towns and villages

#### *B2.6.1 Objective (2)*

*Rural and coastal towns and villages have adequate infrastructure.*

- 8.54 As noted above, the roading infrastructure providing access to Beachlands is not adequate to service development enabled by PC88.

#### *B2.6.2. Policies*

(1) *Require the establishment of new or expansion of existing rural and coastal towns and villages to be undertaken in a manner that does all of the following:*

...

(b) *incorporates adequate provision for infrastructure;*

...

(g) *provides access to the town or village through a range of transport options including walking and cycling.*

- 8.55 The proposed expansion of Beachlands does not incorporate adequate provision for infrastructure. It provides a range of transport options within Beachlands, but not to it.

### B3.3 Transport

#### *Objective B3.3.1*

(1) *Effective, efficient and safe transport that:*

(a) *supports the movement of people, goods and services;*

(b) *integrates with and supports a quality compact urban form;*

(c) *enables growth;*

(d) *avoids, remedies or mitigates adverse effects on the quality of the environment and amenity values and the health and safety of people and communities; and*

(e) *facilitates transport choices, recognises different trip characteristics and enables accessibility and mobility for all sectors of the community.*

- 8.56 In my view PC88 does not avoid, remedy or mitigate adverse transport effects on the safety of people and communities.

### B3.3.2 Policies

(1) *Enable the effective, efficient and safe development, operation, maintenance and upgrading of all modes of an integrated transport system.*

...

- (4) *Ensure that transport infrastructure is designed, located and managed to:*
- (a) *integrate with adjacent land uses, taking into account their current and planned use, intensity, scale, character and amenity; and*
  - (b) *provide effective pedestrian and cycle connections. ...*

- 8.57 PC88 does not enable the effective, efficient and safe operation or upgrading of all modes as it does not provide for adequate operation or upgrading of Whitford-Maraetai Road and others.

- (5) *Improve the integration of land use and transport by:*
- (a) *ensuring transport infrastructure is planned, funded and staged to integrate with urban growth;*
  - (b) *encouraging land use development and patterns that reduce the rate of growth in demand for private vehicle trips, especially during peak periods;*
  - (c) *locating high trip-generating activities so that they can be efficiently served by key public transport services and routes and complement surrounding activities by supporting accessibility to a range of transport modes;*
  - (d) *requiring proposals for high trip-generating activities which are not located in centres or on corridors or at public transport nodes to avoid, remedy or mitigate adverse effects on the transport network;*
  - (e) *enabling the supply of parking and associated activities to reflect the demand while taking into account any adverse effects on the transport system; and*
  - (f) *requiring activities adjacent to transport infrastructure to avoid, remedy or mitigate effects which may compromise the efficient and safe operation of such infrastructure.*

- 8.58 PC88 does not make adequate provision for transport infrastructure to be staged with growth. It does not encourage land development patterns that reduce the rate of growth in demand for private vehicle trips in peak periods as it will increase the demand for such travel.

- 8.59 To summarise, in my view the proposal is not consistent with the RPS.

### Auckland Plan 2050

- 8.60 The RPS describes the Auckland Plan as:

*The Auckland Plan, being the spatial plan required to be prepared and adopted under sections 79 and 80 of the Local Government (Auckland Council) Act 2009 as a comprehensive and effective long-term (20- to 30-year) strategy for Auckland's growth and development, is a relevant statutory planning document for the preparation of the regional policy statement.*

- 8.61 The NPS-UD requires the Council to prepare a Future Development Strategy. The Auckland Plan states the Development Strategy included within it serves as that strategy. The Auckland Plan states, "*The Development Strategy describes how and where growth can occur over the next 30 years ...*". It is informed by the Future Urban Land Supply Strategy (FULSS).

- 8.62 As noted in the ITA, the Auckland Plan 2050 (AP) identifies six Outcomes, one of which is Transport and Access, which has three Directions and seven Focus Areas.

- 8.63 The AP notes:

*Our car-focused transport system is put under significant strain by:*

- *Auckland's continued population growth*
- *our challenging natural setting and urban form.*

*These factors cause harm to people and the environment.*

- 8.64 I understand a key part of our challenging natural setting is Auckland's location on an isthmus and peninsulas with limited routes for road access, something that is relevant to Beachlands.

Direction 1: Maximise safety, environmental protection and emissions reduction

- 8.65 The AP notes that in 2020, Auckland Transport adopted Vision Zero which follows the Safe System approach.
- 8.66 In my view development enabled by PC88 would result in a significant increase in crashes on Whitford-Maraetai Road and the other rural roads linking Whitford to the remainder of the city. The proposed infrastructure changes are insufficient to fully address that increased risk.
- 8.67 Emissions are discussed below.

Direction 2: Better connect people, places, goods and services

- 8.68 This direction includes the statement:

*To make [economic productivity and prosperity] possible, it is important that land use change enables people to easily access services and amenities close to where they live. This helps encourage shorter, cheaper and less emission-heavy journeys.*

- 8.69 The PC88 provisions would enable some services and amenities close to where they live, but development enabled by PC88 would also result in significant demand for travel to employment, services and amenities outside Beachlands. That travel would be relatively long on congested routes, working against this direction.

Direction 3: Increase genuine travel choices for a healthy, vibrant and equitable Auckland

- 8.70 This direction notes that a lack of travel choice is often a problem in rural areas as transport costs can be large.
- 8.71 It also notes a lack of choice means travel is often long and unreliable, making congestion unavoidable. The direction proposes developing the rapid transit network to address this.
- 8.72 In my view public transport would be an attractive travel mode to the small proportion of people living in the northern part of the plan change area wishing to travel to central Auckland. For the other people in that area, and those in other parts, the only practical choice is a relatively long journey on congested rural roads, contrary to this direction of the AP.

Focus area 1: Make better use of existing transport networks

- 8.73 This focus area discusses the expense of widening roads, and making the most efficient use of the roads we have by changing the demands we put on them. The focus area proposes encouraging greater use of public transport and active modes. While parts of the PC88 area would have good access to the ferry, the remainder of the area would have poorer access.
- 8.74 In my view, the most practical and effective means for ensuring Whitford-Maraetai Road and the other rural roads operate efficiently and cost-effectively without incurring the cost of widening them is to limit the travel demand placed on them by limiting the amount of development in Beachlands.

Focus area 2: Target new transport investment to the most significant challenges

- 8.75 This focus area discusses the importance of strategic planning to make the best use of transport funding. PC88 is not consistent with strategic growth planning and would likely result in transport investment being diverted away from significant challenges.



Focus area 4: Make walking, cycling and public transport preferred choices for many more Aucklanders

- 8.76 This focus area states, “*Reducing congestion and emissions will only be possible if more Aucklanders walk, cycle and use public transport*” and “*Rural areas may require a different approach due to their dispersed development patterns and long trip distances*”
- 8.77 In my view the combination of the proposed provisions and other parts of the AUP could achieve a local environment that is pleasant to walk and cycle in. As noted above, access to public transport is limited. The location of Beachlands means that development enabled by PC88 would significantly increase the demand for private car travel to destinations outside Beachlands.

Focus area 5: Better integrate land-use and transport

- 8.78 This focus area is also relevant to PC88, and it states (emphasis added):

*Transport infrastructure and services are important for enabling and supporting residential and commercial growth in new and existing urban areas. **The location of growth also affects how well the transport system performs.** Because transport and land use are so strongly connected, all decisions need to consider their impact on the other.*

*Inefficient land use patterns lead to longer travel times, increased car dependency and more transport emissions. To address these issues, we need to encourage housing and employment growth to occur in areas that allow the use of better travel options.*

*Encouraging **growth to be concentrated in areas with better travel choices** will result in more use of public transport, walking and cycling. This will ease some of the pressure growth places on our transport system and contribute to reducing transport emissions.*

*Integrating land use and transport is particularly important for rapid transit. The speed and reliability of rapid transit improves the accessibility of an area, making it more attractive for redevelopment.*

*Unlocking **growth around rapid transit corridors and stations is essential** to address Auckland’s housing and transport challenges. It will also maximise the benefits from the large investment required to build and operate rapid transit.*

- 8.79 With respect to this focus area, Beachlands is a poor location for growth as it has limited travel choices. Development enabled by PC88 would lead to longer travel times, increased car dependency and more transport emissions.

Focus area 6: Move to a safe transport network free from death and serious injury

- 8.80 This focus area discusses the goal of reducing death and injury caused by travel on the road network. Plans include upgrading rural roads to improve safety. Development of PC88 would result in a deterioration in road safety without significant upgrading of access routes.

Focus area 7: Develop a sustainable and resilient transport system

- 8.81 This focus area discusses the need to improve the resilience of or transport system in response to disruption, including disruption from accidents or incidents, weather events, or other changes.
- 8.82 Beachlands is vulnerable to disruption of the transport system as all access is via either ferry, or lengthy journeys on rural roads subject to closure or limitation due to the events listed above.
- 8.83 The AP suggests part of the solution is to decrease emissions by, among other things, reducing the distance people need to travel. While PC88 would enable the provision of local employment and services, it would still increase the demand for longer-distance journey by private vehicle.

- 8.84 Increased exposure of people to the poor resiliency of access to Beachlands could be avoided by limiting growth in this area.

#### Summary

- 8.85 In my view, PC88 is poorly aligned with the transport outcomes sought by the Auckland Plan.

### **Te Tāruke-ā-Tāwhiri      Auckland Climate Plan**

- 8.86 The climate plan is a document related to the Auckland Plan. The plan has eight priorities including Built Environment and Transport.

#### Built Environment

- 8.87 This priority is focused on the delivery of buildings and the design of local communities, and it also describes the approach to planning and growth which includes maintaining and upholding a quality compact urban form approach.

#### Transport

- 8.88 The plan seeks to reduce emissions from transport. It states (emphasis added):

*While there are many potential pathways to our goal, we need to make significant changes to:*

- *how and where we live*
- *how we conduct and power our personal travel*
- *how we transport our freight*
- *how much we travel*
- *how we grow as a region.*

- 8.89 It also states:

*The highest priority is reducing emissions generated by light passenger vehicles and commercial vehicles, given these generate about 80 per cent of on-road emissions.*

- 8.90 As noted above, development enabled by PC88 would increase the demand for relatively lengthy journeys by private vehicles on congested roads.

- 8.91 This priority has some Action Areas.

*Action area T1. Changing the way we all travel*

- *Encourage the use of public transport, walking and micro-mobility devices, rather than driving.*
- *Shorten private vehicle trips, and fulfil several travel needs at once including for business purposes.*
- *Choose lower emissions vehicles when purchasing, sharing, or leasing.*
- *Reduce private vehicle travel and encourage lower emissions travel options by introducing pricing and parking measures.*

- 8.92 While the PC88 material expects the use of public transport to increase significantly, in my view PC88 would not ensure that outcome. It would not reduce the length of private vehicle trips or reduce private vehicle travel.

### **Transport Emissions Reduction Pathway**

- 8.93 This document (TERP), endorsed by Auckland Transport and adopted by Auckland Council, is intended to give effect to the climate plan. It directs the activities of the Council and AT, describes eleven transformation areas, and provides an implementation pathway.

## Reduce Travel

- 8.94 The TERP seeks to reduce travel where possible and appropriate. One measure is “*restricting road expansion that induces light vehicle travel.*” This is based on the hypothesis that road expansion projects can stimulate additional travel, which could undermine the goal.
- 8.95 The additional information supplied in support of PC88 notes that widening of Whitford-Maraetai Road may never occur because of this goal.
- 8.96 In my view that hypothesis should not in and of itself prevent widening of the road, as not all widening projects induce significant additional travel, not all additional travel is undesirable, and widening projects can reduce congestion and emissions.
- 8.97 I note that AT requests that widening of Whitford-Maraetai Road be included as required infrastructure if PC88 is approved [344.27].
- 8.98 Appropriately locating growth is a more reliable and effective way of reducing travel than not widening a road. In other words, locating growth at Beachlands would have a far larger negative impact on this goal than widening the road.

## Build Up Not Out

- 8.99 One of the transformations in the area of reducing reliance on cars, is “*6 Build up not out*” which includes planning for an increase in sustainable modes, a reduction in light vehicle kilometres travelled (VKT), reducing the scale of urban expansion, and locating more intensive development in areas with good access to opportunities. The pathway includes upzoning around areas of high access.
- 8.100 The TERP states (emphasis added):

*Auckland needs most future growth to be accommodated through intensification in the existing urban area, particularly **locations with shorter average trip lengths and access to good quality transport options, rather than continued expansion into greenfield and rural areas.***

*People who live within the existing urban area close to good public and active transport tend to drive less and travel more via sustainable modes than those who live in greenfield developments in formerly rural areas.*

*The pathway requires:*

*Planning that supports an increase in access via sustainable modes and a **reduction in light vehicle VKT.** Helping Aucklanders drive less and make more sustainable transport choices must be central to our planning framework. This requires access via sustainable modes and **a reduction in car dependency to be clearly signalled in planning documents and prioritised in land use planning decisions – including revisions of strategic land use planning documents, consenting decisions, and consideration of potential plan changes.** Cities around the globe have recognised the essential role land use planning must play in reducing transport emissions and upholding their climate commitments. Achieving this requires action from both government and the council.*

*Reducing the scale of planned urban expansion. Current growth plans envisage significant urban expansion over the next three decades, and the NPS-UD requires councils to be ‘responsive’ to private plan changes. Both drive expectations of opportunities for future greenfield growth. **Research shows a strong correlation between transport emissions and the distance between a development and the city centre, even when accounting for differences in density and PT provision. Minimising future urban expansion is imperative to reducing transport emissions.***

*Growth in greenfields areas comes at a cost of growth within the existing urban area, where residents have easier access to more sustainable transport options and typically travel shorter distances. It means the lower density areas which could benefit from more community members and more PT ridership do not receive the intensification needed. However, where greenfield growth does occur, travel patterns of new communities must be shaped in a positive*

way by providing them with sustainable transport options right from the outset and designing streets that give priority access to walking, cycling and PT ahead of car access. This will involve costs, however, and it is important that the majority of the cost of sustainable growth in new urban areas is incorporated into the cost of development, rather than being reliant on funding from public sources.

More intensive development around places with good access to opportunities. Auckland is a rapidly growing city, and its population growth is projected to continue. To minimise transport emissions, **much more growth needs to occur near existing and emerging employment hubs** and in areas with good access to jobs, services and amenities, so that it is easier for people to access these opportunities via sustainable modes of transport. It is **also easier and more cost-effective to deliver sustainable transport options in higher density areas**.

More growth is also needed in locations which are best served by PT. While recent government driven changes have set a minimum level of density that councils must permit **around rapid transit stations**, council and the government must do more to support mixed-use urban renewal **around PT stations** in the near term. While quality development in an area can incentivise further development other cities are more explicitly incentivising development **within the walkable catchment** of their **rapid transit networks**, and some have set explicit targets for the proportion of new dwellings that should be located within these catchments.

- 8.101 Development enabled by PC88 would be consistent with some parts of the TERP, such as promoting walking and cycling from some parts of the area to those jobs and services that would be provided in the local area.
- 8.102 Vehicle kilometres travelled (VKT) is a travel metric that is not readily measurable, and I consider it to be a poor proxy for transport emissions. It takes no account of the type of vehicle being used, the number of people in the vehicle, or the fuel use (and hence emissions) per kilometre of travel which is sensitive to speed and changes in speed, so highly sensitive to congestion. It also does not account for any economic or other benefits associated with the travel.
- 8.103 Additional development requires additional travel, so additional VKT is a somewhat inevitable part of enabling people and communities to provide for their social, economic and cultural well-being, health and safety.
- 8.104
- 8.105 While VKT is a poor proxy for emissions, it does follow that additional VKT would result in additional emissions, so when deciding on
- 8.106 Development enabled by PC88 would not result in a reduction in VKT, would not reduce the scale of urban expansion, is not in an area with good access to opportunities, and not an area of high access.
- 8.107 Beachlands is a significant distance from the city centre. It is not near an existing or emerging employment hub. The ferry is not rapid transit.
- 8.108 In my view, PC88 is inconsistent with this transformation area and the TERP overall.

### **Draft Future Development Strategy**

- 8.109 As noted above, the Council is required to prepare a Future Development Strategy. The current version is contained within the Auckland Plan 2050, prepared in 2018.
- 8.110 At the time of writing, the Council had recently released a consultation Draft Auckland Future Development Strategy 2023-2053 (FDS). When finalised the FDS will replace the Auckland Plan 2050 Development Strategy and the Future Urban Land Supply Strategy. The Council expects to adopt the final FDS in late 2023.
- 8.111 The Draft FDS contains a section discussing the provision of infrastructure:

#### 2.3.4 Investing in infrastructure in a financially constrained environment

*As the population of Tāmaki Makaurau continues to grow, there is demand for new infrastructure alongside the on-going need to look after existing infrastructure networks and services. The Auckland Unitary Plan and more recent land use planning changes have enabled a greater level of intensification across the existing urban area which will increase the requirement for upgraded and new infrastructure. There is significant uncertainty in forecasting the location and timing of required infrastructure to support growth that will occur over the next thirty years.*

*Infrastructure is costly, and the council's capacity to provide infrastructure is not unlimited. Funding and financing of bulk infrastructure is complex, and it is essential to ensure developers pay an appropriate share of the infrastructure investment that they contribute to the need for and will benefit from. The challenge is therefore one of understanding what is required, what is affordable, who will pay and how to get the best value from the investments council decides to make.*

*Reducing emissions, adapting to natural hazards and increasing accessibility, all drive the need to reconsider where and how to invest in infrastructure. This means that previously planned and prioritised infrastructure may no longer be appropriate or provide the best value for money. As priorities change, trade-offs need to be made (and re-made) to ensure Aucklanders are getting the best value for money from infrastructure investment.*

8.112 The Draft FDS has five principles. Those most relevant to transport are summarised below.

##### Principle 1: Support greenhouse gas emission reduction

8.113 A compact urban form is seen as a critical requirement, as it reduces car dependency and vehicle kilometres travelled (VKT).

8.114 While development enabled by PC88 would be a relatively compact urban form when viewed at the local scale, when viewed at the sub-regional and regional scales it is clear it would increase VKT and emissions, both in isolation and in comparison with other growth locations. I consider PC88 to be contrary to this principle.

##### Principle 3: Make efficient and equitable infrastructure investments

8.115 Principle 3(a) is "Take a regional view to infrastructure investment and costs". The draft FDS says (emphasis added):

*Infrastructure to support growth will always require significant investment, which is difficult when finances are constrained.*

*At a regional scale infrastructure servicing urban intensification varies in cost depending on its location. Development in existing urban areas typically costs less when compared with development in future urban areas. Adding **additional growth at the fringes of our existing networks is the least cost-effective investment** in infrastructure to support growth. The best return on investment is closer to the centre.*

***We will prioritise growth and infrastructure investment closer to the city centre and sub-regional nodes** within the existing urban area, to assist the council's financial management and value for money for Aucklanders, while also addressing disparities in infrastructure and service provision.*

***We will take a regional and whole of society view of the costs and benefits when making long-term decisions, and we will take those costs and benefits into consideration when land use planning decisions are made.***

8.116 The proposed plan change would result in growth at the fringes of the existing transport network. I consider PC88 to be contrary to this principle.



Principle 5: Enable sufficient capacity for growth in the right place and at the right time

8.117 This principle includes (emphasis added):

*The council cannot fund all infrastructure needed to serve growth which is now enabled across much of Tāmaki Makaurau. The council must make choices about how it allocates limited funding across Tāmaki Makaurau. The council will proactively invest in a limited number of places at a time to achieve the greatest benefits, across multiple outcomes, and support development capacity in those areas to be realised. This means **investing primarily in existing urban areas**, with a strong focus on aligning land use and infrastructure. This is also a way to support projects which have city-shaping potential.*

8.118 In preparing the Draft FDS, the Council considered some scenarios, and derived some themes from evaluating them. One theme was:

*Land use and infrastructure integration, particularly transport, is fundamental to spatial outcomes*

*Scenarios that **focused growth within the existing urban area and specifically within the walkable catchments of the planned RTN/FTN<sup>41</sup>** performed better against transport criteria specifically but also environmental, social, cultural and economic criteria.*

*Compact urban forms perform better in terms of least monetary cost of infrastructure over time, as they result in more efficient use of existing services and new infrastructure. More expansive urban forms require the greatest amount of new infrastructure with the most significant costs.*

8.119 The Draft FDS contains a section (4.2.2) on future urban areas (FUAs) and discusses how “private plan changes severely undermine coordination.” It also provides updated timing for readiness of identified FUAs, including the removal of some areas previously identified in FULSS. As with FULSS, the Draft FDS does not identify any land near Beachlands as a FUA. The FDS identifies the existing Beachlands and Maraetai settlements as Rural Settlements within the rural area.

8.120 Reasons for the removal or re-timing of some previous FUAs are given in an appendix, and the reasons given for the removal or changes are useful to consider with regard to Beachlands.

8.121 Part of the Kumeū-Huapai-Riverhead FUA was removed for reasons including “Potential for higher VKT and CO<sub>2</sub> emissions than other FUAs due to Kumeū-Huapai-Riverhead FUA being relatively distant from high quality existing or planned public transport, a wide range of jobs, education and other services compared to other FUAs”. In my view those reasons also apply to Beachlands.

8.122 Other existing FUAs are proposed for further investigation due to the substantial infrastructure investment required to service future urban areas.

8.123 Warkworth is a larger more self-contained settlement, with a high standard of road access provided by the recently opened Ara Tūhono Puhoi to Warkworth Motorway, and planned improvements to bus services. Reasons for reconsidering parts of Warkworth include the following, with similar reasons provided for further investigation of Dairy Flat, Wainui East, Upper Orewa, Kumeū-Huapai, Riverhead, and Albany Village:

- a) Infrastructure: “There is no rapid transit network planned so this area would not contribute to VKT reduction. Distance from the existing urban area, lack of rapid transit and lower opportunities for mode shift mean strategic outcomes are unlikely to be achieved”.
- b) Emissions/ VKT reduction: “Potential for higher vehicle kilometres travelled (VKT) and CO<sub>2</sub> emissions than other FUAs due to Warkworth being relatively distant from high

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<sup>41</sup> RTN = Rapid Transit Network (rail and busway). FTN = Frequent Transit Network (typically high-frequency buses in bus lanes)



*quality existing or planned public transport, a wide range of jobs, education and other services compared to other FUAs”.*

- 8.124 Perhaps the most relevant aspect of the Draft FDS to PC88 is the consideration given for the retiming of the nearby Maraetai 2 future urban area to “no earlier than 2035+”<sup>42</sup>. Considerations include (emphasis added):

**“No bulk transport improvements are planned to support development at Maraetai 2 and as there is no rapid transit network planned, this area would not contribute to VKT reduction. Relative distance from the existing urban area, lack of rapid transit and lower opportunities for mode shift mean strategic outcomes are unlikely to be achieved...”**

**“There is potential for higher VKT and CO<sub>2</sub> emissions per household at 2048 in the rural and coastal FUAs than all the larger FUAs and existing urban areas, due to these settlements being relatively distant from high quality existing or planned public transport, a wide range of jobs, education and other services”.**

## 9 Submissions

- 9.1 This section summarises the transport matters raised in submissions. A significant number of submissions on PC88 were made, and many of the submissions had transport concerns.
- 9.2 In some cases transport concerns were expressed generally, and other submissions provided significant detail. I have addressed these matters topic by topic noting that several of the topics are inter-related and overlap. For example, submitters raised issues around the adequacy of the ferry service, and this is related to the transport assessment assumptions around ferry mode share, and the proposed improvements.
- 9.3 Some submissions suggested specific amendments to the PC88 provisions. These suggestions are addressed separately provision by provision.

### Active Mode Infrastructure

- 9.4 Some submissions [327.5, 359.3] expressed the view that active mode connections are inadequate or need to be improved.
- 9.5 Submitters noted that non-specified footpaths were inadequate or needed to be improved [92.1], and other identified footpaths to the existing Beachlands and marina areas [80.2], or Jack Lachlan Dr [346.2, 348.5]. I support amendments to address that issue.
- 9.6 Submitters requested construction of a coastal trail [276.3], or trail connections to the wider Pohutukawa Coast environment. [149.2, 303.1, 303.3, 312.3]. An “*Indicative Coastal Pathway*” is shown on Precinct Plans 3 and 5, establishment of that path is a Controlled activity (A15), and connectivity of this path to existing connections and the ferry berth are a matter of control (I.8.1.1 (3)). Those provisions enable the Coastal Pathway, but none of them require it. I support adding provisions that require the pathway to be provided.
- 9.7 Submitters noted that non-specific cycle facilities were inadequate or needed improvement [92.1, 336.4], and another specifically identified cycle lanes between Beachlands and Whitford and on Jack Lachlan Dr [346.2]. The provision of safe cycle facilities on high-speed high-volume rural roads like Whitford-Maraetai Road would typically require the provision of wide shoulders or off-road paths and require additional bridges over water features. I do not consider such features to be warranted on Whitford-Maraetai Road unless undertaken as part of a large-scale realignment and widening project. I do support the provision of cycle facilities (paths or lanes) on both sides of Jack Lachlan Drive.

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<sup>42</sup> Pgs. 61-62, Future Urban Areas Evidence Report, Auckland Council

- 9.8 Subdivision enabled by PC88 would usually be undertaken in accordance with the current standards for provision of footpaths on local streets, and the provision of footpaths and cycle facilities on collector and arterial roads. The design of streets is subject to the approval of the Council and Auckland Transport at the time of subdivision consent.
- 9.9 The provision and timing of paths in off-street locations to provide direct, attractive and convenient is typical in many modern subdivisions but less certain and more reliant on individual developer aspirations. For that reason additional support for these features in the provisions could be warranted.

## **Public Transport**

### General

- 9.10 Several submitters [51.4, 56.5, 88.2, 113.4, 114.4, 149.3, 152.3, 163.5, 171.2, 182.3, 185.1, 187.1, 211.4, 250.2, 251.2, 266.5, 280.2, 284.1, 285.1, 289.1, 291.1, 308.2, 314.1, 315.1, 374.1] are of the view that non-specific public transport services are unreliable, inefficient, generally inadequate and/ or need improvement. I consider these views in conjunction with the specific points on ferry and bus services below.

### Ferry

- 9.11 AT [344.9] requested references to the “ferry terminal” at Pine Harbour be changed to “ferry berth”. As noted earlier, I understand these to be distinct from each other, with berth referring to marine infrastructure such as pontoons, piers and access ramps; and terminal being a wider term that could include parking, shelter facilities and the like. I use those terms accordingly in this report and support this amendment.

### *Service Capacity and Timetable*

- 9.12 Matters relating to the capacity or timetable of the ferry service include:
- a) the ferry service is at capacity, weather dependant, generally inadequate or needs improvement [33.1, 42.1, 45.2, 49.8, 56.5, 75.4, 77.1, 126.3, 127.1, 143.3, 149.3, 163.5, 193.1, 210.2, 219.1, 232.2, 238.2, 239.2, 240.2, 241.1, 243.2, 247.2, 252.2, 254.1, 255.1, 259.2, 260.2, 261.1, 267.3, 286.1, 288.2, 294.1, 295.1, 298.2, 320.3, 324.1, 332.6-7, 334.2, 342.2, 360.1, 371.1, 372.2, 375.2]; and
  - b) the ferry service is not a rapid transit mode [368.4].
- 9.13 PC88 as proposed requires additional capacity to be provided by new or improved vessels in order to enable some forms of development or subdivision. The proposed provisions cannot make the service less dependent on weather or change the service into a rapid transit service. In my view these reasons contribute to the current level of ferry patronage and would limit future patronage.

### *Vessel Berthing, Manoeuvring, and Passage*

- 9.14 Matters relating to the ferry berthing, manoeuvring, or passage include:
- a) the ferry berth or jetties are insufficient or need improvement [124.4, 312.4, 313.3, 337.2, 342.2, 376.2];
  - b) there is insufficient draw (1.2m) and/ or manoeuvring room for 200-seat vessels in the marina [358.1, 368.4];
  - c) the ferry facilities need to be redesigned to place the ferry terminal operations outside the existing Marina on the south-west side to avoid disruption to both the water and land-based activities of existing berth holders [293.1]; and

- d) the plan change requestor should be required to agree service changes with Pine Harbour Marina Limited (PHML) and/ or AT [296.2, 340.1].
- 9.15 I do not have expertise in the manoeuvring or berthing requirements of marine vessels and rely on the view of Auckland Transport and marina operators.
- 9.16 I understand changes to the ferry service would require the approval of Auckland Transport. I expect any physical changes to the berth may require the approval of PHML and/ or the Auckland Transport Harbour Master. Other approvals or consents may also be required for any physical changes to the berth. I cannot provide an expert opinion on the appropriateness of a plan provision requiring two or more parties to agree.

#### *Terminal*

- 9.17 Matters relating to the ferry terminal include that the terminal is either insufficient or needs improvement [124.4, 268.3, 295.9, 312.4, 313.3, 332.6, 334.2, 337.2, 376.2, 378.1, 379.3].
- 9.18 Matters relating to parking for the ferry service include:
- a) the parking for ferry service is already at capacity, and/ or needs improvement, and/ or no additional parking is proposed. [116.3, 124.4, 163.5, 238.2, 239.2, 268.3, 312.4, 313.3, 320.2, 342.2, 356.1, 368.4, 374.2];
  - b) there is nowhere to extend the existing carpark [35.2, 328.2]; and
  - c) there is insufficient bicycle parking [368.4].
- 9.19 The provision of sufficient motor vehicle and cycle parking at public transport stations or berths is the responsibility of Auckland Transport. AT has indicated they have no funding for increasing the supply of car parking at Pine Harbour<sup>43</sup>.
- 9.20 While there may be no additional land available to increase the capacity of the carpark, I expect it would be feasible to provide additional cycle parking close to the berth, and additional car parking on the existing parking area by constructing a parking building.
- 9.21 There may be a desire by some to constrain the supply of parking near the ferry berth in order to promote the use of other modes (walking, cycling, and bus) to the ferry berth; however, if use of the ferry is to be maximised the provision of additional parking is a key consideration for those people who live outside the walkable catchment and/ or are unable to walk or cycle.
- 9.22 For that reason I support requests to increase the supply of parking within easy walking distance of the ferry berth, and I recommend amendments to Table 2 to address this. The applicant has declined requests to provide parking demand data, but there is ample anecdotal evidence from multiple submitters suggesting the existing supply is inadequate.
- 9.23 The existing parking supply is in the order of 174 parking spaces, which is 35% of the current a.m. two-hour peak period ferry capacity of 492 passengers. A small proportion of that demand is likely to be generated by passengers living in Maraetai and surrounding rural areas. I consider it appropriate for the supply of parking to be increased in proportion to the ferry capacity, and in the absence of any additional data consider a proportion of 30% is likely to be appropriate. I recommend changes to Table 2 to incorporate that requirement in Appendix B.

#### *Improvements*

- 9.24 Matters relating to the proposed improvements to the ferry service include:
- a) the ferry upgrades proposed are inadequate [126.3, 232.2, 240.2, 247.2];
  - b) no terminal with shelter is to be provided [368.4]; and

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<sup>43</sup> Submission point 344.37

- c) there is uncertainty the proposed additional capacity, which the ITA relies on, would occur [327.4, 334.2, 366.3].
- 9.25 The ITA expects ferry patronage to more than double as a proportion of the population, and PC88 is likely to result in the population doubling, so the PC88 assessment is forecasting the ferry patronage increasing four-fold.
- 9.26 The PC88 material identifies the recommended improvements to the ferry as fleet improvement (larger vessels), and additional sailings in off-peak periods. It also recommends a “*focus on supporting the new ferry terminal*” and a shuttle service to mitigate the need to provide additional park and ride facilities. The ITA does not identify when any improvements, other than new vessels, should be provided, or who would be responsible for funding and providing them.
- 9.27 The PC88 material discusses the possibility of funding being provided by CPI, and a draft funding plan includes a contribution towards ferry services and infrastructure of \$16 million with an indicative timeline of 2025-2030.
- 9.28 I cannot provide expert opinion on the certainty of the funding arrangements, but I do note a contribution requires additional funding from another source, which I expect would be Auckland Transport as the provision of berthing and terminal facilities for the ferry is their responsibility. AT currently have no funding for changes to the ferry vessels, berth or terminal identified in the RLTP 2021-2031, although that is not unexpected as little growth is currently planned in the area. Auckland Transport’s submission [344.37] states:

*Auckland Transport recognises there is an existing, longer-term need for improvements to the ferry services at Pine Harbour. Improvements to ferry services will require significant funding and time and likely include better frequency, improved customer experience and larger, low / zero emission ferries. No funding has been allocated and forward planning has not advanced sufficiently to be included within the RLTP. Forward planning demand for improvements in ferry services has not included PPC 88 to date as it is unanticipated growth.*

- 9.29 For those reasons I support each of these submission points.

#### Bus

- 9.30 Matters relating to bus transport include:
- a) The bus service is generally inadequate or needs improvement, serves few destinations, is unreliable, and/ or an inefficient use of time [75.4, 116.4, 126.3, 152.3, 163.5, 174.4, 210.1, 232.2, 238.2, 243.2, 247.2, 267.1, 288.2, 294.1, 295.3, 298.2, 320.3, 336.4, 368.3, 371.1, 372.2, 375.2]; and
- b) there is no ability to provide rapid transit links [368.5].
- 9.31 As noted earlier, the existing bus service has low patronage, and reasons for that would include the matters identified by these submitters. Those reasons would also contribute to the bus mode share remaining similar to the existing 1% rather than experiencing any significant increase.
- 9.32 Matters relating to improvements to the bus service include:
- a) a request to provide bus stops on Jack Lachlan Drive and within 50m of secondary school [348.7];
- b) a request to provide better bus services to the ferry [277.2];
- c) noting it is not stated who will provide the shuttle bus recommended in the ITA [328.2];
- 9.33 The provision of bus stops along a bus route and at specific locations such as near secondary schools is a normal function of Auckland Transport’s planning of bus services. Where the general location of bus stops can be identified, the provision of bus stops and bus shelters is usually addressed as part of the subdivision and/ or development process. I do not consider it

appropriate for plan provisions to specify the location of bus stops when details of bus routing and school locations have not been confirmed.

- 9.34 The additional information confirms it is expected that the recommended additional ferry shuttle bus service(s) would be provided by AT. As noted earlier, AT's funding is limited so a shuttle bus may not be provided, at least in a timely manner.
- 9.35 Submissions requesting changes to the provisions include a request to require additional assessment and plan provisions to ensure that the bus services to support the proposal are feasible, funded and reflected in staging provisions I.7.3. [344.38].
- 9.36 In my view the existing bus service has more than sufficient capacity to accommodate a growth in patronage on that service arising from PC88. I consider the provision of additional services between Beachlands and other locations is unlikely to have sufficient patronage and is unlikely to be warranted given the presence of the existing service.
- 9.37 A new service looping through the new development area and providing access to existing services within Beachlands, transfers to the existing bus service, and transfers to the ferry is most likely to support development of PC88. Without such a service I consider the ferry mode share is unlikely to improve beyond current levels, particularly if a secondary school is provided.

## Roads and Intersections

### Efficiency

- 9.38 The matter most frequently cited in submissions was the view that roads were generally insufficient, had significant delay or congestion, and/ or needed to be improved, including:
- a) unspecified roads [2.1, 6.1, 7.4, 8.1, 9.1, 10.1, 11.3, 13.1, 17.1, 18.1, 21.1, 22.1, 23.1, 24.1, 26.1, 27.1, 28.1, 29.1, 30.1, 31.1, 32, 33.1, 34.1, 35.2, 36.1, 38.1, 39.1, 40.1, 41.1, 42.1, 43.1, 44.1, 45.2, 46.2, 47.1, 49.1, 52.1, 53.1, 54.1, 55.1, 56.2, 57.4, 58.1, 59.1, 62.3, 64.1 65.1 66.1, 67.1, 69.2, 70.1, 71.1, 73.2, 74.1, 76.1, 77.1, 78.1, 79.1, 80.1, 82.1, 83.2, 83.3, 84.1, 85.3, 86.4, 88.1, 88.2, 89.1, 90.2, 91.1, 92.2, 94.1, 95.3, 96.3, 97.3, 98.3, 99.3, 100.3, 101.3, 102.3, 103.3, 104.1, 105.3, 106.3, 107.1, 108.2, 110.2, 111.1, 117.1, 118.1, 121.1, 123.1, 123.2, 124.1, 124.3, 125.1, 127.1, 129.1, 133.3, 134.3, 135.2, 136.3, 137.3, 138.3, 139.1, 144.4, 145.1, 147.1, 147.3, 148.1, 138.2, 150, 151.2, 152.1, 153.1, 154.1, 157.1, 158.1, 159.1, 160.1, 161.1, 162.1, 164.1, 165.2, 166.3, 167.1, 168.1, 170.1, 171.1, 172.3, 174.1, 175.1, 177.1, 179.1, 182.1, 184.1, 185.1, 187.1, 191, 193.1, 195.2, 196.2, 197.1, 198.1, 200.3, 201.3, 202.1, 208.1, 209.2, 210.2, 211.1, 212.1, 213.1, 214.1, 215.1, 216.1, 217.1, 218.1, 219.1, 221.1, 223.1, 224.1, 225.1, 226.1, 227.1, 228.1, 229.1, 230.1, 231.1, 232.1, 232.2, 233.4, 234.1, 235.1, 236.1, 237.1, 238, 239, 240, 241.2, 242.1, 243.1, 244.1, 245.2, 246.1, 247.1, 248.1-2, 249.1, 250.1, 251.1, 253.2, 254.1, 255.1, 257.1, 259.2, 260.1, 261.1, 262.1, 263.1, 264.3, 266.7-8, 267.1, 268.1, 269.2, 270.2, 271.1, 273.1, 274.1, 276.4, 277.1, 279.1, 280.1, 282.1, 283.1, 284.1, 285.1, 286.1, 287.3, 288.1, 289.1, 290.1, 291.2, 292.1, 294.1, 295.2, 298.1, 299.2, 300.3, 301.1-2, 302.2, 305.2, 306.1, 309.1, 310.1, 313.1, 314.1, 315.1, 316.1, 318.1, 319.2, 321.1, 322.1, 324.1, 329.1, 331.1, 334.2, 335.1, 337.2, 339.1, 341.1, 343.1-2, 349.1, 350.1, 353.1, 355.1, 359.1, 360.1, 361.1, 363.1, 364.1, 365.1, 367.1, 368.5, 369.1, 370.1, 371.1, 372.1, 373.4, 377.1, 381.1, 383.1];
  - b) a spill-over effect on existing infrastructure [380.6];
  - c) Whitford-Maraetai Road specifically (aka the Beachlands-Whitford road, "the road", or the "main road"), and/ or requests for the road to be widened to provide three or four lanes [7.4, 14.1, 15.1, 16.1, 19.1, 25.1, 26.2, 45.2, 48.5, 51.3, 52.1, 60.2, 61.1, 62.3, 63.5, 75.1, 80.2, 95.3, 96.3, 97.3, 98.3, 99.3, 100.3, 101.3, 102.3, 103.3, 105.3, 106.3, 108.2, 113.2, 114.2, 115.1, 119.1, 120.1, 121.1, 126.2, 130.1, 132.1, 133.3, 134.3, 135.2, 136.3, 137.3, 140.1, 141.1, 143.1, 153.4, 154.4, 155.1, 163.4, 189.2, 190.2, 194.1, 195.2, 197, 200.3, 201.3, 216.2, 221.1, 227.5, 232.2, 236.3, 244.2, 246.4, 308.1, 313.1, 320.1, 325.2, 328.1, 332.5, 337.2, 338.1, 342.2, 344.11, 346.2, 356.3, 359.2, 361.1, 366.1, 374.1, 375.1, 376.1, 378.2, 379.2, 382.1];
  - d) a request for four-laning of unspecified existing roads, presumably Whitford-Maraetai Road, and possibly others [48.5, 49.3, 83.3, 181.1, 353.1];
  - e) Whitford Road (or Whitford Gorge, or gorge road) [126.2, 155.1, 355.1, 362.1];

- f) Whitford Park Road [245.2, 355.1];
  - g) Sandstone Rd [155.1, 355.1, 197.1];
  - h) Maraetai-Howick, Beachlands-Ormiston, Beachlands-Somerville, or Beachlands/ Maraetai – Motorway, or routes to Flat Bush, Botany, Howick, East Tamaki, and Pakuranga [15.1, 35.2, 40.1, 46.2, 47.2, 52.1, 58.1, 59.1, 183.1, 192.1, 197, 224.4, 233.2, 235.2, 313.1, 320.1, 324.1, 333.3, 337.2, 341.3, 349.1]; and
  - i) Ti Rakau Dr [233.2].
- 9.39 Other submissions raised efficiency, general inadequacy, or the need for improvement at various intersections including:
- a) Whitford-Maraetai Road / Beachlands Road [147.3, 265.1];
  - b) Whitford-Maraetai Road / Clifton Rd [68.1, 126.1, 142.1, 362.1];
  - c) Whitford-Maraetai Road / Henson Road [126.1]; and
  - d) Howick gorge roundabout [245.2].
- 9.40 Several submitters consider the proposed intersection improvements to be inadequate [61.1, 63.1, 119.1, 120.1, 130.1, 140.1, 243.1, 368.5, 376.2];
- 9.41 Some submitters requested various intersection improvements be provided or avoided including:
- a) traffic lights or roundabouts to be provided at all intersections off Whitford-Maraetai Road [142.1];
  - b) roundabouts to be provided at all intersections off Whitford-Maraetai Road [48.5, 92.2];
  - c) roundabouts to be provided at all entry ways [144.4];
  - d) smart traffic signals at the Whitford roundabout and the Whitford-Maraetai Road / Jack Lachlan Drive intersection [122.2];
  - e) 50m long auxiliary left-turn lanes to reduce delay to following traffic, and free-left-turn merge lanes at each intersection [197.1];
  - f) safe and efficient entry and exit ways provided for communities [346.2];
  - g) a request to stage development to include a roundabout at an unspecified location [266.6];
  - h) a request to include over passes or under passes at unspecified locations [353.1, 356.3];
  - i) ensure no traffic light intersections and provide flyovers or tunnels instead [113.3, 114.3]; and
  - j) one submitter considered the traffic problems were due to insufficient employment [49.2].
- 9.42 As noted at various locations through this report, Whitford-Maraetai Road, connecting routes beyond Whitford, and intersections along them are congested during peak periods. These roads are, or shortly will be, at capacity.
- 9.43 As also noted, the Council's policies<sup>44</sup> with respect to the widening of roads is that widening that could result in additional travel should be avoided, and because of that, the application material expects that Whitford-Maraetai Road may never be widened. I do not agree that climate goals should or do prevent the widening of any and all roads.

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<sup>44</sup> Transport Emissions Reduction Pathway, pg 37.



- 9.44 In my view, development enabled by PC88 would lead to substantial increases in the demand for private-vehicle travel along Whitford-Maraetai Road, and others, that could not be accommodated safely or efficiently unless the roads are widened, irrespective of improvements to the ferry service and improvements to discrete intersections.
- 9.45 For that reason, I generally support these submission points, except that I recommend the determination of the appropriate form of any intersection (sign control, roundabout, or traffic signals) occur at the time of subdivision or development in conjunction with Auckland Transport.

#### Safety

- 9.46 Several submission points raise specific road safety concerns, including:
- a) existing safety issues, the current need for safety improvements, and the impact of PC88 on road safety [30.1, 37.1, 41.1, 44.1, 45.1, 56.2, 60.2, 61.1, 73.2, 112.1, 123.2, 131.1, 143.1, 152.1, 238.3, 239.3, 247.1, 305.2, 325.3, 333.1, 336.4];
  - b) concerns that the Whitford-Maraetai Road / Jack Lachlan Drive intersection would become more dangerous [131.1];
  - c) The driveways at 671 Whitford-Maraetai Road would be more dangerous [131.1];
  - d) That the anticipated hotel would result in an increase in intoxicated drivers [155.2]; and
  - e) that safety for cyclists is poor [368.5].
- 9.47 Some submitters requested specific safety improvements including:
- a) that high-crash corners should be altered [218.2]; and
  - b) significant improvements to Whitford-Maraetai Road to ensure safety for vehicles and cyclists [112.1].

#### Whitford Village

- 9.48 Several submitters raised concerns about transport effects at Whitford Village, including:
- a) general concerns about traffic in Whitford [46.2, 304.1, 374.2, 380.4]; and
  - b) a bottleneck at Whitford roundabout [245.2].
- 9.49 Some submitters raised matters about improvements including:
- a) the proposed upgrade would not improve the safety or state of feeder roads [155.1];
  - b) That (smart) traffic lights should be installed at Whitford roundabout [122.2, 212.2]; and
  - c) that implementation of the Whitford Bypass should be required [45.2, 84.2, 126.2, 197.1, 304.1, 336.4, 338.1, 344.10 355.1, 367.1, 368.5].
- 9.50 As per my assessment above, I agree with those concerns and support adding the Whitford Bypass to the table of required infrastructure items.

#### Bridges

- 9.51 Several submitters raised concerns about bridges in relation to efficiency, safety, or their vulnerability in relation to the resilience of access routes:
- a) Whitford Bridge (Whitford-Maraetai Road at Turanga Creek) is inadequate and/ or should be widened [26.2, 69.2, 341.1];
  - b) Waikopua Bridge (Whitford-Maraetai Road at Waikopua Creek) [218.2, 341.1]; and

- c) Mangemangeroa Bridge (Whitford Road at Mangemangeroa Creek) should be widened [69.2, 197.1], replaced [92.2], or is generally inadequate [198.2, 341.1, 367.2].
- 9.52 One submitter requests that all heavy construction traffic be required to use Sandstone Rd instead of Mangemangeroa Bridge [367.2].
- 9.53 I expect the two bridges on Whitford-Maraetai Road would be duplicated, superseded, replaced, or improved (if necessary) as part of any large-scale widening and realignment project, which I support as a requirement if PC88 is approved. If they are not, then it is the responsibility of Auckland Transport to maintain those bridges.
- 9.54 The ITA acknowledges that there are safety concerns at the Mangemangeroa Bridge and recommends improvements are made but does not specify any particular improvements, so it is not clear that improvements capable of addressing the effects are practicable. Any such improvements have not been included in the proposed funding plan.
- 9.55 AT has the ability to impose limits on the mass or length of vehicles using any of its bridges at any time, so I do not support modifying the planning provisions to manage heavy vehicle movements at this bridge.

### Resilience

- 9.56 Several submissions raised concerns about the resilience of road access to Beachlands including:
- a) there is only one route in and out of Beachlands [46.2, 333.1, 334.1, 359.2];
  - b) Beachlands is isolated [247.1];
  - c) concerns about poor resilience for access by emergency services [46.3, 73.2];
  - d) motorists are subject to delays when crashes occur [192, 359.2];
  - e) if bridges on the main route fail the coastal route (Maraetai Coast Road) is the only alternative [341.1]; and
  - f) the coastal route (Maraetai-Clevedon-Papakura) is subject to natural hazards [16.1, 86.4, 192, 225.1, 300.3, 359.2].
- 9.57 Some submitters requested PC88 be declined until another access road is provided [269.1, 270.1, 282.2].
- 9.58 I agree that access to Beachlands is limited and can be vulnerable to disruption. Disruption due to adverse weather events may also disrupt ferry services.
- 9.59 Resilience is also a topic referred to in the Auckland Climate Plan. The realignment and widening of Whitford-Maraetai Road and the provision of Whitford Bypass as previously proposed by MCC would result in road access to Beachlands being more resilient. I do not consider the construction of another new road is practical or warranted.

### Road Maintenance

- 9.60 Some submitters were concerned that local roads are in poor condition [69.1, 154.1, 366.1], or that the proposed improvements are insufficient to alleviate increased wear and tear [124.3, 131.1].
- 9.61 Maintenance of existing roads is the responsibility of Auckland Transport, with funding available from a variety of sources including from fuel excise duties and road user charges (RUCs) via the Land Transport Fund. Increased travel as the result of development enabled by PC88 would generate additional duties, RUC and, and additional development would also produce additional rates revenue, some of which is allocated to road maintenance. I do not support amendments to the planning provisions to address road maintenance.

## Other Matters

- 9.62 One submitter requested that heavy vehicles including construction vehicles be banned between Botany and the Whitford roundabout [369.2]. I do not support that submission point.

## **Traffic Impacts on Properties**

- 9.63 One submitter requests that safe and efficient access be provided to 101 Jack Lachlan Drive [205.2], a property that could be developed for residential activity. The concern arising from the proposed location of the Indicative Primary Road Corridor (School) where it intersects with Jack Lachlan Drive. The submitter seeks the assessment of the proposed intersection on the ability to provide access to development of 101 Jack Lachlan Drive.
- 9.64 Due to the winding alignment of Jack Lachlan Drive the number of locations with sufficient sight distances to provide a safe intersection are limited. It appears the indicative road location proposed on Precinct Plan 5 would be close to the only viable location for development of the above property, which is already live-zoned.
- 9.65 Best practice design for intersections along collector or arterial roads is to either:
- a) Ensure the intersections are sufficiently separated to avoid interference with each other; or
  - b) To ensure the side roads are located at the same point to form crossroads, which must be controlled by traffic signals or a roundabout to provide adequate safety.
- 9.66 I recognise the concern expressed by this submitter. There may also be other properties that could have development curtailed or substantially constrained by the location of new intersections.
- 9.67 This is a district-wide matter which is often dealt with in the formulation of structure plans and precinct plans. This plan change has prepared a precinct plan that future development is proposed to be in accordance with; however, it appears the preparation of the precinct plan may not have adequately considered access to the above property.
- 9.68 I support either the inclusion of a matter of control and assessment criteria to address this concern, or a change to the precinct plans that relocate the proposed road to preferably provide adequate separation (ideally 70m or more) or provide a location suitable for crossroads with provision for control by a roundabout or traffic signals.

## **Travel Demand and Emissions**

- 9.69 Several submitters expressed concerns about PC88 resulting in an increase in travel (VKT), an increase in emissions, the impact on the climate and/ or environmental harm [19.1, 30.1, 33.2, 46.1, 47.4, 146.2, 148.2, 337.2, 339.1, 345].
- 9.70 Some submitters are of the view PC88 is inconsistent with the Climate Plan or Council emission targets [46.1, 73.3, 146.1, 335.1, 368.5], and one [376.3] stated PC88 was inconsistent with non-specific climate change goals.
- 9.71 I agree that PC88 would result in a considerable increase in demand for travel, most of which would use private vehicles, and much of which would travel relatively long distances by road. As noted earlier, I agree that PC88 is not consistent with the Climate Plan.

## **Transport Assessment**

- 9.72 Several submitters raised concerns about the Integrated Transport Assessment (ITA).

### Mode Share or Trip Distribution

- 9.73 Submitters raised concerns about the mode share assumptions in the ITA, often in conjunction with concerns about ITA assumptions in relation to where people would travel. This included concerns the mode share assumptions are unreliable, unrealistic, inefficient, and/or lack justification about future use of:
- a) unspecified public transport mode(s) [206.1, 211.1, 229.1, 238.2, 239.2, 254.1, 255.1, 328.2, 345];
  - b) ferries [63.1, 125.2, 305.4, 327.4, 337.2, 344.36, 376.2, 380.7]; or
  - c) buses [327.3, 344.36, 380.7];
- 9.74 Submitters were of the view the ITA assumptions were poor because Beachlands residents commute to variety of locations (outside Central Auckland ) for work, education, community and medical services [113.6-7, 114.6-7, 116.1-2, 126.3, 143.3 198.2, 328.2, 331.1, 332.3, 337.2, 350.1, 359.2, 365.1, 368.6, 374.2, 375.2, 376.2].
- 9.75 One submitter [116.5] stated walking and cycling to areas outside Beachlands is not practical, therefore travel will be via private car, causing additional congestion.
- 9.76 Another was of the view the ITA comparison with the Hobsonville development is inappropriate [334.1].

### Scope or Methodology

- 9.77 One submitter [327.2] is of the view the ITA had insufficient information to quantify the transport effects of the proposed development. That submission states the ITA is very focused on trips for work and employment relying extensively on census data, yet this is only about 1/4 - 1/3 of daily household trips (Household Travel Survey, Auckland report prepared for MoT). No information is supplied about other trips. These trips, their VKT impact, and their possible impact on interpeak and weekend congestion have not been accounted for.
- 9.78 Another submission states the actual and potential adverse effects on the transport network have not been appropriately assessed and addressed [344.3] and requested a more robust assessment [344.4].
- 9.79 One submitter [380.4] is of the view the ITA is subject to significant assumptions but did not state which assumptions (if any) are considered to be inappropriate.

### Trip Generation

- 9.80 Some submitters have concerns about the trip generation rates and internalisation assumptions [327.2], and others have the view that increases in traffic volume would be well in excess of that indicated [278.1, 335.1], or faster than indicated [304.1].
- 9.81 As set out above, I agree with those concerns.
- 9.82 Other submitters have concerns regarding the potential housing yields from Sub-precinct E. [344.14], that analysis was completed during Covid [321.1], or that a lack of water supply will result in more water trucks on road [51.1].
- 9.83 The effect of the Covid-19 Health Orders has been addressed earlier. I cannot provide an expert view on water supply but note that water trucks would be a regular part of the traffic stream on surrounding roads and are not understood to generate any particular adverse effects, so I do not support that submission point.

### Modelling

- 9.84 Submitters had concerns about the traffic modelling, including that it:
- a) is not robust [359.1];

- b) is inaccurate and has not been peer reviewed or endorsed by the Auckland Forecasting Centre [311.1];
  - c) takes no serious account of future demands from outside of the Proposal site [332.7]; and
  - d) does not consider additional intensification of the Countdown area, Pine Harbour, 250 new homes from Fletchers, PC78 intensification, and increased high school student commuting [113.5, 114.5].
- 9.85 The ITA mentions two future development areas, being 89ha of FUZ land in Maraetai expected to provide 200 dwellings over the next 15 years, and a proposal for a development with 235 dwellings in Beachlands<sup>45</sup>. The ITA has assumed those developments are included in the background traffic growth rates. The ITA has not considered potential intensification that may arise from PC78 outside the PC88 area and assumes a secondary school would be provided. For those reasons, and others set out earlier, I agree the modelling is inadequate.
- 9.86 One submission states travel times in the Structure Plan document are misrepresented [368.1]. The Structure Plan provides travel times in Figure 19 Employment Destination Plan, for example Onehunga/ Penrose is shown as a 40-min car journey from the PC88 land. As a comparison, I have examined the Google Maps Directions service travel times for a journey from Kōwaitau Avenue in Beachlands to Felix Street Onehunga. The estimated times were 39 minutes departing at 11:30am, and up to 80 minutes departing at 7:00am. As a result I consider the travel times shown in the Structure Plan are correct for off-peak times with no congestion, but not representative of typical travel times to employment, so agree with the submitter in part.

#### Proposed Improvements or Mitigation

- 9.87 Some submissions stated concerns that the proposed improvements are generally insufficient including that:
- a) the traffic assessment relies on \$75 million dollars of funding which will only upgrade local roads and the ferry terminal and will not affect the wider transport issues as outlined. [113.8, 114.8];
  - b) PC88 should be declined unless further detail and information on roading infrastructure is provided [276.1];
  - c) a range of additional transport upgrades and improvements would be required which are not included in the ITA or the proposed precinct provisions [344.39]; and
  - d) the proposed roading improvements will not be enough to alleviate the increased congestion and increased wear and tear [124.3].
- 9.88 I support these submission points, except with respect to increased wear and tear.
- 9.89 One submitter was concerned that key opportunities to coordinate with other projects such as Eastern Busway has not been discussed in the ITA and was of the view the ITA should broaden its approach to understand transport opportunities within east Auckland and the proposed development [311.1]. In my view the opportunity for growth in other locations to integrate with such projects is a relevant matter to consider when evaluating if growth at Beachlands is appropriate.
- 9.90 Two submitters [63.1, 305.5] are concerned about effects from construction vehicles. I do not support the submission points about construction vehicles as they are part of the typical traffic stream on the roads in the area, as are other heavy vehicles delivering goods or collecting waste.

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<sup>45</sup> Pgs. 39 and 62, ITA

## General

- 9.91 Some submitters expressed general concern including that the ITA was inadequate [7.2], or that a peer review is required [380.8]. Having undertaken a peer review, I consider the ITA to be inadequate.

## Summary

- 9.92 As noted earlier in this report, in my view some aspects of the ITA are satisfactory, but others are not. I consider many of the assumptions are either based on insufficient information without sufficient sensitivity testing; or where sufficient information is available, the assumptions are not robust.
- 9.93 Those assumptions combined with insufficient sensitivity testing, and a limited spatial scope of analysis results in a significant likelihood that traffic volumes on the road network would be significantly higher than those forecast and modelled in the ITA assessment.
- 9.94 I therefore support the majority of the above submission points.

## **Funding for Transport Infrastructure**

### General

- 9.95 Some submitters requested that the plan require:
- a) developers to fund all unspecified / road/ transport infrastructure [95.2, 96.2, 97.2, 98.2, 99.2, 100.2, 101.2, 102.2, 103.2, 105.2, 106.2, 108.2, 133.2, 134.3, 135.2, 136.3, 137.2, 163.3, 189.1, 190.1, 200.2, 201.2, 212.1, 299.7, 304.3, 331.2, 346.2, 366.1, 367.3];
  - b) substantial additional infrastructure which is not currently funded [327.7, 338.2]; and
  - c) funding and investment of infrastructure including transport [81.2].
- 9.96 Two submitters were concerned the cost of additional infrastructure will require Council funding and/ or unfairly increase rates [46.4, 306.1]. One submitter requested the plan require adequate infrastructure to be funded and in place before development is allowed, even if it is on a gradual basis [209.3].
- 9.97 A submitter is of the view the applicant should fund an independent review of roads and public transport [224.6]. The applicant has funded this plan change process including the preparation of this report which has been undertaken independently, but I have not undertaken traffic modelling and other analysis that I expect would be included within an independent review. An independent review may provide some of the missing information and a more robust assessment, but that could also be provided by the applicant. For that reason I am of the view that an independent review funded by the applicant would be useful, but I disagree with the submitter that it is essential.
- 9.98 Two submitters request that detailed plans [for improvements] be agreed with Council, AT and Government [296.3, 332.1]. Any work on roads controlled by AT requires the approval of AT.
- 9.99 One submitter noted AT have insufficient funds to consider any works in Beachlands area for the next 10 to 12 years [368.8].

### Public Transport

- 9.100 Some submission points requested that the plan provisions ensure the developer contribution is sufficient to action new:
- a) ferry vessels [312.4, 332.6];
  - b) new ferry parking [312.4]; and



c) a new ferry terminal [334.2].

9.101 One submitter noted the proposed additional ferries require funding from AT [306.1].

#### Roads

9.102 Some submissions were concerned there would be a lack of funding for intersection and road infrastructure improvements [168.1, 169.2, 295.4-5].

9.103 Some submissions requested developers contribute to, or fully fund,

- a) roading improvements [89.3, 176.1, 178.2, 188.1, 225.6, 233.5];
- b) four-laning Whitford-Maraetai Road [212.2]; or
- c) road maintenance [212.2, 272.2].

9.104 For the reasons set out earlier (discussion on road maintenance at 9.61, I do not support submissions requiring a contribution to road maintenance.

9.105 I do not have expertise in the funding of infrastructure but do provide some comments on funding of transport infrastructure with respect to the addressing of adverse effects on the transport environment that would be generated by development enable by PC88.

9.106 I understand that solving Auckland's transport problems is not the responsibility of the plan change applicant, or the responsibility of parties who would undertaken development. Those matters are properly addressed by the Council and transport infrastructure providers including AT. I also understand that development proposals should not exacerbate transport problems, and that development is required to be integrated with the provision of transport infrastructure.

9.107 While I do not have expertise in the funding of infrastructure, I agree that the draft funding plan provided as part of the PC88 materials is insufficient to provide for the provision of the transport infrastructure required to accommodate development enabled by PC88 and to address the transport effects that development would cause or exacerbate, as additional infrastructure (and therefore funding) is required.

9.108 I also note the Council decisions to not include Beachlands as a growth area (in the Auckland Plan, FULSS, and Draft FDS), and to limit intensification at Beachlands (in PC78) because of the constraints in providing transport infrastructure, so it is not surprising that no funding has been allocated to these projects. While the allocation of transport funding is reviewed every three years, I expect allocating funding to projects at Beachlands would divert funding from other potentially more efficient and effective projects.

9.109 For those reasons I agree that if PC88 were to be approved substantial additional funding from other sources could be required to provide the required infrastructure in a comprehensive and integrated manner.

#### **Planning Policy and Strategies**

9.110 Some submitters are of the view that PC88 is inconsistent with planning policy and/ or strategy relevant to transport including that it is inconsistent with:

- a) the NPS-UD [368.7, 327.1, 344.1];
- b) the Auckland Plan 2050 [81.1, 327.1, 331.3, 337.1, 345, 380.3];
- c) the Auckland Unitary Plan [327.1, 338.1, 368.7, 370.1];
- d) the RPS [327.1, 344.1, 345]; and
- e) inconsistent with the RLTP [345].

- 9.111 Three submitters stated growth should be in different locations close to centres and major public transport [365.1, 366.3, 370.1].
- 9.112 I agree with those submission points for the reasons set out in Section 8 where I evaluate PC88 against those documents.
- 9.113 Some submitters noted PC88 was inconsistent with or should align with the Auckland Council Beachlands Transport Constraints Control Evaluation Report [113.1, 116.6, 127.2, 128.1, 368.2, 376.2].
- 9.114 As noted earlier, the Council report was prepared to inform the development of PC78 Intensification which as notified proposes the Beachlands Transport Infrastructure Constraint as a Qualifying Matter to limit intensification at Beachlands. PC78 was notified after PC88 was lodged, and decisions on PC78 are not expected to be made prior to PC88 being decided. For that reason I understand the proposed PC78 BTIC does not have to be considered when determining PC88.
- 9.115 Despite that precedence issue on the proposed BTIC, the Council report did consider the same or similar issues, namely the ability for the transport environment, including with potential improvements, to service additional development at Beachlands. That report was considered by the Councillors resulting in a decision to include the BTIC in PC78. I understand that report and decision can be considered as a relevant matter. Further, I consider it would be incongruous for the PC78 decision to retain the BTIC, and for the PC88 decision to allow for a significant increase in development. I support that submission point.

#### **Change of Extents or Zoning**

- 9.116 One submitter [206] requests that 600 Whitford-Maraetai Road be included and zoned FUZ.
- 9.117 One submitter [266] requests development be scaled back to allow further assessment over time, and that the FUZ be delayed until the impact of developing the northern part [live-zoned] has been assessed. Another submitter [241.4] requested the project be reduced in size and staged in a more sustainable way.
- 9.118 One submitter was of the view the full development including FUZ should be assessed to understand the infrastructure requirements, or that the FUZ be removed [332.2].
- 9.119 Another submitter was of the view the FUZ should be declined if the remainder is approved [344.2], and that the plan change be amended to include only the 'live zone' areas excluding the proposed areas of FUZ [344.13].
- 9.120 The ITA expects that widening of Whitford-Maraetai Road to four lanes, and other improvements to road infrastructure, would be required to accommodate development of the proposed FUZ land. The additional information expects that widening work may never be implemented. If there is any reasonable prospect of the Whitford-Maraetai four-laning and Whitford Bypass projects not occurring, then support for the inclusion of the FUZ is absent.
- 9.121 From my review of the ITA analysis of the live-zoned land, those improvements would be required to accommodate development of that land, and insufficient analysis has been provided to determine if those improvements would also be sufficient to accommodate the FUZ land, if additional improvements would be required.
- 9.122 I acknowledge that if PC88 is approved and any FUZ land is retained, that another rezoning process is required, and that should be based on new assessments of effects. In my view there is insufficient justification to zone any part of the PC88 area as FUZ.
- 9.123 For those reasons, and the reasons set out elsewhere, I do not support the live-zoned aspects of PC88 as proposed, and I do not support the proposal to rezone land to FUZ. I do not support additional land being zoned FUZ. I support the submission points requesting the FUZ be declined.

## Requested Amendments to Provisions

9.124 Several submitters have requested specific amendments to particular provisions, additional provisions, or have requested general amendments to achieve a particular outcome. Those relevant to transport matters are considered below, firstly with regard to each part of the provisions, and secondly with regard to submissions seeking general or overall changes.

### I.3 Objectives (precinct-wide)

#### *Objective 9*

9.125 One submitter requests that Objective 9 is amended as follows [357.4], which I support:

- (9) Beachlands South is a walkable coastal town with a street-based environment that positively contributes to pedestrian amenity, safety and convenience for all active modes. Beachlands South develops and functions in a way that:
  - (a) Results in a significant mode shift to public and active modes of transport including walking and cycling;
  - (b) Provides safe and effective active mode movement between focal points of commercial activity, community facilities, **educational facilities**, housing, jobs, open spaces and the Pine Harbour Ferry Terminal; and
  - (c) Integrates with, and minimises adverse effects on the safety and efficiency of, the surrounding transport network, including any upgrades to the surrounding network.

#### *Objective 10*

9.126 A submitter seeks the plan change “*Retain the same or similar wording of Objective 10 which reflects the outcomes of the objectives*” [344.16].

9.127 Another submitter [345.7] requests this objective be amended along with Policy 11 “*to include clearer directive language to ensure that subdivision and development is avoided prior to necessary transport infrastructure being constructed and operational*”, such as:

- (10) Subdivision and development in the precinct ~~is coordinated with the efficient provision of required~~ **does not occur in advance of the availability of operational** transport, water, energy and telecommunications infrastructure.

9.128 The September 2022 version of the notified provisions has some different amendments that are not related to transport, and do not conflict with the previous request.

#### *New Objectives*

9.129 A submitter requests that the plan change “*include new objective: Objective (10A): Subdivision and development does not occur in advance of the availability of operational transport infrastructure*” [344.17], which I support.

9.130 A submitter requests that the plan change “*include specific planning provisions (including objectives, policies and rules) to require subdivision and development to provide active mode connections to adjacent sites and ensure intersections are designed to prioritise vulnerable road users*” [327.6]. I support that request.

## I.4 Policies

### *Policy 11*

9.131 Two submitters request non-conflicting changes to Policy 11 which I support:

- a) Amend PPC 88 Policy 11 as follows [344.18]:
  - (11) Require subdivision and development in the precinct to be coordinated with required transport infrastructure upgrades to minimise the adverse effects of development on the safety, efficiency and effectiveness of the surrounding road transport network.
- b) Amend Policy 11 (and Objective 10) “to include clearer directive language to ensure that subdivision and development is avoided prior to necessary transport infrastructure being constructed and operational”, such as [345.7]:
  - (11) Require that subdivision and development in the precinct does not occur in advance of the availability of operational ~~to be coordinated with required~~ transport infrastructure upgrades to minimise the adverse effects of development on the safety, efficiency and effectiveness of the surrounding road network
- c) Amend Policy 11 so that effects on the wider transport network are included within its scope [345.8].

### *Policy 12*

9.132 To submitters request changes to Policy 12, with both adding a different third clause. I support the addition of both clauses:

- (12) Promote a mode shift to public transport and active modes by:
  - (a) Encouraging walking and cycling connections to the Pine Harbour Ferry Terminal, including along the indicative coastal walkway and indicative primary and secondary collector roads as shown in Precinct Plan 5; and
  - (b) Encouraging streets to be designed to provide safe separated access for cyclists on collector roads; and
  - (c) Providing direct active mode connections to ferry and town centres at the same time as residential development establishes. (344.19)
  - (d) Ensuring connections and linkages are effectively integrated within the Precinct and into the existing Beachlands settlement (357.5)

### *Policy 17*

9.133 One submitter requests changes to Policy 17 [357.6], which I support.

- (17) Encourage streets to be attractively designed to appropriately provide for all modes of transport by:
  - (a) Providing a high standard of amenity for pedestrians in areas where higher volumes of pedestrians are expected; and
  - (b) Providing for and prioritizing active modes with safe separated access for cyclists on primary and secondary collector roads that link key destinations in the Precinct and the existing Beachlands settlement; and

- (c) Providing for the safe and efficient movement of vehicles

### Policy 18

9.134 One submitter requests the following transport-related changes to Policy 18 [357.7] which I support

#### *Open Space Network*

- (18) Establish an integrated movement and public open space network within and across the precinct as indicatively shown on Precinct Plan 3, including:
- (a) Providing a safe, attractive and connected network of indicative open space linkages such as walkways and pedestrian accessways **in the Precinct and connecting to the existing Beachlands settlement;**
  - (b) Encourage provision of the indicative coastal walkway to enable access to and along the coast while avoiding adverse effects on the marine significant ecological areas;
  - (c) Requiring provision of the Fairway Reserve and connection to the coastal walkway;
  - (d) Enabling the provision of a high-quality civic space adjacent to the Village Centre;
  - (e) Encouraging the establishment of a network of suburban and neighbourhood parks, walkways and pedestrian linkages.

### *New Policies*

9.135 One submitter requests a new policy be added [344.22] which I support, except I consider this would be appropriately addressed by the proposed amendments to Policy 11:

**(13A) Require that subdivision and development does not occur in advance of the availability of operational transport infrastructure.**

9.136 As noted above, another submitter requests the plan change “*include specific planning provisions (including objectives, policies and rules) to require subdivision and development to provide active mode connections to adjacent sites and ensure intersections are designed to prioritise vulnerable road users*” [327.6]. I support this request and consider it is likely to be addressed by the above changes.

9.137 A submitter requests the plan change ‘*introduce policies and provisions around determining the appropriate form and timing of key intersections*’ [344.12] which I support and consider this is best addressed by amendments to other provisions.

### I.5 Activity Table

9.138 Two submitters request changes to the activity table [344.24] to address the transport network effects of growth, such as stronger consent activity status [345.3], with the second submitter also saying, “*that a stringent activity status for non-compliance with standard I.7.3 may be required (i.e. non-complying activity status), to signal that any such proposal requires greater scrutiny, and to reflect the importance of operational infrastructure upgrades being in place*” [345.12]. I support those changes.

### I.7 Standards - Exclusions

9.139 One submitter requests the removal of E27.6.1 from Standard I.7 unless PPC 88 transport provisions are amended to satisfactorily address the effects of growth enabled by it on the transport network. [344.26]. The effect of that change would be that standard E27.6.1 trip

generation threshold would apply within the precinct as it does elsewhere. I support that request.

### Standard I.7.3 Staging of Development with Transport Upgrades

- 9.140 One submission requests the plan change be amended to *“incorporate provisions addressing the staging and timing of transport infrastructure and services with the proposed development build-out”* including among other things, *“stronger staging or review provisions”* [344.27]. Given the issues with the assessment set out earlier, I support this submission point.

#### *Purpose*

- 9.141 As notified (both versions), the purpose reads:

Purpose: Manage the adverse effects of traffic generation on the safety and efficiency of the surrounding road network by ensuring subdivision and development is coordinated with infrastructure upgrades.

- 9.142 One submitter requests the purpose of this standard be amended *“to use more certain language such as ‘minimise’”*, and that it should be *“expanded to reference relevant objectives and policies relating to the integration of land use and transport”*. [345.10]. I support that submission and recommend amended wording in the appended provisions.

#### *Standard I.7.3 (1)*

- 9.143 The Ministry of Education requests an amendment to Part 1 of the standard [357.13]:

*Prior to the operation of any light industrial activities in sub-precinct F-or education facility in sub-precinct G, Jack Lachlan Drive must be upgraded to provide two-way walking and cycling active modes along the full length of one side of the road.*

- 9.144 Another submitter requests separate and/ or additional upgrades relating to the timing and delivery of a primary and/or secondary school [351.4], for the reason that the transport analysis has assumed a school will be present, but the timing is not confirmed.
- 9.145 The Ministry amendment is requested noting the Ministry supports the provision of the facility but would *“prevent the Ministry from opening a school”* and *“implies that the Ministry would have to pay for the walking and cycling infrastructure in order to open a school.”* The Ministry’s submission states the provision of a school *“should not trigger the need to provide transport upgrades to support the residential growth already there”* and suggests *“Alternative wording could include a dwelling threshold that would trigger the need for these upgrades once a certain amount of dwelling have been built”*.
- 9.146 I do not accept the wording of the standard assigns funding responsibility to any particular party, but I do accept the absence of the facility could prevent any school opening. I also note that the establishment of a school within the precinct, even to serve the existing residential area, could generate adverse effects on pedestrian and cyclist safety if a facility were not provided. I do note the Ministry, or any other school provider, could apply for resource consent to establish a school without the facility as a Discretionary activity where the effects associated with a particular school proposal could be considered. I do not support this submission point.
- 9.147 I agree that in the event the provision of a school is delayed, infrastructure upgrades are likely to be required at lower levels of development, and additional infrastructure projects are likely to be required.
- 9.148 Submission point [344.5] notes that a two-way cycle path is proposed on Jack Lachlan Drive and states these outcomes are not supported in relation to encouraging active mode share. In my view two-way cycle facilities can be appropriate in some circumstances, but not all, and the design of Jack Lachlan Drive and any active mode facilities on it should be subject to a matter of discretion and assessment criteria.



9.149 A submitter supports upgrading the Jack Lachlan Road frontage, if PPC 88 is approved. The submitter notes *“the staging standard is only linked to the establishment of a school or the business area when some upgrades may be necessary to link to the ferry and established networks within Beachlands including any frontage adjoining a development”* [344.5]. As noted earlier, I support extending this requirement to other activities and sub-precincts.

*Standard I.7.3 (2) - General*

9.150 A submitter requests this standard is amended to ensure that the infrastructure upgrades listed in Column 2 are operational before the relevant level of land use in Column 1 is allowed to occur [345.11], which I support.

9.151 A submitter requests the plan change *“Reduce size of the area in Precinct Plan 6 which is subject to Standard I.7.3 to include only the live zoned component, and not the land which is proposed to remain Future Urban”* [352.2]. I understand this is because technically the precinct provisions would only apply to the live-zoned land, so on that basis I support that submission point.

9.152 It is possible for some development to occur within the FUZ, and as any such development is likely to result in additional travel demand and “use up” some of the road capacity, I consider it would be appropriate for the standard to apply to the entire precinct if that is possible.

9.153 A submitter is of the view the triggers in the table *“must clearly relate to unacceptable anticipated adverse effects of the generated traffic on the roading network”* and *“the required measures must efficiently and effectively avoid, remedy or mitigate those effects to an acceptable level”* [352.4]. The submitter states there is no clear link between the thresholds and triggers in the table and the predicted traffic generation in the ITA.

9.154 Effects on the road network are best correlated with the trip generation of an activity, and some precincts in the AUP have standards linked with a daily or peak hour traffic volume. The trip generation of some activities is best correlated with the number of employees at a business, the number of bedrooms in a dwelling, or another measure. Other precincts have standards linked with the scale of the activity as measured in a number of dwellings, or a gross floor area.

9.155 In general, while standards with traffic volume measures may be more closely related with the effects, they can be significantly more difficult for the community to understand. I support the scale measures used in the table as they are easy to understand, and easy to enforce as changes in the scale typically require the Council to process a resource consent and/ or building consent. For that reason I do not support that submission point.

9.156 A submitter [344.27] requests the text should be amended for consistency (e.g. to refer to activities, development **and** subdivision), which I support.

9.157 The same submission point [344.27] requests additional or modified provisions *“addressing the risk of key assumptions not coming to pass such as on employment and education facilities being in place which reduce the need to travel beyond Beachlands. However if these are not provided, alternative (higher trip generation) outcomes would result and are not addressed in I.7.3.”* I support that point and consider it would be addressed by the reductions in the level of land use for the staging of transport infrastructure I have recommended in Appendix B.

*Standard I.7.3 (2) - Table 2 – Column 1 Enabled Land Use*

9.158 Two submitters request similar amendments to clarify the operation of this column, and I support both:

- a) one submitter says the items are *“mischievously expressed as all of the individual aspects need to be achieved to trigger the threshold”* [332.7]; and
- b) another submitter requests amendments to make it clear *“that the exceedance of a single threshold brings the next row of upgrades into play, and that upgrades in Column 2 are cumulative”* [345.11] and requests amendments to (emphasis in original):

*Ensure that the drafting of 1.7.3 generally reflects the operation of Table 2 (which requires transport infrastructure in Column 2 to be operational **before** the activities, development or subdivision enabled in Column 1 is undertaken). It should also be made clear that:*

- *an exceedance of an individual threshold in a row (e.g. by a single dwelling or a single m<sup>2</sup> as the case may be) brings the next row into play / necessitates completion of the upgrades in the next row; and*
- *upgrades in Column 2 are cumulative – i.e. each row in Column 2 should also refer to the upgrades in the rows above as having to be operational to enable the activities, development and subdivision in Column 1.*

9.159 A submission point requests several changes to provide more clarity saying [344.27] the following, which I support:

*Within Table 2 for residential dwellings the reference is to “more than XX dwellings or residential lots”. Much greater clarity in the drafting of the precinct provisions is required to ensure that lots and dwellings (including potential development pursuant to permitted activity rights) are appropriately counted. This would align with ITA expectations: These upgrades are included in the proposed precinct provisions and are required to be implemented prior to any subdivision and development of land.*

*Where residential development is permitted based on the relevant AUPOP provisions, then these dwellings would not necessarily require a land use consent. Further, a ‘residential lot’ may have up to three dwellings as of right. This has obvious implications in terms of the way items in Column 1 of Table 2 are drafted. A robust monitoring mechanism is essential. As presently drafted, the provisions are uncertain.*

9.160 Two submission points request changes to recognise the different transport impacts, particularly with respect to ferry capacity, of residential and non-residential activities:

a) Submission point [344.27] requests changes and notes:

*“The employment associated with non-residential activities potentially has lesser or positive impact and combining them with residential or including them at all may not be appropriate given the main concern is around the generation of additional trips on the road network serving Beachlands. They are also not as reliant on the Ferry or passenger transport as a mode of transport.*

b) Submission point [352.1] requests that land uses (b)(ii), (c)(ii, iii, iv), (d)(ii, iii, iv) and (e)(ii, iii, iv) be deleted from the table so that there is no trigger for non-residential activities. A reason is that increased ferry capacity is required for any non-residential activity, and yet the increase in capacity appears to be driven by the residential development only.

9.161 I acknowledge that the ITA analysis has assumed that residential and non-residential activities will be developed more or less concurrently and relatively evenly distributed in time. That is unlikely to occur in practice, but it is a reasonable assumption for the purpose of determining precinct provisions.

9.162 I accept that demand for additional ferry capacity would primarily, or even solely, driven by residential development. Demand for ferry travel by non-residential activities is most likely to be in the off-peak direction where there is surplus capacity.

9.163 The same is also true for travel by road, but to a lesser extent. Unlike ferries, road travel in the off-peak direction can reduce the performance of intersections and mid-block sections.

9.164 For that reason I do not support there being no provisions relating non-residential activities and infrastructure requirements. I support modifications to the standard so that increases in ferry capacity were not linked with non-residential activities provided the link between non-residential activities and roading infrastructure improvements were retained.

Standard I.7.3 (2) - Table 2 – Column 2 Transport Infrastructure Required

9.165 A submitter (the plan change applicant) requests the table be amended to reflect changes to ferry passenger numbers and service times made in further information (as shown on Precinct Plan 6) [351.3] as follows:

|     | <b>Column 1 Land use enabled within the area identified on Precinct Plan 6 by transport infrastructure in column 2</b>   | <b>Column 2 Transport infrastructure required to enable activities or subdivision in column 1</b>  |
|-----|--|--|
| (a) | Up to a maximum of 250 dwellings and/or residential lots   | Site (A) on Precinct Plan 6: Upgrade of Whitford Maraetai Road / Jack Lachlan Drive intersection to traffic signals; and<br><br>Site (D) on Precinct Plan 6: Upgrade of Whitford Park Road / Whitford Road / Whitford Maraetai Road roundabout to a double roundabout.   |
| (b) | A provision of:<br>i. More than 250 and up to 550 dwellings or residential lots; and<br>ii. Up to 3,500m <sup>2</sup> light industrial GFA;  | Provision for an additional capacity of <del>400</del> <b>98</b> ferry passengers (total capacity of <del>600</del> <b>592</b> passengers) from Pine Harbour during the two-hour peak period between <del>0645-0845</del> <b>0630-0830</b> on weekdays; and  |
| (c) | A provision of:<br>i. More than 550 and up to 820 dwellings or residential lots;<br>ii. More than 3,500m <sup>2</sup> and up to 5,700m <sup>2</sup> light industrial GFA;<br>iii. Up to 400m <sup>2</sup> retail GFA; and<br>iv. Up to 1,100m <sup>2</sup> commercial GFA  | Provision for an additional capacity of <del>200</del> <b>198</b> ferry passengers (total capacity of <del>700</del> <b>692</b> passengers) from Pine Harbour Ferry Terminal during the two-hour peak period between <del>0645-0845</del> <b>0630-0830</b> on weekdays; and<br><br>Site (B) on Precinct Plan 6: Provision of an additional 30m left-turn approach lane on the northbound approach to the Whitford Park Road / Saleyard Road / Sandstone Road roundabout. |
| (d) | A provision of:<br>i. More than 820 and up to 1,900 dwellings or residential lots;<br>ii. More than 5,700m <sup>2</sup> and up to 12,300m <sup>2</sup> light industrial GFA;<br>iii. More than 400m <sup>2</sup> and up to 2,100m <sup>2</sup> retail GFA; and<br>iv. More than 1,100m <sup>2</sup> and up to 3,300m <sup>2</sup> commercial GFA.      | Provision for an additional capacity of <del>400</del> <b>458</b> ferry passengers (total capacity of <del>900</del> <b>952</b> passengers) from Pine Harbour during the two-hour peak period between <del>0645-0845</del> <b>0630-0830</b> on weekdays; and<br><br>Site (C) on Precinct Plan 6: Upgrade to Trig Road (south) intersection.  |
| (e) | A provision of:<br>i. More than 1,900 and up to 2,918 dwellings or residential lots;<br>ii. More than 12,300m <sup>2</sup> and up to 18,000m <sup>2</sup> light industrial GFA;<br>iii. More than 2,100m <sup>2</sup> and up to 5,700m <sup>2</sup> retail GFA; and<br>iv. More than 3,300m <sup>2</sup> and up to 5,100m <sup>2</sup> commercial GFA. | Provision for an additional capacity of <del>650</del> <b>730</b> passengers (total capacity of <del>1150</del> <b>1224</b> passengers) from Pine Harbour during the two-hour peak period between <del>0645-0845</del> <b>0630-0830</b> on weekdays.   |

9.166 I have not located the additional information containing changes to the ferry capacities or service times, or the reason for the changes requested.

9.167 I note the existing ferry services start at 06:20 and run at 20-minute intervals until 08:40. The ITA notes the “The existing weekday ferry capacity is currently approximately 500 passengers

during the peak two-hour period (6:45-8:45am)". I would also note the ferry timetable and services are subject to change, and that AT re-tenders ferry services on a regular schedule, with the result that ferry operators, and the vessels they own, for any particular service could change every few years.

- 9.168 Subject to further information being provided on this matter at the hearing, do not support the change in timing. From my review of the transport assessment I consider the ferry patronage is likely to be much lower than anticipated, so that the ferry capacities proposed would be excessive. I recommend changes to the capacities in Appendix B.
- 9.169 Table 2 expresses the ferry infrastructure required as, in row (b) for example "*Provision for an additional capacity of 100 ferry passengers (total capacity of 600 passengers) from Pine Harbour during the two-hour peak period between 0645 -0845 on weekdays*".
- 9.170 A submitter [332.7] states the ferry capacity measures should be changed, and suggests the current capacity is 438 seats, not 500 as implied by row (b) of the table. Table 2 currently refers to a number of passengers, not a number of seats, and that might account for the 438 vs 500 passenger difference, potentially allowing for standing passengers. The submission requests that the ferry capacity requirements "*should refer to a simple increase in capacity to the targeted number*" instead of a number of seats" which I support, and I recommend changes to the wording of this provision in Appendix B.

#### *Form of Upgrades*

- 9.171 Some submissions seek amendments to specify the appropriate form of the intersection upgrades, which I support:
- a) "*introduce policies and provisions around determining the appropriate form and timing of key intersections*" [344.12], also noted above;
  - b) "*...The upgrades must also be specified with the requisite specificity to enable certain application and enforcement. For instance, site (C) is on Precinct Plan 6 is described 'upgrade to Trig Road (south) intersection' and it is unclear what upgrade would satisfy this standard*" [345.13].

#### *Additional Infrastructure*

- 9.172 Some submissions seek that additional infrastructure items be included:
- a) "*All necessary upgrades must be specified in this table*" [345.13];
  - b) "*additional required upgrades (beyond those identified in the ITA) identified as necessary through further assessment, including (without limitation) to address matters raised in AT's submission on PPC 88*" [345.4];
  - c) active mode items [344.27]:
    - i) active mode connections in a timely manner such as early active mode access to the ferry facility or bus services;
    - ii) increased active mode connectivity throughout the PPC 88 area;
    - iii) intersection approach improvements [for cyclists]; and
    - iv) safe design where two-way cycle ways are proposed.
  - d) public transport items [344.27]:
    - i) The outcomes in Table 2, Column 2 do not address the full suite of mitigation proposed within the ITA [pg 55] which includes 3.5 hours of additional weeknight ferry operations, permanent weekend ferry services and supporting bus shuttle services to service the park and ride area;

- ii) upgrading of the ferry berthing area and land side infrastructure (likely to exceed the amount nominated within the ITA);
  - iii) higher capacity ferries that are available to operate at (at least) a 20-minute headway to the capacity identified within the ITA and I.7.3;
  - iv) Connections through the development (including staging of internal networks and intersections) so that buses can operate efficiently;
  - v) Additional public transport services for the Precinct Plan area;
- e) road infrastructure items:
- i) provisions to avoid adverse effects on the key arterial road Whitford-Maraetai Road [344.11];
  - ii) Whitford-Maraetai Road (and shoulder) widening to three or four lanes [344.27];
  - iii) intersection upgrades to two lane roundabouts [344.27];
  - iv) the Whitford Bypass [344.27];
  - v) safety improvements including new or upgraded road safety barriers and hazard removal (trees, non-traversable swales, power poles) [344.27];
  - vi) safety improvements to Whitford Road between the village and Somerville Road intersection, including Mangemangeroa Bridge [344.27];
  - vii) improvements to the intersections of Ormiston Road and Murphys Road and Whitford Road and Somerville Road [344.27];
- f) separate and/ or additional upgrades relating to the timing and delivery of a primary and/ or secondary school [351.4].

9.173 For the reasons set out in my assessment (Section 6), I support each of these points.

#### *Timing of Infrastructure*

9.174 Some submissions requested amendments in relation to timing of infrastructure including:

- a) to including the timing of delivery of key active mode infrastructure such as the Fairway Reserve [344.5];
- b) to introduce ‘*provisions around determining the appropriate form and timing of key intersections*’ [344.12], also noted above;
- c) Amend Standard I.7.3 (e.g. standard (2)) to ensure that any relevant infrastructure upgrades listed in Column 2 are operational before the relevant level of activity / land use / subdivision in Column 1 is allowed to occur, and that there is no ambiguity as to the operation of I.7.3 and Table 2 (for instance, that it is clear that the exceedance of a single threshold brings the next row of upgrades into play, and that upgrades in Column 2 are cumulative) [345.11].

9.175 I support those points and recommend modified provisions in Appendix B.

9.176 A submitter requests the plan change “*Retain provisions which require staging of transport infrastructure upgrade outcomes which address the transport network effects of growth enabled by PPC 88 and amend as appropriate to give effect to other relevant relief sought in this submission ... e.g. consideration of stronger staging or review provisions ...*” [344.24]. I support that request. I discuss the provisions in Section 7 and provide recommended amendments in Appendix B.



- 9.177 A submission requests that the standard be amended “generally to ensure consistency (e.g. to refer to activities, development and subdivision where appropriate)” [345.12].
- 9.178 Another recommends drafting the provisions to be similar to those “*contained in the recently approved Waihoehoe, Drury Centre and Drury East precincts, adapted as necessary*” [345.14]. Those provisions have:
- a) an Activity Status of either Discretionary or Non-Complying for various rows in the table as discussed earlier;
  - b) a different Purpose for the infrastructure staging standard;
  - c) a requirement that any applicant agree on an Augier basis to buildings not being occupied until the infrastructure is in place;
  - d) a reference to the related Special Information Requirement; and
  - e) each row in the table includes infrastructure items in earlier rows.
- 9.179 I support some of those items being included in the provisions and recommend the provision of infrastructure prevent construction of buildings rather than occupation of buildings which dispenses with the need for the Augier agreement.
- 9.180 Several submissions raised insufficient parking as an issue including:
- a) does not provide enough parking in the development [196.2, 219.1, 238.1, 239.1, 239.1, 316.1, 328.2, 332.3];
  - b) the MDRS does not allow for sufficient parking [336.4];
  - c) there is no indication that medium density housing will provide sufficient garage space for off-street parking [63.2];
  - d) modify the plan change to require two or more off-street carparks per unit [312.3, 356.1]; and
  - e) a request to build secure lifestyle retirement homes with garaging and motor home parking [155.3];
- 9.181 From my research, including surveying the demand for on-street parking in medium-density residential areas, the demand for on-street parking exceeds the supply in most modern Auckland medium-density residential subdivisions. This typically results in cars being parked illegally across footpaths, on reserves, and in on-street areas where they make movement difficult and/ or unsafe.
- 9.182 The provision of cheap or easy to access parking is also seen by some as encouraging private vehicle use with a concern that could result in additional travel producing more emissions and more congestion.
- 9.183 There is no Unitary Plan or other subdivision requirement for on-street parking to be provided within new streets. The NPS-UD prevents the Unitary Plan from having a minimum parking requirement standard for activities.
- 9.184 While the Unitary Plan has maximum parking standards for some activities such as offices, for the most part the provision of parking is now a decision made by developers, subject to the Council sometimes considering effects arising from the provision of too few or too many parking spaces for activities that require consent under E27.
- 9.185 Due to the NPS-UD not allowing a Plan to contain a minimum parking standard, there is no ability to impose a minimum parking requirement in the precinct provisions.
- 9.186 There is ability for an appropriate supply of parking to be referenced in the Objectives, Policies, as a matter of discretion, and in assessment criteria for subdivision; however, this is an



Auckland-Wide issue and this precinct would not have special characteristics in relation to parking. For that reason I consider this is best addressed in E27 and do not support the inclusion of parking in those parts of the precinct provisions.

#### I.9 Assessment – restricted discretionary activities

9.187 One submitter [344.5] requests amendments to incorporate matters of discretion and associated assessment criteria, to provide for timely, efficient, safe and effective active mode networks by:

- a) Requiring establishment of safe active mode connections to / from the ferry berth and to local facilities early in development so active mode connections are immediately available to provide travel options and assist in establishing active travel patterns.
- b) Ensuring safe walking and cycling facilities are provided for as part of the proposed road/ street network including local roads and access ways and provisions for rear access along roads with cycle facilities.

9.188 I support that submission point, and that as described in the submission, the provision should include appropriate timing for the provision of safe active mode crossing points on Jack Lachlan Drive to link development in the PC88 precinct with activities in the existing Beachlands area.

9.189 The same submitter [344.32] also requests that matter of discretion I.9(3) make clear the broader matters of discretion in I.9.(1) with the following amendment, which I support.

- (3) New buildings, other than buildings for residential units in a residential zone [...]
  - (c) Infrastructure servicing;
  - (d) Design and sequencing of upgrades to the existing **transport road** network and ferry services;
  - (e) The extent to which development achieves the outcomes outlined in the Beachlands South Sustainability Strategy; and
  - (f) Movement network on Precinct Plan 5.

#### I.10 Special Information Requirements

9.190 The plan change requestor [351.7] requests the requirement of a Travel Management Plan. The same text has already been added to the September 2022 version of the notified precinct provisions as I.10 (6). It proposes:

**A Travel Management Plan (TMP) is required for commercial activities greater than 500m<sup>2</sup> within this precinct. A TMP must be prepared by a suitably qualified and experienced person and include:**

- (a) Operational measures to be established on-site to encourage reduced vehicle trips;**
- (b) Operational measures to be established to restrict the use of any employee parking area(s) during peak periods;**
- (c) Details of the management structure within the building or site in which the activity is to be located which has overall responsibility to oversee the implementation and monitoring of travel management measures; and**
- (d) The methods by which the effectiveness of the proposed measures outlined in the TMP can be independently measured, monitored and reviewed.**

9.191 The Unitary Plan defines “Commercial activities” as:

The range of commercial activities including offices, retail and commercial services providers<sup>46</sup>.

- 9.192 Commercial services are similar to retail activities except they sell services rather than goods, and include activities such as banks, travel agents, and hairdressers.
- 9.193 The AUP already has provisions intended to limit the travel demand of office activities district-wide by implementing a maximum parking standard.
- 9.194 In my view the proposed wording of provision (b) is ambiguous, as it is unclear who is to be restricted from using employee parking areas. I presume the intention is that employees should be restricted from using any parking set aside for their use during peak periods, presumably in an attempt to reduce peak-hour vehicle travel by employees. In my view that provision, if effective, would likely relocate employee parking onto the street or other areas and be contrary to internalisation of effects of the proposal, and for that reason I oppose that part of the proposed TMP requirements.
- 9.195 A submitter requests that the notified I.10 (4) or a similar provision requiring an Integrated Transport Assessment be retained [344.34] which I support, subject to the amendments and additions below.
- 9.196 The same submitter requests that the precinct provisions be amended “to include a new provision such as I452.9. Special information requirements (Waihoehoe Precinct) and be applicable to permitted development as well as subdivision, development or uses that require consent” [344.23].
- 9.197 For reference, I452.9<sup>47</sup> contains three sections relevant to transport requiring:
- a) an Integrated Transport Assessment that must assess several specific matters;
  - b) demonstration of compliance with the staging requirements including the maximum quantum of activity to be enabled, as well as anticipated activities for subdivision involving super lots; and
  - c) A Transport Design Report including concept plans, transport modelling and land use assumptions. Where an interim upgrade is proposed additional information is required.
- 9.198 The same submitter [344.33] requests an additional special information requirement, which is similar to that contained in I452.9:

#### (6) All activities

All applications are to provide a register of development and subdivision that has been previously approved under Standard I.7.3 Staging of Development with Transport Upgrades. The register shall include details of the maximum number of dwellings or amount of retail, commercial or light industrial GFA proposed to be enabled (as well as anticipated dwellings/GFA for any subdivision proposal involving superlots) completed since the most recent transport upgrade under 1.7.3 Table 2 in a format which illustrates compliance (or otherwise) with 1.7.3.

- 9.199 I support that submission point in general, although in my view the register must include all development within the precinct, not just that previously approved under I.7.3, and it should include any consented activities not included within Table 2.

#### I.11 Precinct Plans

##### *Precinct Plan 5 Movement Network*

- 9.200 Submitters request a few changes to Precinct Plan 5 Movement Network so that it:

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<sup>46</sup> Pg 30 AUP Chapter J Definitions

<sup>47</sup> Introduced in PC50, Fully Operative 16 December 2022.

- a) shows the exact proposed location of the Primary Road Corridor (School) Road intersection with Jack Lachlan Drive in a position that does not compromise future access to 101 Jack Lachlan Drive [205.3], which I support;
- b) includes 600 Whitford-Maraetai Road [206.9], which I do not support; and
- c) identifies key intersections including collector / collector, and intersection of the proposed road serving the proposed business area and Jack Lachlan Drive [344.12], to link with other provisions, which I support.

*General*

I.12 Appendix 1 Road Design

9.201 Some submissions request amendments in relation to road design:

- a) Require roads to be built to relevant standards / wide enough to ensure fire service access even with cars parked both sides [156.2, 195.2, 312.3]; and
- b) include specific planning provisions (including objectives, policies and rules) to require subdivision and development to provide active mode connections to adjacent sites and ensure intersections are designed to prioritise vulnerable road users [327.6].

9.202 A submitter requests the addition of a new figure to the appendix which provides the concept design of the intersection on Jack Lachlan Drive including access into 101 Jack Lachlan Drive [205.4]. I support that request.

9.203 AT [344.35] requests the drawings be deleted and a table similar to I452.11 Appendix 1 be used instead, along with a new activity within the activity table (as a restricted discretionary activity), an appropriate matter of discretion, and an assessment criterion. Reasons given include:

- a) I.12 does not indicate the need to provide a geometry capable of accommodating buses to likely bus routes;
- b) any two-way cycle facilities need to be supported by appropriate design or else need to be on both sides with potential additional road width;
- c) roads may need to be changed to reflect constraints or localised requirement (e.g. additional or lessor width may be required compared to the standard);
- d) the local road of 15 metres is less than the usual minimum local road standard;
- e) the one-sided local road with no footpath on one side needs to be justified or removed with local road as a default with criteria where not required (e.g. park edge);
- f) the terminology of some of the road types such as “local collectors” is confusing;
- g) there are insufficient provisions and criteria to address departures from I.12;
- h) the movement network includes an overly fine-grained network and some local roads may not be required and should be removed from the movement plan;
- i) Jack Lachlan Drive is not included within I.12.

9.204 I note that I.12 is not a standard, but only a reference point for an assessment criterion, but it does nonetheless set expectations for road design that would be appropriate, when in my view roads designed in accordance with I.12 may not be appropriate.

9.205 I agree with each of the reasons given and support the submission point.

### General or Non-Specific

- 9.206 A submitter requests amendments to the precinct description, objectives, policies, standards, and other provisions (including e.g. precinct maps) to ensure that urban development does not occur in advance of necessary transport infrastructure being in place and operational [345.6], which I support.
- 9.207 One submitter requests amendment of the precinct text “(e.g. the precinct description and purpose statement in 1.7.3) use more certain language such as ‘minimise’.” That submitter supports the acknowledgement in the precinct description that transport infrastructure upgrades are necessary to address adverse effects on the local and wider network. The submitter considers those upgrades “*should in turn be reflected throughout the precinct provisions*” [345.7], which I support.
- 9.208 A submitter requests the proposed plan change text be amended to reflect the increased Plan Change and Future Urban Zone areas resulting from the inclusion of 600 Whitford-Maraetai Road in the plan change [206.11]. I oppose this submission point as I oppose the request to include that site.
- 9.209 As noted earlier, a submission point requests the precinct provisions be amended to incorporate any additional required upgrades (beyond those identified in the ITA) identified as necessary through further assessment, including (without limitation) to address matters raised in AT’s submission on PPC 88 [345.4], and I support that point for each of the raised matters that I support.
- 9.210 A submitter requests amendments to the precinct policies, provisions and plans to ensure the ability to serve by active mode and passenger transport the needs of each stage of development, connect with the surrounding network and ensure that interim adverse effects are adequately avoided, remedied or mitigated [344.6]. I support that submission point.
- 9.211 That submitter also requests amendment to the provisions to remove references to traffic signals, to support the appropriate form for key intersections being determined through the resource consent process, and to identify key intersections on the precinct plans [344.12]. I support those requests.

### I403 Beachlands Precinct

- 9.212 As noted by a submitter [344.5] PC88 may also require amendments to I403. The submitter notes:
- Beachlands Precinct 1 (I403) contains a number of requirements to retain the rural character of Jack Lachlan Drive (particularly Rule I403.6.7(9)). It is unclear how these provisions will be addressed by PPC 88.*
- 9.213 The I403 provisions relating to Jack Lachlan Drive include Objective 7, along with Policies 3 and 28, Standard I403.6.7, and Precinct Plan 1.
- 9.214 The standard contains a number of requirements including that direct vehicle access not be provided along some parts of the northern side of Jack Lachlan Drive as shown on Precinct Plan 1. The prohibition on direct site access is generally for reasons of inadequate sightlines along Jack Lachlan Drive to provide adequate safety.
- 9.215 As noted by the submitter, Standard I403.6.7, subject to a few exceptions, requires Jack Lachlan Drive to remain rural in form and appearance. PC88 conflicts with and is contrary to the provisions of I403.
- 9.216 I agree with the submitter that if PC88 is approved, I403 would need to be modified.

## 10 Conclusions and Recommendations

### Conclusions

#### Adequacy of Assessment

- 10.1 The Integrated Transport Assessment (ITA) and additional transport information supplied with the plan change have used common methodologies, but most of the assumptions made are made on the basis of insufficient with inadequate sensitivity analysis or are not in accordance with the data that is available.
- 10.2 Values, constraints and opportunities within the transport environment have not been identified adequately.
- 10.3 The applicant's transport assessment significantly under-estimates the future traffic volume on Whitford-Maraetai Road without the proposed plan change. Historical growth has been in the order of 3.2 - 4.5% p.a. The ITA uses population forecasts to estimate future growth rates of between 0% and 0.52% p.a. to 2038, and the modelling incorporates growth of only 0.46% to 2038.
- 10.4 The application material describes the plan change as ensuring or delivering a transit-oriented development in close proximity to the Pine Harbour ferry berth, which along with the provision of employment and other activities would lead to moderate increases in motor vehicle travel outside the area.
- 10.5 The majority of the plan change area is well outside the walkable catchment of the ferry berth, which provides a Local level service to one destination, albeit one that is well connected and provides a wide range of services. Private vehicle travel will continue to provide faster and more attractive journeys to a wider range of employment opportunities and other activities. That travel must occur on Whitford-Maraetai Road and the other roads that link Whitford Village to the rest of the Auckland urban area.
- 10.6 The transport assessment significantly over-estimates the proportion of new residents that would travel by ferry or bus, and significantly over-estimates the proportion of new residents that will be employed locally or otherwise remain within the local area. For example, the ITA assumes:
  - a) ferry use would more than double from 6% now to 13% in future, despite an expected secondary school reducing demand for travel to education;
  - b) bus use would more than double from 1% now to 2.5% in future with negligible change to journey times or service frequency, and in reliance on AT to provide improvements;
  - c) residential trip generation would be low like it is in metropolitan areas;
  - d) non-residential trip generation rates would be low;
  - e) a golf-course zoned for residential development would not be developed for residential activity;
  - f) a new (secondary) school would result in fewer vehicle trips outside Beachlands, not reflecting the significant uncertainty around the provision or timing of a school;
  - g) fewer residents would leave the area for employment despite the dwellings to jobs ratio being similar to the existing level;
  - h) fewer residents would leave the area for all other reasons.
- 10.7 The ITA under-estimates the volume of traffic that development enabled by PC88 would generate, and significantly under-estimates the volume of traffic that would be added to surrounding roads, particularly Whitford-Maraetai Road.

- 10.8 As a result the likely adverse effects on the transport environment have not been adequately identified or described, and the beneficial effects have been overstated.
- 10.9 Development enabled by the plan change would likely generate transport effects in addition to those described, such as an increase in travel time, congestion, emissions, and crashes along Whitford-Maraetai Road and the roads that connect Whitford to the rest of Auckland.
- 10.10 The ITA briefly considers the development that might be enabled by eventual live-zoning of the land proposed to be zoned Future Urban, estimating it could be similar to that enabled by the proposed live-zoned land. The ITA also briefly considers the transport infrastructure that might be required to support live-zoning of the FUZ land, including widening of Whitford-Maraetai Road. In my view there is insufficient justification for including any future-urban land.
- 10.11 The methods proposed to avoid, manage or mitigate those adverse effects are insufficient.
- 10.12 In my view the applicant has not adequately assessed the private plan change effects on the environment related to transport effects.

#### Planning Framework

- 10.13 In my view the private plan change is not consistent with the provisions of Resource Management Act, National Policy Statements, or Auckland Unitary Plan including the Regional Policy Statement.
- 10.14 In addition, the plan change is not consistent with other relevant documents including the Auckland Plan, Climate Plan, or the Draft Future Development Strategy.
- 10.15 While PC78 Intensification and the Beachlands Transport Infrastructure Constraint Qualifying Matter as notified have not been considered or decided at this time, the research and information informing the formulation of the BTIC are useful and relevant to consider. PC88 is contrary to those matters.

#### Additional Methods

- 10.16 In my view there are no additional management methods that could ensure consistency with the higher order planning documents, as a fundamental reason for the plan change inconsistency is the relatively remote location of Beachlands with respect to the principal Auckland urban area.

#### Additional Information

- 10.17 There are conflicting viewpoints on the ability of the current ferry berth to accommodate larger vessels. The applicant is of the view the existing berth is sufficient. Submitters, including Auckland Transport, are of the view that the existing berth is insufficient and that provision of berthing facilities for larger vessels would have significant consenting, time, and cost implications. I do not have expertise in marine engineering, and additional information on this matter would be beneficial. In the absence of additional information I rely on AT.

#### Areas of Significant Concern

- 10.18 There is significant uncertainty around the ability of the plan change applicant to deliver the required transport upgrades contained in the proposed plan change provisions. The uncertainty arises from poor design of some intersection upgrades, and the need for third-party land to be acquired.
- 10.19 While the applicant has identified a potential source of funding, the proposed funding plan makes contributions to some items, leaving the remainder of those items and the full cost of others to be borne by Auckland Transport. While many or all of those items are the responsibility of Auckland Transport to provide, that does not reflect the reality that Auckland Transport's funds are limited so the provision of those transport infrastructure and service projects is likely to be significantly delayed.

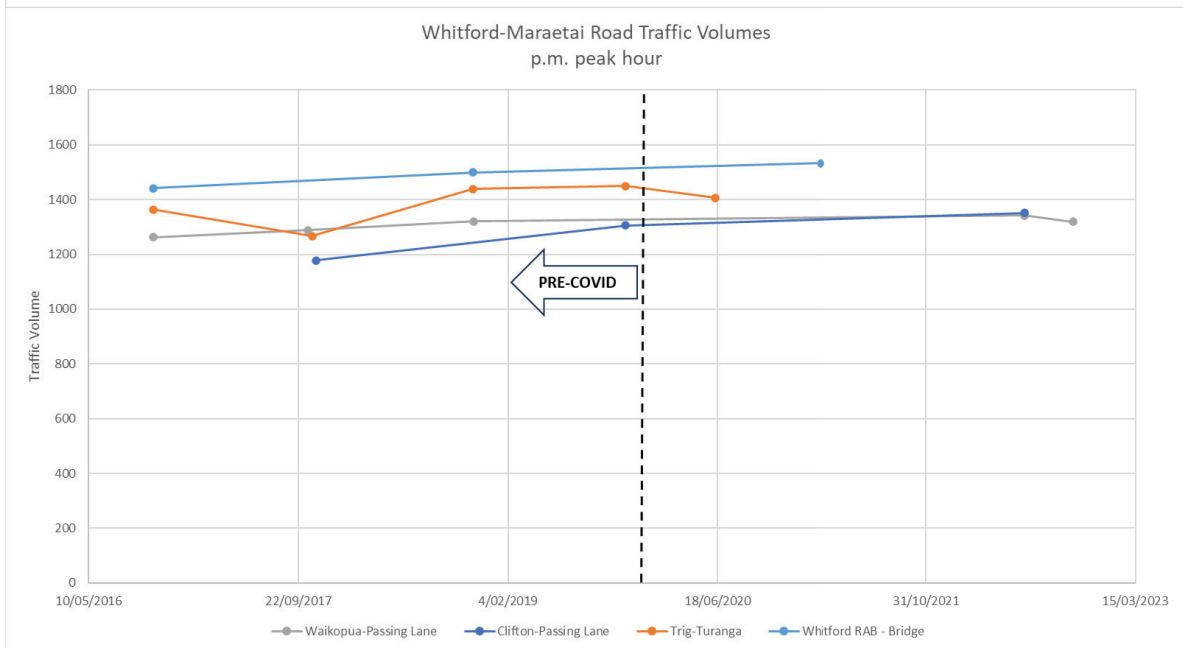
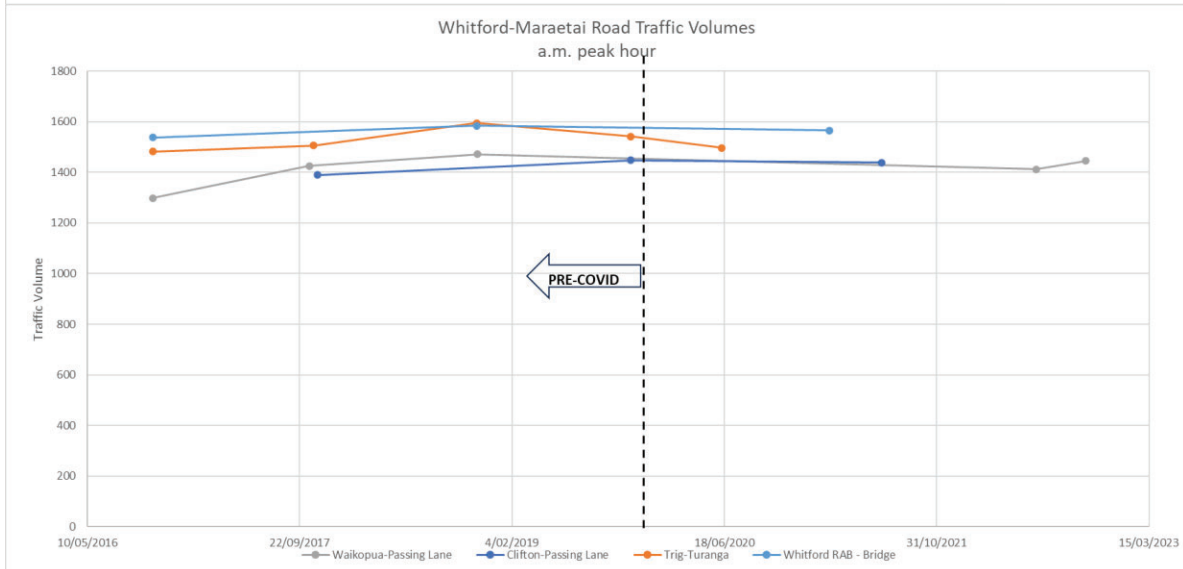
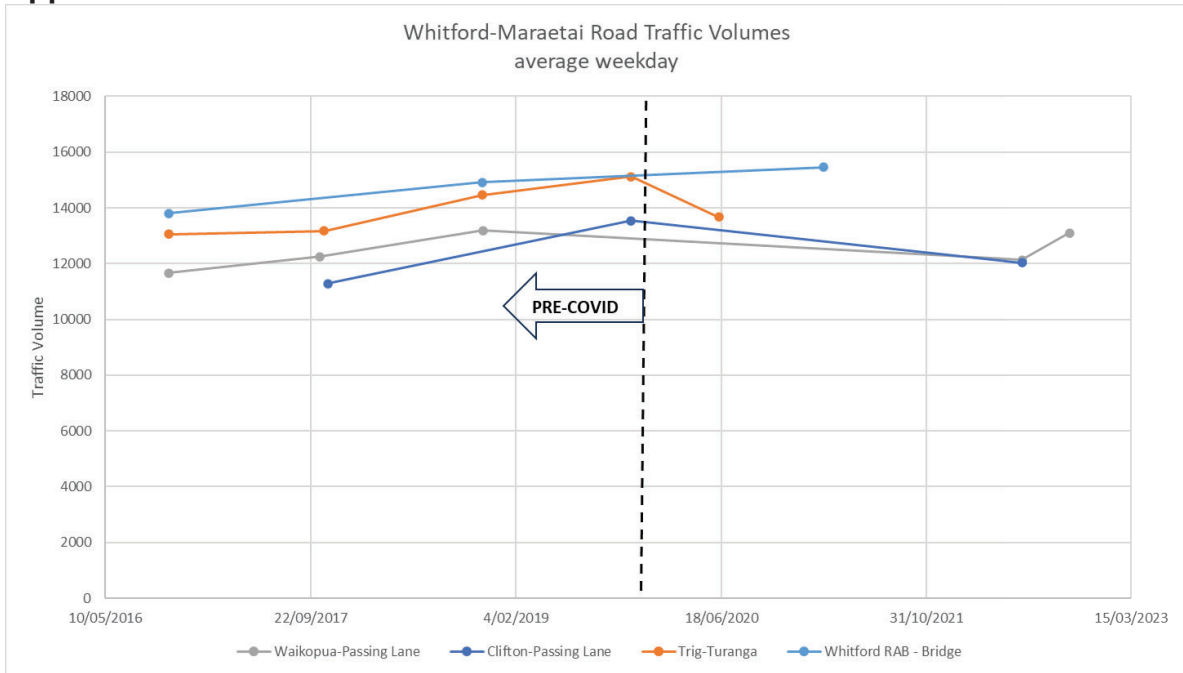


- 10.20 In my view the applicant's transport analysis significantly under-estimates the future traffic volume on Whitford-Maraetai Road and its feeder routes with and without the plan change, and the adverse effects resulting from higher volumes. The ITA acknowledges Whitford-Maraetai Road is currently over-capacity and has safety deficiencies. It expects these matters to be addressed, if at all, by Auckland Transport.
- 10.21 For that reason, transport infrastructure in addition to that identified would be required. That should include projects including additional intersection upgrades, the Whitford Bypass project, and the realignment and four-laning of Whitford-Maraetai Road. The cost of those projects is considerable. Recent analysis by Auckland Council and Auckland Transport to inform PC78 and the Draft FDS have identified the significant cost of transport infrastructure to provide for growth at Beachlands is not justified, leading the Council to constrain growth at Beachlands and not identify any new growth areas around it.
- 10.22 To conclude, there are several transport areas of significant concern that, in my view, warrant declining the plan change request.

### **Recommendations**

- 10.23 I am unable to support the private plan change with or without modifications. My overall recommendation is that the plan change be declined because:
- a) the plan change material under-estimates the volume of traffic that PC88 could enable;
  - b) the plan change material under-estimates the effects on the transport environment and does not provide sufficient mitigation of those effects;
  - c) there is significant uncertainty that the mitigation measures proposed are suitable, and that the applicant may not be able to achieve suitable upgrades, particularly where third-party land is required;
  - d) the plan change is not consistent with the RMA, NPS-UD, or AUP including the RPS;
  - e) the plan change is not consistent with the Auckland Plan and its Development Strategy, the Draft FDS, the Climate Plan, or TERP;
  - f) the plan change is contrary to the analysis that resulted in the Council proposing to limit intensification at Beachlands by introducing the Beachlands Transport Infrastructure Constraint Qualifying Matter in PC78 (which is yet to be decided).
- 10.24 Should the plan change be approved, I set out in Appendix B a set of precinct provisions with possible amendments that could assist in partly managing some of the adverse effects on the transport environment.

# Appendix A: Historical Traffic Counts on Whitford-Maraetai Road



## Appendix B: Recommended Changes to Provisions

- B.1 If Plan Change 88 is approved, I recommend the following changes are made to the provisions.
- B.2 The provisions are based on the earlier notified version as the September 2022 version contains few changes relevant to transport, and the most significant of those that are relevant are also requested in submissions.
- B.3 I have provided submission point numbers against recommended changes where appropriate, but in order to save space and improve legibility in some cases only one representative submission point reference from many applicable points is used.
- B.4 Some amendments I recommend are not directly linked to particular submission points but are grammatical changes made in an effort to improve the understanding or operation of the provision. Those amendments are marked [G]

### I.1. Beachlands South Precinct

#### I.2. Precinct Description

The Beachlands South Precinct applies to approximately 307 hectares of land with a contiguous boundary to the existing coastal town of Beachlands. The purpose of the Beachlands South Precinct is to provide for significant expansion of the existing coastal town of Beachlands ~~into a comprehensively planned and public transport focussed community adjacent to the Pine Harbour Ferry Terminal that supports the development of a well-functioning urban environment.~~

The precinct comprises a variety of urban zones for residential, business, light industrial and recreational development opportunities. This variety of urban zones will enable the development of a wide range of activities that will support the expansion of the existing coastal town of Beachlands. The remainder of the precinct is zoned Future Urban and will be rezoned for urban purposes in the future in coordination with identified infrastructure upgrades and funding.

Development of this precinct will be guided by the following precinct plans:

- Precinct Plan 1: Additional Controls and Overlays
- Precinct Plan 2: Natural Features
- Precinct Plan 3: Structuring Elements
- Precinct Plan 4: Cultural Landscape
- Precinct Plan 5: Movement Network
- Precinct Plan 6: Transport Staging and Upgrades
- Precinct Plan 7: Earthworks Catchments

A high-quality built environment is planned for the Beachlands South Precinct. To ensure this high-quality design outcome, the resource consent process will enable a qualitative design assessment against the relevant matters of discretion and assessment criteria. Development in this precinct will also be externally assessed by the Beachlands South

Design Review Panel to ensure the specific placemaking design outcomes for Beachlands South are achieved.

...

## Sustainability

A key attribute of the Beachlands South Precinct is sustainability and contributing to mitigating the effects of climate change and biodiversity loss. The precinct achieves this by ~~promoting a modal shift to public transport and~~ requiring the provision of a highly integrated and connected walking and cycling network including a coastal walkway, implementation of water sensitive design principles and promoting low-carbon development with on-site carbon sequestration through native planting to enhance biodiversity values.

...

## Transport Infrastructure and Staging

~~The transport network in the wider Beachlands area and services at the Pine Harbour Ferry Terminal will be progressively upgraded and funded over time to support development in the precinct.~~ The precinct includes provisions to ensure that the subdivision and development of land ~~for business and housing~~ is coordinated with the construction and delivery of infrastructure, including upgrades to the road network and ferry services to manage adverse effects on the local and wider network.

## Zoning and Sub-precincts

The zoning of land within the Beachlands South Precinct is Residential – Terrace Housing and Apartment Building, Residential - Mixed Housing Urban Zone, Residential – Large Lot, Business – Mixed Use, Business – Local Centre, Business – Light Industry, Open Space – Active Sport and Recreation and Future Urban.

There are six Sub-precincts in the Beachlands South Precinct:

- **Sub-precinct A, Marina Point** is zoned Residential – Terrace Housing and Apartment Buildings and Residential - Mixed Housing Urban. It's location between the Pine Harbour Ferry Terminal and the Precinct's Village Centre provides the opportunity for high-intensity residential development to complement the local centre and maximise the efficient use of land adjacent to a ~~significant~~ public transport infrastructure asset. A key feature of this sub-precinct is the Fairway Reserve which is a generous band of recreational and amenity open spaces extending between the existing Marina to the north and the Village Centre to the south.
- **Sub-precinct B, Village Centre** is located on the central circulation spine and zoned Business – Local Centre and Business – Mixed Use. It is intended to provide for high density residential opportunities, employment and a range of commercial activities for the local convenience needs of surrounding residential areas. The Village Centre is ~~strategically~~ located to support the Pine Harbour Ferry Terminal and is intended to complement the existing commercial activities within Beachlands/Maraetai. This sub-precinct is the focal point for local retail, commercial services, offices, food and beverage, and appropriately scaled supermarkets. Development in this sub-precinct envisages a ~~high-quality~~ street environment for walking and cycling to the existing Beachlands community, within the Village Centre itself and to the Pine Harbour Ferry Terminal. The Village Centre is orientated with views down to the western gully over the coastal edge and beyond to Rangitōtō Island, reinforcing the connection with the sea.
- **Sub-precinct C, Community** is zoned Residential – Mixed Housing Urban, Open Space – Active Sport and Recreation and Business – Mixed Use. This sub-precinct is

intended to be the focal point for civic and community facilities including a destination civic space to reinforce the Village Centre and public open spaces for informal recreation. Opportunities for visitor accommodation and associated amenities are also provided for through the adaptive reuse of existing buildings. The development of education facilities is provided for within this sub-precinct and ~~its~~ [G] colocation with other ~~planned~~ **enabled** [G] community facilities ~~will~~ **would** [G] enable the use of shared facilities/amenities accessible by ~~strong~~ pedestrian connections while maximising the efficient use of land. Given its proximity to the Village Centre, community facilities and the Pine Harbour Ferry Terminal, the development of high-density housing is envisaged along the northern boundary of this sub-precinct which will enjoy benefits of outlook over ecological areas that are being retained.

- **Sub-precinct D, Coastal** is zoned Residential – Terrace Housing and Apartment Buildings, Residential - Mixed Housing Urban and Residential – Large Lot. The sub-precinct is located along a coastal escarpment with significant landscape features including a central ridge sloping towards a densely vegetated gully of significant terrestrial and ecological value. Development in this sub-precinct will respect the natural rolling topography and landform character while ensuring people and property is protected from natural hazards. The coastal edge of this sub-precinct is celebrated with the provision of a **high-quality** public open space network for walking and cycling connections offering sweeping views of the Hauraki Gulf and Waikōpua Estuary. Residential densities in this sub-precinct are expected to be high to medium density closer to the Village Centre, in combination with terraced and detached housing, and provision for larger lots within the Large Lot Zone along the coastal edge which are subject to the Subdivision Variation Control.
- **Sub-precinct E, Golf** is zoned Residential - Mixed Housing Urban. The purpose of this sub-precinct is to provide for the maintenance and on-going activities of the remaining 9-holes golf course within the Golf Course Overlay while respecting significant ecological features. The underlying zoning provides opportunities for residential development ~~in the future~~ [344.14] in accordance with the planned urban built character of the MHU zone.
- **Sub-precinct F, Employment** is zoned Business - Mixed Use and Light Industry. Its location at the eastern edge will be **highly** ~~accessibly~~ [G] to the existing Beachlands-Maraetai community and will provide a local employment source. Development in this sub-precinct should ensure a high-quality built environment is achieved to ensure it is aligned with the overall high-quality development aspirations for Beachlands South overall.

### 1.3. Objectives (precinct-wide) [rp/dp]

All relevant overlay, Auckland-wide and zone provisions apply in this precinct unless otherwise specified below.

All relevant overlay, Auckland-wide and zone objectives apply in this precinct in addition to those specified below.

...

~~(7) Beachlands South is a highly sustainable and low carbon coastal town.~~

- (8) Beachlands South is **public transport focussed** development that supports high density residential, employment ~~generating~~ [G], retail and community activities within walking ~~and or~~ [G] cycling distance of the Pine Harbour Ferry Terminal in a manner which prioritises active modes of transport.

- (9) Beachlands South is a walkable coastal town with a street-based environment that positively contributes to pedestrian amenity, safety and convenience for all active modes. Beachlands South develops and functions in a way that:
- (a) Results in a **significant** mode shift to public and active modes of transport including walking and cycling;
  - (b) Provides safe and effective active mode movement between focal points of commercial activity, community facilities, **educational facilities**,<sup>[357.4]</sup> housing, jobs, open spaces and the Pine Harbour Ferry Terminal; and
  - (c) Integrates with, and minimises adverse effects on the safety and efficiency of, the surrounding transport network, including any upgrades to the surrounding network.
- (10) Subdivision and development in the precinct ~~is coordinated with the efficient provision of required~~ **do not occur in advance of the availability of operational** transport, water, energy and telecommunications infrastructure <sup>[345.7]</sup>, **and consider the appropriate provision of car parking.** <sup>[196.2 et al]</sup>

**(10A) Subdivision and development do not occur in advance of the availability of operational transport infrastructure.** <sup>[344.17]</sup>

...

- (14) A high-quality coastal walkway and connected network of open spaces is established which recognises the need to protect and manage effects on the marine significant ecological areas.

*Sub-precinct A: Marina Point*

- (15) The highest density urban living is developed in sub-precinct A closest to the Pine Harbour Ferry Terminal ~~and along key planned public transport routes~~ and the Fairway Reserve.
- (16) A series of high-quality, safe and well-connected of open spaces are established in sub-precinct A and supported by clear north-south connections including the Fairway Reserve Area, spine road and coastal walkway.

*Sub-precinct B: Village Centre*

- (17) A compact, walkable and active pedestrian environment that provides priority to pedestrians and cyclists in a high-quality and slow speed street environment.

...

**I.4. Policies [rp/dp]**

All relevant overlay, Auckland-wide and zone policies apply in this precinct in addition to those specified below.

...

*Transport, Infrastructure and Staging*

- (11) Require **that** <sup>[345.7]</sup> subdivision and development in the precinct ~~to be coordinated with required~~ **does not occur in advance of the availability of operational** <sup>[345.7]</sup> transport infrastructure upgrades to minimise the adverse effects of development on



the safety, efficiency and effectiveness of the surrounding and wider [345.8] ~~road~~  
transport [344.18] network.

- (12) Promote a mode shift to public transport and active modes by:
- (a) Encouraging Requiring [327.6] walking and cycling connections to the Pine Harbour Ferry Terminal, including along the indicative coastal walkway and indicative primary and secondary collector roads as shown in Precinct Plan 5; ~~and~~
  - (b) Encouraging Requiring [327.6] streets to be designed to provide safe separated access for cyclists on collector roads-;
  - (c) Providing direct active mode connections to ferry and town centres at the same time as residential development establishes; [344.19] and
  - (d) Ensuring connections and linkages are effectively integrated within the Precinct and into the existing Beachlands settlement. [357.5]
- (13) Require subdivision and development in the precinct to be coordinated with the provision of sufficient stormwater, wastewater, water supply, energy and telecommunications infrastructure.

#### *Movement Network*

- (14) Require primary and secondary collector roads to be generally in the locations as shown on Precinct Plan 5, while allowing for variation, where it would achieve a better-connected street layout that integrates with the surrounding transport network.
- (15) Encourage the design of new collector and local roads to be in general accordance with the road design and cross section details provided in I.12 Appendix 1: Beachlands South Precinct, Road Design and Cross Section Details.
- (16) Ensure that development provides a local road network that achieves a highly connected street layout and integrates with the collector road network within the precinct, the surrounding transport network, and supports the safety and amenity of the open space and stream network.
- (17) Encourage streets to be attractively designed to appropriately provide for all modes of transport by:
- (a) Providing a high standard of amenity for pedestrians in areas where higher volumes of pedestrians are expected; and
  - (b) Providing for and prioritising active modes with safe separated access for cyclists on primary and secondary collector roads that link key destinations in the Precinct and the existing Beachlands settlement [357.6]; and
  - (c) Providing for the safe and efficient movement of vehicles.

#### *Open Space Network*

- (18) Establish an integrated movement and public open space network within and across the precinct as indicatively shown on Precinct Plan 3, including:
- (a) Providing a safe, attractive and connected network of indicative open space linkages such as walkways and pedestrian accessways in the Precinct and connecting to the existing Beachlands settlement [357.7];

- (b) Encourage provision of the indicative coastal walkway to enable access to and along the coast while avoiding adverse effects on the marine significant ecological areas;
- (c) Requiring provision of the Fairway Reserve and connection to the coastal walkway;
- (d) Enabling the provision of a high-quality civic space adjacent to the Village Centre;
- (e) Encouraging the establishment of a network of suburban and neighbourhood parks, walkways and pedestrian linkages.

### I.5. Activity table [rp/dp]

The provisions in any relevant overlays, zone and the Auckland-wide apply in this precinct unless otherwise specified below.

Activity Table IX.4.1 specifies the activity status for land use and development activities pursuant to section 9(3) of the Resource Management Act 1991 and the activity status for subdivision pursuant to section 11 of the Resource Management Act 1991.

**Table IX.4.1 Activity table**

#### All Sub-Precincts

| Activity  |   | Activity Status |
|---|---|-----------------|
| <b>Use</b>  |   |                 |
| <b>Accommodation Residential</b> [Notified Provisions September 2022 Version] |   |                 |
| (A1)  | Up to 3 residential units per site in a residential zone  | P               |
| (A2)  | More than 3 residential units per site in a residential zone  | RD              |
| <b>Development</b>  |   |                 |
| (A3)  | Buildings for up to 3 residential units per site in a residential zone  | P               |
| (A4)  | Buildings for more than 3 residential units per site in a residential zone  | RD              |
| (A5)  | Buildings for 1 or more residential units in a residential zone which do not comply with any of the I.7.14 Residential Density Standards below. | RD              |
| (A6)  | New buildings [excluding (A1) and (A3)]   | RD              |
| (A7)  | Demolition of buildings   | P               |
| (A8)  | Internal alterations to buildings   | P               |
| (A9)  | Additions and alterations an existing dwelling  | P               |
| (A10)   | Development that does not comply with Standard I.7.3 Staging of Development with Transport Upgrades   | D               |
| (A11)   | Development that does not comply with Standard I.7.4 Water Supply and Wastewater  | D               |
| (A12)   | Public amenities  | P               |
| (A13)   | Development of publicly accessible open spaces greater than 1000m <sup>2</sup>  | RD              |
| (A14)   | Development of a civic space as shown on Precinct Plan 3  | C               |
| (A15)   | Establishment of the Coastal Pathway as shown on Precinct Plan 5  | C               |
| <b>Ecological Protected Area Network</b>                                      |   |                 |
| (A16)   | Pest and invasive vegetation removal within the Ecological Protected Area Network as shown on Precinct Plan 2                                   | P               |
| (A17)   | Vegetation alteration or removal within the Ecological Protected Area Network (excluding high value terrestrial and wetland                     | P               |

|                    |  |   |
|--------------------|--|---|
|                    | vegetation) to form the indicative shared path links as shown on Precinct Plan 5   |   |
| (A18)              | Vegetation alteration or removal within the Ecological Protected Area Network (excluding high value terrestrial and wetland vegetation) for routine operation, <del>maintainence</del> <u>maintenance</u> [G] and repair of existing tracks. | P                                       |
| (A19)              | Vegetation alteration or removal within the Ecological Protected Area Network for all other purposes not otherwise provided for.   | <del>RD</del> <u>D</u> [Sept 22]        |
| (A20)              | Subdivision or development that does not comply with standard I.7.6 Ecological Protected Area Network  | D                                       |
| <b>Subdivision</b> |  |   |
| (A21)              | Subdivision that complies with Standard I.7.3 Staging of Development with Transport Upgrades   | <del>RD</del> <u>See Standard I.7.3</u> |
| (A22)              | Subdivision that does not comply with Standard I.7.3 Staging of Development with Transport Upgrades  | <del>D</del> <u>NC</u> [344.24, 345.12] |
| (A23)              | Subdivision that complies with Standard I.7.4 Water Supply and Wastewater  | RD                                      |
| (A24)              | Subdivision that does not comply with Standard I.7.4 Water Supply and Wastewater   | D                                       |
| <del>(A25)</del>   | <del>Subdivision for 1 or more residential units per site in a residential zone</del>  | <u>C</u>                                |

| <b>Sub-Precinct A, Marina Activity</b> |  | <b>Activity Status</b> |
|--|--|------------------------|
| <b>Development</b>                     |  |                        |
| (A26)                                  | Development that does not provide the indicative Fairway Reserve area as shown on Precinct Plan 1. | D                      |
| (A27)                                  | Development that does not comply with Standard I.7.8 Fairway Reserve.                              | D                      |

| <b>Sub-Precinct C, Community Activity</b> |                                    | <b>Activity Status</b>                             |
|---|------------------------------------|--|
| <b>Use</b>                                |                                    |  |
| <b>Community</b>                          |                                    |  |
| (A28)                                     | Education facilities               | P  |
| (A29)                                     | Community facilities               | P  |
| (A30)                                     | Visitor accom <u>m</u> odation [G] | <del>P</del> <u>RD</u> [if E27.6.1 does not apply] |

| <b>Sub-Precinct E, Golf Activity</b> |   | <b>Activity Status</b> |
|--------------------------------------|---|------------------------|
| <b>Use</b>                           |   |                        |
| <b>Community</b>                     |   |                        |
| (A31)                                | Organised sport and recreation including associated maintenance in the Golf Course Overlay shown on Precinct Plan 1 | P                      |

| <b>Sub-Precinct D, Coastal Activity</b> |  | <b>Activity Status</b> |
|---|--|------------------------|
| <b>Use</b>                              |  |                        |
| <b>Subdivision</b>                      |  |                        |
| (A32)                                   | Subdivision of land complying with Standard I.7.12 Subdivision Variation Control     | RD                     |
| (A33)                                   | Subdivision of land not complying with Standard I.7.12 Subdivision Variation Control | D                      |

| Sub-Precinct F, Employment Activity |   | Activity Status |
|-------------------------------------|---|-----------------|
| <b>Use</b>                          |   |                 |
| <b>Development</b>                  |   |                 |
| (A34)                               | New buildings                                   | RD              |
| (A35)                               | Additions and alterations to existing buildings | RD              |

## I.7. Standards

**(1)** All relevant overlay, Auckland-wide and zone standards apply in this precinct except for the following:

...

- o H6.6.15 Outdoor living space

~~o E27.6.1 Trip Generation [344.26]~~

All activities listed in Activity Table IX.4.1 must comply with the following permitted activity standards.

### I.7.3. Staging of Development with Transport Upgrades

Purpose: ~~Manage~~ **Minimise** [345.10] the adverse effects of traffic generation on the safety and efficiency of the surrounding road network by ensuring subdivision and development ~~is coordinated with~~ **does not occur in advance of the availability of operational** [345.7] infrastructure upgrades.

- (1) Prior to ~~the operation of~~ any ~~light industrial~~ activities, **subdivision, or development** [344.27] in sub-precinct F, or **any** education facility ~~in sub-precinct C~~ [344.5], **or any residential activities**, Jack Lachlan Drive must be upgraded to provide two-way walking and cycling active modes along the full length of ~~one side of~~ the road. [344.5]

**(1A) Prior to the operation of any activities in Sub-Precinct A or Sub-Precinct B, the walking and cycling connection specified in Standard I.8 (2) through Fairway Reserve must be provided.** [344.5]

- (2) ~~Activities, subdivision and, or~~ [344.27] development within the precinct must not exceed the thresholds in Table 2 until such time that the infrastructure upgrades described in Column 2 and as shown on Precinct Plan 6 are constructed and operational. **Applications for resource consent in respect of activities, development or subdivision identified in Column 1 of the Table will be deemed to comply with this standard I.7.3(2) if the corresponding infrastructure identified in Column 2 of the Table is:** [345.14]

**(a) Constructed and operational prior to lodgement of the resource consent application; or** [345.14]

**(b) Under construction with relevant consents and/or designations being given effect to prior to the lodgement of the resource consent application and the application is expressly made on the basis that the relevant infrastructure upgrade(s) will be completed and operational prior to:** [345.14]

**(i) the issue of a section 224(c) RMA certificate in the case of a subdivision consent application; and/or** [345.14]

**(ii) the construction of any dwellings, commercial, and/or community activities in the case of a land use consent application; or** [345.14]

(c) Proposed to be constructed by the applicant as part of the resource consent application and the application is expressly made on the basis that the relevant infrastructure upgrade(s) will be completed and operational: [345.14]

(i) Prior to or in conjunction with the issue of a section 224(c) RMA certificate in the case of a subdivision consent application; and/or [345.14]

(ii) Prior to the construction of any dwellings, commercial, and/or community activities in the case of a land use consent application. [345.14]

(2A) For the purpose of this standard: [344.27]

(a) Residential dwellings or lots in Column 1 include retirement units; [344.27]

(b) For the purposes of calculating the number of residential dwellings a single residential lot may provide up to 3 dwellings; and [344.27]

(c) 'Operational' means the relevant upgrade is available for use and open to all traffic (be it road traffic in the case of road upgrades, or ferry passenger traffic in the case of the ferry upgrades). [345.14]

(2B) Any proposal for land use listed in Table 2 must demonstrate compliance with this rule in accordance with the Special Information Requirements in I.10. [345.14]

**Table 2: Threshold for Subdivision and Development as shown on Beachlands South: Precinct Plan 6**

| Column 1<br>Land use enabled within the <u>Precinct</u> area identified on <u>Precinct Plan 6</u> by transport infrastructure in <u>column 2</u> ; [G]  | Column 2<br>Transport infrastructure required to enable activities <u>or</u> , subdivision, <u>or</u> development in column 1  |
|---|--|
| (a) Up to a maximum of <del>250</del> <u>125</u> dwellings <del>and/or residential lots</del> [344.27]  | <p>Site (A) on Precinct Plan 6: Upgrade of Whitford Maraetai Road / Jack Lachlan Drive intersection <del>to traffic signals</del> [344.12]; and</p> <p><del>Site (D) on Precinct Plan 6: Upgrade of Whitford Park Road / Whitford Road / Whitford Maraetai Road roundabout to a double roundabout.</del> [45.2, 344.27, 352.4 et al]</p> <p><u>Implementation of the Whitford Bypass from Trig Road to Saleyard Road</u> [45.2, 344.27, 352.4 et al]</p> <p><u>Safety improvements along Whitford-Maraetai Road</u> [112.1, 218.2, et al].</p> |
| (b) A provision of:<br>i. More than <del>250</del> <u>125</u> and up to <del>550</del> <u>275</u> dwellings <del>or residential lots</del> [344.27]; <u>and or</u><br>ii. <del>Up to 3,500m<sup>2</sup> light industrial GFA;</del> [352.1] | <p><u>Infrastructure in row (a) and</u> [345.11]</p> <p>Provision for <del>an additional capacity of 100 ferry passengers</del> [332.7] (total capacity of <del>600</del> <u>592</u> [351.3] passengers) from Pine Harbour during the two-hour peak period between 0645 -0845 on weekdays; and</p> <p><u>Provision for a total capacity of 205 park and ride car parking spaces within 400m walk of the ferry berth</u> [116.3, 342.2, 356.1, et al]</p>   |

|                           |  |  |
|---------------------------|--|--|
| <p>(c)</p>                | <p>A provision of:</p> <ul style="list-style-type: none"> <li>i. <del>More than 550 and up to 820 dwellings or residential lots;</del> [352.1]</li> <li>ii. <del>More than 3,500m<sup>2</sup> and</del> [352.1] up to <del>5,700</del><b>2,875</b>m<sup>2</sup> light industrial GFA;</li> <li>iii. Up to <del>400</del><b>200</b>m<sup>2</sup> retail GFA; and</li> <li><del>iv.</del> <b>iii.</b> Up to <del>1,100</del><b>550</b>m<sup>2</sup> commercial GFA.</li> </ul> | <p><b><u>Infrastructure in row (a) and</u></b> [345.11]</p> <p>Provision for an additional capacity of 200 ferry passengers (total capacity of 700 passengers) from Pine Harbour Ferry Terminal during the two-hour peak period between 0645–0845 on weekdays [352.1]</p> <p><b><u>Realignment and Four-Laning of Whitford-Maraetai Road</u></b> [7.4, 344.11, 354.13, 356.3, et al]<br/>; and</p> <p><b><u>Safety improvements to Whitford Road between Whitford Village and Somerville Road; and</u></b> [344.27]</p> <p><b><u>Improvements to the Ormiston Road / Murphys Road intersection; and</u></b> [344.27]</p> <p><b><u>Improvements to the Whitford Road / Somerville Road intersection; and</u></b> [344.27]</p> <p>Site (B) on Precinct Plan 6: Provision of an additional 30m left turn approach lane on the northbound approach to <b><u>two circulating, approach, and departure lanes on each road at the Whitford Park Road / Saleyard Road / Sandstone Road roundabout if not already provided.</u></b> [45.2, 344.27, 352.4 et al]</p> |
| <p><b><u>(ca)</u></b></p> | <p>A provision of:</p> <ul style="list-style-type: none"> <li>i. More than <del>550</del> <b>275</b> and up to <del>820</del> <b>410</b> dwellings or residential lots [344.27];</li> <li>ii. <del>More than 3,500m<sup>2</sup> and up to 5,700m<sup>2</sup> light industrial GFA;</del> [352.1]</li> <li>iii. <del>Up to 400m<sup>2</sup> retail GFA; and</del> [352.1]</li> <li>iv. <del>Up to 1,100m<sup>2</sup> commercial GFA.</del> [352.1]</li> </ul>                 | <p><b><u>Infrastructure in row (c); and</u></b> [345.11]</p> <p>Provision for an <del>additional capacity of 200 ferry passengers</del> ([332.7] total capacity of <del>700</del> <b>692</b>) [351.3] passengers) from Pine Harbour Ferry Terminal during the two-hour peak period between 0645 - 0845 on weekdays; and</p> <p><del>Site (B) on Precinct Plan 6: Provision of an additional 30m left turn approach lane on the northbound approach to the Whitford Park Road / Saleyard Road / Sandstone Road roundabout.</del> [352.1]</p> <p><b><u>Provision for a total of 265 park and ride car parking spaces within 400m walk of the ferry berth</u></b> [116.3, 342.2, 356.1, et al]</p>  |



|      |   |   |
|------|---|---|
| (d)  | <p>A provision of:</p> <ul style="list-style-type: none"> <li>i. <del>More than 820 and up to 1,900 dwellings or residential lots;</del> [352.1]</li> <li>ii. <del>More than 5,700<del>2,875</del>m<sup>2</sup> and up to 12,300<del>6,150</del>m<sup>2</sup> light industrial GFA;</del> [344.27]</li> <li>iii. <del>More than 400<del>200</del>m<sup>2</sup> and up to 2,100<del>1,050</del>m<sup>2</sup> retail GFA; and</del> [344.27]</li> <li>iv. <del>More than 1,100<del>550</del>m<sup>2</sup> and up 3,300<del>1,650</del>m<sup>2</sup> commercial GFA.</del> [344.27]</li> </ul> | <p><b><u>Infrastructure in row (a) and row (c); and</u></b> [345.11]</p> <p><del>Provision for an additional capacity of 400 ferry passengers ( total capacity of 900 passengers) from Pine Harbour during the two-hour peak period between 0645–0845 on weekdays; and</del>[344.27]</p> <p>Site (C) on Precinct Plan 6: Upgrade to Trig Road (south) intersection.</p>                             |
| (da) | <p>A provision of:</p> <ul style="list-style-type: none"> <li>i. <del>More than 820 <b>410</b> and up to 1,900 <b>850</b> dwellings or residential lots</del>[344.27];</li> <li>ii. <del>More than 5,700m<sup>2</sup> and up to 12,300m<sup>2</sup> light industrial GFA;</del> [352.1]</li> <li>iii. <del>More than 400m<sup>2</sup> and up to 2,100m<sup>2</sup> retail GFA; and</del> [352.1]</li> <li>iv. <del>More than 1,100m<sup>2</sup> and up 3,300m<sup>2</sup> commercial GFA.</del> [352.1]</li> </ul>  | <p><b><u>Infrastructure in row (c); and</u></b> [345.11]</p> <p><b><u>Provision for a total capacity of 952</u></b> [351.3] <b><u>passengers) from Pine Harbour during the two-hour peak period between 0645 -0845 on weekdays; and</u></b></p> <p><b><u>Provision for a total of 385 park and ride car parking spaces within 400m walk of the ferry berth</u></b> [116.3, 342.2, 356.1, et al]</p> |
| (e)  | <p>A provision of:</p> <ul style="list-style-type: none"> <li>i. <del>More than 1,900 and up to 2,918 dwellings or residential lots;</del> [352.1]</li> <li>ii. <del>More than 12,300m<sup>2</sup> and up to 18,000m<sup>2</sup> light industrial GFA;</del> [352.1]</li> <li>iii. <del>More than 2,100m<sup>2</sup> and up to 5,700m<sup>2</sup> retail GFA; and</del> [352.1]</li> <li>iv. <del>More than 3,300m<sup>2</sup> and up to 5,100m<sup>2</sup> commercial GFA.</del> [352.1]</li> </ul>  | <p><del>Provision for an additional capacity of 650 passengers (total capacity of 1150 passengers) from Pine Harbour during the two-hour peak period between 0645–0845 on weekdays.</del>[344.27]</p>   |

(3) The subdivision or development of land for more than **any of the following** [para 7.44] is a discretionary activity:

**(a)** ~~2,918~~ **850** dwellings ~~or residential allotments;~~ [344.27]

**(b)** ~~18,000~~**2,875**m<sup>2</sup> light industrial GFA; [344.27]

**(c)** ~~5,695~~**1,050**m<sup>2</sup> retail GFA; [344.27] **and or** [G]

**(d)** ~~5,100~~**1,650**m<sup>2</sup> commercial GFA precinct-wide [344.27]

### **I.7.8. Fairway Reserve**

Purpose: To provide a recreational open space and connection between the Village Centre and Pine Harbour Ferry Terminal while enhancing the amenity of highest density residential areas.

- (1) The indicative Fairway Reserve area as shown on Precinct Plan 1 must be provided in the form of an open green space linear park for a minimum width of 20 metres. This Fairway Reserve must be formed and vested with the Council; or maintained by way of an appropriate legal protection mechanism.
- (2) A continuous walking and cycling connection must be provided within the Fairway Reserve connecting between the Village Centre and the Pine Harbour Ferry Terminal.
- (3) The Fairway Reserve must be available for public use at all times unless written approval has been obtained from the council. In all circumstances the Fairway Reserve must be available for public use between the hours of 7am and 11pm.
- (4) The registration of an access easement on the title to which the Fairway Reserve applies is required to ensure preservation of the reserve and its ongoing maintenance by the owner(s) of the land concerned.
- (5) Fences, or walls, or a combination of these structures, adjoining the Fairway Reserve must not exceed the heights specified below, measured from the ground level at the boundary:
  - (a) 1.2m in height; or
  - (b) 1.8m in height if the fence is at least 50% visually open.

### **I.9. Assessment – restricted discretionary activities**

#### **I.9.1. Matters of discretion**

The Council will restrict its discretion to all of the following matters when assessing a restricted discretionary activity resource consent application:

...

- (3) New buildings, other than buildings for residential units in a residential zone:
  - (a) Matters of discretion H13.8.1(3) and H11.8.1(4) apply;
  - (b) Design and external appearance of buildings and landscape design;
  - (c) Infrastructure servicing;
  - (d) Design and sequencing of upgrades to the existing ~~road~~ [transport](#) [344.32] network and ferry services;
  - (e) The extent to which development achieves the outcomes outlined in the Beachlands South Sustainability Strategy; and
  - (f) Movement network on Precinct Plan 5.
- (4) Subdivision that complies with Standard I.7.3 Staging of Development with Transport Upgrades:

- (a) Design and sequencing of upgrades to the existing road network and ferry services; and [G]
- (b) Whether the proposal is of a scale or type that promotes increased walking, cycling and use of public transport-; and [G]

**(c) The quality of walking and cycling connections:**

**(i) within the subdivision;**

**(ii) between the subdivision and the ferry berth; and**

**(iii) between the subdivision and other activities in the Beachlands area.**  
[344.5]

...

### **I.9.2. Assessment Criteria**

The Council will consider the relevant assessment criteria below for restricted discretionary activities:

...

- (2) Subdivision that complies with Standard I.7.3 Staging of Development with Transport Upgrades:

- (a) The implementation of mitigation measures proposed to address adverse effects which may include measures such as travel planning, providing alternatives to private vehicle trips including accessibility to public transport, staging development, or contributing to improvements to the local transport network and ferry services;
- (b) the extent of subdivision and development that have been previously approved under this standard-; and [G]

**(c) the extent, safety, and efficiency of walking and cycling facilities with the subdivision, precinct, and the wider Beachlands area including connections to the ferry berth and on Jack Lachlan Drive.** [327.6, 344.5, 346.2, 348.5, et al]

**(d) the extent to which intersections are designed to provide safe and efficient movement for pedestrians and cyclists.** [327.6]

...

- (7) In addition to the criteria under E38.12.2(7), the following criteria apply to subdivision:

- (a) The extent to which collector and local roads are provided within the precinct in general accordance with Precinct Plan 5 to achieve a highly connected street layout that integrates with the surrounding transport network and responds to landform;
- (b) If an alternative alignment is proposed, the extent to which that alignment provides an equal or better degree of connectivity and amenity within and beyond the precinct may be appropriate, having regard to the following functional matters:
  - (i) The presence of natural features, natural hazards or contours and how this impacts the placement of roads;

- (ii) The need to achieve an efficient block structure and layout within the precinct suitable to the proposed activities; and
  - (iii) The constructability of roads and the ability for it to be delivered by a single landowner.
- (c) Whether a high quality and integrated network of local roads is provided within the precinct that provides a good degree of accessibility and supports a walkable street network
- (d) The extent to which the design of road within the precinct prioritises the provision of active mode facilities including walking and cycling;
- (e) the extent to which the design of primary and secondary collector roads and local roads are designed in general accordance with road design and cross section details provided in I.12 Appendix 1: Beachlands South Precinct, Road Design and Cross Section Details; ~~and~~ [G]
- (f) the extent to which roads are designed in general accordance with the Auckland Transport design standards and provide for the passage of emergency vehicles; and** [156.2, 195.2, 312.3]
- (g) the extent to which the subdivision provides the Structuring Elements on Precinct Plan 3 including open space linkages, green links, coastal pathways, and the connections between them and existing connections.** [276.3, 149.2, 303.1, 312.3]

...

#### **I.10. Special information requirements**

An application for resource consent in this Precinct must be accompanied by:

...

- (4) Integrated Transport Assessment
- (a) An application to infringe Standard I.7.3 Staging of Development with Transport Upgrades must be accompanied by an integrated transport assessment prepared by suitably qualified transport planner or traffic engineer prepared in accordance with the Auckland Transport Integrated Transport Assessment Guidelines in force at the time of the application.
  - (b) The integrated transport assessment must include a register of development and subdivision ~~that has been previously approved under Standard I.7.3 Staging of Development with Transport Upgrades~~ **in the precinct.**
  - (c) Without limiting the scope of the integrated transport assessment, the integrated transport assessment must assess and provide details of the following:**
    - (a) Whether the proposal is in accordance with Policies I.3(12), I.3(14), I.3(15), I.3(16), and I.3(17) in addition to any other relevant AUP policy;**
    - (b) Whether the Whitford-Maraetai Road can operate safely and with reasonable efficiency during the inter-peak period, being generally no worse than a Level of Service D for the overall route and intersections along it;**

- (c) Whether the proposal would have a similar or lesser trip generation and similar effects on the surrounding transport network to the Subdivision and development mix provided for in the Table I.7.3.2;
- (d) Whether residential development is coordinated with non-residential development within the precinct to minimise trips outside of the precinct;
- (e) Whether the actual rate of development in the wider area is slower than anticipated;
- (f) The effect of the timing and development of any other transport upgrades or transport innovations not anticipated by the precinct;
- (g) Whether the integrated transport assessment supporting the application documents the outcome of engagement with the road controlling authority;
- (h) Whether the proposal demonstrates methods that promote the increased use of public transport, including details of how those methods would be implemented, monitored and reviewed so as to contribute to a reduction in vehicle trips;
- (i) Whether the surrounding transport network can operate safely and efficiently when considering traffic generated by construction activities within the precinct. [344.23]

...

- (6) Travel Management Plan (*as per September 2022 Updated Provisions and [351.7]*)

A Travel Management Plan (TMP) is required for commercial activities greater than 500m<sup>2</sup> within this precinct. A TMP must be prepared by a suitably qualified and experienced person and include:

- (a) Operational measures to be established on-site to encourage reduced vehicle trips;
- ~~(b) Operational measures to be established to restrict the use of any employee parking area(s) during peak periods;~~
- (c) Details of the management structure within the building or site in which the activity is to be located which has overall responsibility to oversee the implementation and monitoring of travel management measures; and
- (d) The methods by which the effectiveness of the proposed measures outlined in the TMP can be independently measured, monitored and reviewed.

#### (7) Transport Design Report

Any proposed new road intersection or upgrading of existing road intersections shall be supported by a Transport Design Report and Concept Plans (including forecast transport modelling and land use assumptions), prepared by a suitably qualified transport engineer confirming the location and design of any road and its intersection(s) supports the safe and efficient function of the existing and future (ultimate) transport network and can be accommodated within the proposed or available road reserves. This may be included within a transport assessment supporting land use consent.

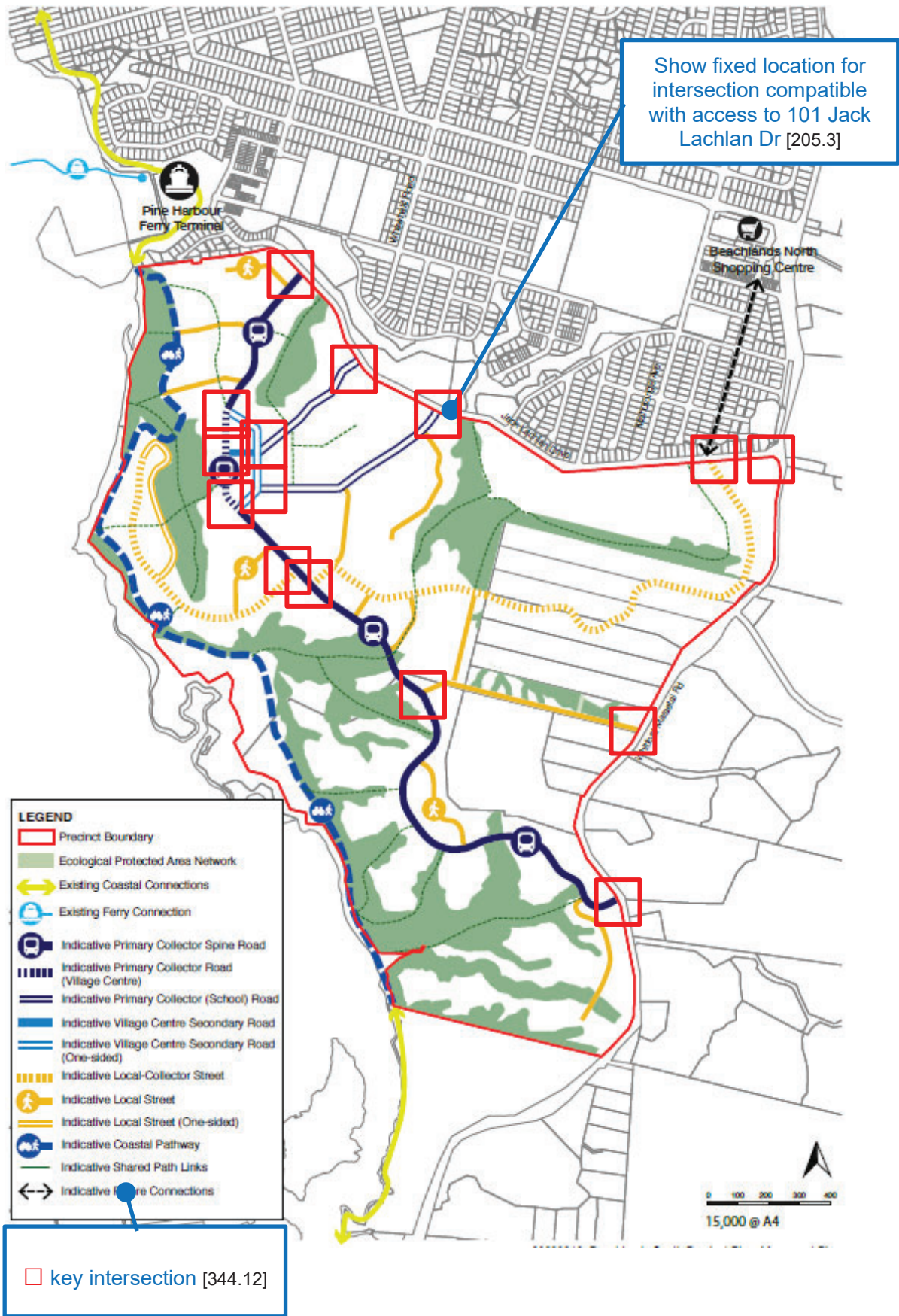
In addition, where an interim upgrade is proposed, information must be provided, detailing how the design allows for the ultimate upgrade to be efficiently delivered. [344.23]

- (8) All applications are to provide a register of development and subdivision that has been previously approved in the precinct. The register shall include details of the maximum number of dwellings and non-residential activity proposed to be enabled (as well as anticipated development for any subdivision proposal involving superlots) completed since the most recent transport upgrade under 1.7.3 Table 2 in a format which illustrates compliance (or otherwise) with 1.7.3. [344.33]

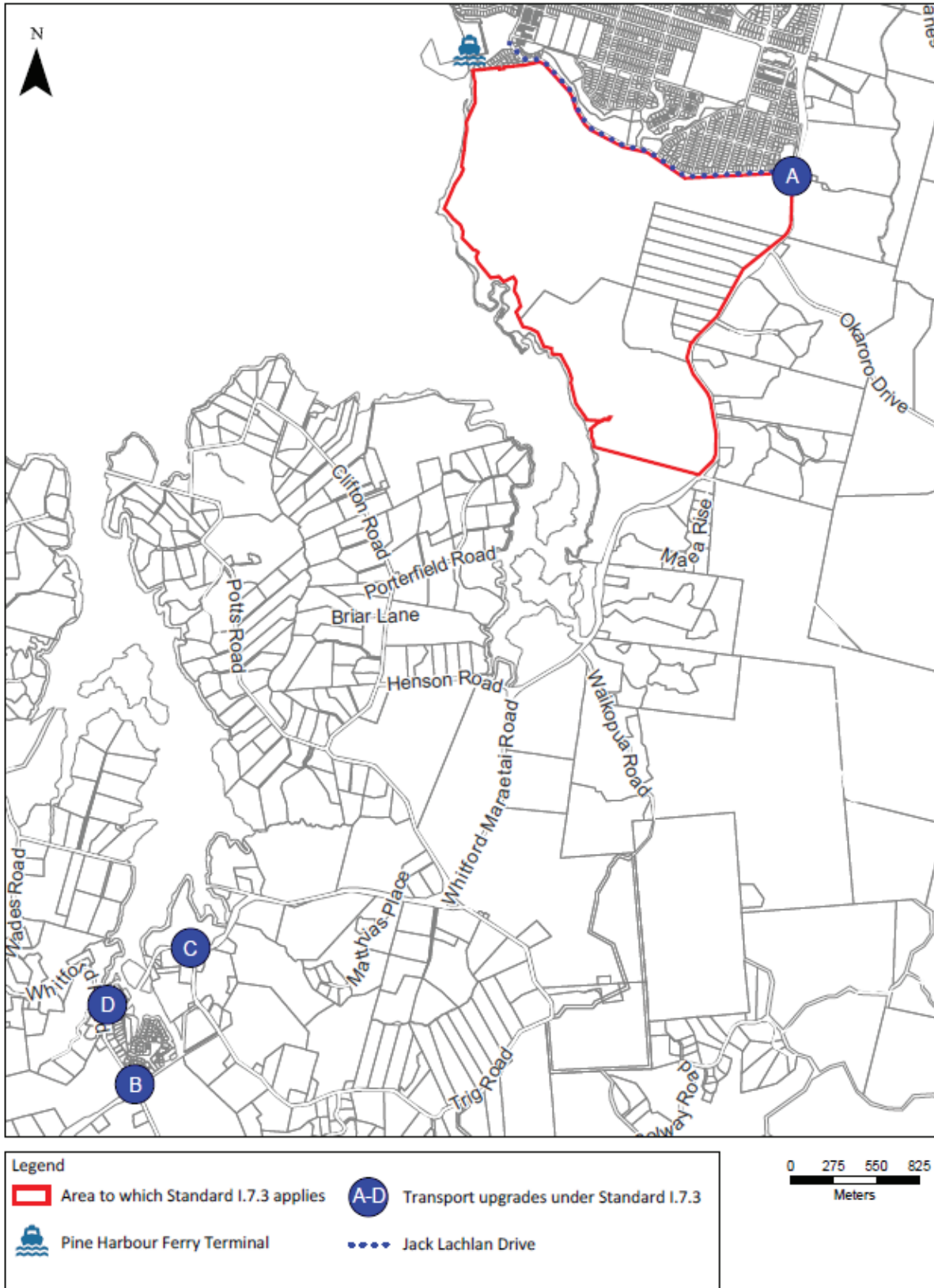
## I.11. Precinct plans



# Precinct Plan 5 – Movement Network



# Precinct Plan 6 – Transport Staging and Upgrades



## I.12. Appendix 1: Beachlands South Precinct, Road Design and Cross Section Details

| Road Type  | Corridor Width | Carriageway | Cycle Paths                        | Footpath | Street trees/<br>Rain-Garden/<br>Parking                           | Speed Limit |
|--|----------------|-------------|------------------------------------|----------|--|-------------|
| Indicative Primary Collector Spine Road              | 23-8m          | 6-8m        | 3-2m two-way cycleway, on one side | 2m       | 4m planted swale / bus stops, on both sides                        | 40 kph      |
| Indicative Primary Collector (Village Centre)        | 23-8m          | 6-8m        | 3-2m two-way cycleway, on one side | 2.5m     | 2.8m swale/loading/Placemaking                                     | 40 kph      |
| Indicative Primary Collector (School Road)           | 23-6m          | 6-8m        | 3-2m two-way cycleway, on one side | 2.5m     | 2.8m planted swale   | 40 kph      |
| Indicative Village Centre Secondary Road             | 19-2m          | 6-4         | Not required                       | 4m       | 2.4m parking and trees   | 40 kph      |
| Indicative Village Centre Secondary Road (One-sided) | 19-2m          | 6-4m        | Not required                       | 2.5m     | 2.4m parking and trees   | 40 kph      |
| Indicative Local Collector                           | 16-5m          | 5-4m        | Not required                       | 3.5m     | 2.5m parking and trees   | 30 kph      |
| Indicative Local Street                              | 15m            | 5-4m        | Not required                       | 2.0m     | 2.5m planting/parking on one side, and 1.5m planting on other side | 30 kph      |
| Indicative Local Street (One-sided)                  | 11-5m          | 5-4m        | Not required                       | 2.0m     | 2.5m planting/parking on one side                                  | 30 kph      |

[344.35]

| <b>Road Function and Required Design Elements</b> |                            |                                      |                     |                            |                 |                                  |                          |                                    |                             |
|---|----------------------------|--------------------------------------|---------------------|----------------------------|-----------------|----------------------------------|--------------------------|------------------------------------|-----------------------------|
| <u>Road Name</u><br>(refer to Precinct Plan 5)    | <u>Role and Function</u>   | <u>Min. Road Reserve<sup>1</sup></u> | <u>Design Speed</u> | <u>Access Restrictions</u> | <u>Median</u>   | <u>Bus Provision<sup>2</sup></u> | <u>On Street Parking</u> | <u>Cycle Provision</u>             | <u>Pedestrian Provision</u> |
| <u>Jack Lachlan Drive</u>                         | <u>Arterial</u>            | <u>27m</u>                           | <u>50</u>           | <u>Yes</u>                 | <u>Yes</u>      | <u>Yes</u>                       | <u>Optional</u>          | <u>Yes separated on both sides</u> | <u>Yes both sides</u>       |
| <u>Spine Road</u>                                 | <u>Primary Collector</u>   | <u>23m</u>                           | <u>40</u>           | <u>No</u>                  | <u>No</u>       | <u>Yes</u>                       | <u>Yes</u>               | <u>Yes separated on both sides</u> | <u>Yes both sides</u>       |
| <u>Spine Road Village Centre</u>                  | <u>Primary Collector</u>   | <u>23m</u>                           | <u>40</u>           | <u>Yes</u>                 | <u>Optional</u> | <u>Yes</u>                       | <u>Optional</u>          | <u>Yes separated on both sides</u> | <u>Yes both sides</u>       |
| <u>Primary Collector</u>                          | <u>Primary Collector</u>   | <u>23m</u>                           | <u>40</u>           | <u>Yes</u>                 | <u>Optional</u> | <u>Yes</u>                       | <u>Yes</u>               | <u>Yes separated on both sides</u> | <u>Yes both sides</u>       |
| <u>Secondary</u>                                  | <u>Primary Collector</u>   | <u>20m</u>                           | <u>40</u>           | <u>No</u>                  | <u>No</u>       |                                  | <u>Yes</u>               | <u>Yes separated on both sides</u> | <u>Yes both sides</u>       |
| <u>Secondary Village Centre</u>                   | <u>Secondary Collector</u> | <u>20m</u>                           | <u>40</u>           | <u>Yes</u>                 | <u>Optional</u> |                                  | <u>Optional</u>          | <u>Yes separated on both sides</u> | <u>Yes both sides</u>       |
| <u>Local Street</u>                               | <u>Local</u>               | <u>16m</u>                           | <u>30</u>           | <u>No</u>                  | <u>No</u>       |                                  | <u>Yes</u>               | <u>No</u>                          | <u>Yes both sides</u>       |

[344.35]

**Note 1: Typical minimum width which may need to be varied in specific locations where required to accommodate network utilities, batters, structures, stormwater treatment, intersection design, significant constraints or other localised design requirements.** [344.35]

**Note 2: Carriageway and intersection geometry capable of accommodating buses.**

*Note 3: Any interim, hybrid, constrained or ultimate upgrades must be designed and constructed to include a new road pavement and be sealed to the appropriate standard in accordance with the Role and Function of the road.* [344.35]

Figures Deleted [344.35]

## **ATTACHMENT 7**

### **ASSESSMENT OF RELEVANT NPS AND AUP OBJECTIVES AND POLICIES**





## Attachment 7 Assessment of relevant NPS and AUP objectives and policies

|  | Relevant provision  | Assessment   |
|--|---|--|
| <b>National policy statements</b>                                  |   |  |
| <p>National Policy Statement on Urban Development 2020 (NPSUD)</p> | <p><b>Objective 1:</b> 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><b>Objective 2:</b> Planning decisions improve housing affordability by supporting competitive land and development markets.</p> <p><b>Objective 3:</b> 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"> <li>(a) the area is in or near a centre zone or other area with many employment opportunities</li> <li>(b) the area is well-serviced by existing or planned public transport</li> <li>(c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.</li> </ul> <p><b>Objective 4:</b> 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><b>Objective 5:</b> Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).</p> <p><b>Objective 6:</b> Local authority decisions on urban development that affect urban environments are:</p> <ul style="list-style-type: none"> <li>(a) integrated with infrastructure planning and funding decisions; and</li> </ul> | <p>PC88 proposes to expand an existing township providing for approximately 3,500 dwellings across the live zone and FUZ areas. Beachlands has limited public transport options and effectively one road in and out (Whitford-Mareatai Road). Additional services and amenities including enabling provision of a secondary school, retail and commercial opportunities that would enhance the character and self-sufficiency of Beachlands. Although some local employment would be enabled most people would be required to leave the area for work as discussed in Section 8.3, having to travel relatively long distances as discussed in Section 8.13. Most travel would be by private vehicle, and along with additional trips required to access services and amenities not provided locally, would significant increase VKT and therefore carbon emissions from transport.</p> <p>While I accept that PC88 would achieve a variety of homes and sites for business, and would therefore add significantly to development capacity, it would not contribute to a well-functioning urban environment. Beachlands is a coastal town with limited access between housing, jobs, and community services and an additional 3,000 dwellings would further add to this.</p> <p>Beachlands is not identified in the Auckland Plan - Development Strategy (Future Development Strategy) as an area for growth. Although the AUP enables growth of rural and coastal towns (B2.6.1) and PC88 would deliver significant development capacity, additional growth is not required to meet demand. Sufficient development capacity will be enabled in the</p> |

|  | Relevant provision   | Assessment  |
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|  | <p>(b) strategic over the medium term and long term; and</p> <p>(c) responsive, particularly in relation to proposals that would supply significant development capacity.</p> <p><b>Objective 8:</b> New Zealand’s urban environments:</p> <p>(a) support reductions in greenhouse gas emissions; and</p> <p>(b) are resilient to the current and future effects of climate change.</p> <p><b>Policy 1:</b> Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:</p> <p>(a) have or enable a variety of homes that:</p> <ul style="list-style-type: none"> <li>i. meet the needs, in terms of type, price, and location, of different households; and</li> <li>ii. enable Māori to express their cultural traditions and norms; and</li> </ul> <p>(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and</p> <p>(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</p> <p>(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and</p> <p>(e) support reductions in greenhouse gas emissions; and</p> <p>(f) are resilient to the likely current and future effects of climate change.</p> <p><b>Policy 6:</b> When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:</p> <p>(a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement</p> | <p>East Auckland Market to meet demand as discussed in Section 8.3 and therefore additional growth is not required.</p> <p>Although several viable options are proposed for wastewater servicing, significant issues are raised regarding whether there is adequate capacity within the aquifer for water supply as discussed in Section 8.8. Critically while transport upgrades are identified and proposed to be coordinated with growth, PC88 relies on an improved ferry service that is significantly uncertain and there is no proposal to upgrade Whitford-Maraetai Road which is already at capacity.</p> <p>I do not consider PC88 to contribute to a well-functioning urban environment because it does not support growth in an urban environment that is well-served by public transport or employment, it is not integrated with infrastructure planning and funding decisions and would not support the reduction in greenhouse gas emissions.</p> <p>I therefore do not consider PC88 to be consistent with Objectives 1, 3, 6, 8, and Policies 1, 6 and 8.</p> <p>I consider the applicant to have taken into account the principles of Te Tiriti o Waitangi consistent with Objective 5 and Policy 9 through their engagement with Ngāi Tai ki Tāmaki throughout the development of PC88 including reflecting cultural values in the BSP.</p> |

|  | Relevant provision  | Assessment |
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|  | <p>(b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:</p> <ul style="list-style-type: none"> <li>i. may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and</li> <li>ii. are not, of themselves, an adverse effect</li> </ul> <p>(c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)</p> <p>(d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity</p> <p>(e) the likely current and future effects of climate change.</p> <p><b>Policy 8:</b> 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:</p> <ul style="list-style-type: none"> <li>(a) unanticipated by RMA planning documents; or</li> <li>(b) out-of-sequence with planned land release.</li> </ul> <p><b>Policy 9:</b> Local authorities, in taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) in relation to urban environments, must:</p> <ul style="list-style-type: none"> <li>(a) involve hapū and iwi in the preparation of RMA planning documents and any FDSs by undertaking effective consultation that is early, meaningful and, as far as practicable, in accordance with tikanga Māori; and</li> <li>(b) when preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and</li> </ul> |            |

|  | Relevant provision   | Assessment   |
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|  | <p>(c) provide opportunities in appropriate circumstances for Māori involvement in decision-making on resource consents, designations, heritage orders, and water conservation orders, including in relation to sites of significance to Māori and issues of cultural significance; and</p> <p>(d) operate in a way that is consistent with iwi participation legislation.</p>   |  |
| National Policy Statement for Freshwater Management 2022 (NPSFM) | Objective 1<br>Policies 1, 2, 3, 6, 7, 9, 11, 12, 15   | I adopt assessment of applicant in section 8.7 of the s32 evaluation report.   |
| National Policy statement for Highly Productive Soils 2022       | Objective 1<br>Policies 1, 4, 5, 9   | Not relevant because the land is currently CLZ which is not identified as a relevant rural zone for the application of the NPSHPL until such time as the council implements changes to the RPS to identify highly productive land.   |
| National Policy Statement for Indigenous Biodiversity 2023       | <p>Objective 1 The objective of this National Policy Statement is:</p> <p>(a) to maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity after the commencement date; and</p> <p>(b) to achieve this:</p> <p>(i) through recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity; and</p> <p>(ii) by recognising people and communities, including landowners, as stewards of indigenous biodiversity; and</p> <p>(iii) by protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity; and</p> <p>(iv) while providing for the social, economic,</p> <p><b>Policy 1:</b> Indigenous biodiversity is managed in a way that gives effect to the decision-making principles and takes into account the principles of the Treaty of Waitangi.</p> | <p>The NPSIB came into effect in July 2023 after PC88 was notified. Therefore it has not been considered within the applicant's plan change material, although the proposed NPS was considered in section 8.9 of the s32 evaluation report.</p> <p>PC88 identifies Significant Natural Areas through the proposed EPAN which protect significant indigenous vegetation and significant habitats of indigenous fauna from adverse effects of new subdivision, use and development consistent with Policies 4, 6, 7.</p> <p>Restoration of indigenous biodiversity is promoted and provided for through the requirement to plant riparian margins as well as the EPAN (Policy 13).</p> <p>The BSP requires planting within riparian margins to mitigate the effects of land use change, but also seek to count this planting towards any off-setting or compensation required for future consenting, which effectively double counts restoration</p> |

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|  | <p><b>Policy 2:</b> Tangata whenua exercise kaitiakitanga for indigenous biodiversity in their rohe, including through:</p> <p>(a) managing indigenous biodiversity on their land; and</p> <p>(b) identifying and protecting indigenous species, populations and ecosystems that are taonga; and</p> <p>(c) actively participating in other decision-making about indigenous biodiversity.</p> <p><b>Policy 3:</b> A precautionary approach is adopted when considering adverse effects on indigenous biodiversity.</p> <p><b>Policy 4:</b> Indigenous biodiversity is managed to promote resilience to the effects of climate change.</p> <p><b>Policy 5:</b> Indigenous biodiversity is managed in an integrated way, within and across administrative boundaries.</p> <p><b>Policy 6:</b> Significant indigenous vegetation and significant habitats of indigenous fauna are identified as SNAs using a consistent approach.</p> <p><b>Policy 7:</b> SNAs are protected by avoiding or managing adverse effects from new subdivision, use and development.</p> <p><b>Policy 8:</b> The importance of maintaining indigenous biodiversity outside SNAs is recognised and provided for.</p> <p><b>Policy 9:</b> Certain established activities are provided for within and outside SNAs.</p> <p><b>Policy 10:</b> Activities that contribute to New Zealand’s social, economic, cultural, and environmental wellbeing are recognised and provided for as set out in this National Policy Statement.</p> <p><b>Policy 13:</b> Restoration of indigenous biodiversity is promoted and provided for.</p> <p><b>Policy 14:</b> Increased indigenous vegetation cover is promoted in both urban and non-urban environments.</p> | <p>planting, as discussed in Section 8.9. The proposed approach would reduce the extent to which increased indigenous vegetation cover is promoted in PC88 area and undermine the ability to achieve at least no overall loss in indigenous biodiversity in the event that reclamation of wetlands or streams are proposed in the future. Because of this issue, I consider PC88 to be inconsistent with Objective 1 and Policy 14.</p> |



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| National Coastal Policy Statement  | Objectives 1, 2, 3, 4, 5, 6, 7<br>Policies 1, 2, 3, 4, 5, 6, 7, 11, 13, 14, 15, 17, 18, 19, 22, 23, 25   | I adopt assessment of applicant in section 8.4 of the s32 evaluation report.   |
| <b>Auckland Unitary Plan Regional Policy Statement</b>   |  |  |
| <b>Note:</b> Proposed amendments by Plan Change 80 (decision version) identified as underlined text. |  |  |
| Chapter B2.2 Urban Growth  | <p><b>Objective 1A</b> <u>A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future</u></p> <p><b>Objective 1</b> <u>A well-functioning urban environment with a quality compact urban form that enables all of the following:</u></p> <ul style="list-style-type: none"> <li>(a) a higher-quality urban environment;</li> <li>(b) greater productivity and economic growth;</li> <li>(c) better use of existing infrastructure and efficient provision of new infrastructure;</li> <li>(d) <u>good accessibility for all people, including by improved and more effective efficient public or active transport;</u></li> <li>(e) greater social and cultural vitality;</li> <li>(f) better maintenance of rural character and rural productivity; and reduced adverse environmental</li> <li>(g) <u>effects; and</u></li> <li>(h) <u>improved resilience to the effects of climate change.</u></li> </ul> <p><b>Objective 2</b> Urban growth is primarily accommodated within the urban area 2016 (as identified in Appendix 1A).</p> <p><b>Objective 3</b> Sufficient development capacity and land supply is provided to accommodate residential, commercial, industrial growth and social facilities to support growth.</p> | <p>The growth strategy set out in Chapter B2.2 requires sufficient development capacity to support growth, which should be focused primarily in the existing urban area, and within the Rural Urban boundary and towns. I acknowledge that PC88 would expand the Beachlands coastal town and deliver additional development capacity contributing to the provision of development capacity in accordance with Objectives 3 and 4. However, sufficient development capacity is not required in all locations.</p> <p>Policy 1 identifies the need to provide sufficient development capacity within the Rural Urban Boundary and does not require growth to occur in all areas. Sufficient development capacity is already available within the East Auckland area through intensification enabled by PC78 as well as identified FUZ areas as discussed in Section 8.3. Policy 4 promotes growth through intensification rather than expansion, and it has not been determined that additional growth at Beachlands is not needed.</p> <p>Provision is made for a secondary school within the plan change area and this would be beneficial to the township and reduce trips outside of the area of education. However, although 960 jobs would be enabled within PC88 most people would still need to leave the area for work (approximately 75%). In addition, while some services and amenities would be provided locally residents would still need to travel outside the area to access those that are not provided.</p> |

|  | Relevant provision   | Assessment  |
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|  | <p><b>Objective 4</b> Urbanisation is contained within the Rural Urban Boundary, towns, and rural and coastal towns and villages.</p> <p><b>Objective 5</b> The development of land within the Rural Urban Boundary, towns, and rural and coastal towns and villages:</p> <p>(a) <u>Is integrated with the provision of appropriate infrastructure, and</u></p> <p>(b) <u>Improves resilience to the effects of climate change.</u></p> <p><b>Policy 1</b> Include sufficient land within the Rural Urban Boundary that is appropriately zoned to accommodate at any one time a minimum of seven years' projected growth in terms of residential, commercial and industrial demand and corresponding requirements for social facilities, after allowing for any constraints on subdivision, use and development of land.</p> <p><b>Policy 4</b> Promote urban growth and intensification within the urban area 2016 (as identified in Appendix 1A), enable urban growth and intensification within the Rural Urban Boundary, towns, and rural and coastal towns and villages, <u>in a way that contributes to a well-functioning urban environment</u> and avoid urbanisation outside these areas.</p> <p><b>Policy 5</b> Enable higher residential intensification:</p> <p>(a) in and around centres;</p> <p>(b) along identified corridors; and</p> <p>(c) close to public transport, social facilities (including open space) and employment opportunities.</p> <p><b>Policy 6</b> Identify a hierarchy of centres that <u>contributes to a well-functioning urban environment which</u> supports a quality compact urban form:</p> | <p>PC88 relies on the implementation of an improved public transport network, particularly the ferry service, along with local employment and 'working from suburb' and provision of a secondary school to achieve a quality compact urban. However, the proposed improvements to the public transport network cannot be relied upon because there is significant uncertainty that the ferry service and capacity will be increased and no upgrades are identified for the Whitford-Maraetai Road which is at capacity, as discussed in Section 8.13.</p> <p>PC88 is consistent with Policies 5 and 6 because higher intensities are proposed in proximity to public transport (ferry), employment, and proposed open space; and the local centre would provide a focus point for the future community.</p> <p>Based on the above assessment, I consider PC88 to be inconsistent with Objectives 1, 2, and 5, and Policy 4.</p> |

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|  | <p>(a) at a regional level through the city centre, metropolitan centres and town centres which function as commercial, cultural and social focal points for the region or sub-regions; and</p> <p>(b) at a local level through local and neighbourhood centres that provide for a range of activities to support and serve as focal points for their local communities.</p>   |   |
| Chapter B2.3 A quality built environment | <p><b>Objective 1</b> A <u>well-functioning urban environment with a quality built environment</u> where subdivision, use and development do all of the following:</p> <p>(a) respond to the intrinsic qualities and physical characteristics of the site and area, including its setting;</p> <p>(b) reinforce the hierarchy of centres and corridors;</p> <p>(c) contribute to a diverse mix of choice and opportunity for people and communities;</p> <p>(d) maximise resource and infrastructure efficiency;</p> <p>(e) are capable of adapting to changing needs; and</p> <p>(f) <del>respond and adapt</del> <u>has improved resilience</u> to the effects of climate change.</p> <p><b>Objective 2</b> Innovative design to address environmental effects is encouraged.</p> <p><b>Objective 3</b> The health and safety of people and communities are promoted.</p> <p><b>Policy 1</b> Manage the form and design of subdivision, use and development so that it <u>contributes to a well-functioning urban environment</u> and does all of the following:</p> | <p>PC88 largely relies on the underlying zone provisions to achieve a quality built environment and incorporates the MDRS provisions. Proposed objectives and policies (Objective I.3(4) and policies I.4(19)-(21)) a built form that creates a distinctive sense of place and responds to the natural site features, and a highly sustainable and low-carbon coastal town (Objective I.3(7) and policies I.4(6) and (7)). A village centre is proposed with both local centre and mixed use zones that provides a high-quality and slow speed environment; a built form featuring a variety of mixed-use and multi-level buildings; and a high-quality public realm (Objectives I.3(17)-(20), and policies I.4(27)-(29)). Other objectives and policies address subdivision and the street network.</p> <p>All new buildings (other than those permitted under MDRS) require resource consent as a restricted discretionary activity, requiring consideration of the effects including on the urban built character of the zone and the extent to which development achieves the outcomes of the Beachlands Sustainability Strategy.</p> <p>Precinct Plan 5 Movement Network provides an indicative local road network and Appendix I.12 provides road design details, which are required to be considered at the time of subdivision.</p> |

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|  | <p>(a) supports the planned future environment, including its shape, landform, outlook, location and relationship to its surroundings, including landscape and heritage;</p> <p>(b) contributes to the safety of the site, street and neighbourhood;</p> <p>(c) develops street networks and block patterns that provide good access and enable a range of travel options;</p> <p>(d) achieves a high level of amenity and safety for pedestrians and cyclists;</p> <p>(e) meets the functional, and operational needs of the intended use; and</p> <p>(f) allows for change and enables innovative design and adaptive re-use; <u>and</u></p> <p><u>(g) improves resilience to the effects of climate change.</u></p> <p><b>Policy 2</b> Encourage subdivision, use and development to be designed to promote the health, safety and well-being of people and communities by all of the following:</p> <p>(a) providing access for people of all ages and abilities;</p> <p>(b) enabling walking, cycling and public transport and minimising vehicle movements; and</p> <p>(c) minimising the adverse effects of discharges of contaminants from land use activities (including transport effects) and subdivision.</p> <p><b>Policy 3</b> Enable a range of built forms to support choice and meet the needs of Auckland's diverse population.</p> <p><b>Policy 4</b> Balance the main functions of streets as places for people and as routes for the movement of vehicles.</p> | <p>Standard I.7.13 require non-potable water supply for all new dwellings and water efficient fixtures to a minimum of 3 Star standard.</p> <p>I consider PC88 to be generally consistent with the quality built environment provisions of the Chapter B2.4 .</p> |

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|   | <p><b>Policy 5</b> Mitigate the adverse environmental effects of subdivision, use and development through appropriate design including energy and water efficiency and waste minimisation.</p>  |  |  |  |  |  |         |         |         |   |
| <p>Chapter B2.4 Residential growth</p> <p>Objectives B2.4.1<br/>Policies B2.4.2</p> | <p><b>Objective 1</b> Residential intensification <u>contributes to a well-functioning urban environment and supports a quality compact urban form.</u></p> <p><b>Objective 1A</b> Residential intensification is <u>limited in some areas to the extent necessary to give effect to identified qualifying matters.</u></p> <p><b>Objective 2</b> Residential areas are attractive, healthy, <u>and safe and have improved resilience to the effects of climate change</u> with quality development that is in keeping with the planned built character of the area.</p> <p><b>Objective 3</b> Land within and adjacent to centres and corridors or in close proximity to public transport and social facilities (including open space) or employment opportunities is the primary focus for residential intensification.</p> <p><b>Objective 4</b> An increase in housing capacity and the range of housing choice which meets the varied needs and lifestyles of Auckland’s diverse and growing population.</p> <p><b>Objective 6</b> Sufficient, feasible development capacity for housing is provided, in accordance with Objectives 1 to 4 above, to meet the targets in Table B2.4.1 below:</p> <p><b>Table B2.4.1: Minimum Dwelling Targets</b></p> <table border="1" data-bbox="430 1161 1055 1347"> <thead> <tr> <th data-bbox="430 1161 593 1257">Term</th> <th data-bbox="593 1161 766 1257">Short to Medium<br/>1 - 10 years<br/>(2016 – 2026)</th> <th data-bbox="766 1161 904 1257">Long<br/>11 - 30 years<br/>(2027 – 2046)</th> <th data-bbox="904 1161 1055 1257">Total<br/>1 – 30 years<br/>(2016 – 2046)</th> </tr> </thead> <tbody> <tr> <td data-bbox="430 1257 593 1347"><b>Minimum Target</b><br/>(number of dwellings)</td> <td data-bbox="593 1257 766 1347">189,800</td> <td data-bbox="766 1257 904 1347">218,500</td> <td data-bbox="904 1257 1055 1347">408,300</td> </tr> </tbody> </table> | Term                                   | Short to Medium<br>1 - 10 years<br>(2016 – 2026) | Long<br>11 - 30 years<br>(2027 – 2046) | Total<br>1 – 30 years<br>(2016 – 2046) | <b>Minimum Target</b><br>(number of dwellings) | 189,800 | 218,500 | 408,300 | <p>PC88 proposes a range of zones and relies largely on the underlying zone provisions in the AUP and MDRS provisions to deliver housing to a range of densities and typologies. The THAB zone is proposed in areas that are adjacent to the proposed Village Centre and generally within walking distance of the ferry. Lower density development is provided for through the large lot zone in response to the natural topography and coastal landform (Objectives 1.3(25) and (26) and policies 1.4(32) and (33)).</p> <p>Additional development capacity will contribute to meeting the minimum dwelling targets, and the BSP provides a place-based planning tool to achieve a planned neighbourhood character.</p> <p>I consider PC88 to be consistent with the objectives and policies of B2.4 residential growth.</p> |
| Term  | Short to Medium<br>1 - 10 years<br>(2016 – 2026)  | Long<br>11 - 30 years<br>(2027 – 2046) | Total<br>1 – 30 years<br>(2016 – 2046)           |  |  |  |         |         |         |   |
| <b>Minimum Target</b><br>(number of dwellings)                                      | 189,800   | 218,500                                | 408,300  |  |  |  |         |         |         |   |

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|  | <p><b>Policy 1</b> Provide a range of residential zones that enable different housing types and intensity that are appropriate to the residential character of the area.</p> <p><b>Policy 2</b> Enable higher residential intensities in areas closest to centres, the public transport network, large social facilities, education facilities, tertiary education facilities, healthcare facilities and existing or proposed open space, <u>which contribute to a well-functioning urban environment.</u></p> <p><b>Policy 3</b> Provide for medium residential intensities in area that are within moderate walking distance to centres, public transport, social facilities and open space, <u>whilst limiting height and/or density of urban form in areas where there are qualifying matters.</u></p> <p><b>Policy 4</b> Provide for lower residential intensity in areas:</p> <ul style="list-style-type: none"> <li>(a) that are not close to centres and public transport;</li> <li>(b) that are subject to high environmental constraints;</li> <li>(c) where there are natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage and special character; and</li> <li>(d) where there is a suburban area with an existing neighbourhood character; <u>and</u></li> <li>(e) <u>where, there are other qualifying matters listed in Chapter A that justify that limitation.</u></li> </ul> <p><b>Policy 6</b> Ensure development is adequately serviced by existing infrastructure or is provided with infrastructure prior to or at the same time as residential intensification, <u>including, as a qualifying matter, limiting intensification prior to upgrade of capacity in areas of known water and wastewater infrastructure constraints.</u></p> <p><b>Policy 8</b> Recognise and provide for existing and planned neighbourhood character through the use of place-based planning tools.</p> |            |



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|   | <p><b>Policy 9</b> Manage built form, design and development to achieve an attractive, healthy and safe environment that is in keeping with the descriptions set out in placed-based plan provisions.</p> <p><b>Policy 11</b> Enable a sufficient supply and diverse range of dwelling types, <u>and sizes and locations</u> that meet the housing needs of people and communities, including:<br/> (a) households on low to moderate incomes; and<br/> people with special housing requirements.</p>   |  |
| <p>Chapter B2.5<br/>Commercial and industrial growth</p> <p>Objectives B2.5.1<br/>Policies B2.5.2</p> | <p><b>Objective 1</b> Employment and commercial and industrial opportunities meet current and future demands.</p> <p><b>Objective 2</b> Commercial growth and activities are primarily focussed within a hierarchy of centres and identified growth corridors that <del>supports</del> <u>contributes to a well-functioning urban environment and a compact urban form.</u></p> <p><b>Objective 2A</b> <u>Commercial and industrial activities are resilient to the effects of climate change.</u></p> <p><b>Objective 3</b> Industrial growth and activities are enabled in a manner that does all of the following:<br/> (a) promotes economic development;<br/> (b) promotes the efficient use of buildings, land and infrastructure in industrial zones;<br/> (c) manages conflicts between incompatible activities <u>by applying relevant qualifying matters;</u><br/> (d) recognises the particular locational requirements of some industries; and<br/> (e) enables the development and use of Mana Whenua’s resources for their economic well-being.</p> | <p>PC88 identifies land for commercial and industrial growth, within the Village Centre, Community and Employment sub-precincts that will provide for a range of retail, commercial, education, tourism, and industrial activities. PC88 largely relies on the underlying zoning for development of commercial and industrial activities.</p> <p>The structure plan identifies that the community could support a local centre to support the convenience retail and commercial needs of the community. The PEL report determines that the proposed local centre would not impact on the existing local centre at Beachlands, or the centres hierarchy of the AUP.</p> <p>I consider PC88 to be consistent with the RPS provisions for commercial and industrial growth.</p> |

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|  | <p><b>Policy 1</b> Encourage commercial growth and development in the city centre, metropolitan and town centres, and enable retail activities on identified growth corridors, to provide the primary focus for Auckland's commercial growth.</p> <p><b>Policy 2</b> Support the function, role and amenity of centres by encouraging commercial and residential activities within centres, ensuring development that locates within centres contributes <u>to a well-functioning urban environment</u> and the following:</p> <p><u>(aa) a high density urban form that responds to a centre's accessibility by public transport, commercial activity and community facilities;</u></p> <p>(a) an attractive and efficient urban environment with a distinctive sense of place and quality public places;</p> <p>(b) a diverse range of activities, with the greatest mix, <del>and</del> concentration <u>and density</u> of activities in the city centre;</p> <p>(c) a distribution of centres that provide for the needs of people and communities;</p> <p>(d) employment and commercial opportunities;</p> <p>(e) a character and form that supports the role of centres as focal points for communities and compact mixed-use environments;</p> <p>(f) the efficient use of land, buildings and infrastructure;</p> <p>(g) high-quality street environments including pedestrian and cycle networks and facilities; <del>and</del></p> <p>(h) development does not compromise the ability for mixed use developments, or commercial activities to locate and expand within centres; <u>and</u></p> <p><u>(i) a scale and form of development that is necessary to achieve any relevant identified qualifying matters.</u></p> <p><b>Policy 3</b> Enable new metropolitan, town and local centres <u>which contribute to a well-functioning urban environment</u> following a structure</p> |            |

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|  | <p>planning process and plan change process in accordance with Appendix 1 Structure plan guidelines, having regard to all of the following:</p> <p>(a) the proximity of the new centre to existing or planned medium to high intensity residential development;</p> <p>(b) the existing network of centres and whether there will be sufficient population growth to achieve a sustainable distribution of centres;</p> <p>(c) whether the new centre will avoid or minimise adverse effects on the function, role and amenity of the city centre, metropolitan and town centres, beyond those effects ordinarily associated with trade effects on trade competitors;</p> <p>(d) the form and role of the proposed centre;</p> <p>(e) any significant adverse effects on existing and planned infrastructure;</p> <p>(f) a safe and efficient transport system which is integrated with the centre; and</p> <p>(g) any significant adverse effects on the environment or on natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage or special character, <u>or other identified qualifying matters</u>.</p> <p><b>Policy 7</b> Enable the supply of land for industrial activities, in particular for land-extensive industrial activities and for heavy industry in areas where the character, scale and intensity of the effects from those activities can be appropriately managed.</p> <p><b>Policy 8</b> Enable the supply of industrial land which is relatively flat, has efficient access to freight routes, rail or freight hubs, ports and airports, and can be efficiently served by infrastructure.</p> |            |

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|   | <p><b>Policy 10A</b> <u>Require commercial, retail and industrial activities to be located, designed and developed to improve their resilience to the effects of climate change.</u></p>  |   |
| <p>Chapter B2.6<br/>Rural and coastal towns and villages</p> <p>Objectives B2.6.1<br/>Policies B2.6.2</p> | <p><b>Objective 1</b> Growth and development of existing or new rural and coastal towns and villages is enabled in ways that:</p> <p>(a) avoid natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage or special character unless growth and development protects or enhances such values; and</p> <p>(b) avoid elite soils and avoid where practicable prime soils which are significant for their ability to sustain food production; and</p> <p>(c) avoid areas with significant natural hazard risks;</p> <p><u>(ca) are resilient to the effects of climate change;</u></p> <p>(d) are consistent with the local character of the town or village and the surrounding area; and</p> <p>(e) enables the development and use of Mana Whenua’s resources for their economic well-being.</p> <p><b>Objective 2</b> Rural and coastal towns and villages have adequate infrastructure.</p> <p><b>Policy 1</b> Require the establishment of new or expansion of existing rural and coastal towns and villages to be undertaken in a manner that does all of the following:</p> <p>(a) maintains or enhances the character of any existing town or village;</p> <p>(b) incorporates adequate provision for infrastructure;</p> <p>(c) avoids locations with significant natural hazard risks where those risks cannot be adequately remedied or mitigated;</p> | <p>PC88 proposes to expand the existing coastal township of Beachlands by approximately doubling the size of it. Structure planning has been undertaken in accordance with Appendix 1 and development avoids natural and physical resources that are scheduled, and significant natural hazard areas.</p> <p>There is insufficient infrastructure capacity within the existing network. There is no public water supply, and the wastewater treatment plant is at capacity (approximately 10,000 people). There is limited public transport services via ferry and bus, and the primary road in and out of the area (Whitford-Maraetai Road) is at capacity.</p> <p>The applicant proposes to fund all local infrastructure required to service development, including stormwater, water and wastewater. Several transport upgrades are identified, and commitment to contribute to funding these. Standard I.7.4 requires development and subdivision to have adequate water and wastewater infrastructure otherwise resource consent is required as a discretionary activity.</p> <p>Standard I.7.3 requires development and subdivision to be staged to coordinate with the provision of transport upgrades, including increased ferry capacity and frequency of service. However, no upgrades are proposed to Whitford-Maraetai Road, and there is significant uncertainty that ferry upgrades will be delivered. Non-compliance with Standard I.7.3 would require resource consent as a discretionary activity, but I am not satisfied that this is adequate to manage the effects of inadequate infrastructure.</p> |

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|  | <p>(d) avoids elite soils and avoids where practicable prime soils which are significant for their ability to sustain food production;</p> <p>(e) maintains adequate separation between incompatible land uses;</p> <p>(f) is compatible with natural and physical characteristics, including those of the coastal environment; and</p> <p>(g) provides access to the town or village through a range of transport options including walking and cycling; <u>and</u></p> <p>(h) <u>improved resilience to the effects of climate change.</u></p> <p><b>Policy 2</b> Avoid locating new or expanding existing rural and coastal towns and villages in or adjacent to areas that contain significant natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage or special character, unless the growth and development protects or enhances such resources including by any of the following measures:</p> <p>(a) the creation of reserves;</p> <p>(b) increased public access;</p> <p>(c) restoration of degraded environments;</p> <p>(d) creation of significant new areas of biodiversity; or</p> <p>(e) enablement of papakāinga, customary use, cultural activities and appropriate commercial activities.</p> <p><b>Policy 3</b> Enable the establishment of new or significant expansions of existing rural and coastal towns and villages through the structure planning and plan change processes in accordance with Appendix 1 Structure plan guidelines.</p> | <p>PC88 is consistent with Objective B2.5.1(1) and Policies 2.6.2(2)-(4). However, PC88 does not provide adequate infrastructure and is therefore inconsistent with Objective B2.6.1(2) and Policy B2.6.2(1).</p> |

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| <p>Chapter B2.7<br/>Open space and recreation facilities</p> <p>Objectives B2.7.1<br/>Policies B2.7.2</p> | <p><b>Objective 1</b> Recreational needs of people and communities are met through the provision of a range of quality open spaces and recreation facilities <u>which contribute to a well-functioning urban environment.</u></p> <p><b>Objective 2</b> Public access to and along Auckland’s coastline, coastal marine area, lakes, rivers, streams and wetlands is maintained and enhanced.</p> <p><b>Objective 3</b> Reverse sensitivity effects between open spaces and recreation facilities and neighbouring land uses are avoided, remedied or mitigated.</p> <p><b>Objective 4</b> <u>Open space and recreation facilities are resilient to the effects of climate change.</u></p> <p><b>Policy 1</b> Enable the development and use of a wide range of open spaces and recreation facilities to provide a variety of activities, experiences and functions <u>and which contribute to a well-functioning urban environment.</u></p> <p><b>Policy 2</b> Promote the physical connection of open spaces to enable people and wildlife to move around efficiently and safely.</p> <p><b>Policy 3</b> Provide a range of open spaces and recreation facilities in locations that are accessible to people and communities.</p> <p><b>Policy 4</b> Provide open spaces and recreation facilities in areas where there is an existing or anticipated deficiency.</p> <p><b>Policy 8</b> Avoid, remedy or mitigate significant adverse effects from the use of open spaces and recreational facilities on nearby residents and communities.</p> <p><b>Policy 9</b> Enable public access to lakes, rivers, streams, wetlands and the coastal marine area by enabling public facilities and by seeking agreements with private landowners where appropriate.</p> <p><b>Policy 10</b> Limit public access to and along the coastal marine area, lakes, rivers, streams and wetlands by esplanade reserves, esplanade</p> | <p>PC88 seeks to establish an integrated movement and open space network indicatively shown on Precinct Plan 3, which provides range of open space and recreation facilities. Provision of open space and recreation facilities is supported by the OSSAR zone and sub-precinct provisions that for a coastal walkway, fairway reserve and high-quality civic space adjacent to the village centre.</p> <p>An extensive network and range of open space and recreation reserves are identified within the plan change area. Provision of open space would exceed the council’s requirements as discussed in Section 8.12. However, the BSP appropriately identifies open spaces as indicative on Precinct Plan 3, and provisions reflect that they may be vested to the council or retained in private ownership.</p> <p>PC88 enables the development of a wide range of open spaces and recreation facilities and Precinct Plan 5 – Movement network promotes physical connections between them.</p> <p>Overall, I consider the provision of open spaces to be consistent with the objectives and policies of B2.7.</p> <p>PC88 is consistent with the objectives and policies of Chapter B2.7 because it provides opportunities for a range of open spaces and recreation facilities within the plan change area to meet the needs of the community.</p> |



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|   | <p>strips or other legal mechanisms where necessary for health, safety or security reasons or to protect significant natural or physical resources.</p> <p><b>Policy 11</b> Provide for improved resilience to the effects of climate change in open space and associated recreation and biodiversity management.</p>   |   |
| <p>Chapter B2.8<br/>Social facilities</p> <p>Objectives<br/>B2.8.1</p> <p>Policies B2.8.2</p> | <p><b>Objective 1</b> Social facilities that meet the needs of people and communities, including enabling them to provide for their social, economic and cultural well-being and their health and safety <u>and which contribute to a well-functioning urban environment.</u></p> <p><b>Objective 2</b> Social facilities located where they are accessible by an appropriate range of transport modes</p> <p><b>Objective 3</b> Reverse sensitivity effects between social facilities and neighbouring land uses are avoided, remedied or mitigated.</p> <p><b>Objective 4</b> Social facilities are resilient to the effects of climate change.</p> <p><b>Policy 1</b> Enable social facilities that are accessible to people of all ages and abilities to establish in appropriate locations <u>which contribute to a well-functioning urban environment</u> as follows:</p> <p>(a) small-scale social facilities are located within or close to their local communities;</p> <p>(b) medium-scale social facilities are located with easy access to city, metropolitan and town centres and on corridors;</p> <p>(c) large-scale social facilities are located where the transport network (including public transport and walking and cycling routes) has sufficient existing or proposed capacity.</p> <p><b>Policy 2</b> Enable the provision of social facilities to meet the diverse demographic and cultural needs of people and communities.</p> <p><b>Policy 3</b> Enable intensive use and development of existing and new social facility sites.</p> | <p>The structure plan developed for PC88 identifies that the scale development will enable social amenities such as schools, open spaces, ecological corridors, community facilities and a village centre to be established. Proposed zones provide for a range of activities including social and community facilities to create successful and thriving communities.</p> <p>Relevant BSP provisions include objectives and policies that seek to establish a vibrant coastal town with a mix of activities (Objective BI.3(3)), a Sub-precinct C Community provides opportunities for develop social facilities including co-location of schools and community facilities (Objectives I.3(23) and (24), and Policies I.4(30) and (31)). Sub-precinct C rules include provision for education, community and visitor accommodation facilities as permitted activities supporting the provision of social facilities. Social facilities are generally provided for as a permitted activity in the LC zone.</p> <p>PC88 is consistent with the objectives and policies of Chapter B2.8 because it provides opportunities for social facilities to be established both in the Village Centre and Community Sub-precinct to meet the needs of the community.</p> |

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|   | <p><b>Policy 4</b> In growth and intensification areas identify as part of the structure plan process where social facilities will be required and enable their establishment in appropriate locations <u>which contribute to a well-functioning urban environment.</u></p> <p><b>Policy 5</b> Enable the efficient and flexible use of social facilities by providing on the same site for:</p> <p>(a) activities accessory to the primary function of the site; and</p> <p>(b) in appropriate locations, co-location of complementary residential and commercial activities.</p> <p><b>Policy 7</b> <u>Require social facilities to provide for improved resilience to the effects of climate change.</u></p> |   |
| Chapter B3.2<br>Infrastructure<br><br>Objectives<br>B3.2.1<br>Policies B3.2.2 | <p><b>Objective (5)</b> Infrastructure planning and land use planning are integrated to service growth efficiently.</p> <p><b>Policy (4)</b> Avoid where practicable, or otherwise remedy or mitigate, adverse effects of subdivision, use and development on infrastructure.</p>   | <p>PC88 includes provisions to ensure that development is adequately serviced with water supply and wastewater (Standard I.7.4). Stormwater infrastructure will be developed in accordance with an approved Stormwater Management Plan.</p> <p>Although subdivision or development could not be approved without adequate water supply, there is an identified risk that the aquifer does not have sufficient capacity to service the plan change area as discussed in section 8. Relying on future consent process to confirm sufficient water supply does not achieve integrated infrastructure and land use planning.</p> <p>I do not consider PC88 to be consistent with Objective 5 and Policy 4</p> |
| Chapter B3.3<br>Transport<br><br>Objectives<br>B3.3.1<br>Policies B3.3.2      | <p><b>Objective (1)</b> Effective, efficient and safe transport that:</p> <p>(a) supports the movement of people, goods and services;</p> <p>(b) integrates with and supports a quality compact urban form;</p> <p>(c) enables growth;</p>  | <p>PC88 identifies transport upgrades to be delivered to support growth (Standard I.7.3) which includes improvements to more than double the current ferry capacity during the weekday peak period (0645 – 0845) from approximately 500 to a total capacity of 1150 to service the live-zoned area. Several intersection upgrades within the wider transport network are also identified.</p>   |

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|   | <p>(d) avoids, remedies or mitigates adverse effects on the quality of the environment and amenity values and the health and safety of people and communities; and</p> <p>(e) facilitates transport choices, recognises different trip characteristics and enables accessibility and mobility for all sectors of the community</p> <p><b>Policy 5</b> Improve the integration of land use and transport by:</p> <p>(a) ensuring transport infrastructure is planned, funded and staged to integrate with urban growth;</p> <p>(b) encouraging land use development and patterns that reduce the rate of growth in demand for private vehicle trips, especially during peak periods;</p> <p>(c) locating high trip-generating activities so that they can be efficiently served by key public transport services and routes and complement surrounding activities by supporting accessibility to a range of transport modes;</p> <p>(d) requiring proposals for high trip-generating activities which are not located in centres or on corridors or at public transport nodes to avoid, remedy or mitigate adverse effects on the transport network;</p> <p>(e) enabling the supply of parking and associated activities to reflect the demand while taking into account any adverse effects on the transport system; and</p> <p>(f) requiring activities adjacent to transport infrastructure to avoid, remedy or mitigate effects which may compromise the efficient and safe operation of such infrastructure.</p> | <p>The indicative local transport network is set out in Precinct Plan 5 – Movement network which supports movement throughout the precinct including by walking and cycling, and access to the ferry terminal to increase transport choice.</p> <p>Improvements proposed to the public transport network cannot be relied upon to service growth because there is significant uncertainty that the ferry service and capacity could be increased or that the ferry mode share would increase to 13% as indicated by the applicant’s ITA as discussed in Section 8.13.</p> <p>Additional traffic generated by PC88 would require upgrades to the Whitford-Maraetai Road which is already at capacity, as well as construction of the Whitford Bypass which are not identified within the BSP, as discussed in Section 8.13.</p> <p>Due to the isolated location of Beachlands the land use pattern would not reduce the rate of growth in demand for private vehicle trips. Although several transport upgrades are proposed to be funded by the applicant, only a contribution is proposed towards improvements to the ferry and there is no identified funding towards the upgrade roading upgrades beyond the intersections identified in Standard I.7.3.</p> <p>PC88 does not improve integration of land use and transport to support a quality compact urban form and is therefore inconsistent with Objective 1 and Policy 5.</p> |
| Chapter B5<br>Historic heritage and special character | <b>Objective 1</b> Significant historic heritage places are identified and protected from inappropriate subdivision, use and development.  | There are several recorded archaeological sites within the plan change area that have been assessed. Two were identified to be of high or outstanding value which would meet the threshold for scheduling in the AUP in accordance with Policies 1 and 2,   |

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| Objectives B5.2<br>Policies B5.3 | <p><b>Objective 2</b> Significant historic heritage places are used appropriately and their protection, management and conservation are encouraged, including retention, maintenance and adaptation.</p> <p><b>Policy 1</b> Identify and evaluate a place with historic heritage value considering the following criteria:</p> <p>(a) historical: the place reflects important or representative aspects of national, regional or local history, or is associated with an important event, person, group of people, or with an idea or early period of settlement within New Zealand, the region or locality;</p> <p>(b) social: the place has a strong or special association with, or is held in high esteem by, a particular community or cultural group for its symbolic, spiritual, commemorative, traditional or other cultural value;</p> <p>(c) Mana Whenua: the place has a strong or special association with, or is held in high esteem by, Mana Whenua for its symbolic, spiritual, commemorative, traditional or other cultural value;</p> <p>(d) knowledge: the place has potential to provide knowledge through archaeological or other scientific or scholarly study, or to contribute to an understanding of the cultural or natural history of New Zealand, the region, or locality;</p> <p>(e) technology: the place demonstrates technical accomplishment, innovation or achievement in its structure, construction, components or use of materials;</p> <p>(f) physical attributes: the place is a notable or representative example of:</p> <ul style="list-style-type: none"> <li>(i) a type, design or style;</li> <li>(ii) a method of construction, craftsmanship or use of materials; or</li> <li>(iii) the work of a notable architect, designer, engineer or builder;</li> </ul> | <p>as discussed in Section 8.5. However, PC88 does not propose to schedule these sites.</p> <p>A heritage building is identified as having potentially significant heritage values on 720 Whitford-Maraetai Road by the council's expert as discussed in Section 8.5. However, no field assessment has been undertaken to determine the values so it is not possible to determine whether this feature should be scheduled. There is a risk that if this feature is not fully assessed as part of PC88 that it could be destroyed before there is an opportunity in the future to do so.</p> <p>PC88 is not considered to be consistent with Objective 1 and Policies 1 and 2 because insufficient justification is provided to explain why the identified feature are not proposed to be protected by scheduling.</p> |

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|  | <p>(g) aesthetic: the place is notable or distinctive for its aesthetic, visual, or landmark qualities;</p> <p>(h) context: the place contributes to or is associated with a wider historical or cultural context, streetscape, townscape, landscape or setting.</p> <p><b>Policy 2</b> Define the location and physical extent of a significant historic heritage place, having considered the criteria in Policy B5.2.2 (1) to identify:</p> <p>(a) the area that contains the historic heritage values of the place; and</p> <p>(b) where appropriate, any area that is relevant to an understanding of the function, meaning and relationships of the historic heritage values.</p> <p><b>Policy 3</b> Include a place with historic heritage value in Schedule 14.1 Schedule of Historic Heritage if:</p> <p>(a) the place has considerable or outstanding value in relation to one or more of the evaluation criteria in Policy B5.2.2 (1); and</p> <p>(b) the place has considerable or outstanding overall significance to the locality or greater geographic area.</p> <p><b>Policy 4</b> Classify significant historic heritage places in Schedule 14.1 Schedule of Historic Heritage in one of the following categories:</p> <p>(a) Category A: historic heritage places that are of outstanding significance well beyond their immediate environs;</p> <p>(b) Category A*: historic heritage places identified in previous district plans which are yet to be evaluated and assessed for their significance;</p> <p>(c) Category B: historic heritage places that are of considerable significance to a locality or beyond;</p> |            |

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|  | <p>(d) Historic heritage areas: groupings of interrelated but not necessarily contiguous historic heritage places or features that collectively meet the criteria for inclusion in Schedule 14.1 Schedule of Historic Heritage in Category A or B and may include both contributing and non-contributing places or features, places individually scheduled as Category A or B, and notable trees.</p> <p><b>Policy 5</b> Identify the known heritage values, the primary feature or features of historic heritage value and the exclusions from protection of each historic heritage place in the Schedule 14.1 Schedule of Historic Heritage.</p>  |  |
| <p>Chapter B6.2<br/>Recognition of<br/>Te Titiri o<br/>Waitangi<br/>partnerships<br/>and<br/>participation</p> | <p><b>Objective (1)</b> The principles of the Treaty of Waitangi/Te Tiriti o Waitangi are recognised and provided for in the sustainable management of natural and physical resources including ancestral lands, water, air, coastal sites, wāhi tapu and other taonga.</p> <p><b>Objective (2)</b> The principles of the Treaty of Waitangi/Te Tiriti o Waitangi are recognised through Mana Whenua participation in resource management processes.</p> <p><b>Policy (1)</b> Provide opportunities for Mana Whenua to actively participate in the sustainable management of natural and physical resources including ancestral lands, water, sites, wāhi tapu and other taonga in a way that does all of the following:</p> <p>(a) recognises the role of Mana Whenua as kaitiaki and provides for the practical expression of kaitiakitanga;</p> <p>(b) builds and maintains partnerships and relationships with iwi authorities;</p> <p>(c) provides for timely, effective and meaningful engagement with Mana Whenua at appropriate stages in the resource management process, including development of resource management policies and plans;</p> | <p>In developing PC88, the applicant has engaged with Ngāi Tai ki Tāmaki as Mana Whenua providing opportunities for participation in accordance with the principles of Te Tiriti o Waitangi.</p> <p>Opportunity was also provided to other Mana Whenua to identify interest in PC88. No other iwi identified an interest.</p> <p>Overall, I consider PC88 to be consistent with the objectives and policies of B6.2.</p> |



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|  | <p>(d) recognises the role of kaumātua and pūkenga;</p> <p>(e) recognises Mana Whenua as specialists in the tikanga of their hapū or iwi and as being best placed to convey their relationship with their ancestral lands, water, sites, wāhi tapu and other taonga;</p> <p>(f) acknowledges historical circumstances and impacts on resource needs;</p> <p>(g) recognises and provides for mātauranga and tikanga; and</p> <p>(h) recognises the role and rights of whānau and hapū to speak and act on matters that affect them.</p>  |  |
| <p>Chapter B6.3<br/>Recognising<br/>Mana Whenua<br/>values</p> | <p><b>Objective (1)</b> Mana Whenua values, mātauranga and tikanga are properly reflected and accorded sufficient weight in resource management decision-making.</p> <p><b>Objective (2)</b> The mauri of, and the relationship of Mana Whenua with, natural and physical resources including freshwater, geothermal resources, land, air and coastal resources are enhanced overall.</p> <p><b>Policy (1)</b> Enable Mana Whenua to identify their values associated with all of the following:</p> <p>(a) ancestral lands, water, air, sites, wāhi tapu, and other taonga;</p> <p>(b) freshwater, including rivers, streams, aquifers, lakes, wetlands, and associated values;</p> <p>(c) biodiversity;</p> <p>(d) historic heritage places and areas; and</p> <p>(e) air, geothermal and coastal resources.</p> <p><b>Policy (2)</b> Integrate Mana Whenua values, mātauranga and tikanga:</p> <p>(a) in the management of natural and physical resources within the ancestral rohe of Mana Whenua, including:</p> | <p>PC88 is within the ancestral rohe of Ngāi Tai ki Tāmaki and a Cultural Values Assessment was prepared to inform PC88, identifying cultural values of significance.</p> <p>Precinct Plan 4 highlights key cultural landscape elements that link to the whakapapa and pukenga</p> <p>A pā site is identified on Precinct Plan 4 as a significant site and the values of this site are recognised and protected through precinct provisions that require consent as a discretionary activity for earthworks, development or subdivision to ensure that values are protected.</p> <p>Freshwater values are recognised through the requirement for planting riparian margins and stormwater quality treatment of impervious areas.</p> <p>Indigenous biodiversity values are recognised, protected and enhanced through the EPAN provisions requiring restoration planting.</p> <p>Overall, I consider PC88 to be consistent with the objectives and policies of B6.3.</p> |

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|   | <p>(i) ancestral lands, water, sites, wāhi tapu and other taonga;</p> <p>(ii) biodiversity; and</p> <p>(iii) historic heritage places and areas.</p> <p>(b) in the management of freshwater and coastal resources, such as the use of rāhui to enhance ecosystem health;</p> <p>(c) in the development of innovative solutions to remedy the longterm adverse effects on historical, cultural and spiritual values from discharges to freshwater and coastal water; and</p> <p>(d) in resource management processes and decisions relating to freshwater, geothermal, land, air and coastal resources.</p> <p><b>Policy (3)</b> Ensure that any assessment of environmental effects for an activity that may affect Mana Whenua values includes an appropriate assessment of adverse effects on those values.</p> <p><b>Policy (6)</b> Require resource management decisions to have particular regard to potential impacts on all of the following:</p> <p>(a) the holistic nature of the Mana Whenua world view;</p> <p>(b) the exercise of kaitiakitanga;</p> <p>(c) mauri, particularly in relation to freshwater and coastal resources;</p> <p>(d) customary activities, including mahinga kai;</p> <p>(e) sites and areas with significant spiritual or cultural heritage value to Mana Whenua; and</p> <p>(f) any protected customary right in accordance with the Marine and Coastal Area (Takutai Moana) Act 2011.</p> |   |
| Chapter B6.5<br>Protection of<br>Māori cultural<br>heritage | <p><b>Objective 1</b> The tangible and intangible values of Mana Whenua cultural heritage are identified, protected and enhanced.</p> <p><b>Objective 2</b> The relationship of Mana Whenua with their cultural heritage is provided for.</p>   | As discussed above PC88 identifies and protects a pā site within the plan change area through provisions in the BSP. An assessment is not provided against Policy 2, and it is not proposed to schedule the site within Schedule 12 Sites and |

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|  | <p><b>Objective 3</b> The association of Mana Whenua cultural, spiritual and historical values with local history and whakapapa is recognised, protected and enhanced.</p> <p><b>Policy 1</b> Protect Mana Whenua cultural and historic heritage sites and areas which are of significance to Mana Whenua.</p> <p><b>Policy 2</b> Identify and evaluate Mana Whenua cultural and historic heritage sites, places and areas considering the following factors:</p> <p>(a) Mauri: ko te mauri me te mana o te wāhi, te taonga rānei, e ngākaunuitia ana e te Mana Whenua. The mauri (life force and life-supporting capacity) and mana (integrity) of the place or resource holds special significance to Mana Whenua;</p> <p>(b) Wāhi tapu: ko tērā wāhi, taonga rānei he wāhi tapu, arā, he tino whakahirahira ki ngā tikanga, ki ngā puri mahara, o ngā wairua a te Mana Whenua. The place or resource is a wāhi tapu of special, cultural, historic, metaphysical and or spiritual importance to Mana Whenua;</p> <p>(c) Kōrero Tūturu/historical: ko tērā wāhi e ngākaunuitia ana e te Mana Whenua ki roto i ōna kōrero tūturu. The place has special historical and cultural significance to Mana Whenua;</p> <p>(d) Rawa Tūturu/customary resources: he wāhi tērā e kawea ai ngā rawa tūturu a te Mana Whenua. The place provides important customary resources for Mana Whenua;</p> <p>(e) Hiahiatanga Tūturu/customary needs: he wāhi tērā e eke ai ngā hiahia hinengaro tūturu a te Mana Whenua. The place or resource is a repository for Mana Whenua cultural and spiritual values; and</p> <p>(f) Whakaaronui o te Wa/contemporary esteem: he wāhi rongonui tērā ki ngā Mana Whenua, arā, he whakaahuru, he whakawaihanga, me te tuku mātauranga. The place has special amenity, architectural or educational significance to Mana Whenua.</p> <p><b>Policy 6</b> Protect Mana Whenua cultural heritage that is uncovered during subdivision, use and development by all of the following:</p> <p>(a) requiring a protocol to be followed in the event of accidental discovery of kōiwi, archaeology or artefacts of Māori origin;</p> | <p>Places of Significance to Mana Whenua. It is assumed that the outcomes proposed by PC88 are supported by Ngāi Tai ki Tāmaki as an identified partner, and no submission has been received to indicate concerns with the proposed approach.</p> <p>Precinct Plan 4 identifies the tangible and intangible values and it is envisaged that through partnership with Ngāi Tai ki Tāmaki throughout the development process that these values can be identified, protected and enhanced. However, there are no specific provisions in the BSP that require further assessment or consideration of the values identified in Precinct Plan 4 other than the objectives and policies and protection of the pā discussed above.</p> <p>Overall, I consider PC88 to be consistent with the provisions in Chapter B6.5.</p> |

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|  | <p>(b) undertaking appropriate actions in accordance with mātauranga and tikanga Māori; and</p> <p>(c) requiring appropriate measures to avoid, remedy or mitigate further adverse effects.</p> <p><b>Policy 7</b> Include a Māori cultural assessment in structure planning and plan change process to do all of the following:</p> <p>(a) identify Mana Whenua values associated with the landscape;</p> <p>(b) identify sites, places and areas that are appropriate for inclusion in the Schedule 12 Sites and Places of Significance to Mana Whenua Schedule for their Mana Whenua cultural heritage values as part of a future plan change; and</p> <p>(c) reflect Mana Whenua values.</p>  |   |
| <p>Chapter B7.2<br/>Indigenous biodiversity</p> <p>Objectives B7.2.1<br/>Policies B7.2.2</p> | <p><b>Objective 1</b> Areas of significant indigenous biodiversity value in terrestrial, freshwater, and coastal marine areas are protected from the adverse effects of subdivision use and development.</p> <p><b>Objective 2</b> Indigenous biodiversity is maintained through protection, restoration and enhancement in areas where ecological values are degraded, or where development is occurring.</p> <p><b>Policy 1</b> Identify and evaluate areas of indigenous vegetation and the habitats of indigenous fauna in terrestrial and freshwater environments considering the following factors in terms of the descriptors contained in Schedule 3 Significant Ecological Areas – Terrestrial Schedule:</p> <p>(a) representativeness;</p> <p>(b) stepping stones, migration pathways and buffers;</p> <p>(c) threat status and rarity;</p> <p>(d) uniqueness or distinctiveness; and</p> <p>(e) diversity.</p> | <p>Areas of terrestrial SEA are identified within the plan change area. The BSP protects existing SEA and identifies additional Significant Natural Areas for protection and enhancement through the EPAN provisions.</p> <p>High value terrestrial vegetation is identified and the precinct requires that development is set back from these areas to avoid potential impacts.</p> <p>PC88 is consistent with the provisions of Chapter B7.2.</p> |
| <p>Chapter B7.3<br/>Freshwater systems</p>   | <p><b>Objective 1</b> Degraded freshwater systems are enhanced.</p> <p><b>Objective 2</b> Loss of freshwater systems is minimised.</p> <p><b>Objective 3</b> The adverse effects of changes in land use on freshwater are avoided, remedied or mitigated.</p>   | <p>PC88 provides for intermittent and permanent streams to be retained and enhanced within ecological corridors, including provision for riparian planting for a minimum width of 10m. The area is identified as SMAF-1 for the purposes of hydrological mitigation, and stormwater quality treatment is required by the</p>  |

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| <p>Objective B7.3.1<br/>Policies B7.3.2</p>   | <p><b>Policy 1</b> Integrate the management of subdivision, use and development and freshwater systems by undertaking all of the following:<br/>           (a) ensuring water supply, stormwater and wastewater infrastructure is adequately provided for in areas of new growth or intensification;<br/>           (b) ensuring catchment management plans form part of the structure planning process;<br/>           (c) controlling the use of land and discharges to minimise the adverse effects of runoff on freshwater systems and progressively reduce existing adverse effects where those systems or water are degraded; and<br/>           (d) avoiding development where it will significantly increase adverse effects on freshwater systems, unless these adverse effects can be adequately mitigated.</p>   | <p>precinct provisions to mitigate adverse effects of land use on freshwater.</p> <p>The BSP provisions seek to provide adequate water supply, stormwater and wastewater. However, there is insufficient evidence to support the availability of groundwater within the aquifer for water supply which is a key issue.</p> <p>PC88 is generally consistent with the relevant provisions of Chapter B7.3 apart from water supply.</p> <p>I do not consider PC88 to be consistent with Objective 3 and Policy 1, because there is uncertainty that water supply can be achieved within the capacity of the aquifer.</p>   |
| <p>Chapter B7.4<br/>Coastal water, freshwater and geothermal water</p> <p>Objectives B7.4.1<br/>Policies B7.4.2</p> | <p><b>Objective 2</b> The quality of freshwater and coastal water is maintained where it is excellent or good and progressively improved over time where it is degraded.</p> <p><b>Objective 3</b> Freshwater and geothermal water is allocated efficiently to provide for social, economic and cultural purposes.</p> <p><b>Objective 4</b> The adverse effects of point and non-point discharges, in particular stormwater runoff and wastewater discharges, on coastal waters, freshwater and geothermal water are minimised and existing adverse effects are progressively reduced.</p> <p><b>Objective 5</b> The adverse effects from changes in or intensification of land use on coastal water and freshwater quality are avoided, remedied or mitigated.</p> <p><b>Objective 6</b> Mana Whenua values, mātauranga and tikanga associated with coastal water, freshwater and geothermal water are recognised and provided for, including their traditional and cultural uses and values</p> <p><b>Policy 6</b> Progressively improve water quality in areas identified as having degraded water quality through managing subdivision, use, development and discharges.</p> | <p>The coastal marine area adjoining the southern portion of the plan change area is identified as degraded 2 (Figure B7.4.2.1). Assessment of effects on coastal receiving environment is provided in Section 8.10, concluding that potential adverse effects would be adequately managed through the BSP in combination with the Auckland-wide provisions of the AUP.</p> <p>The BSP in Standard I.7.11 limits the amount of exposed earthworks areas within each catchment to mitigate potential sediment discharges into the receiving environment.</p> <p>Freshwater quality would be improved as riparian margins would be planted and sediment discharges in the long term would reduce as the land would be urbanised. Stormwater quality would be managed through BSP provisions requiring treatment of stormwater runoff from impervious areas prior to discharge minimising the discharge of contaminants.</p> <p>Water supply is proposed to be groundwater bores. The precinct includes requirement for rainwater harvesting for non-potable water supply for all new dwellings as well as the</p> |

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|  | <p><b>Policy 7</b> Manage the discharges of contaminants into water from subdivision, use and development to avoid where practicable, and otherwise minimise, all of the following: (a) significant bacterial contamination of freshwater and coastal water;</p> <p>(b) adverse effects on the quality of freshwater and coastal water;</p> <p>(c) adverse effects from contaminants, including nutrients generated on or applied to land, and the potential for these to enter freshwater and coastal water from both point and non-point sources;</p> <p>(d) adverse effects on Mana Whenua values associated with coastal water, freshwater and geothermal water, including wāhi tapu, wāhi taonga and mahinga kai; and</p> <p>(e) adverse effects on the water quality of catchments and aquifers that provide water for domestic and municipal supply.</p> <p><b>Policy 8</b> Minimise the loss of sediment from subdivision, use and development, and manage the discharge of sediment into freshwater and coastal water, by:</p> <p>(a) promoting the use of soil conservation and management measures to retain soil and sediment on land; and</p> <p>(b) requiring land disturbing activities to use industry best practice and standards appropriate to the nature and scale of the land disturbing activity and the sensitivity of the receiving environment.</p> <p><b>Policy 9</b> Manage stormwater by all of the following:</p> <p>(a) requiring subdivision, use and development to</p> <p>(i) minimise the generation and discharge of contaminants; and</p> <p>(ii) minimise adverse effects on freshwater and coastal water and the capacity of the stormwater network; and</p> <p><u>(iii) improve resilience to the effects of climate change.</u></p> <p>(b) adopting the best practicable option for every stormwater diversion and discharge; and</p> <p>(c) controlling the diversion and discharge of stormwater outside of areas serviced by a public stormwater network.</p> <p><b>Policy 11</b> Promote the efficient allocation of freshwater and geothermal water by all of the following:</p> <p>(a) establishing clear limits for water allocation;</p> | <p>implementation water efficiency measures. However, insufficient evidence has been provided to confirm the capacity of the aquifer to meet the water supply requirements and it may be over allocated.</p> <p>I do not consider PC88 to be consistent with Objective 3 and Policy 11 because of concerns about the capacity of the aquifer to provide water supply. However, PC88 is consistent with other provisions relating to freshwater and coastal water quality.</p> |



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|   | <p>(b) avoiding over-allocation of water, including phasing out any existing overallocation;</p> <p>(c) safeguarding spring flows, surface waterbody base flows, ecosystem processes, life-supporting capacity, the recharge of adjacent aquifers, and geothermal temperature and amenity; and</p> <p>(d) providing for the reasonable requirements of domestic and municipal water supplies.</p> <p><b>Policy 12</b> Promote the efficient use of freshwater and geothermal water</p> <p><b>Policy 13</b> Promote the taking of groundwater rather than the taking of water from rivers and streams in areas where groundwater is available for allocation</p> <p><b>Policy 14</b> Enable the harvesting and storage of freshwater and rainwater to meet increasing demand for water and to manage water scarcity conditions, including those made worse by climate change.</p>   |   |
| <p>Chapter B8.2<br/>Coastal environment.</p> <p>Objectives<br/>B8.2.1<br/>Policies B8.2.2</p> | <p><b>Objective 1</b> Areas of the coastal environment with outstanding and high natural character are preserved and protected from inappropriate subdivision, use and development.</p> <p><b>Objective 2</b> Subdivision, use and development in the coastal environment are designed, located and managed to preserve the characteristics and qualities that contribute to the natural character of the coastal environment.</p> <p><b>Objective 3</b> Where practicable, in the coastal environment areas with degraded natural character are restored or rehabilitated and areas of high and outstanding natural character are enhanced.</p> <p><b>Policy 4</b> Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects on natural character of the coastal environment not identified as outstanding natural character and high natural character from inappropriate subdivision, use and development.</p> <p><b>Policy (4A)</b> <u>Provide for the natural systems that support natural character to respond in a resilient way to the effects of climate change including sea level rise over at least 100 years.</u></p> | <p>PC88 is within the coastal environment. However, the coastal environment is not identified as having outstanding or high natural character. The landscape assessment, as discussed in Section 8.1, determines that the development would be designed, located and managed to mitigate adverse effects on the character of the coastal environment.</p> <p>I consider PC88 to be consistent with the relevant provisions of the Chapter B8.2.</p> |

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|   | <p><b>Policy 5</b> Enable land use practices and restoration projects that will restore, rehabilitate or enhance natural character in outstanding natural character and high natural character areas in the coastal environment.</p>  |   |
| <p>Chapter B8.3<br/>Subdivision and development in the Coastal Environment</p> <p>Objectives<br/>B8.3.1<br/>Policies B8.3.2</p> | <p><b>Objective 1</b> Subdivision, use and development in the coastal environment are located in appropriate places and are of an appropriate form and within appropriate limits, taking into account the range of uses and values of the coastal environment.</p> <p><b>Objective 2</b> The adverse effects of subdivision, use and development on the values of the coastal environment are avoided, remedied or mitigated.</p> <p><b>Objective 3</b> The natural and physical resources of the coastal environment are used efficiently and activities that depend on the use of the natural and physical resources of the coastal environment are provided for in appropriate locations.</p> <p><b>Objective 7</b> In areas potentially affected by coastal hazards, <u>including sea level rise over at least 100 years</u>, subdivision, use and development avoid increasing the risk of social, environmental and economic harm.</p> <p><b>Policy 1</b> Recognise the contribution that use and development of the coastal environment make to the social, economic and cultural well-being of people and communities.</p> <p><b>Policy 2</b> Avoid or mitigate sprawling or sporadic patterns of subdivision, use and development in the coastal environment by all of the following:</p> <p>(a) concentrating subdivision, use and development within areas already characterised by development and where natural character values are already compromised;</p> <p>(b) avoiding urban activities in areas with natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal, historic heritage and special character; and</p> <p>(c) ensuring that subdivision, use or development involving land above and below the mean high water springs can provide for any associated facilities or infrastructure in an integrated manner.</p> | <p>BSP provisions require a coastal protection yard of 30m from the coastal edge to avoid coastal hazard effects, and in areas at risk of land instability a large residential lot size is required of 1,000m<sup>2</sup>.</p> <p>Stormwater quality treatment is required for all impervious areas, along with planting of riparian margins, which will mitigate potential adverse effects from runoff into the coastal environment.</p> <p>If a local wastewater treatment plan is proposed within the plan change area it would need to apply for the appropriate resource consents and would be required to manage potential adverse effects.</p> <p>I consider PC88 to be consistent with the relevant provisions of the Chapter B8.3.</p> |

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|   | <p><b>Policy 4</b> Require subdivision, use and development in the coastal environment to avoid, remedy or mitigate the adverse effects of activities above and below the mean high water springs, including the effects on existing uses and on the coastal receiving environment.</p> <p><b>Policy 5</b> Adopt a precautionary approach towards proposed activities whose effects on the coastal environment are uncertain, unknown or little understood, but could be significantly adverse.</p> <p><b>Policy 7</b> Set back development from the coastal marine area, where practicable, to protect the natural character and amenity values of the coastal environment.</p>  |   |
| <p>Chapter B8.4<br/>Public access<br/>and open space</p> <p>Objectives 8.4.1<br/>Policies 8.4.2</p> | <p><b>Objective 1</b> Public access to and along the coastal marine area is maintained and enhanced, except where it is appropriate to restrict that access, in a manner that is sensitive to the use and values of an area.</p> <p><b>Objective 2</b> Public access is restricted only where necessary to ensure health or safety, for security reasons, for the efficient and safe operation of activities, or to protect the value of areas that are sensitive to disturbance.</p> <p><b>Objective 3</b> The open space, recreation and amenity values of the coastal environment are maintained or enhanced, including through the provision of public facilities in appropriate locations</p> <p><b>Policy 1</b> Subdivision, use and development in the coastal environment must, where practicable, do all of the following:<br/> (a) maintain and where possible enhance public access to and along the coastal marine area, including through the provision of esplanade reserves and strips;<br/> (b) be designed and located to minimise impacts on public use of and access to and along the coastal marine area;<br/> (c) be set back from the coastal marine area to protect public open space values and access; and<br/> (d) take into account the likely impact of coastal processes and climate change, including sea level rise over at least 100 years, and be set back sufficiently to not compromise the ability of future generations to have access to and along the coast.</p> | <p>An esplanade reserve exists along the coastal margin of PC88. PC88 supports the provision of public access to and along the coastal marine area by identifying an indicative coastal pathway on Precinct Plan 3 Structuring elements and Precinct Plan 5 Movement network. Provision of the coastal pathway would require resource consent as a controlled activity to ensure it facilitates access to the ferry terminal.</p> <p>I consider PC88 to be consistent with the relevant provisions of the Chapter B8.4.</p> |

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| <p>Chapter B8.5<br/>Hauraki Gulf /<br/>Te Moana Nui o<br/>Toi / Tikapa<br/>Moana</p> <p>Objectives<br/>B8.5.1<br/>Policies B8.5.2</p> | <p><b>Objective 3</b> Economic well-being is enabled from the use of the Hauraki Gulf's natural and physical resources without resulting in further degradation of environmental quality or adversely affecting the life-supporting capacity of marine ecosystems.</p> <p><b>Policy 1</b> Encourage and support the restoration and enhancement of the Hauraki Gulf's ecosystems, its islands and catchments.</p> <p><b>Policy 2</b> Require the integrated management of use and development in the catchments, islands, and waters of the Hauraki Gulf to ensure that the ecological values and life-supporting capacity of the Hauraki Gulf are protected, and where appropriate enhanced.</p> <p><b>Policy 9</b> Identify and protect areas or habitats, particularly those unique to the Hauraki Gulf, that are:</p> <p>(a) significant to the ecological and biodiversity values of the Hauraki Gulf; and</p> <p>(b) vulnerable to modification.</p> | <p>PC88 is within the catchment of the Hauraki Gulf and the BSP provisions along with the Auckland-wide provisions of the AUP will achieve integrated management of use and development.</p> <p>EPAN areas will support the identification, protection and restoration of ecological values and habitats within the coastal environment.</p> <p>I consider PC88 to be consistent with the relevant provisions of Chapter B8.5.</p>  |
| <p>Chapter B9<br/>Rural<br/>environment</p> <p>Objectives<br/>B9.2.1<br/>Policies B9.3</p>  | <p><b>Objective 1</b> Rural areas make a significant contribution to the wider economic productivity of, and food supply for, Auckland and New Zealand.</p> <p><b>Objective 4</b> Auckland's rural areas outside the Rural Urban Boundary and rural and coastal towns and villages are protected from inappropriate subdivision, urban use and development.</p> <p><b>Policy 1</b> Enable a diverse range of activities while avoiding significant adverse effects on and urbanisation of rural areas, including within the coastal environment, and avoiding, remedying, or mitigating other adverse effects on rural character, amenity, landscape and biodiversity values.</p>  | <p>Land within the plan change area is currently rural and identified for country living or rural lifestyle through the Whitford Precinct. Therefore land is not identified to have value as rural production.</p> <p>The BSP includes provisions such as landscape buffers along Whitford-Maraetai Road that are considered to mitigate potential adverse effects on the rural character of land to the east.</p> <p>I consider PC88 to be consistent with the provisions of Chapter B9.</p> |
| <p>Chapter B10.2<br/>Natural hazards<br/>and climate<br/>change</p> <p>Objectives<br/>B10.2.1</p>                                     | <p><b>Objective 1</b> Communities are more resilient to natural hazards and the effects of climate change.</p> <p><b>Objective 2</b> The risks to people, property, infrastructure and the environment from natural hazards are not increased in existing developed areas.</p> <p><b>Objective 3</b> New subdivision, use and development avoid the creation of new risks to people, property and infrastructure.</p>  | <p>Structure planning was undertaken to support PC88, identifying natural hazards areas including overland flow paths, flooding, land instability and coastal hazards. The applicant proposes to manage potential adverse effects from natural hazards relying on the AUP framework and BSP provisions.</p>   |

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| Policies B10.2.2 | <p><b>Objective 4</b> The effects of climate change on natural hazards, including effects on sea level rise, <u>over at least 100 years</u> and on the frequency and severity of storm events, is recognised and provided for.</p> <p><b>Objective 5</b> The functions of natural systems, including floodplains, are protected from inappropriate subdivision, use and development.</p> <p><b>Objective 6</b> The conveyance function of overland flow paths is maintained</p> <p><b>Policy 2</b> Undertake natural hazard identification and risk assessments as part of structure planning.</p> <p><b>Policy 3</b> Ensure the potential effects of climate change are taken into account when undertaking natural hazard risk assessments.</p> <p><b>Policy 4</b> Assess natural hazard risks:<br/> (a) using the best available and up-to-date hazard information; and<br/> (b) across a range of probabilities of occurrence appropriate to the hazard, including, at least, a 100-year timeframe for evaluating flooding and coastal hazards, <u>including sea level rise in response to global warming</u>.</p> <p><b>Policy 5</b> Manage subdivision, use and development of land subject to natural hazards based on all of the following:<br/> (a) the type and severity of potential events, including the occurrence natural hazard events in combination;<br/> (b) the vulnerability of the activity to adverse effects, including the health and safety of people and communities, the resilience of property to damage and the effects on the environment; and<br/> (c) the cumulative effects of locating activities on land subject to natural hazards and the effects on other activities and resources.</p> <p><b>Policy 6</b> Adopt a precautionary approach to natural hazard risk assessment and management in circumstances where:<br/> (a) the effects of natural hazards and the extent to which climate change will exacerbate such effects are uncertain but may be significant, including the possibility of low-probability but high potential impact events, <u>and also sea level rise over at least 100 years</u>; or</p> | <p>Relevant BSP provisions include 30m coastal protection yards and LLZ in area susceptible to coastal erosion or land instability.</p> <p>Flood modelling provided by the applicant was reviewed by Healthy Waters. As discussed in Section 8.7, Healthy Waters raised concerns about the validity of the flood modelling because it is based on out dated information. It is therefore not possible to determine that the cumulative effects of development would not exacerbate downstream flooding that is already occurring. While I acknowledge that Healthy Waters anticipates that flooding effects could be resolved, adequate information is not currently available to determine this.</p> <p>I consider PC88 is consistent with the natural hazards provisions in relation to identification and management within the plan change area, but I do not consider PC88 to be consistent with Objective 2 and Policies 4 and 5 because flood modelling date is not the most up-to-date and therefore the scale of downstream flooding effects is not able to be fully understood.</p> |

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|  | <p>(b) the level of information on the probability and/or impacts of the hazard is limited.</p> <p><b>Policy 7</b> Avoid or mitigate the effects of activities in areas subject to natural hazards, such as earthworks, changes to natural and built drainage systems, vegetation clearance and new or modified structures, so that the risks of natural hazards are not increased.</p> <p><b>Policy 8</b> Manage the location and scale of activities that are vulnerable to the adverse effects of natural hazards so that the risks of natural hazards to people and property are not increased.</p> <p><b>Policy 9</b> Encourage activities that reduce, or do not increase, the risks posed by natural hazards, including any of the following:</p> <ul style="list-style-type: none"> <li>(a) protecting and restoring natural landforms and vegetation;</li> <li>(b) managing retreat by relocation, removal or abandonment of structures;</li> <li>(c) replacing or modifying existing development to reduce risk without using hard protection structures;</li> <li>(d) designing for relocatable or recoverable structures; or</li> <li>(e) providing for low-intensity activities that are less vulnerable to the effects of relevant hazards, including modifying their design and management.</li> </ul> <p><b>Policy 11</b> Strengthen natural systems such as flood plains, vegetation and riparian margins, beaches and sand dunes in preference to using hard protection structures.</p> <p><b>Policy 13</b> Require areas potentially affected by coastal hazards over the next 100 years to <del>do all of the following</del>:</p> <ul style="list-style-type: none"> <li>(a) avoid changes in land use that would increase the risk of adverse effects from coastal hazards;</li> <li>(b) <del>do not increase, or reduce,</del> the intensity of activities that are vulnerable to the effects of coastal hazards beyond that enabled by the Plan;</li> <li>(c) in the event of redevelopment, minimise natural hazard risks through the location and design of development; <del>or and</del></li> <li>(d) where it is impracticable to locate infrastructure outside of coastal hazard areas, then ensure coastal hazard risks are mitigated.</li> </ul> |            |



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| <b>Regional Plan</b>   |  |  |
| <p>Chapter E1<br/>Water quality and integrated management</p> <p>Objectives E1.2<br/>Policies E1.3</p> | <p><b>Objective 1</b> Freshwater and sediment quality is maintained where it is excellent or good and progressively improved over time in degraded areas.</p> <p><b>Objective 2</b> The mauri of freshwater is maintained or progressively improved over time to enable traditional and cultural use of this resource by Mana Whenua.</p> <p><b>Objective 3</b> Stormwater and wastewater networks are managed to protect public health and safety and to prevent or minimise adverse effects of contaminants on freshwater and coastal water quality.</p> <p><b>Policy 4</b> When considering any application for a discharge, the Council must have regard to the following matters:<br/>(a) the extent to which the discharge would avoid contamination that will have an adverse effect on the life-supporting capacity of freshwater including on any ecosystem associated with freshwater; and<br/>(b) the extent to which it is feasible and dependable that any more than a minor adverse effect on freshwater, and on any ecosystem associated with freshwater, resulting from the discharge would be avoided.</p> <p><b>Policy 5</b> When considering any application for a discharge the Council must have regard to the following matters:<br/>(a) the extent to which the discharge would avoid contamination that will have an adverse effect on the health of people and communities as affected by their secondary contact with fresh water; and<br/>(b) the extent to which it is feasible and dependable that any more than minor adverse effect on the health of people and communities as affected by their secondary contact with fresh water resulting from the discharge would be avoided.</p> <p><b>Policy 8</b> Avoid as far as practicable, or otherwise minimise or mitigate, adverse effects of stormwater runoff from greenfield development on freshwater systems, freshwater and coastal water by:<br/>(a) taking an integrated stormwater management approach (refer to Policy E1.3.10);</p> | <p>The regional plan objectives and policies in Chapter E1 address water quality and integrated and are relevant to stormwater and wastewater management and discharges.</p> <p>In terms of wastewater, the applicant has provided a Wastewater Concept Design that illustrates viable options for servicing, treatment and disposal. As discussed in Section 8.8, sufficient information is provided to demonstrated wastewater effects can be appropriately managed.</p> <p>In terms of stormwater, the applicant has provided a draft Stormwater Management Plan demonstrating consistency with the regional plan requirements for stormwater management and disposal, as discussed in Section 8.7. The applicant indicates that stormwater discharges will be approved under the council’s Network Discharge Consent. Healthy Waters does not currently support the adoption of the draft Stormwater Management Plan because of concerns about the hydraulic modelling. However, it is anticipated that this issue can be resolved with revised modelling.</p> <p>I consider PC88 to be consistent with the objectives and policies in Chapter E1 in terms of wastewater and stormwater management. However, I consider PC88 to be inconsistent with Policy 11 because the applicant has not adequately demonstrated that downstream flooding would not be exacerbated by development.</p> |

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|  | <p>(b) minimising the generation and discharge of contaminants, particularly from high contaminant generating car parks and high use roads and into sensitive receiving environments;</p> <p>(c) minimising or mitigating changes in hydrology, including loss of infiltration, to:</p> <p>(i) minimise erosion and associated effects on stream health and values;</p> <p>(ii) maintain stream baseflows; and</p> <p>(iii) support groundwater recharge;</p> <p>(d) where practicable, minimising or mitigating the effects on freshwater systems arising from changes in water temperature caused by stormwater discharges; and</p> <p>(e) providing for the management of gross stormwater pollutants, such as litter, in areas where the generation of these may be an issue.</p> <p><b>Policy 10</b> In taking an integrated stormwater management approach have regard to all of the following:</p> <p>(a) the nature and scale of the development and practical and cost considerations, recognising:</p> <p>(i) greenfield and comprehensive brownfield development generally offer greater opportunity than intensification and small-scale redevelopment of existing areas;</p> <p>(ii) intensive land uses such as high-intensity residential, business, industrial and roads generally have greater constraints; and</p> <p>(iii) site operational and use requirements may preclude the use of an integrated stormwater management approach.</p> <p>(b) the location, design, capacity, intensity and integration of sites/development and infrastructure, including roads and reserves, to protect significant site features and hydrology and minimise adverse effects on receiving environments;</p> <p>(c) the nature and sensitivity of receiving environments to the adverse effects of development, including fragmentation and loss of connectivity of rivers and streams, hydrological effects and contaminant discharges and how these can be minimised and mitigated, including opportunities to enhance degraded environments;</p> |            |

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|  | <p>(d) reducing stormwater flows and contaminants at source prior to the consideration of mitigation measures and the optimisation of on-site and larger communal devices where these are required; and</p> <p>(e) the use and enhancement of natural hydrological features and green infrastructure for stormwater management where practicable.</p> <p><b>Policy 11</b> Avoid as far as practicable, or otherwise minimise or mitigate adverse effects of stormwater diversions and discharges, having particular regard to:</p> <p>(a) the nature, quality, volume and peak flow of the stormwater runoff;</p> <p>(b) the sensitivity of freshwater systems and coastal waters, including the Hauraki Gulf Marine Park;</p> <p>(c) the potential for the diversion and discharge to create or exacerbate flood risks;</p> <p>(d) options to manage stormwater on-site or the use of communal stormwater management measures;</p> <p>(e) practical limitations in respect of the measures that can be applied; and</p> <p>(f) the current state of receiving environments.</p> <p><b>Policy 17</b> Avoid the discharge of wastewater to the coastal marine area and to freshwater, unless:</p> <p>(a) alternative methods, sites and routes for the discharge have been considered and are not the best practicable option;</p> <p>(b) Mana Whenua have been consulted in accordance with tikanga Māori and due weight has been given to section 6, section 7 and section 8 of the Resource Management Act 1991;</p> <p>(c) the affected community has been consulted regarding the suitability of the treatment and disposal system to address any environmental effects;</p> <p>(d) the extent to which adverse effects have been avoided, remedied or mitigated on areas of:</p> <p>(i) high recreational use, or that are used for fishing or shellfish gathering;</p> <p>(ii) areas of maintenance dredging;</p> <p>(iii) commercial or residential waterfront development;</p> |            |

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|--|--|--|
|  | <p>(iv) high ecological value; and<br/>(v) marine farms.</p> <p><b>Policy 18</b> Avoid the discharge of wastewater from wastewater treatment plants and associated structures to freshwater, unless:</p> <p>(a) alternative methods, sites and routes for the discharge have been considered and are not the best practicable option;<br/>(b) Mana Whenua have been consulted in accordance with tikanga Māori and due consideration has been given to section 6, section 7 and section 8 of the Resource Management Act 1991;<br/>(c) the affected community has been consulted regarding the suitability of the treatment and disposal system to address any environmental effects; and<br/>(d) the extent to which adverse effects have been avoided where practicable, or otherwise remedied or mitigated in areas of:<br/>(i) high recreational use, or areas that are used for fishing or shellfish gathering;<br/>(ii) commercial or residential development; and (iii) significant ecological value.</p>   |  |
| <p>Chapter E2<br/>Water quantity allocation and use</p> <p>Objectives E2.2<br/>Policies E2.3</p> | <p><b>Objective 1</b> Water in surface rivers and groundwater aquifers is available for use provided the natural values of water are maintained and established limits are not exceeded.</p> <p><b>Objective 2</b> Water resources are managed within limits to meet current and future water needs for social, cultural and economic purposes.</p> <p><b>Objective 3</b> Freshwater resources available for use are managed and allocated in order of priority to provide for domestic and municipal water supplies, animals, and economic development.</p> <p><b>Objective 4</b> Water resources are managed to maximise the efficient allocation and efficient use of available water.</p> <p><b>Objective 5</b> Mana Whenua values including the mauri of water, are acknowledged in the allocation and use of water.</p> <p><b>Policy 1</b> Manage the allocation of fresh water within the guidelines provided by Appendix 2 River and stream minimum flow and availability and Appendix 3 Aquifer water availabilities and levels and give priority</p> | <p>The applicant proposes to take groundwater from the Beachlands Waitemata and the Whitford Waitemata aquifers for water supply. The water supply assessment identifies the demand and therefore what supply is needed but does not provide an assessment of the availability of water within the aquifers. It is therefore not possible to determine whether PC88 would be consistent with the objectives and policies for water quantity allocation and use.</p> <p>It is unclear whether there is sufficient water available to service PC88 without impact on existing users. There are no alternative water sources available to service the site.</p> <p>The BSP includes provisions requiring water efficiency measures to be installed as well as rainwater reuse tanks for all new dwellings to reduce pressure on groundwater supply. Provided there is sufficient capacity to supply the water</p> |

|  | Relevant provision   | Assessment  |
|--|--|---|
|  | <p>to making freshwater available for the following uses (in descending order of priority):</p> <ul style="list-style-type: none"> <li>(a) existing and reasonably foreseeable domestic and municipal water supply and animal drinking water requirements;</li> <li>(b) existing lawfully established water users;</li> <li>(c) uses of water for which alternative water sources are unavailable or unsuitable; and</li> <li>(d) all other uses.</li> </ul> <p><b>Policy 3</b> Ensure allocations support the outcomes sought by relevant objectives and policies in B7.3 Freshwater systems.</p> <p><b>Policy 4</b> Promote the efficient allocation and use of freshwater and geothermal water by:</p> <ul style="list-style-type: none"> <li>(a) requiring the amount of water taken and used to be reasonable and justifiable with regard to the intended use, and where appropriate: <ul style="list-style-type: none"> <li>(i) municipal water supplies are supported by a water management plan;</li> <li>(ii) industrial and irrigation supplies implement best practice, in respect of the efficient use of water for that particular activity or industry; or</li> <li>(iii) all takes (other than municipal water supplies from a dam) are limited to a maximum annual allocation based on estimated water requirements;</li> </ul> </li> <li>(b) requiring consideration of water conservation and thermal efficiency methods;</li> <li>(c) facilitating the transfer of surface water take permits, provided the transfer is within the same surface water catchment and does not result in site-specific adverse effects;</li> <li>(d) encouraging the shared use and management of water through water user groups or other arrangements where it results in an increased efficiency in the use and allocation of water; and</li> <li>(e) providing for storage and harvesting of fresh water.</li> </ul> <p><b>Policy 7</b> Require all proposals to take and use groundwater from any aquifer to demonstrate that:</p> | <p>demand then these provisions would be consistent with relevant regional plan provisions.</p> <p>As discussed in Section 8.8 there is significant uncertainty that the aquifers have the capacity to service the plan change area. Therefore overall, I do not consider PC88 to be consistent with Objectives 1, 2, and 4, and Policies 1, 3, 4, and 7.</p> |

|  | Relevant provision   | Assessment |
|--|--|------------|
|  | <p>(a) the taking is within the water availabilities and levels for the aquifer in Table 1 Aquifer water availabilities and Table 2 Interim aquifer groundwater levels in Appendix 3 Aquifer water availabilities and levels, except in accordance with Policy E2.3(11), and meeting all of the following:</p> <ul style="list-style-type: none"> <li>(i) recharge to other aquifers is maintained; and</li> <li>(ii) aquifer consolidation and surface subsidence is avoided.</li> </ul> <p>(b) the taking will avoid, remedy or mitigate adverse effects on surface water flows, including the following:</p> <ul style="list-style-type: none"> <li>(i) base flow of rivers, streams and springs; and</li> <li>(ii) any river or stream flow requirements and in particular the minimum stream flow and availability in Appendix 2 River and stream minimum flow and availability.</li> </ul> <p>(c) the taking will avoid, remedy or mitigate adverse effects on terrestrial and freshwater ecosystem habitat;</p> <p>(d) the taking will not cause saltwater intrusion or any other contamination;</p> <p>(e) the taking will not cause adverse interference effects on neighbouring bores to the extent their owners are prevented from exercising their lawfully established water takes;</p> <p>(f) Policy E2.3(7)(e) above will not apply in the following circumstances:</p> <ul style="list-style-type: none"> <li>(i) where it is practicably possible to locate the pump intake at a greater depth within the affected bore; or</li> <li>(ii) where it can be demonstrated that the affected bore accesses, or could access, groundwater at a deeper level within the same aquifer, if drilled or cased to a greater depth.</li> </ul> <p><b>Policy 13</b> When considering any application the Council must have regard to the following matters:</p> <p>(a) the extent to which the change would adversely affect safeguarding the life supporting capacity of fresh water and of any associated ecosystem; and</p> |            |



|   | Relevant provision   | Assessment  |
|---|--|---|
|   | (b) the extent to which it is feasible and dependable that any adverse effect on the life-supporting capacity of freshwater and of any associated ecosystem resulting from the change would be avoided.  |   |
| Chapter E15<br>Vegetation management and biodiversity<br><br>Objectives E15.2<br>Policies E15.3 | <p><b>Objective 1</b> Ecosystem services and indigenous biological diversity values, particularly in sensitive environments, and areas of contiguous indigenous vegetation cover, are maintained or enhanced while providing for appropriate subdivision, use and development.</p> <p><b>Objective 2</b> Indigenous biodiversity is restored and enhanced in areas where ecological values are degraded, or where development is occurring.</p> <p><b>Policy 1</b> Protect areas of contiguous indigenous vegetation cover and vegetation in sensitive environments including the coastal environment, riparian margins, wetlands, and areas prone to natural hazards.</p> <p><b>Policy 2</b> Manage the effects of activities to avoid significant adverse effects on biodiversity values as far as practicable, minimise significant adverse effects where avoidance is not practicable, and avoid, remedy or mitigate any other adverse effects on indigenous biological diversity and ecosystem services, including soil conservation, water quality and quantity management, and the mitigation of natural hazards.</p> <p><b>Policy 3</b> Encourage the offsetting of any significant residual adverse effects on indigenous vegetation and biodiversity values that cannot be avoided, remedied or mitigated, through protection, restoration and enhancement measures, having regard to Policy E15.3(4) below and Appendix 8 Biodiversity offsetting.</p> <p><b>Policy 4</b> Protect, restore, and enhance biodiversity when undertaking new use and development through any of the following:</p> <p>(a) using transferable rural site subdivision to protect areas that meet one or more of the factors referred to in B7.2.2(1) and in Schedule 3 Significant Ecological Areas -Terrestrial Schedule or shown on the Kawau Island Rural Subdivision SEA Control.</p> <p>(b) requiring legal protection, ecological restoration and active management techniques in areas set aside for the purposes of mitigating or offsetting adverse effects on indigenous biodiversity;</p> <p>or</p> | <p>Structure planning undertaken for PC88 identified areas of contiguous indigenous vegetation that are to be protected in the form of an ecological protection area network. The BSP provisions manage vegetation alteration and removal and require the areas to be legally protected and enhanced.</p> <p>I consider PC88 to be consistent with the regional plan provisions for vegetation management and biodiversity other than the approach to ‘double count’ riparian margin planting required to mitigate the effects of land use for offsetting of future residual adverse effects. For this reason I consider PC88 to be inconsistent with Objective E15.2(2) and Policy E15.3(3).</p> |

|  | Relevant provision   | Assessment |
|--|--|------------|
|  | <p>(c) linking biodiversity outcomes to other aspects of the development such as the provision of infrastructure and open space.</p> <p><b>Policy 5</b> Enable activities which enhance the ecological integrity and functioning of areas of vegetation, including for biosecurity, safety and pest management and to control kauri dieback.</p> <p><b>Policy 6</b> Enable vegetation management to provide for the operation and routine maintenance needs of activities.</p> <p><b>Policy 10</b> Avoid (while giving effect to Policy E15(9) above) activities in the coastal environment which result in significant adverse effects, and avoid, remedy or mitigate other adverse effects of activities, on:</p> <ul style="list-style-type: none"> <li>(a) areas of predominantly indigenous vegetation;</li> <li>(b) habitats that are important during the vulnerable life stages of indigenous species;</li> <li>(c) indigenous ecosystems and habitats that are found only in the coastal environment and are particularly vulnerable to modification, including estuaries, lagoons, coastal wetlands, dunelands, intertidal zones, rocky reef systems, eelgrass and saltmarsh;</li> <li>(d) habitats of indigenous species that are important for recreational, commercial, traditional or cultural purposes including fish spawning, pupping and nursery areas;</li> <li>(e) habitats, including areas and routes, important to migratory species;</li> <li>(f) ecological corridors, and areas important for linking or maintaining biological values; or</li> <li>(g) water quality such that the natural ecological functioning of the area is adversely affected.</li> </ul> |            |



## **ATTACHMENT 8**

### **SUBMISSIONS AND FURTHER SUBMISSIONS**



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

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



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

Attn: Planning Technician  
Auckland Council  
Level 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)

Zainal Trustee Limited

#### Address for service of Submitter

647 Whitford-Maraetai Road

Telephone:

21588989

Fax/Email:

greatdragon98@gmail.com

Contact Person: (Name and designation, if applicable)

### Scope of submission

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

Plan Change/Variation Number

PC 88 (Private)

Plan Change/Variation Name

Beachlands South

The specific provisions that my submission relates to are:

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

Plan provision(s)

Rezone of land, change of rural

Or

Property Address

Or

Map

Or

Other (specify)

### Submission

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

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

Help the growth of Auckland and its councils, develop greater opportunities for our city.

1.1

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

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

I 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

01/23/2027

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.



**Alice Zhou**

---

**From:** Karin Vince <kvince@beachlands.school.nz>  
**Sent:** Wednesday, 1 February 2023 9:58 am  
**To:** Unitary Plan  
**Subject:** Beachlands South Submission No to "Future Urban"

**Categories:** Manisha

To whom it may concern

We are, in principle, happy with most of the initial proposals for Beachlands South Development. However our current access road Whitford Maraetai Road is gravely insufficient to currently cope with day to day traffic let alone any additional vehicles, including heavy construction and building vehicles.

The intersection at Jack Lachlan and Whitford Maraetai Rd is a congestion point and a dangerous entrance and exit point.

There is no continuous footpath linking current residences in Jack Lachlan and the Avenues with public transport, e.g. the Pine Harbour Ferry.

We are definitely opposed to the 'Future Urban' portion of the Beachlands South application. This area is currently an area of rural that needs to remain so. It is the green space that allows for view points for all out across Whitford. To have this as a higher density residential area would be a scar on our green landscape. Currently at 1 dwelling per 10HA the integral character of this area remains intact. There is plenty of other areas that could be utilised closer to Beachlands, Te Puru and Maraetai that could be used for the 'Urban Sprawl' which would link residents to the 'new' infrastructure.

Kind regards

Karin Vince

2.1

2.2

**Alice Zhou**

---

**From:** Unitary Plan  
**Sent:** Wednesday, 1 February 2023 7:46 am  
**To:** Unitary Plan  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Adam Johnson

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Adam Johnson

Organisation name:

Agent's full name: Adam Johnson

Email address: apjohnson@gmail.com

Contact phone number:

Postal address:  
34 Liberty Crescent  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Property address:

Map or maps:

Other provisions:  
Provision for a high school to be built

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

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

The reason for my or our views are:  
We desperately need a high school in the area, even more so once the proposed development is built

3.1

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

3.2

Details of amendments:

Submission date: 1 February 2023

## Attend a hearing

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

## Declaration

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

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

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

No

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

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**Alice Zhou**

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**From:** Unitary Plan  
**Sent:** Tuesday, 31 January 2023 11:00 pm  
**To:** Unitary Plan  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Ashti chauhan

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Ashti chauhan

Organisation name:

Agent's full name:

Email address: chauhanashti@fmail.com

Contact phone number: 0210406677

Postal address:

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Beachland secondary school

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:  
Easy for families and kids

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

4.1

Details of amendments:

Submission date: 31 January 2023

## Attend a hearing

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

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

## Declaration

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

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

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

Yes

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

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**Alice Zhou**

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**From:** Unitary Plan  
**Sent:** Tuesday, 31 January 2023 8:45 pm  
**To:** Unitary Plan  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Catherine White

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Catherine White

Organisation name:

Agent's full name:

Email address: cwhite2711@live.co.uk

Contact phone number:

Postal address:  
18 Cherrie Rd  
Beachlands  
Christchurch 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Property address: Beachlands south

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:  
Support new housing in the area and support towards new secondary school

I or we seek the following decision by council: Approve the plan change without any amendments | 5.1

Details of amendments:

Submission date: 31 January 2023

## Attend a hearing

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

## Declaration

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

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

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

No

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

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**Alice Zhou**

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**From:** Unitary Plan  
**Sent:** Tuesday, 31 January 2023 9:00 pm  
**To:** Unitary Plan  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Harriett Brownell

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Harriett Brownell

Organisation name:

Agent's full name:

Email address: harriettbrownell@icloud.com

Contact phone number:

Postal address:

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Proposed development of houses in Beachlands

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

I strongly believe a development of this size should only be approved if there is adequate amenities (both primary and high school education, additional employment, healthcare services (GP in particular) and transport included within the plans. The need for a high school along the Coast is essential. The number of children already travelling on an unsafe road, on buses where they have to stand is not acceptable in such an affluent and growing area. There are a huge number of junior school age children, so this problem is only going to get greater. The plans for future growth must be joined by significant investment into education

6.1

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

Details of amendments: A high school!

Submission date: 31 January 2023

### **Attend a hearing**

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

### **Declaration**

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

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

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

No

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

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**Alice Zhou**

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**From:** Unitary Plan  
**Sent:** Monday, 30 January 2023 4:16 pm  
**To:** Unitary Plan  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Jason Wayne Monson

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Jason Wayne Monson

Organisation name:

Agent's full name:

Email address: j\_monson@icloud.com

Contact phone number:

Postal address:  
90 Third View Ave  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Property address:

Map or maps:

Other provisions:  
B3 - Infrastructure. Waste water  
B3 - Transport

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:

B3. The proposal provides inadequate assessment of impacts from waste from 3000 homes to the proposed plant. Eg There is no assessment of likely sizes of treatment required in relation to storm events for instance or impacts on system water discharges. nor any mention made of current consent requirements for this element of the process. What monitoring? When? By who? What limits Etc

7.1

The submitted must provide assessment of these issues. Perhaps a separate consent for the waste water treatment plant must be applied for and further development on housing to be restricted until such is approved. | 7.1

Transport: again inadequate assessment of transport had been put forward. The information ignores that This road is already straining at the seams with cars backed up for 2 km between Henson road and Whitford village in peak times. The figures relied upon are 4 years old, a period that has included substantial development and increased road use. | 7.2

The submitter must provide funding for road widening (2 lanes each direction) along Whitford-Maraetai road. Asserting or implying mode changes (ferry/bus) is unrealistic in context of a semi rural community that has to travel significant distances to a wide variety of locations making public transport infeasible.

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

Details of amendments: 1. Require approval of consent for water treatment plant with relevant conditions prior to further work being done. 2. Require provision of funding to widen Whitford-Maraetai road to allow two lanes both directions to be built within the next 5 years. | 7.3  
| 7.4

Submission date: 30 January 2023

### Attend a hearing

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

### Declaration

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

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

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

No

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

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**Alice Zhou**

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**From:** Unitary Plan  
**Sent:** Sunday, 29 January 2023 3:31 pm  
**To:** Unitary Plan  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Justine Benson

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Justine Benson

Organisation name:

Agent's full name:

Email address: paul\_jussie@slingshot.co.nz

Contact phone number:

Postal address:

Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Complete development

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

We do not have adequate infrastructure to add this huge amount of population and businesses to our community. You have not looked at the impact on the entire region. What about the knock on effect of roading in and out of Whitford and Maraetai, which are also expanding in population. You do NOT have adequate roading to facilitate this. People live in Beachlands because we DO NOT want shopping complexes and businesses on our doorstep! Of particular concern, is the "light industrial" complex you wish to make, which is completely out of step with ALL of Beachlands. It will devalue the properties along Jack Lachlan Drive significantly. When people drive into Beachlands, the very first thing they will see is an light industrial complex. This is meant to be a rural/residential area where people enjoy

8.1

8.2

nature, go to the beach etc. Your interpretation of "looking after the ecology" is by demolishing it and replacing it with apartment buildings and man made parks! The community you represent DO NOT want this. I am disappointed that this has become a money grabbing exercise for a small group of people. Once you blemish our wonderful community with this development it can never be restored.

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

Submission date: 29 January 2023

**Attend a hearing**

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

**Declaration**

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

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

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

No

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

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**Alice Zhou**

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**From:** Unitary Plan  
**Sent:** Saturday, 28 January 2023 1:15 pm  
**To:** Unitary Plan  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Nathir Natik Dawood

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Nathir Natik Dawood

Organisation name:

Agent's full name:

Email address: nathir.dawood.nz@gmail.com

Contact phone number: 21774494

Postal address:  
33 Kaiawa Street  
Beachland  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Change 88 and roads

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:

My concerns are around commute. I don't believe we have efficient and reliable roads. Adding extra business and housing will lead to congestion to our roads and potentially have more accident to an already over congested Rd.

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

Submission date: 28 January 2023



## Attend a hearing

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

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

## Declaration

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

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

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

Yes

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

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**Alice Zhou**

---

**From:** Unitary Plan  
**Sent:** Friday, 27 January 2023 5:30 pm  
**To:** Unitary Plan  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Samuel James nobilo

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Samuel James nobilo

Organisation name:

Agent's full name:

Email address: samuelnobilo@gmail.com

Contact phone number:

Postal address:  
26 Kaiawa Street  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Unsure

Property address: Unsure - Formosa, Beachlands development

Map or maps: Unsure

Other provisions:  
Unsure

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 support the development as long as the school and commercial space goes ahead with it and improvement to roads. | 10.1

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

Details of amendments:

Submission date: 27 January 2023

## Attend a hearing

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

## Declaration

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

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

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

Yes

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



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**Alice Zhou**

---

**From:** Unitary Plan  
**Sent:** Wednesday, 1 February 2023 1:31 pm  
**To:** Unitary Plan  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Valerie Oldfield

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Valerie Oldfield

Organisation name:

Agent's full name:

Email address: ragle1965@yahoo.co.nz

Contact phone number:

Postal address:

Beachlands  
Auckland 2018

**Submission details****This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Complete development.

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

The presence of Industrial and Commercial buildings will devalue properties throughout Beachlands. Beachlands is a rural residential area and is a close community. The plan to ruin the natural beauty of the area and replace it with man made lakes etc is ludicrous. Recently built new homes have been restricted to the amount of concrete allowed, which plants, shrubs and trees can be planted in gardens and Waka Kotahi dictated the width of driveways. Surely the building of 3000 new homes and industrial premises would require vehicle parking and pathways. A concrete jungle to say the least!. Infrastructure is inadequate. Roading in particular. The traffic to and from Whitford and Maraetai is increasing due to new developments. We do not have a 24 hour A&E facility in the area. We have a volunteer fire

11.1

11.2

11.3

service, water is not reticulated. In the event of serious accidents or fire would the service cope whilst waiting for appliances battling congested roads from other areas.

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

Submission date: 1 February 2023

### **Attend a hearing**

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

### **Declaration**

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

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

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

No

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

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Guohong Li

Organisation name:

Agent's full name:

Email address: [emilyw0917@hotmail.com](mailto:emilyw0917@hotmail.com)

Contact phone number:

Postal address:  
8 Kervil Avenue  
Te Atatu Peninsula  
Auckland 0610

### Submission details

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Property address: 651 whitford-Maraetai Road

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 support the rezone as this will lead to more local business and centres which improves the accessibility of local living.

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

12.1

Details of amendments:

Submission date: 2 February 2023

### Attend a hearing

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

## Declaration

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

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

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

No

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

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Jeremy Stockton

Organisation name:

Agent's full name:

Email address: [jeremy.a.stockton@gmail.com](mailto:jeremy.a.stockton@gmail.com)

Contact phone number:

Postal address:  
17 First View Avenue  
Beachlands  
Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:  
Plan change

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

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

The reason for my or our views are:

The roading, infrastructure related to water and waste is currently insufficient. Further expansion of light industry and unneeded commercial and residential expansion will further negatively impact this area.

The use of existing green spaces for leisure and lifestyle is essential for ongoing wellbeing in this community.

This expansion is undesired and unnecessary.

13.1  
13.2  
13.3

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

Submission date: 3 February 2023

## Attend a hearing

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

## Declaration

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

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

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

Yes

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

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Barney Sharland

Organisation name:

Agent's full name: Barney Sharland

Email address: [sdl1995@outlook.co.nz](mailto:sdl1995@outlook.co.nz)

Contact phone number:

Postal address:

[sdl1995@outlook.co.nz](mailto:sdl1995@outlook.co.nz)

Beachlands

Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

Property address: Formosa Golf Club

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

Traffic on Whitford / Maraetai Rd. The road need to upgraded to support the increase in volume.

14.1

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

Details of amendments: Traffic Volumes.

Submission date: 3 February 2023

### Attend a hearing

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

## Declaration

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

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

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

No

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

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Dear Sir/Madam

Regarding the planned re-zoning of approx 307ha of land south of Beachlands from Rural-countryside Living zone to a mix of business, residential, open space and Future Urban zones, I wish to put in a Submission **against** this proposal.

I have lived in Maraetai for over forty years now and I strongly believe that there is not sufficient infrastructure in place to support the plan change.

The Maraetai-Whitford-Howick road is already extremely congested during rush hour times with workers and school children travelling through the area. 15.1

I also believe that there is insufficient sewage facilities to support such a plan change which would obviously involve thousands more vehicles on our access roads. 15.2

I am not against progress, and in the future, once the Howick - Maraetai roads have been widened to double lanes both ways and sewage treatment plant extended or upgraded then it could be a feasible change, but for now until major upgrading and improvements of infrastructure have been made to support such a plan change I feel it would put a crippling strain on the existing roading and other infrastructure facilities.

Already there are many accidents on our Howick-Maraetai roads and every time there is an accident, even a fairly mild one, it involves a road closure which forces travellers to go many many kilometers out of their way to get home or to work.

Therefore I wish to submit my strong opposition to the planned change.

Yours sincerely

Rhonda Mary Pike

[rhondampike@gmail.com](mailto:rhondampike@gmail.com)

16 Omana Esplanade,

Maraetai, Auckland 2018

021909724

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Rita Olga Yakich

Organisation name:

Agent's full name:

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

Contact phone number: 021421942

Postal address:  
682 Whitford-Maraetai Rd,  
RD1 Howick  
Beachlands  
Auckland 2571

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:  
Rezoning south of Beachlands township from country living to residential/business'/urban living

Property address: 682 Whitford-Maraetai Rd

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

The road is already terribly busy the condition of the road is such that the speed limit has been lowered over and over again to keep drivers safe, as it is apparently too expensive to fix the road. There is no industry/employment opportunities in this area, which puts more stress on the road. As it stands if there is an accident on the main road in or out of Beachlands the residence have to travel around the coastal road which will add at least an extra 1:30min on any journey. Secondly the coastal road running through Maraetai gets many slips in winter and the tides keep washing it away, yet again this needs to be fixed up. There is no High school out in the Beachlands/Maraetai area, the primary/intermediate school is bursting at the seams and yet the council has done nothing about that. Unreliable power supply with ample outages as well as tank water supply which is limited. One very small medical Centre that is already at its capacity. With all of these things in mind it is ludicrous to put in more houses with this insufficient infrastructure, which has been at capacity for a few years now. There is already significant

16.1

16.2

16.3

housing development in progress now by countdown/spinnaker bay and all the extra housing that has gone up in Beachlands it self has already put all the existing infrastructure under immense pressure. To increase the number of housing with this infrastructure would be beyond stupid. I would wish that our city council would try and resolve the existing issues rather than starting a new project and creating more problems for the residence of our rural community! Fire and ambulance services also need to be upgraded for the Health and safety of all residence before any new plans are made. Our observation of the very narrow and unsurpassable roads in the new subdivision of Beachlands already cannot accommodate for ambulances and fire trucks because of the short sightedness and unprofessional planning of our council.

16.4

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

Details of amendments: All the points mentioned above!

Submission date: 4 February 2023

### **Attend a hearing**

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

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

### **Declaration**

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

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

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

Yes

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

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Lauren Hewitt

Organisation name:

Agent's full name:

Email address: [laurenelisahewitt@gmail.com](mailto:laurenelisahewitt@gmail.com)

Contact phone number:

Postal address:  
5 Ealing Crescent  
Beachlands  
Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:  
Building more residential homes

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:  
The road and infrastructure are already under stress due to rapid growth.

Current road is gridlocked going through Whitford and to Somerville via the gorge due to morning and evening work commuting and number of school buses on the road.

17.1

Secondary school and recreation facilities (indoor and outdoor sports fields, indoor swimming pool), library and community facilities are needed prior to any more housing. Our community includes both young and old and there are not currently enough facilities to take care of this population in the local area without going into Botany or further.

17.2

Water supply, waste water, power infrastructure are also under stress.

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

Submission date: 4 February 2023

### **Attend a hearing**

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

### **Declaration**

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

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

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

Yes

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

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: KAYLEIGH SHAW

Organisation name:

Agent's full name:

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

Contact phone number: 0273263657

Postal address:  
5 Albacore way  
Mareatai  
Auckland 2018

### Submission details

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Rules

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:  
No guarantee to improvements to the following:

|   |      |
|---|------|
| Roading infrastructure improvements to all the roading and out of the Pohuktukawa coast.  | 18.1 |
| No improvements to transport options: Need for increase in public transport, bus and ferry options.   |      |
| No guarantee of improved electricity infrastructure. Currently all over head and frequent power outages occur.  | 18.2 |
| No guarantee of a high school within the next 10 years. This should be compulsory.  | 18.3 |
| No improvements to water infrastructure. We need town water supply and better waste water services.   | 18.4 |
| No improvement to council services such as council pools and gyms, full library.  | 18.5 |
| No improvement to health care services to take accommodate extra housing and people. GP, after hours care, Plunket services, midwifery, ambulance service, FENZ | 18.6 |
| No improvement to policing services in Beachlands and Mareatai.eg a 24 hour manned station.   |      |

No improvement to competitive retail on the Pohutukawa Coast  
Intensification with the possibility of a 30/30/30 model (sold private, first home, state housing) leads to an increase in anti-social behaviour in the community and crime. There are no wrap around services based on the Pohutukawa Coast.

18.7

18.6

For me to agree to the change in land use the developer and council MUST improve and future proof the above resources in our area to enable safe development of the land Beachlands South

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

Submission date: 4 February 2023

### **Attend a hearing**

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

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

### **Declaration**

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

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

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

Yes

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

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Martina Katharina Toebosch

Organisation name:

Agent's full name:

Email address: [makatoe@gmail.com](mailto:makatoe@gmail.com)

Contact phone number:

Postal address:

Beachlands  
Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:  
Private plan change request.

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:

Roading in and out of Beachlands is not adequate now for existing and future road users ( see current developments in Beachlands) An additional 6000 to 9000 vehicles would have to use Whitford Maraetai Road, should Beachlands South go ahead. Prior to that construction traffic, some heavy, will further damage this road and result in higher volume of traffic leading to a higher risk for all road users. Not to mention the extra emissions from passenger cars, commercial vehicles and heavy trucks. Disturbing the natural flow of the land and building many hectares of hard surfaces will be to the detriment of the sea water quality ( run off is enormous already now) ; resulting in negative effects on sea life and recreational activities in and on the water.

19.1

19.2

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

Submission date: 6 February 2023

## **Attend a hearing**

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

## **Declaration**

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

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

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

No

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

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The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Brian Reed

Organisation name:

Agent's full name:

Email address: [mohungaaotea@yahoo.co.nz](mailto:mohungaaotea@yahoo.co.nz)

Contact phone number:

Postal address:  
99 First View Avenue Beachlands  
Beachlands  
Auckland 2011

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Property address:

Map or maps:

Other provisions:  
Water supply, Schools, sewage, boat ramps

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:

Beachlands relies on rainwater for it's water supply which has led to questionable drinking water standards in n increasingly urbanized area with large traffic movements. The area needs a fit for purpose water supply if development is approved. | 20.1

MOE is still working on census data from the previous good census despite being informed of their ineptitude. There needs to be a Secondary school and a middle school and another primary school built prior to development. If Countdown can do the maths why can't MOE. | 20.2

The limited sewage system designed for rain water supply and forest percolation was for a much smaller population and needs rethinking and rebuilding before development. | 20.3

We have been in Beachlands for 30 plus years and there has been no upgrading of public ramps that are inadequate these need redesigning and expansion before adding to the population and Pine Harbour Marina needs to be required to dredge the deliberately silted ramp that was part of the conditions on the marinas establishment. | 20.4



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

Details of amendments: As above

Submission date: 7 February 2023

### **Attend a hearing**

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

### **Declaration**

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

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

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

Yes

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

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Zanel Burger

Organisation name:

Agent's full name:

Email address: [zmburger73@gmail.com](mailto:zmburger73@gmail.com)

Contact phone number:

Postal address:  
72 Constellation Avenue  
Beachlands  
Auckland 2018

### Submission details

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
PC88

Property address: Beachlands South

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:  
Why get rid of a golf course and nature, just to cause gridlock into Howick on an already busy road. Beachlands doesn't want to look like Flat Bush.

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

| 21.1

Submission date: 8 February 2023

### Attend a hearing

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

## Declaration

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

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

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

Yes

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

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

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



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

Attn: Planning Technician  
Auckland Council  
Level 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)

HILARY FRANCES HETHERINGTON

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

Address for service of Submitter

84 Second View Avenue, Beachlands, Auckland 2018

Telephone:

621 125 2371

Fax/Email:

tryner@orcon.net.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 88 (Private)

Plan Change/Variation Name

Beachlands South

The specific provisions that my submission relates to are:

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

Plan provision(s)

to re-zone northern portion from Rural. / to rezone southern portion from Rural. new precinct - stormwater -

Or Property Address

Or Map

Or Other (specify)

## Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them

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: Keep the whole area cannot support expansion as requested by developers i.e. whole water, reclamation of same, main road as ferry only goes to city; industrial development; future precinct; storm water catchment in view of climate change;

(continue on a separate sheet if necessary)

I seek the following decision by Council:

- Accept the proposed plan change / variation
- Accept the proposed plan change / variation with amendments as outlined below
- Decline the proposed plan change / variation  | 22.1
- If the proposed plan change / variation is not declined, then amend it as outlined below.

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at a hearing

*[Handwritten Signature]*  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

5 February 2023  
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.

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Arvin Gardiola

Organisation name:

Agent's full name: Arvin Gardiola

Email address: [gadjie007@yahoo.com](mailto:gadjie007@yahoo.com)

Contact phone number: 02102787016

Postal address:  
97 Maraetai Drive  
Maraetai  
Manukau  
Manukau 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

rezone the northern portion of the land (159.54 hectares) from Rural – Countryside Living zone to a mixture of Future Urban, Residential – Mixed Housing Urban, Business - Local Centre, Business – Light Industry; Business – Mixed Use; and Open Space zones  
rezone the southern portion (147.58 hectares) from Rural – Countryside Living zone to Future Urban Zone, requiring a future plan change to zone the land for development

Property address: 110 Jack Lachlan Drive; and 620, 680, 682, 702, 712, 722, 732, 740, 746, 758 and 770 Whitford-Maraetai Road, Beachlands

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

Traffic, roads, school, and other amenities cannot support the additional housing/people

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

23.1

Submission date: 13 February 2023

## Attend a hearing

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

Would you consider presenting a joint case at a hearing if others have made a similar submission? No

## Declaration

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

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

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

Yes

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

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Shane norton

Organisation name:

Agent's full name:

Email address: [onorty@xtra.co.nz](mailto:onorty@xtra.co.nz)

Contact phone number: 0274224828

Postal address:  
33 sunkist bay rd  
Beachlands  
Auckland 2018

### Submission details

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Infrastructure

Property address: Formosa beachlands

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:  
No infrastructure

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

24.1

Submission date: 10 February 2023

### Attend a hearing

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

Would you consider presenting a joint case at a hearing if others have made a similar submission? No

## Declaration

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

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

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

Yes

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

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I am making a submission regarding the plan change as I believe I will be adversely affected by this as I border onto the Formosa golf course. I think this will affect my property value also I moved out here 18 years ago for the peaceful lifestyle. | 25.5

Currently there is only one road in and out and this proposed change does not allow for an upgrade of the main road into the area and if there is an accident we are trapped. | 25.1

Also the environmental impact on this area would endanger native birds lizards and frogs. | 25.2

Currently we have water tanks but cannot see how high rise apartment/intensive housing would be able to meet their water requirements. Are they looking to supply articulated water. | 25.3

There are other concerns regarding cultural significance in the area adjoining the golf course. | 25.4

I object to the proposed plan change for all the reasons as above.

Sent from Glenis Clapham

6 Tui Brae

BEACHLANDS 2018

Phone 09 5366305

Mobile 021 140 6688

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Hayden

Organisation name:

Agent's full name:

Email address: [haydenessa@gmail.com](mailto:haydenessa@gmail.com)

Contact phone number:

Postal address:

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:

6.9 Transport and movement

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

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

The reason for my or our views are:

The vast majority of working residents of Beachlands and Maraetai rely on private vehicle comutes via Whitford-Maraetai into east Auckland and beyond. The proposed develop will significantly increase the population, and while there is a desire by the developer and council for the existing Ferry connection to offset vehicle commutes, this assumes that residents will be employed in the CBD; while realistically one can expect the majority of employment to come from nearby East Tamaki and wider east Auckland.

Over recent years Beachland and Maraetai have grown ahead of infrastructure, due to the age and two lane design of the arterial route , current morning and afternoon commutes see bottle necks at intersections which result in delays and frustration for users. Without addressing the capacity of the Whitford-Maraetai arterial route by increasing the lane count, I strongly believe such a significant increase in commuter traffic as a result of the proposed development will have a large negative impact to the existing Beachlands and Maraetai residents and is likely to result in an increase of vehicle accidents.

26.1

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

Details of amendments: Include upgrade of Whitford-Maraetai arterial route road to four lanes, and widening of bridge on Whitford road.

26.2

Submission date: 11 February 2023

### **Attend a hearing**

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

### **Declaration**

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

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

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

No

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

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Adriana Janssen

Organisation name:

Agent's full name:

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

Contact phone number:

Postal address:

2018

Beachlands

Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

Infrastructure to roading

Property address:

Map or maps:

Other provisions:

Infrastructure needs to be upgraded to support further housing development, Specifically roading

27.1

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:

Already heavy traffic in and out

Poor roading

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

Details of amendments: Infrastructure

Submission date: 11 February 2023

## **Attend a hearing**

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

## **Declaration**

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

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

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

Yes

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

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Micaela Watson

Organisation name:

Agent's full name:

Email address: [micaela.watson@bjball.co.nz](mailto:micaela.watson@bjball.co.nz)

Contact phone number:

Postal address:  
2018

Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

My concerns are around the lack of infrastructure in the area already!

| 28.1

No water. Limited footpaths and drainage. No high school and one road in and out that is shared with 100s of trucks. The drive that used to take 20 mins now takes over an hour. Ridiculous and you want to cram more housing in?????

Property address: 14a Sunkist Bay 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:

Sit in the traffic in the morning to get the picture

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

Submission date: 11 February 2023

### Attend a hearing

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

## **Declaration**

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

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

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

Yes

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

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Benjamin Doidge

Organisation name:

Agent's full name:

Email address: [ben@doidge.co.nz](mailto:ben@doidge.co.nz)

Contact phone number: +64 21 977 309

Postal address:

2018

Beachlands

Auckland 2018

### Submission details

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Additional medium density housing rezoning

Property address: Beachlands

Map or maps: Beachlands

Other provisions:

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

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

The reason for my or our views are:

There has been no consideration to increased traffic that the increased housing will have on the road in and out of beachlands. There has also been no consideration to the impact of the beachlands community.

29.1

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

Submission date: 11 February 2023

### Attend a hearing

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

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

## **Declaration**

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

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

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

Yes

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

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: David Kemshall

Organisation name:

Agent's full name:

Email address: [dave\\_kemshall@hotmail.com](mailto:dave_kemshall@hotmail.com)

Contact phone number:

Postal address:

Maraetai  
Auckland 2018

### Submission details

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Property address: Formosa development

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

The development will bring too large a growth in population and car traffic than the existing infrastructure can handle. This is a safety risk, and also will increase carbon emissions due to additional travel delays for the existing population. A lower density development may be okay.

30.1

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

Submission date: 11 February 2023

### Attend a hearing

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

## Declaration

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

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

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

Yes

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

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Cheryl Jones

Organisation name:

Agent's full name:

Email address:

Contact phone number: 09 948 6694

Postal address:  
132 second View Avenue  
Beachlands  
Auckland 2018

### Submission details

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Beachlands South

Property address: Beachlands South

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:  
Not enough infrastructure- schools, roads, shopping, water.

31.1

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

Submission date: 11 February 2023

### Attend a hearing

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

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



## Declaration

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

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

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

Yes

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

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Mathew Guadagni

Organisation name:

Agent's full name:

Email address: [matt.guadagni@gmail.com](mailto:matt.guadagni@gmail.com)

Contact phone number:

Postal address:  
9 Herbert Pollard Drive  
Maraetai  
Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

Property address: 110 Jack Lachlan Drive; and 620, 680, 682, 702, 712, 722, 732, 740, 746, 758 and 770 Whitford-Maraetai Road, Beachlands.

Map or maps: All

Other provisions:  
Lack of road upgrades and High School

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 road to Beachlands simply cannot cope with the current levels of peak hour traffic let alone an effective doubling of the population should this plan be approved. There are massive bottlenecks at Whitford and the gorge leading up to Somerville.

32.1

The public transport is atrocious other than the ferry, but that's also at capacity during peak hours. School busses are also overflowing with kids often being told the bus is full and left behind.

For once, can Auckland Council sort out the infrastructure FIRST and then approve the development? Beachlands simply cannot cope with such a massive development without the supporting infrastructure, something developers don't care about.

32.2

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

Submission date: 11 February 2023

### **Attend a hearing**

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

### **Declaration**

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

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

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

Yes

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

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Phoebe Taylor

Organisation name:

Agent's full name:

Email address: [phoebetaylor@hotmail.co.uk](mailto:phoebetaylor@hotmail.co.uk)

Contact phone number:

Postal address:  
782 Clevedon Kawakawa Rd  
Clevedon  
Auckland 2585

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:  
Changing the zoning of the area from rural to medium density housing.

Property address: 97 Second View Ave, Beachlands

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

The roading going into and out of Beachlands is seriously insufficient to allow this many new houses to be built in the area. The schools are at capacity. The Pine Harbour ferry is full in commuting hours. The development will add to environmental problems as the commute into Auckland is very long. There are many areas closer to Auckland or train transport hubs that would be better develop into houses. This development will have a huge negative impact on the lifestyle of the people living in Beachlands and Maraetai and will be harmful to the environment.

33.1

33.2

33.3

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

Submission date: 11 February 2023

## Attend a hearing

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

## Declaration

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

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

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

Yes

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

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To whom it may concern,

To start of rezoning our beautiful Beachlands and creating another botany is disgusting. Our roads are horrible as it is let alone when more housing happens. We desperately need to highschool now not in 10 years time our kids will end up suffering in high density highschools. I am strongly against this development and what it stands for.

Rebecca

34.1

34.2

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Philip Stout

Organisation name:

Agent's full name:

[REDACTED]

[REDACTED]

[REDACTED]

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Says optional but won't let me submit without. Doesn't need to apply to "rules". It's a general opinion.

Issue applies to multiple areas. Traffic, parking, public transport and the very need for it in the first place.

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:

First and foremost, what I'd the point of a regional plan set for many years, if someone can just pass a few gilts in front of council and apply to walk all over the regional plan. 35.1

I bought a house in a rural area "knowing" that the swathe between Beachlands and Whitford would remain rural. 1 year in and money talks. This shouldn't even get air time.

Ok, so you don't care about that, but here are some practical reasons.

1). There is no parking to sustain a bigger ferry service. Just no space. 35.2



- 2) the road is unsuitable for a doubling of traffic. Whitford especially will be a bottleneck. 35.2
- 3) with the advent of home working, desire for property near Auckland is waning. People can work from Hamilton, Tauranga, Wellington. Auckland doesn't need to expand. So last decade. 35.3
- 4) congestion in Flat Bush and botany will be terrible.
- 5) botany cannot sustain more business. Car parks are regularly full. 35.2
- 6). Flat Bush isn't complete. Even more demand on local infrastructure. That's Without this.
- 7) traffic congestion reaches a tipping point. It's linear to a point and then gridlock follows. We were stuck at tōtara today. Roads are at capacity.

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

Submission date: 11 February 2023

### Attend a hearing

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

### Declaration

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

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

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

Yes

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

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Terry ray Honey

Organisation name:

Agent's full name:

Email address: [honeyhouse@xtra.co.nz](mailto:honeyhouse@xtra.co.nz)

Contact phone number: 0276054592

Postal address:  
81 Pineharbour parade  
Beachlands  
Auckland 2018

### Submission details

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Property address: Formosa golf club

Map or maps: All of it

Other provisions:  
Infrastructure or the lack of it.

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 project is going to be a disaster, environmentally, socially structurally, and Geographically, to many dwelling's, no supporting infrastructure, developers promises that are never kept.

A slum in the making. 😞 😞 😞 ☐☐

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

36.1

Submission date: 11 February 2023

**Attend a hearing**

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

Would you consider presenting a joint case at a hearing if others have made a similar submission? No

### **Declaration**

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

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

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

Yes

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

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Louise Barratt

Organisation name:

Agent's full name:

Email address: [lsbarratt@outlook.com](mailto:lsbarratt@outlook.com)

Contact phone number:

Postal address:  
14 Reliance Crescent  
Beachlands  
Auckland 2018

### Submission details

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
3.18 Transport

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

The proposed development should not proceed until road safety is addressed for the existing traffic volume. Construction vehicles and increased traffic during works will contribute to further degradation of the roads which are already in poor condition.

37.1

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

Submission date: 11 February 2023

### Attend a hearing

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

## Declaration

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

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

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

No

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

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Lorna Peachey

Organisation name:

Agent's full name:

Email address: [lpeachey@hotmail.co.uk](mailto:lpeachey@hotmail.co.uk)

Contact phone number:

Postal address:  
60 Pine Harbour Parade  
Beachlands  
Auckland 2018

### Submission details

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Formosa

Property address: Formosa

Map or maps: Formosa

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:

Roads inadequate, school bus currently inadequate - children standing, no seats, overcrowded, severe congestion into Somerville Roads, houses on tank water, environmentally friendly? No, more cars on roads, pollution, currently 2 weeks to book into see a Dr, more houses more waiting time

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

38.1

Submission date: 11 February 2023

### Attend a hearing

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

## Declaration

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

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

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

No

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

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

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



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

Attn: Planning Technician  
Auckland Council  
Level 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) Alistair Dinnis

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

### Address for service of Submitter

51 Karaka Road, Beachlands, 2018

Telephone:  Fax/Email:

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

Plan Change/Variation Name

### 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)**

## 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:

The existing local road network is over capacity. The local ferry services at pine harbour are constrained by the dimensions of pine harbour and the depth of the water. The proposal does not adequately provision for the transport infrastructure required and will directly contribute to Auckland's existing transport problem.

39.1

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

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

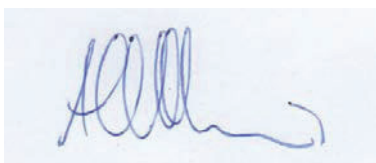
Decline the proposed plan change / variation

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

I 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



12 Feb 2023

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.

Dear Sir/Madam

Regarding the planned re-zoning of approx 307ha of land south of Beachlands from Rural-countryside Living zone to a mix of business, residential, open space and Future Urban zones, I wish to put in a Submission **against** this proposal.

I have lived in Maraetai for over forty years now and I strongly believe that there is not sufficient infrastructure in place to support the plan change.

The Maraetai-Whitford-Howick road is already extremely congested during rush hour times with workers and school children travelling through the area.

40.1

I also believe that there is insufficient sewage facilities to support such a plan change which would obviously involve thousands more vehicles on our access roads.

I am not against progress, and in the future, once the Howick - Maraetai roads have been widened to double lanes both ways and sewage treatment plant extended or upgraded then it could be a feasible change, but for now until major upgrading and improvements of infrastructure have been made to support such a plan change I feel it would put a crippling strain on the existing roading and other infrastructure facilities.

40.2

Already there are many accidents on our Howick-Maraetai roads and every time there is an accident, even a fairly mild one, it involves a road closure which forces travellers to go many many kilometers out of their way to get home or to work.

Therefore I wish to submit my strong opposition to the planned change.

Yours sincerely

Jennifer Anderson  
7 Fern Place  
Beachlands

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Lyndsay Gerard Turner

Organisation name:

Agent's full name: Lyndsay Turner

Email address: [lyndsayt@slingshot.co.nz](mailto:lyndsayt@slingshot.co.nz)

Contact phone number:

Postal address:

[lyndsayt@slingshot.co.nz](mailto:lyndsayt@slingshot.co.nz)

Manukau

Manukau 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

PC 88 (Private): Beachlands South

Property address: Formosa Golf Club , Jack Lachlan drive Beachlands

Map or maps: Jacklachlan drive

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:

My reason for objecting is that the Roads in and out of area our over crowed and Health & Safety risk , I identify it as Hazard more traffic to life & limb. | 41.1

The traffic is queued most morning trying to get to work

Also object that the council is starting to limit the number of properties that can put a minor dwelling on , so the can swap the numbers over to help the development proceed, the community does not want this development . | 41.2

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

Submission date: 12 February 2023

## **Attend a hearing**

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

## **Declaration**

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

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

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

Yes

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

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Keith Walker

Organisation name:

Agent's full name:

Email address: [walker\\_keith@hotmail.com](mailto:walker_keith@hotmail.com)

Contact phone number:

Postal address:  
31 Te Pene Road  
Maraetai Beach  
Auckland 2018

### Submission details

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Entire Plan Change

Property address: 110 Jack Lachlan Drive; and 620, 680, 682, 702, 712, 722, 732, 740, 746, 758 and 770 Whitford-Maraetai Road, Beachlands.

Map or maps: Entire Plan Change

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:

Maraetai and Beachlands are currently serviced by a single two-lane carriageway that struggles to cope with the existing traffic. Adding 3000 dwellings will basically bring the area to a stand still during rush hour. The road is frequently closed due to accidents resulting in a long diversion through Clevedon. The rural roads have not been designed to accommodate the projected traffic volumes. The ferry that services the area is also frequently cancelled due to weather. It is cancelled as I type this.

42.1

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

Submission date: 12 February 2023

## **Attend a hearing**

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

## **Declaration**

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

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

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

No

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

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Paul David Mason

Organisation name:

Agent's full name:

Email address: [pdlkmason@xtra.co.nz](mailto:pdlkmason@xtra.co.nz)

Contact phone number:

Postal address:  
201 Jack Lachlan Drive  
Beachlands  
Auckland 2018

### Submission details

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Property address: PC 88 (Private): Beachlands South

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:  
Like the area as it is rural. Roads can not handle the extra traffic

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

43.1

Submission date: 12 February 2023

### Attend a hearing

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

### Declaration

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

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

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

Yes

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

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Linsey Karen Mason

Organisation name:

Agent's full name:

Email address: [pdlkmason@xtra.co.nz](mailto:pdlkmason@xtra.co.nz)

Contact phone number:

Postal address:  
201 Jack Lachlan Drive  
Beachlands  
Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

Property address: PC 88 Private Beachlands South

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

The area can not with stand extra residential properties. Roading is a danger | 44.1

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

Submission date: 12 February 2023

### Attend a hearing

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

### Declaration

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

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

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

Yes

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

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The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Lisa Ball

Organisation name:

Agent's full name:

Email address: [lisaball@hotmail.co.nz](mailto:lisaball@hotmail.co.nz)

Contact phone number: 021547241

Postal address:  
13 Hutukawa Drive  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Rezoning all land from rural - country side living to all proposed zones listed in pc 88

Property address:

Map or maps:

Other provisions:

307 ha is comparable in size to the current foot print of Beachlands now. My objections to this submission is primarily focussed in the area shaded as future urban zone and shown on PC 88 - appendix 1 - plan change zoning map.

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

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

The reason for my or our views are:

The area of land being proposed for rezoning is too large and impactful on the surrounding environment, transport network, utilities network and social amenities (schools, medical/hospital). The road network is already extensively used and road infrastructure is not in good condition and there are no plans contained in this submission to widen or upgrade the road corridor over its entire length, despite there being live destinations in the AUP for the Whitford bypass and for road widening along Whitford Maraetai Road, as stated in Appendix 4 - Beachlands South Structure plan. The impact to ferry services are already very busy. This service would need to be heavily improved with bigger boats and new infrastructure at Pine Harbour. Environmental impact is already occurring due to mature trees and bush being fully cut down along the

45.1

45.2

45.3

ridge line of the beach at Pine Harbour Marina which is directly adjacent, and borders against, Formosa Golf Resort. The impact to wild/bird life has been highly noticeable. I am concerned with any kind of development this will continue to be detrimental to all wild life on the coast line from Beachlands to Whitford.

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

Submission date: 12 February 2023

### **Attend a hearing**

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

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

### **Declaration**

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

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

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

Yes

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

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Jack Benson

Organisation name:

Agent's full name:

Email address: [jussiebenno@gmail.com](mailto:jussiebenno@gmail.com)

Contact phone number:

Postal address:  
57 Jack Lachlan Drive  
Beachlands  
Auckland 2018

### Submission details

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
The rezoning of Beachlands

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

I'd like to begin by reminding you of some facts about NZer's attitude to using private motor vehicles: NZ has the 4th highest rate per capita of car ownership in the world. In 2018, 59.5% of NZ households owned two or more cars. In 2019 NZ car ownership rate was 837 light vehicles per 1000 people. In 2018, 70% of all trips were made in Auckland using a private or company car.

I recall reading that Auckland Council established a Transport Emissions Reference Group to develop options to help achieve the bold emissions-reduction targets outlined in Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan. The group, made up of Councillors, Independent Māori Statutory Board (IMSB) members, members of the Mana Whenua Kaitiaki Forum, and members of the Auckland Transport (AT) board, will provide strategic direction to officers from the council and AT who are jointly developing a Transport Emissions Reduction Plan that will outline concrete actions to dramatically reduce transport emissions by 2030.

Chair of the Environment and Climate Change Committee and member of the new Reference Group,



Councillor Richard Hills says “We need to take bold action to achieve our emissions reduction goals, and there’ll be some tough decisions to be made along the way.

“When we released Te Tāruke-ā-Tāwhiri: Auckland’s Climate Plan in December, we set out what is required to halve Auckland’s emissions by 2030, reach net zero emissions by 2050 and prepare for the impacts of climate change. The work the Reference Group will do will help shape up the options that will go to decision-makers.

Auckland Council, you promised Auckland you were going to halve our emissions in the next seven years and yet by allowing this development to proceed you will be increasing it, (based on AT statistics and just in the first stage of this development alone) by adding at least an extra 2,511 cars to Beachlands. That is based on the number of ‘Dwellings’. Every time you add a storey to each ‘dwelling’ you are adding this many cars to our roads. You have an obligation to adhere to your goal to reduce the emissions, if you allow this development to proceed you will be prioritising developers lofty ambitions and empty promises above our climate emergency. You only have to look at the impact of floods and storms we have endured so far this year to see that we need to take urgent action and be serious about it. Have you factored in the additional emissions created by the development itself? Heavy diesel trucks and machinery trundling up and down our roads, creating traffic issues, creating potholes and dumping carbon emissions into our community. Then there is the ‘light industrial building’ the developers have proposed on the corner of Jack Lachlan drive. This alone will also, no doubt create on-going emissions itself, it will require logistics, freight and more gas guzzling, carbon spewing vehicles to our area. Just how serious are you about your commitment to reducing emissions? Is it something to be believed or just empty words? Your actions and decisions will show us if you are to be trusted or not. If you let this go ahead, then you should really refund all rate payers the climate component we have been paying as you are obviously not serious about it and do not represent the publics stance on this issue.

46.1

Even if there was an unlikely sudden increase in the ownership of electric vehicles in our area, I still have concerns. A study was conducted at Hobsonville around infrastructure and the publics attitudes to electric vehicles. The outcome was that people felt less guilty about owning several cars if they were electric. While this may reduce some of the impact of emissions it certainly does not help with the impact on our roading, which brings me to our infrastructure.

Adding thousands of cars to Beachlands not only greatly increases the emissions to our area which will further damage our climate but also it is going to add traffic, create huge congestion and problems associated with it. We have one road in and one road out. Whitford, Clevedon and Maraetai are all increasing in population also. All of this traffic will funnel into Whitford and then into Howick, Flat Bush and East Tamaki.

46.2

The developers are putting their selfish needs before the community’s. If there is an accident or a medical event in Beachlands, Whitford or Maraetai, how will emergency services be able to get to the scene? All it would take is a car crash which will result in a back log of hundreds of cars and the nearest ambulance service (from Howick) would not be able to get to the scene in time. This could possibly lead to loss of life, all because of congestion because of an unwillingness to address suitable roading BEFORE any development. It is careless and selfish of the developers and the council to think that such a development is suitable for our community, to put the development ahead of infrastructure and then leave it to the people to deal with. This will inevitably cost us unfairly in an increase in rates to pay for the roading and other infrastructure just so the developers can do a quick trade of land for money and lumber us with the problems they do not care about, because once they sell the land, they have no responsibility.....and you would have let them. YOU will be responsible for this.

46.3

We do not have adequate roading, infrastructure and medical facilities to safely support the thousands of people you will be allowing into the area. That is WHY we are a RURAL area and that is why we MUST remain a RURAL area. We have an obligation to our environment to reduce emissions. We have an obligation to keep our community safe, to be able to provide medical assistance in the case of an emergency (ambulances come to us from Howick, we have no A&E or medical facility in the area).

46.3

Aside from that you are also at risk of ruining the character of our community. Multi storied dwellings littering our coastline for the sake of a group of selfish people to make money and then leave our community with the problem. This is not right, and this is not the right thing to do. The Russell group will make their millions and leave the Beachlands community with a litany of problems which WE will have to fix and pay for. Auckland Council, WE voted YOU in, YOU represent US, you have made promises to the people of Beachlands and our environment. We won’t forget who represented us and who didn’t in the next election. Please listen to us, listen to our concerns, consider the huge and negative impact this horrendous development will have on Beachlands, do the right thing and reject this proposal!

46.5

“Strong action on climate is critical. As New Zealand’s largest city, Auckland has a responsibility to combat climate change and reduce emissions so we can protect our children and grandchildren from the most severe impacts of global heating.” – Phil Goff

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

Submission date: 12 February 2023

### **Attend a hearing**

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

### **Declaration**

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

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

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

Yes

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

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Angus James Scott-Knight

Organisation name:

Agent's full name: Angus Scott-Knight

Email address: [angus.scottknight@gmail.com](mailto:angus.scottknight@gmail.com)

Contact phone number: 0299844772

Postal address:  
7 Alexander Avenue  
Maraetai  
Auckland  
Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:

The entire plan change

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

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

The reason for my or our views are:

Beachlands Maraetai already had to absorb a large development within the last 10 years which was massively opposed by objectors but forced on us by the then Manukau City Council. Today we find ourselves facing another plan change to vastly increase the local residential population and none of the impacts which were identified then have been addressed. | 47.1

The two lane highway between Ormiston and Beachlands is already at capacity. A precondition of any further development in the area should be that this highway be four-laned. Given that this is totally unlikely, the plan change should be declined due to lack of roading/transport capacity into and out of the area. | 47.2

There is no secondary school in the area meaning children have to be bussed to schools in Howick, Botany etc. Supporters of the change will argue that the increased population will tip the balance in favour of Min Ed building a new school in the area. I say that unless the Min of Ed actually commit to | 47.3

building such a school as a precondition of the plan change, then it should be judged on the current situation, no school exists yet. No school is yet proposed by the Min of Ed, therefore the plan change should be declined. 47.3

Overall the plan change contributes to Auckland’s transport problems while doing nothing to mitigate the social and environmental impact of further car journeys. There is no significant source of employment in the area. The majority of working age residents will need to commute out of the area to work. This does nothing to improve Auckland’s climate change footprint and makes it worse. 47.4

Other infrastructure such as sewage, drinking water and storm water also lack capacity for increased population. 47.5

Finally, as a kite-surfer I am concerned about the impacts on the Pine Harbour foreshore. The fall into three categories:

1. Wind effects. The Pine Harbour foreshore is one of the best, safest areas for kite-surfing in westerly winds in the Auckland region. Kite-surfing is particularly sensitive to factors which disturb the wind flow. The planned multi-story buildings along hillside at Formosa will negatively affect kite-surfers creating turbulence. This is a hazard. 47.6

2. Silting and mangrove encroachments. There is already a noticeable increase in silting on the inter-tidal zone. This is the result of increased rainfall and run off from the development at Jack Lachlan and tree removal at Formosa. We are already seeing mangrove encroachment. The council must mitigate this by mangrove removal, before this develops into a hazard. 47.7

3. Access and rigging area. There is a limited safe all-tide rigging area for kite-surfers at the northern end of the Formosa foreshore. This is already shared with dog walkers and day visitors and so far without incidents but there is a potential for conflict. Intensification and changes to the foreshore such as a walkway must make provision for a reserved kitesurf rigging area to preserve the existing amenity value of the estuary for kite-surfers. 47.8

Thank you.

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

Submission date: 12 February 2023

### Attend a hearing

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

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

### Declaration

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

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

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

Yes

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

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Murray R Stevens

Organisation name:

Agent's full name:

Email address: [stevensassoc@xtra.co.nz](mailto:stevensassoc@xtra.co.nz)

Contact phone number: 0274770001

Postal address:  
77 Pine Harbour Parade  
Beachlands  
Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

Property address: 110 Jack Lachlan Drive; and 620, 680, 682, 702, 712, 722, 732, 740, 746 758 and 770 Whitford Maraetai Road, Beachlands.

Map or maps:

Other provisions:  
Private Plan Change request to rezone approximately 307 hectares of land in Beachlands from Rural – Countryside Living to a mix of business, residential, open space and Future Urban zones.

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

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

The reason for my or our views are:

1. Proposed rezoning from rural countryside living to a mixed use including high density apartment dwellings and townhouses will severely degrade the visual amenity value of Beachlands and Pine Harbour. | 48.1
2. Sewerage and waste water treatment and disposal will require a major upgrade of Watercare facility as there is not the capacity. On land disposal as proposed potentially will pollute the Maraetai-Whitford aquifer and the local beaches, negatively impact endangered bird breeding grounds the adjoin the development. | 48.2  
| 48.3

- 3. Proposed water supply from a new borefield and some existing bores has a not been assessed in terms of potential impacts on the aquifer. There are numerous private bores in Beachlands drawing from this aquifer. The GWE and Tonkin and Taylor reports do not provide any results of drawdown testing, aquifer recharge, rates, transmissivity, is it a confined or unconfined aquifer, or the capacity of the aquifer to produce potable water for this development and any impacts on existing users. There has been no assessment of potential for salt water incursion if the proposed abstraction rates take place.

48.4
- 4. Existing roading will need upgrading to two lanes each way to cope with with doubling of population and traffic movements. New roundabouts will be required at entry ways to the development for safe turning.

48.5
- 5. Land set aside for schooling does not guarantee the the Ministry of Education will build a new school here. They would have to buy the land first off the developer. There is no certainty that they will nor within a realistic time frame.

48.6
- 6. There is an active landslide on the west part of the proposed plan change area that is moving out onto the adjoining beach, (Kahawairahi Beach) and indicates land instability in this area. Intensive housing not appropriate here.

48.7

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

Submission date: 12 February 2023

**Attend a hearing**

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

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

**Declaration**

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

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

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

Yes

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

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The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: John and Elizabeth Oudney

Organisation name:

Agent's full name: John & Elizabeth Oudney

Email address: [oudney@xtra.co.nz](mailto:oudney@xtra.co.nz)

Contact phone number:

Postal address:  
62 Eighth View Avenue  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Rezoning of 307 hectares South of Beachlands village in the area of Formosa Golf Course from rural to future urban residential etc

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:

Insufficient infrastructure for roading 2 lanes should be 4 lanes for increased traffic

Sewerage system as proposed is inadequate

Bore water is inadequate for a development of this size

Emergency services fire (run by volunteers) no ambulance insufficient medical facility. We are short of doctors now

No high school children are bussed out daily

No adequate public transport and no funds from AT Transport for more available. Ferry service small and restricted by weather which would cause more cars on the rural road

Power supply could be insufficient. Regular powers cuts at present.

Lack of work opportunities therefore people clogging roads to out of area employment

49.1

49.2



|   |      |
|---|------|
| I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested                         | 49.3 |
|   | 49.4 |
| Details of amendments: Improve roading, wastewater, public transport, emergency services, water supply, high school needed, power supply improved | 49.5 |
|   | 49.6 |
| Submission date: 12 February 2023   | 49.7 |
|   | 49.8 |
| <b>Attend a hearing</b>   | 49.9 |

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

**Declaration**

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

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

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

No

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

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Dahya Hira

Organisation name:

Agent's full name:

Email address: [kh200014@ncr.com](mailto:kh200014@ncr.com)

Contact phone number:

Postal address:  
129 Beachlands Road  
Beachlands  
Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

Property address: 129 Beachlands Road

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

We look forward to the increased housing and population growth. With increased population and housing, comes more choice for home buyers, as a more variety of housing, and budget, will be present, and also, there will be a total increase in rates and taxes for the area, which in turn will provide funding to improve the local amenities. It will also assist local businesses, to increase sales and help with finding staff.

50.1

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

Details of amendments:

Submission date: 12 February 2023

## **Attend a hearing**

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

## **Declaration**

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

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

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

No

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

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Susan Scott-Knight

Organisation name:

Agent's full name:

Email address: [susan.scottknight@gmail.com](mailto:susan.scottknight@gmail.com)

Contact phone number:

Postal address:  
7 Alexander Avenue  
Maraetsi  
Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:

I oppose the plan change for the following reasons which are mostly about the existing infrastructure:

- |  |      |
|--|------|
| 1. There is no reticulated water in the Beachlands/Maraetai suburbs. Any increase in population also means an increase in water trucks on the Whitford Maraetai road. A single lane rural road that cannot cope with the current level of traffic at peak times.   | 51.1 |
| 2. Waste water - the waste water plant that services Maraetai/Beachlands does not have the capacity to cope with the increase in wastewater from the proposed development.   | 51.2 |
| 3. The road from Whitford to Beachlands Maraetai is a single carriageway road. It cannot cope with the huge numbers of road users on it during the rush hour. As someone who travelled to work by car to botany, I had to leave progressively earlier and earlier to get to work on time. If there is an accident the road is closed and the only option is for people to travel a long way round via clevedon/alfriston. It is not practical to increase the number of residents out here without improving the road, and I understand the developers do not see this as their responsibility/they do not intend to make any improvements beyond where the new roads will join the existing road. A wholly inadequate response from them. | 51.3 |
| 4. Public transport is inadequate and does not serve the area well enough to provide an alternative to personal car ownership and driving  | 51.4 |
| 5. The area does not have a secondary school. Secondary school students are put on buses to  | 51.5 |

Howick. These buses are already over-subscribed and there are already issues with students being refused entry on to a bus. A new school is not part of the plan as it stands. This means intolerable pressure will be placed on the Howick/Botany schools. It will also put extra pressure on the roads as parents endeavour to get their children to school. It will also put pressure on the existing primary and intermediate schools that have not been built to accommodate the extra numbers. 51.5

6. The existing medical infrastructure is not sufficient to cope with the extra population. 51.6

One of the reasons I like and moved to this area is that it is semi rural. The proposed development will change the nature of the suburb beyond all recognition. The suburb does not have the infrastructure to cope with this change. We do not need new businesses in the area and certainly not without upgrades in all of the current infrastructure which would make it workable.

If local amenities such as golf courses are going to be bought up and the use changed so that development can take place, I would suggest that it should be in places like Remuera where roads and schools and other infrastructure can better absorb the change.

The storms this year have proven that Auckland is struggling under the weight of development and perhaps we should no longer be used as a 'sponge' but the overflow sent to other areas that need development.

As a kite surfer I am also concerned that the development will have a negative impact on the access to the beach at Pine Harbour and the buildings will have a negative effect on the wind on the foreshore. 51.7  
51.8

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 area cannot cope with the large influx of houses and people because of the lack of infrastructure.

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

Submission date: 12 February 2023

## Attend a hearing

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

## Declaration

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

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

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

No

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

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and attachments. We do not accept responsibility for any viruses or similar carried with our email, or any effects our email may have on the recipient computer system or network. Any views expressed in this email may be those of the individual sender and may not necessarily reflect the views of Council.

Dear Sir/Madam

Regarding the planned re-zoning of approx 307ha of land south of Beachlands from Rural-countryside Living zone to a mix of business, residential, open space and Future Urban zones,

I wish to put in a Submission **against** this proposal.

I have lived in Beachlands for over 15 years now and I strongly believe that there is not sufficient infrastructure in place to support the plan change.

The Maraetai-Whitford-Howick road is already extremely congested during rush hour times with workers and school children travelling through the area. And very little maintenance already to maintain the road

I also believe that there is insufficient sewage facilities to support such a plan change which would obviously involve thousands more vehicles on our access roads.

52.1

I am not against progress, and in the future, once the Howick - Maraetai roads have been widened to double lanes both ways and sewage treatment plant extended or upgraded then it could be a feasible change, but for now until major upgrading and improvements of infrastructure have been made to support such a plan change I feel it would put a crippling strain on the existing roading and other infrastructure facilities.

52.2

Already there are many accidents on our Howick-Maraetai roads and every time there is an accident, even a fairly mild one, it involves a road closure which forces travellers to go many many kilometers out of their way to get home or to work.

Therefore I wish to submit my strong opposition to the planned change.

Cheers

**Craig Anderson**

Senior Consultant

**VERDE**  
the optimisers

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P: +64 9 531 5777

M: +64 21 286 1510

[craig.anderson@verdegroun.co.nz](mailto:craig.anderson@verdegroun.co.nz)

[www.verde.co.nz](http://www.verde.co.nz)





The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Kirsten

Organisation name: Hewitt

Agent's full name:

Email address: [kirsten@fpes.co.nz](mailto:kirsten@fpes.co.nz)

Contact phone number:

Postal address:

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:

Lack of roading and infrastructure. Currently can't cope with population, long queues, narrow bridges, frequent power cuts, water/waste water capacity , no high school, insufficient recreational areas

53.1

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:

Lack of roading and infrastructure. Currently can't cope with population, long queues, narrow bridges, frequent power cuts, no high school, insufficient recreational areas

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

Submission date: 13 February 2023

### Attend a hearing

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

## Declaration

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

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

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

Yes

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

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Jane O'Neill

Organisation name:

Agent's full name:

Email address: [janesupplynz@gmail.com](mailto:janesupplynz@gmail.com)

Contact phone number:

Postal address:  
102 First View Ave  
Beachlands  
Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:  
Change of Plan

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:

We have lived in Beachlands over 20 years. The infrastructure can not cope with the number of people currently living here so how is the proposed increase in housing going to help? We have no senior schools and the roads are not able to cope with the current volume of traffic. We do not need any more development in the area.

54.1

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

Submission date: 9 February 2023

### Attend a hearing

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

### **Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Deborah Lea Keane  
**Date:** Monday, 13 February 2023 11:15:52 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Deborah Lea Keane

Organisation name:

Agent's full name: Deb Keane

Email address: jdbeachlands@gmail.com

Contact phone number:

Postal address:  
36 Te Puru Drive  
Maraetai  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
PC 88 - All

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

The infrastructure currently in place does not meet the current needs of the community as is. Additional housing is not a practical solution without a complete overhaul of existing services from roading to power, to waste water and to schooling. Particularly given we have no High School and the buses to Howick College are already over-crowded. Our supermarket is hardly stocked as is, and you have to wait weeks to get a doctors appointment.

55.1

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

Submission date: 13 February 2023

**Attend a hearing**

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

**Declaration**

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

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

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

No

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Jean Alphonsus Philippus Toebosch John  
**Date:** Monday, 13 February 2023 12:00:58 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Jean Alphonsus Philippus Toebosch John

Organisation name:

Agent's full name:

Email address: japtoe@gmail.com

Contact phone number:

Postal address:

Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Plan Change 88 Beachlands South

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:

In order for the Council to approve of this plan change they need to make sure that the current ratepayers are not negatively effected and that future rate payers have adequate facilities for their needs. Therefore the following needs to be addressed:

- 1 Water supply and commitment from Watercare that the future and long term needs of our community can be met. Is there a likelihood that he aquifers can continue to deliver the required water supply long term and in case of a long term drought? 56.1
- 2 Transport in and out of Beachlands taking into account the large increase in vehicles and the safety of all road users before Council approves of this plan change. 56.2
- 3 Sewerage disposal needs to be addressed before approval of plan change. 56.3
- 4 Ministry of Education should commit to a new High School and further Primary Schools. The current situation of convoys of buses to take students to already over crowded high schools is already inadequate. 56.4
- 5 Public Transport: Ferries are cancelled in adverse weather conditions and are replaced by buses. 56.5



This issue needs to be resolved before a plan change is approved.

6 The environmental impact by run off, silt and litter into the sea would be enormous. Again a solution must be found before Council approval.

56.6

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

Details of amendments: The solution of the above issues must be made a condition before the plan change can go ahead.

Submission date: 13 February 2023

### **Attend a hearing**

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

### **Declaration**

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

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

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

No

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Peter Jansen  
**Date:** Monday, 13 February 2023 12:30:54 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Peter Jansen

Organisation name:

Agent's full name: Peter Jansen

Email address: pwcjansen@gmail.com

Contact phone number: 021972222

Postal address:  
73 Pine Harbour Parade  
Beachlands  
Auckland  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Property address; 110 Jack Lachlan Drive; and 620, 680, 702, 712, 722, 732, 740, 746, 758 and 770 Whitford Maraetai Road, Beachlands.

Property address:

Map or maps:

Other provisions:  
Private Plan change request to rezone approximately 307 hectares of land in Beachlands from Rural - Countryside living to a mix of business, residential, open space and future urban zones.

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

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

The reason for my or our views are:

1. Proposed rezoning to a mix of high density apartment living and townhouses will severely degrade the visual amenity value of Beachlands and Pine Harbour. | 57.1
2. Lack of infrastructure to support such a large development proposal including; Sewerage, fresh water availability, roading infrastructure. The proposed suggestions regarding sewerage disposal will potentially pollute the underground aquifer thereby effecting all local residents using water bores. | 57.2
3. Regarding fresh water availability, the proposed development of extracting water from water bores to supply water to the residents of the proposed development will have significant effects on local water bore users. | 57.3

4. Existing roads will need to be upgraded to a two lane road to support the significant increase in traffic expect following completion of the proposed development.

57.4

5. Land set aside for a proposed school does not mean that the Ministry of Education will necessarily have the funds to build a new school.

57.5

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

Submission date: 13 February 2023

**Attend a hearing**

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

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

**Declaration**

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

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

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

Yes

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

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**From:** [Malcolm Pike](#)  
**To:** [Unitary Plan](#)  
**Subject:** Plan opposition  
**Date:** Monday, 13 February 2023 12:42:55 pm

---

Dear Sir/Madam

Regarding the planned re-zoning of approx 307ha of land south of Beachlands from Rural-countryside Living zone to a mix of business, residential, open space and Future Urban zones,

I wish to put in a Submission **against** this proposal.

I have lived in Maraetai for over forty years now and I strongly believe that there is not sufficient infrastructure in place to support the plan change.

The Maraetai-Whitford-Howick road is already extremely congested during rush hour times with workers and school children travelling through the area.

58.1

I also believe that there is insufficient sewage facilities to support such a plan change which would obviously involve thousands more vehicles on our access roads.

I am not against progress, and in the future, once the Howick - Maraetai roads have been widened to double lanes both ways and sewage treatment plant extended or upgraded then it could be a feasible change, but for now until major upgrading and improvements of infrastructure have been made to support such a plan change I feel it would put a crippling strain on the existing roading and other infrastructure facilities.

58.2

Already there are many accidents on our Howick-Maraetai roads and every time there is an accident, even a fairly mild one, it involves a road closure which forces travellers to go many many kilometers out of their way to get home or to work.

Therefore I wish to submit my strong opposition to the planned change.

Regards

Malcolm Pike

Sent from my iPad

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

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



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

Attn: Planning Technician  
Auckland Council  
Level 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/Ms/Miss/Ms (Full Name)

Rochelle (shelly) Geddes

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

Address for service of Submitter

14 Hapukupuku Ave Beachlands Auckland

Telephone:

021 741199

Fax/Email:

shellygeddes@extra.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 88 (Private)

Plan Change/Variation Name

Beachlands South

The specific provisions that my submission relates to are:

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

Plan provision(s)

Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Or

Property Address

Or

Map

Or

Other (specify)

#### Submission

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

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are: the road out to Beechlands/Maateai can not handle the influx of vehicles this subdivision with create along with the roads the storm water /sew evage system wont cope, our school system wont cope we will need a new primary intermediate & highschool the school buses are over loaded now. (continue on a separate sheet if necessary)

59.1  
59.2  
59.3

I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

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

Four lane road, Highscho built at beginning of project to account for new pupils to hoping on already over crowded buses. we will need a new community facility as the ones we currently have wont be big enough.

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

59.4

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

13/2/2023

Date

**Notes to person making submission:**

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

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

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

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

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

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

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

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

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



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

Attn: Planning Technician  
Auckland Council  
Level 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)

Mr Christopher Havill

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

#### Address for service of Submitter

29 Kaiawa St, Beachlands

Telephone:

021535632

Fax/Email:

cshavill@gmail.com

Contact Person: (Name and designation, if applicable)

### Scope of submission

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

Plan Change/Variation Number

PC 88 (Private)

Plan Change/Variation Name

Beachlands South

#### 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

110 Jacklan Dr and 620,680,682,702,712,722,732,740,746,758

Or

Map

and 770 Whitford Maraetai Rd, Beachlands

Or

Other (specify)

### Submission

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



I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

1. Proposed rezoning from rural countryside to a mixed use including high density apartment and town house dwellings will degrade the visual amenity of Beachlands and Pine Harbour. The road between Whitford and Beachlands is only 2 lanes. At present development of the 2 hectare blocks in conjunction with this new proposed development creates a major safety hazard on the existing road. The new development should not be undertaken until the new 4 lane road is constructed.

60.1

2. sewerage and waste water treatment and disposal requires a major upgrade of Watercare facility as there is not the capacity. At present Sunskirt Bay becomes polluted when there is a major storm or a failure overflow at the sewerage plant. With the new subdivisions the road width has been reduced to a point where parking is allowed on one side and therefore leaving no room for cars to pass in the remaining road width.

60.2

60.3

3. Tonkin and Taylors report does not detail bores taking water from the aquifer, we are only aware of one only assessment in the past regarding drawdown from the aquifer, our previous property, 79 Pine harbour Parade, was part of the draw down test. There was only a small number of bores tested at this time regarding draw down from the aquifer. Beachlands and maraeai have grown rapidly over the time we have lived here. The Retirement Village has its own bores, Countdown parent company has bores that supply a large number of dwellings. Drinkrow Water also supplies a large number of dwellings. Drinkrow also fills water tankers. I believe that a full stress test of the aquifers must take place as this plan change may triple the number of dwellings taking water from the aquifer.

60.4

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

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

I 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

Chris Havill

13th february 2023

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

Date

**Notes to person making submission:**

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

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

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

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

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

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

(a) adversely affects the environment; and

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

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Paul Stephen McKay  
**Date:** Tuesday, 14 February 2023 12:15:37 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Paul Stephen McKay

Organisation name:

Agent's full name:

Email address: psmckay@xtra.co.nz

Contact phone number:

Postal address:

2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Rezoning of 307Ha South of Beachlands village in the area of the Formosa Golf Course from Rural to Future Residential etc.

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

- 1. Proposed intersection improvements will not improve road or safety conditions between Beachlands and Whitford without significant improvements to the existing carriageway (ie. wider shoulders or 4 lane carriageway). | 61.1
- 2. Further investigation required to ensure waste water requirements for the proposed development can be met and comply with existing and proposed Environmental regulations (ie. no leeching to ground and compromising existing Aquifer quality). | 61.2
- 3. Further investigation required to look at alternatives to bore water supply to the development to ensure the current aquifer source is not compromised (ie. reticulated water via Watercare). | 61.3

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

Details of amendments: As referred above under 'Reasons for my views'.

Submission date: 14 February 2023

**Attend a hearing**

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

**Declaration**

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

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

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

No

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Allan Henry McGilvray  
**Date:** Tuesday, 14 February 2023 3:00:36 pm

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Allan Henry McGilvray

Organisation name: NA

Agent's full name: NA

Email address: workfutures@gmail.com

Contact phone number: 0274 329310

Postal address:  
 9 Tui Brae Pine Harbour  
 Beachlands  
 Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:  
 Proposed rezoning

Property address: 307 Ha South of Beachlands Village in the area of Formosa Golf Course

Map or maps: Those referenced by Auckland City Council in their correspondence date 20 January 2023

Other provisions:  
 None

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

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

The reason for my or our views are:

1. The proposal if approved will lead to changes that will impact forever the identity of Beachheads as a rural community and the fabric/character and visualisation of the Beachlands Village. The visual photographs produced by Beachlands South Limited show that post the proposed rezoning there will be development that includes at least 1390 dwellings that are at least 5 or 6 stories in height. This is in stark contrast to the existing Beachlands skyscape. If Beachlands is to retain its status as a rural community under the Auckland City Council Unitary Plan then any proposal to move dwelling construction from essentially single/double level dwellings to a high proportion of high-density housing, changes the Beachlands status diametrically.

62.1

2. My submission is that the proposal should be rejected until such time as agreement is reached with Beachlands South Limited that they will provide at their cost, all infrastructure (including but not

62.2

limited to roading, water, sewerage, flood management, waste management, power, transport, telecommunications) and associated services that Auckland City Council deem appropriate to support the additional 3900 plus dwellings that are proposed subsequent to this proposed plan change.

62.2

Critically:

- Roading upgrades are required to support the additional populations that come with 3900 plus new dwellings identified in Stage 1 of the proposed developments. Specifically, the existing rural two lane road between Beachlands and Whitford needs to be upgraded to a four lane road. This upgrade would also need to include the provision of safe and efficient entry/exit ways for communities along the roadway in particular, the upgrading Jack Lachlan Drive to cope with the increased traffic volumes.

62.3

- The proposal is for the use of bore water for all uses including residential, community and commercial across the proposed rezoned areas. Whilst I am no expert on these matters, common sense suggests that this will not work for a development of the size proposed by this rezoning application. On that basis town water needs to be available for all dwellings post the rezoning.

62.4

- The sewerage system proposed seems to be inadequate to process wastewater for a development of the size proposed. The proposal that wastewater could be dispersed across the existing ground water systems will not work; any proposal needs to consider the needs of a more environmentally conscious community, and have consideration for an area that has in the past had issues with water egress into nearby streams and creeks. A properly considered and well developed wastewater system is required and one that is flood proof.

62.5

Finally, a development of the size proposed cannot proceed without proper and full infrastructure (as indicated above) and, that infrastructure should be a paid for by those wanting rezone and redevelop the area in the rezoning application.

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

Details of amendments: Beachlands South Limited to provide at their cost all infrastructure as outlined above

Submission date: 14 February 2023

### **Attend a hearing**

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

### **Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - DEREK SPENCER  
**Date:** Tuesday, 14 February 2023 4:00:47 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: DEREK SPENCER  
 Organisation name:  
 Agent's full name: DEREK SPENCER  
 Email address: derek.spencer@outlook.co.nz  
 Contact phone number: 092149080  
 Postal address:  
 derek.spencer@outlook.co.nz  
 Beachlands  
 AUCKLAND 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
 Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
All

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

- The proposed intersection improvement will not provide/improve the future traffic flows sufficiently. The assumption that incoming residents will use a ferry service to access work locations in CBD is unreliable. It is likely that the majority will travel to work throughout East Auckland and beyond using road vehicles. 63.1
- No indication that MD housing will provide sufficient garage space for offroad parking. No provision for a duel carriageway road upgrade from Whitford to the site and upgrade to Jack Lachlan Drive. 63.2
- No consideration for effects on existing roads of construction vehicles accessing the site including travel from quarries out of Brookby as an example or from Botany. 63.3
- Insufficient information to determine quantity of water taken from boreholes sufficient for 3000 houses. An alternate/secondary source is required 63.4
- Replace the proposed sewerage scheme with one not relying on disposal to existing ground

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

Details of amendments: Provide a dual carriageway from Whitford Road to Beachlands as a priority before substantial work is undertaken on this development

63.5

Submission date: 14 February 2023

### **Attend a hearing**

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

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

### **Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Michaela martinez  
**Date:** Wednesday, 15 February 2023 12:00:39 am

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Michaela martinez

Organisation name:

Agent's full name:

Email address: mickie09@gmail.com

Contact phone number:

Postal address:  
 29 Shelly bay road  
 Beachlands  
 Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

Property address: Formosa

Map or maps:

Other provisions:

Development of Formosa in Whitford-beachlands coastline including rural properties.

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

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

The reason for my or our views are:

This plan change cannot go ahead without significant infrastructure improvements to the Whitford maraetai areas. The road is dangerous already and will not cope with an additional 3k homes. Also keeping in mind the recent weather events, developing this land will cause further erosion and slips where the road (as above) cannot cope with traffic. School transport and non existent high school are an issue already with the current population.

64.1

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

Submission date: 14 February 2023

### Attend a hearing

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

**Declaration**

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

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

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

No

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Dr Gail Fleming  
**Date:** Wednesday, 15 February 2023 8:45:14 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Dr Gail Fleming  
Organisation name: None  
Agent's full name: None  
Email address: [fleming\\_gail@hotmail.com](mailto:fleming_gail@hotmail.com)  
Contact phone number:  
Postal address:  
11 Craig road  
Omana  
Manukau 2018

**Submission details**

**This is a submission to:**  
Plan change number: Plan Change 88  
Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Building more houses- the whole plan  
Property address: All addresses mentioned in plan  
Map or maps:  
Other provisions:

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

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

The reason for my or our views are:  
There are traffic jams every weekday to get to my healthcare job in manukau. Hundreds of us sit in traffic already. The infrastructure can't support more housing. We rely on tanks for water and have none in a power cut. Our powerlines are down constantly- why put more people thru that?

65.1

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

Submission date: 15 February 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Kelvin Beere  
**Date:** Wednesday, 15 February 2023 9:30:20 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Kelvin Beere

Organisation name:

Agent's full name: Kelvin Beere

Email address: kelvinbeere@forcelogistics.co.nz

Contact phone number:

Postal address:  
59 Te Pene Road  
Maraetai  
Maraetai 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Property address: PC88 Beachlands South

Map or maps:

Other provisions:

No requirement to upgrade the road network accessing the area of the development.

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

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

The reason for my or our views are:

The Plan change will introduce 3000 additional dwellings to the area in its first stage. There is no requirement for the developers to improve the road system accessing the area, namely the Whitford/ Maraetai road and Whitford or Ormiston Roads that are already congested and falling apart due to the large number of vehicles and heavy transport into the area to access the existing dwellings and quarry. The additional dwellings will also increase the requirement for buses to carry school pupils to colleges outside the area thereby increasing further the heavy vehicle number on the roadways.

I oppose this plan in its entirety until it includes a responsible upgrade to the roading system to access the area to handle additional traffic volumes.

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

Submission date: 15 February 2023

66.1

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Michael Bond  
**Date:** Wednesday, 15 February 2023 10:01:36 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Michael Bond

Organisation name:

Agent's full name:

Email address: bondfamilyeaters@gmail.com

Contact phone number:

Postal address:  
15 beachlands road  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Re-zoning of land from rural to future urban.

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:  
The additional development of the Pohutukawa coast would severely impact the existing community with untenable impact on existing infrastructure. The increase in population would have a negative effect on the character and quality of life of the area.

67.1  
67.2

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

Submission date: 15 February 2023

**Attend a hearing**

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

**Declaration**



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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Graeme Watt  
**Date:** Wednesday, 15 February 2023 10:30:26 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Graeme Watt

Organisation name:

Agent's full name: Graeme Watt

Email address: hb1kiwi@gmail.com

Contact phone number:

Postal address:  
309 Clifton rd Whitford  
RD 1 HOWICK  
Auckland 2571

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
BEACHLANDS SOUTH DEVELOPMENT

Formossa development of 3000 - 4000 homes

Property address: FORMOSSA GOLF COURSE

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:

|   |                              |
|---|------------------------------|
| Kia Ora . our roads are already congested these extra 3- 4 thousand homes will make our roads unsafe and totally congested . ( there is only one roundabout in whitford village and it is already problemtic. Getting out of Clifton Rd onto WHitford Maraetai road will also be dangerous for myself and family. Also my house looks out to the Formossa golf course , the high density nature of this development will likely cause a loss in value of my property and enjoyment of it . Light pollution will also be an issue expecially when the tides in at night . the golf course light reflects off the water now let alone 3 -4 thousand houses . Nois pollution will also be a factor especially with the tide in as sound carries across it . the enviroment will also likely suffer . 3-4 thousand houses for this area on top of Beachlands other developments is just too much for our area in my view - a bad idea ! we will never get the natural beauty of the area back once its built over . | 68.1<br>68.2<br>68.3<br>68.4 |
|---|------------------------------|

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

Submission date: 15 February 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Natalie Balemi  
**Date:** Wednesday, 15 February 2023 11:00:25 am

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Natalie Balemi

Organisation name:

Agent's full name:

Email address: natalie.balemi@gmail.com

Contact phone number:

Postal address:  
 18 liberty crescent  
 Beachlands  
 Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:

Provide adequate improved roading, wastewater updates to the area. Include a high school to support current and future kids in the area.

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

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

The reason for my or our views are:

The road in and out of beachlands Maraetai area currently is very poor. Constant road works and increase in population does not help traffic flow. The area is only growing so it would be appropriate and very important to look and improve the current infrastructure first before any more housing development is approved.

A high school in the area would help the traffic flow for commuters every day. This would take pressure off the already full school busses and roading surface.

The bridges at Whitford and mangamanga gorge desperately need widening and strengthening to take on this additional pressure.

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

69.1

Details of amendments: Improve main roads, bridges and include a school as priority before any more future developments

69.2

Submission date: 15 February 2023

### **Attend a hearing**

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

### **Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Maryon Wils  
**Date:** Wednesday, 15 February 2023 11:15:17 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Maryon Wils

Organisation name:

Agent's full name:

Email address: maryonw@me.com

Contact phone number: 021627966

Postal address:

2018

Beachlands

Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Property address:

Map or maps:

Other provisions:

Additional housing before roading infrastructure is upgraded/redeveloped.

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

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

The reason for my or our views are:

More cost effective and efficient to upgrade the roads prior to another 3000 people a day travelling on it. Current traffic jams and climate change, flooding etc leaving a community exposed to being isolated with one road usually obstructed leaving the other as the only way out. This road is also in bad repair and has several areas at risk from flooding, tree debris and daily traffic may as mentioned.

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

Details of amendments: Upgrade the roading infrastructure ahead of construction of 3000 homes to take advantage of efficiencies and lessen disruption

Submission date: 15 February 2023

70.1

**Attend a hearing**

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

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Jacqueline Cooe  
**Date:** Wednesday, 15 February 2023 11:15:27 am

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Jacqueline Cooe

Organisation name:

Agent's full name:

Email address: thecopesnz@gmail.com

Contact phone number:

Postal address:  
 64 Pine Harbour Parade  
 Beachlands  
 Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:  
 Plan change 88 OC 88(private):Beachlands South

Property address: Beachlands village and existing subdivisions

Map or maps: South Beachlands

Other provisions:  
 The building of yet another 3000 dwellings on land which will forever change the village that was here when we purchased our house. It is already over populated with the new sub division adjacent to Pine Harbour marina and the golf course with yet more buildings going up next to Countdown.

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:  
 One road in one road out, no reticulated water or sewage provisions , no high school, poor transport all of which cannot sustain potentially another 10000 plus people and their cars. This was a beautiful semi rural area which you intend decimating like Flat Bush, turning it into yet another concrete jungle. Yes I strongly oppose this plan

71.1

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

Submission date: 15 February 2023

### Attend a hearing

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Martin Sommerville  
**Date:** Wednesday, 15 February 2023 1:00:29 pm

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Martin Sommerville

Organisation name:

Agent's full name:

Email address: martinsommerville@hotmail.com

Contact phone number:

Postal address:  
 71 Maraetai School Road  
 Maraetai  
 Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:  
 Plan Change 88

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:

This submission relates to the fundamental nature of the surroundings in Beachlands and Maraetai and the Pohutakawa coast. I believe we cannot develop all of Auckland's land without thought to where residents of the more densely populated areas can have space to recreate and relax. Auckland's significant development in the south east, eg Botany, East Tamaki and Flat Bush over the last 30 years has seen the creation of town centres, schools, shopping malls, industrial places of work and so on. What has not happened is an increase in areas "away" from all this, where people can find more room for activities. It is an inevitability of urban development that large spaces will become smaller. And large undeveloped spaces are needed in our communities. Whilst I love Hagley Park in central Christchurch the bounding on all sides by the city places a physical and mental limit on the space that I believe not many would say they escape the city to Hagley park. The same can be said of the green spaces developed in the last 30 years in the urban areas previously mentioned in SE Auckland. Whilst they are great to have they do not satisfy that getting away from the city on a day off need. This requirement for larger spaces is well met by travelling the

72.1

relatively short distance to Beachlands, Maraetai and the Pohutakawa coast. I have lived here for 13 years now and have noticed a steady increase in families and visitors to this area particularly on Weekends and public holidays but generally a sunny day means its a great day to bring the family to the coast. People bring their kids, their pets, their relatives and friends because it is a great place to get away from the "city". That greatness, that specialness is not something we can create but it is something we can destroy. Maybe not in one plan change, or in one resource consent. But bit by bit like links in chain the nature of this area is being eroded and the sense of separation from the city diluted. Of course my submission is not entirely altruistic, I bought out here because Maraetai was different from Flat Bush and so on. I know that makes us lucky, but we are genuine in our belief that no-one owns the land in perpetuity and that we are all custodians for future generations. As such we should preserve the nature of special areas . This does not mean no change, it does not mean no improvement. But we have no belief that the current system is geared towards understanding that this area is an extremely important amenity for far more people than just the residents. It is an escape valve for much of South East Auckland. If that valve is restricted further it harms us all. As such I oppose this plan change as I believe a stop needs to be placed on further development in this area. That stop should remain until a plan for the whole Pohutakawa coast is developed which recognises its special nature and importance to the whole of SE Auckland. This current piecemeal approach that has already seen a huge change in Beachlands is not serving the local area or the broader SE Auckland area well.

72.1

72.2

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

Submission date: 15 February 2023

#### **Attend a hearing**

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

#### **Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Sam Benson  
**Date:** Wednesday, 15 February 2023 1:15:59 pm

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Sam Benson

Organisation name:

Agent's full name:

Email address: pau.jus.benson@hotmail.com

Contact phone number:

Postal address:

#### **Submission details**

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

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

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

Rule or rules:

I oppose the rezoning

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

I understand some residents of Beachlands have been seeking and petitioning for a Pohutakawa Coast High School. I even signed the petition as I could see the advantages of having a local high school in our area.

When presented with the petition, the Ministry of Education responded by saying that the population of Beachlands would need to increase in order to justify a school in our area and that Whitford, Clevedon and Maraetai students would also need to utilise this.

The Russell group are now using this as a way to promote their development, intensify our community and rezone it from a rural area to an urban area. Of course, to maximise their profits, they have leapt on the opportunity to include many developments, shopping complexes, hotels, industrial buildings, all listed down along with a first stage development of 3,000 dwellings (which could be several storeys tall), all of this is apparently for the betterment of our community.

Apparently, the people of Beachlands should be grateful and embrace this notion of an urban area, we have been told by the developers we need this. Well, actually we don't. The thousands of people who signed the petition for a local High School had no idea it would mean this development would

be needed in order to get it, and I bet you would find most people who signed that petition would quickly remove their names if they could, now knowing what this will mean to our roads, water, pollution and the character of our community. The people who signed the petition for a High School must not be mistaken for supporting this development. The petition came first, nobody knew it would mean a major change to our community at the time of signing.

Firstly, there is no commitment from the Ministry of education that they will even purchase the land from the Russell group for a High School. The High School could be situated anywhere, Clevedon as an example. Also, the notion of needing a High School because currently the bus to Howick travels 20Km along "high-speed rural roads with high crash rates" is absurd. The notion of our roads being unsuitable for 9 buses to travel along to take our kids to Howick College along dangerous roads is unacceptable but somehow adding thousands of cars to it each day is somehow ok and needed?

73.1

The school is a red herring, being used to convince the community we need to destroy our beautiful area and replace it with intensification. The infrastructure does not allow it. We cannot add thousands of cars and scores more buses to our area. We have one road, it is not adequate for what you are proposing. It is dangerous and potentially life threatening. In the event of an accident, emergency services would not be able to access the scene. It is a single lane in and a single lane out, all of which will pile up at Whitford, the ambulance from Howick would not be able to safely get around the traffic to the accident or medical event. We have a retirement village which houses over 210 residents, this would compromise their health and safety. We have hundreds of people using our beaches at Omana and Maraetai, near drownings are commonplace and accessing the roads is essential for our emergency services. Adding thousands of cars just so we can have a high school seems ridiculous when you consider this.

73.2

The emissions from this traffic will be horrendous and goes against the Councils Transport emissions targets. I am surprised this development is even up for consideration just based on this. 80% of Aucklanders use their private vehicles to commute to work. The congestion is going to mean cars will be crawling up the road and carbon emissions will be pumping into our environment. There is no way we will meet our 50% reduction by 2030, in fact it will be worse than it is now. You will be adding around 2,400 cars per 'dwelling' and for every storey, keep adding this number. It is appalling.

73.3

If we are going to have a High School we will also have parents dropping their kids off each morning and picking them up, buses from Maraetai, Clevedon and Whitford will be using our roads and all of this will add to the emissions and congestion on our roads. What we currently have (9 buses travelling to Howick College) is looking like a far better alternative to this 'solution' in terms of our roading and emissions. Add to this the 'industrial development' they have proposed on Jack Lachlan Drive, heavy trucks coming and going, eroding our roads, adding carbon emissions, people travelling to work and back again and maybe the business itself, potentially producing goods which will result in emissions. The truth is we have no idea what this industrial business will mean and to what scale. It is not noted, it doesn't have to be. It will become a "wait and see" and then a "too late, they have put this in" scenario and we will be left with a polluting factory which ruins the look and character of our community, the very part where people see a sign welcoming them to Beachlands and right beside it will be this disgusting building which is totally out of step with what our community is all about. Beachlands is not about intensified multi storeyed dwellings, industrial complexes, hotels and manmade playgrounds. People come here to get away from that, they come to fish, swim, have picnics at our parks, go boating, enjoy nature, ride bikes, the things urban areas have lost are the things we hold dear and need to protect.

73.4

Our water and wastewater are not up to the task of being utilised for this development. We have experienced 8 power outages in a year alone, one power outage (not related to the cyclone, where we had 1 outage) meant we had a black out for 7 hours. It is unreliable at best, it is always breaking down and you intend to have schools, hotels and shopping complexes using this? It is laughable. We are rural, our facilities and infrastructure are rural. You are trying to stretch rural infrastructure to run a huge urban area and it just won't work.

73.5

I suggest the Russell group take a look around Beachlands, create something that fits with the community but do not make it a built up, sprawling concrete jungle which will mean more traffic, more accidents, more congestion, and more and more pollution. I am not opposed to people making money, but I am when it is at the expense of other people's safety, infrastructure issues, pollution and the character of our community. This development is not a solution, it is a dirty cloth, just wiping the problem of not having a high school to several other more important areas. It is not helpful, it is problematic. Do not rezone our beautiful community, work within it.

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

Submission date: 15 February 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Michele Cadman  
**Date:** Wednesday, 15 February 2023 1:45:15 pm

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Michele Cadman

Organisation name:

Agent's full name:

Email address: michele.cadman@nztravelbrokers.co.nz

Contact phone number:

Postal address:

17 Blakewell Pl

Beachlands

Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

All of the proposed plan

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 current infrastructure is unable to support any additional population. This relates to schooling, roading, sewerage, shops. The area is unable to cope with the population as it is. The pressure on our infrastructure would be untenable

74.1

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

Submission date: 15 February 2023

### Attend a hearing

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

### Declaration

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

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

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

Yes

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

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**From:** [Mark Clapham](#)  
**To:** [Unitary Plan](#)  
**Subject:** Objection to plan change Beachlands  
**Date:** Tuesday, 14 February 2023 5:12:01 pm

---

To whom it may concern,

I wish to object to the proposed plan change enabling the housing subdivision of the current Formosa golf course.

The current roading infrastructure along the Whitford/Maraetai road is not suitable for the intended volume of traffic as it is only two lanes and the only way in or out for us locals. The traffic volumes will impact current residents when complete and indeed during construction of such a large building project as more and more trucks etc...will be on the only road. Contributing to noise and air pollution.

75.1

I am also concerned of the environmental impact on and around the coastal shoreline that will arise from the construction, and once completed, the extra population will have. Currently there is a vast array of bird life, lizards and frogs etc.. that are becoming scarce in Auckland and as such should be protected.

75.2

As there is no secondary school in the area and few if any spaces available in the two current primary schools, this will impact even more on an already busy road as people will need to commute into Howick or Botany and Flat bush, assuming those schools have room.

75.3

Currently the bus service is ' patchy ' at best and the Ferry service would also not cope for those that work in Auckland CBD once the expected population increases and this project is complete. There has been no thought or planning by the owners/corporation undergoing the subdivision to address these obvious problems that will arise.

75.4

The Auckland ratepayers will be left with trying to fix these at great cost, a cost I'm sure that the corporation wishing to capitalize from this subdivision won't wish to contribute to.

In light of the recent weather events that highlighted the already poor infrastructure in Auckland, Mayor Wayne Brown has stated the need to re-think and plan these subdivisions with more care so as to minimize impact for us now and in the future.

Regards,  
Mark Clapham  
14 Lydiard Place  
Beachlands

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

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



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

Attn: Planning Technician  
Auckland Council  
Level 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) AMBER LEE SORRENSON

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

### Address for service of Submitter

257 MARAETAI DRIVE, MARAETAI, AUCKLAND 2018

Telephone:  Fax/Email:

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

Plan Change/Variation Name

### 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)

## 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:

INFRASTRUCTURE. THERE IS NO WAY BEACHLANDS, MARAETAI, WHITFORD, CLEVEDON WILL COPE WITH THE EXTRA HOUSING.2 LANES IN AND OUTIL WE ARE ALREADY UNDER ENOUGH PRESSURE AS IT IS.WASTE OF PERFECT NZ LAND.

76.1

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

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

I wish to be heard in support of my submission

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

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

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

15/02/2023  
Date

**Notes to person making submission:**

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

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

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

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

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

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

(a) adversely affects the environment; and

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

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Michael John bartlett  
**Date:** Wednesday, 15 February 2023 5:30:19 pm

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Michael John bartlett

Organisation name:

Agent's full name:

Email address: michaelbe@hotmail.com

Contact phone number:

Postal address:

11 bell road  
Beachlands  
Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

Rezoning of land to allow residential development

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:

This will effectively double the population of beachlands. Our ferry service and our road access will not be able to support this and we will have traffic jams daily and people getting left behind for the ferry.

77.1

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

Submission date: 15 February 2023

### Attend a hearing

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

### Declaration

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

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

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

No

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Grahame Cain  
**Date:** Wednesday, 15 February 2023 6:30:22 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Grahame Cain

Organisation name:

Agent's full name:

Email address: [grahame.cain@hussmann.com](mailto:grahame.cain@hussmann.com)

Contact phone number:

Postal address:

2018

Beachlands

Manukau 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

I oppose the Formosa 3000 dwellings

Property address: PC 88

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:

Over populated area already inferior infrastructure

78.1

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

Submission date: 15 February 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Rebecca Owen  
**Date:** Wednesday, 15 February 2023 7:30:40 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Rebecca Owen

Organisation name:

Agent's full name:

Email address: becky@samuels.co.nz

Contact phone number:

Postal address:  
64 Pine Harbour Parade  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Formosa housing

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:  
There is obviously not enough infrastructure to support more houses here

79.1

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

Submission date: 15 February 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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

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



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

Attn: Planning Technician  
Auckland Council  
Level 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)

Mrs Sandra Magdalena Pike

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

#### Address for service of Submitter

27 George Town Drive, Beachlands 2018

Telephone:

2108481802

Fax/Email:

Sandypike12@yahoo.com

Contact Person: (Name and designation, if applicable)

### Scope of submission

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

Plan Change/Variation Number

PC 88 (Private)

Plan Change/Variation Name

Beachlands South

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

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

Plan provision(s)

Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from rural to urban resi

Or

Property Address

Or

Map

Or

Other (specify)

### Submission

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

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

Poor roading, single lane in each direction, needs constant maintenance due to surface wear and tear, congested

Area poorly serviced by watercare, most on tanks, few on shared bore with limited capacity.

Frequent power cuts due to overhead supply and car accidents on congested road. Inadequate waste water

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

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

Upgrade Whitford Maraetai Road with good shoulders, entry and access turn offs to adjacent roads, quiet su

Upgrade Jack Laughlin road for increased traffic flow and provide safe entry/exit junction \_traffic lights or rou

Proper safe pavement for walkers from Beachlands Village at top of Jack Laughlin to new housing and marir

Potable water supply not from present inadequate bore and upgraded sewage treatment plant. Infrastructure in first, including high s

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

SPike

02/15/2023

Signature of Submitter

Date

(or person authorised to sign on behalf of submitter)

**Notes to person making submission:**

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

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

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

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

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

(a) adversely affects the environment; and

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

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Sam Noon  
**Date:** Thursday, 16 February 2023 9:45:51 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Sam Noon  
 Organisation name:  
 Agent's full name:  
 Email address: hinoonhoki@gmail.com  
 Contact phone number:  
 Postal address:  
 11 Hapukupuku Avenue  
 Beachlands  
 Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
 Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
 H18 Future Urban Zone  
 Regional Policy Statement & Structure Plan Guidelines  
 Regional Policy Statement & Urban Growth

Property address:

Map or maps:

Other provisions:  
 Prioritised locations to support growth across Tāmaki Makaurau has already been adopted and PC 88 is excluded from this planning.

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:

- locations, priorities and scale of investment have been forecasted as set out in the link below and Beachlands is not included in this list. <https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/auckland-plan/development-strategy/growth-urban-auckland/Pages/growth-development-areas.aspx>

81.1

Given the areas for growth exclude Beachlands, where will the investment come from to improve connecting infrastructure to Beachlands e.g. road transport, ferry. The same can be said for future planning and investment in power supply, water, community facilities...

81.2

- In my view, the issues described above need to be addressed as part of considering PC88



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

Details of amendments: Provision of planning and investment for supporting infrastructure now and into the future.

Submission date: 16 February 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Rebecca Rix  
**Date:** Thursday, 16 February 2023 10:00:53 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Rebecca Rix  
Organisation name:  
Agent's full name: Rebecca Rix  
Email address: rebeccarix29@gmail.com  
Contact phone number:  
Postal address:  
40 Karaka Road  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
rezone the land from Rural – Countryside Living zone to a mix of Future Urban, Residential – Mixed Housing Urban, Business - Local Centre, Business – Light Industry; Business – Mixed Use; and Open Space zones.  
• introduce a new precinct to replace the existing Whitford precinct (and sub-precinct) provisions.  
• extend the Stormwater Management Area Flow 1 control over the plan change area.

Property address: 110 Jack Lachlan Drive, Beachlands (Formosa Complex)

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:  
Having been a resident of the area for 40 years, we have seen the developments take place with no consideration to the infrastructure for the area. The existing roading is unsafe, and there is a lack of utilities in ratio to the number of existing residents (i.e. water supply, and power supply)

82.1

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

Submission date: 16 February 2023

**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.

CAUTION: This email message and any attachments contain information that may be confidential and may be LEGALLY PRIVILEGED. If you are not the intended recipient, any use, disclosure or copying of this message or attachments is strictly prohibited. If you have received this email message in error please notify us immediately and erase all copies of the message and attachments. We do not accept responsibility for any viruses or similar carried with our email, or any effects our email may have on the recipient computer system or network. Any views expressed in this email may be those of the individual sender and may not necessarily reflect the views of Council.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Edith Anne Riddick  
**Date:** Thursday, 16 February 2023 11:16:58 am

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Edith Anne Riddick

Organisation name:

Agent's full name: Christopher John Riddick

Email address: Bumbazonke@hotmail.com

Contact phone number: 02102820601

Postal address:  
 740 Whitford Maraetai Road  
 RD1  
 Howick  
 Beachlands 2571

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

##### My submission relates to

Rule or rules:

Property address: 740 Whitford Maraetai Rd

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:

Firstly, I would like to thank the council for sending a letter, dated 20 January 2023, informing me of the planned change. This was the first that I knew about this.

To give a bit of background, as a youngster, we were brought out to Maraetai on a weekly basis on a Sunday to the beach. My father said that he would like a property looking over the bay if one ever came up. One day a For Sale sign was visible, resulting in my parents purchasing from the Kellys, Dad had the first choice of these alternative lifestyle blocks., and chose 740 for the views of the coast, the surrounding countryside, the relaxed atmosphere and environment away from the hussle and bussle of city life. The council has it on record as being in the late 50s early 60s. It has stayed in the family since then, I am the Trustee and the second generation to look after the land and maintain it. This new proposal is contradicting all of the council's previous stance, which was to be maintained as a green avenue minus any infrastructures. With this proposal, it will not only be visually destroying the current outlook, as it is, we look on to a beautifully manicured World

83.1

Standard and challenging Golf Course; to where the planners want to destroy the beauty that they have made on this course, be it making the Golf Course smaller, or putting dwellings on it. but will also have a dramatic impact on the infrastructure.

The infrastructure is: Power outages: currently experienced on a regular basis, due to overloaded grid and vehicles hitting the posts, trees damaging the lines due to climate change. Some of these can be prevented, roads need to be widened and increased to four lanes.

Water infrastructure is already at a premium, another 3,000 dwellings will erode the ground water, making it an impossibility to adequately supply the need of the proposed community.

We have just experienced a weather incident which could, and probably will be on a more regular basis, putting a huge demand on a stretched First response community, namely, Fire, Ambulance and police.

There is no consideration or mention of the First Response teams mentioned above, there is an Old Age home being constructed now, who will be taking any patients to Middlemore, the nearest hospital when there is not road access in a convenient time frame in emergencies?

The facilities are stretched to capacity now, with an extra 3,000 dwellings to come initially, their attitude is for someone else to address this issue. this is irresponsible forward planning by a conglomerate intend of the almighty dollar.

Storm water and waste water have not been adequately addressed, and Formosa already have a history of waste issues being sent out into the bay as raw sewage.

The plan shows a school position, however, when approached by them, the comment was that: "It is not their problem:.

Beachlands and Maraetai, present junior schools are at and over capacity now, as are other schools in the immediate vicinity.

There needs to be planning and building of both junior and senior schools before construction of the 3,000 dwellings applied for.

This leads to roads that are totally inadequate, even for present day traffic; it is of note that there is only one road into and out of Beachlands, a 2 lane, and the applicant has not deemed it necessary or an issue to address this.

The reality is that the area is woefully inadequate, bulging at the seams; and the applicant is derelict in their duty of concern as to the infrastructure needed to double the size of the population in the beachlands area without concern for implementing adequate structural changes to at least keep up with their anticipated increase in population and density.

The applicant seems to be oblivious to the increased needs of basic amenities, while looking to their own nest egg.

83.2

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

Details of amendments: Before any dwellings are planned, the following need to be implemented: Roothing, Electricity, Water, Sewage, storm water, First Responce, Schools, Health, and recreational facilities, fields and undercover amenities.

83.3  
83.4  
83.5  
83.6

Submission date: 16 February 2023

**Attend a hearing**

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

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Rodger Shepherd  
**Date:** Thursday, 16 February 2023 1:45:40 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Rodger Shepherd  
 Organisation name:  
 Agent's full name:  
 Email address: [rodgershepherd@xtra.co.nz](mailto:rodgershepherd@xtra.co.nz)  
 Contact phone number: 0296268000  
 Postal address:  
 168 Potts Rd  
 Whitford  
 Auckland 2571

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
 Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
 Property address:  
 Map or maps:  
 Other provisions:  
 Transport

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:

Whitford has already become choked up with traffic congestion at certain times of the day. The increased throughput from this development would make it untenable, and is changing the nature of whitford from a quiet onclave with 5 acre sections to a busy thoroughfare. It is essential the previously shelved road from bottom of Ormiston Rd straight across estuary and up behind trig road is implemented as part of this consent. It must be a condition precedent prior to the development going ahead.

84.1

84.2

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

Details of amendments: A new transport corridor as outlined above

Submission date: 16 February 2023



**Attend a hearing**

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

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Geoff Bignell  
**Date:** Thursday, 16 February 2023 2:16:23 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Geoff Bignell

Organisation name:

Agent's full name:

Email address: geoffthepianoguy@gmail.com

Contact phone number:

Postal address:  
20 Alexander Avenue  
Maraetai  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Property address:

Map or maps:

Other provisions:  
Up market Retirement Village and a Secondary School. Infrastructure upgrade

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

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

The reason for my or our views are:  
The above provisions to be included in the plan.

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

|  |      |
|--|------|
| Details of amendments: To include a Retirement Village, a Secondary School and upgraded infrastructure I.e. reading, sewerage, storm water | 85.1 |
|  | 85.2 |
|  | 85.3 |

Submission date: 16 February 2023

**Attend a hearing**

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

**Declaration**

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

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

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

No

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

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Date. # 85  
No.

AUCKLAND COUNCIL  
24 FEB 2023  
CBD - ALBERT ST

Attn Planning Panel

This letter via surface mail should be taken into consideration as part of the email submission already forwarded. The Council designed submission form does not allow for a more protracted viewpoint as described herein. In other words the form provided has its limitations as it does not accept a format other than that supplied by email hence this letter and the use of "old fashioned" surface mail. I trust this explanation is both clear and satisfactory to and for the presiding planning panel.

Yours faithfully  
ATB

**Subject: Application for Land Rezoning of Formosa Golf Course and Surrounding land** *Plan Change 88*

Attn Planning Panel

My history- My name is Geoff Bignell, a Pohutukawa Coast resident ratepayer for 50 years. I have owned two businesses on the Coast, the last one being a non franchised Real Estate Company. Originally a nurseryman I turned to real estate which swallowed up 32 years in practice. For a number of years I held the Chairperson's position for the now defunct Maraetai Residents and Ratepayers Association, belonged to the Maraetai Beach Boat Club, Pine Harbour Cruising Club, Probus, and have been involved in any number of groups and issues on the Coast as an advisory long time resident, horticulturalist, Real Estate agent and musician to name a few.

As a young person I was soon invited to join various platforms to lobby Council and a string of politicians on both a Secondary School and a quality retirement village. Finally and thankfully after 45 years approximately, Council granted consent for the MetLife Care Retirement Village sandwiched between Jack Lachlan Drive and Karaka Road for which residents are most grateful.

My knowledge and experience, I believe, qualifies me to move to my next point. Notwithstanding the dire need for a Secondary School on the Coast servicing servicing Clevedon, Whitford and nearby surrounding areas as well, there is a very real need to for quality retirement village on the Coast and I believe the western/north western flanks would be perfect for such a concept.

The reasons are as follows:

There is a substantial contingent of monied retirees on the Coast, many sitting on large and valuable properties. They are used to the luxury of space, privacy, sea air and a safe living environment. Many of these residents own properties with stunning views over the gulf. They are grateful for their privileged lifestyle

so will not relinquish their hold over it lightly. They are also involved in many activities on a mindful, physical, intellectual and social scale. Such activities include boating, motorhoming, golf, gardening, a large variety of clubs and craft groups. Many 'oldies' not only have developed long term friendships in the community but also have family here on the Coast so have no desire to leave their 'piece of paradise'. They are firmly rooted in the area. The idea of this sector of the retired community moving into a village type situation is abhorrent enough without having to accept only one local option, one that does not provide the quality and sized housing, space and outlook that they are used to and indeed want in their dwindling years on this 'mortal coil', simply because there has never been one available.

Frankly there is a need for all socio-economic groups. However the group of locals I refer to is just not being catered for on the Coast largely because the appropriately zoned land has never been available for this category. As I see it the flank of land I refer to would suit this need admirably, thereby encouraging more local 'oldies' to take up this option. A market survey would soon establish this one way or the other. Such a survey would also establish the needs and wishes for this particular demographic.

The overarching benefits to society would include the subsequent release of the owner occupied retirees properties, more suited to younger families appreciative of our special lifestyle area. In this way these retirees would inadvertently be doing their bit for the grave housing shortage in Auckland.

Such a village logically must fall under the umbrella of residential development, a case in point is the new development of the Pakuranga Golf Course.

I therefore urge the Planners Panel to seriously consider this submission. I can be reached on mobile 0274 976 507.

Respectfully yours,  
Geoff Bignell  
Maraetai



**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Stephen George Pawsey  
**Date:** Thursday, 16 February 2023 3:15:52 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Stephen George Pawsey

Organisation name:

Agent's full name:

Email address: [steve@watts.co.nz](mailto:steve@watts.co.nz)

Contact phone number:

Postal address:

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Property address:

Map or maps:

Other provisions:

Nothing in the plan to address the additional infrastructure required to accommodate the increase in population

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

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

The reason for my or our views are:

Before the plan can be approved the following issues with infrastructure need to be resolved:

1) a secure power supply needs to be installed. Beachlands South is currently supplied by aged overhead cables from Takanini to Maraetai with frequent outages due to weather and other incidents. 86.1

2) no mains water supply. With the above frequent power outages water pumps from our tanks are not operational so we lose water also. This creates a health issue as toilets cannot flush 86.2

3) we understand Watercare's waste water plant for Beachlands is at capacity and there are no current plans to extend this facility to handle the additional population 86.3

4) I have driven the Howick/Whitford to Beachlands road for over 50 years and there has been a total lack of investment on this route by successive councils and it now struggles to handle the current volume of traffic. The only other route is out through Maraetai/Clevedon/Papakura which is an area known to flood with the combination of bad weather and high tide, leaving Beachlands and Maraetai cut off with the volunteer fire brigade the only emergency service able to respond 86.4

5) the very recent weather events have clearly shown the consequences of allowing building to proceed without sufficient regard being given to supporting infrastructure, and to allow this plan change without provision to address the above issues has the potential to put lives of residents at risk in the future. Approval of the plan in its current form will only be creating problems for future councils.

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

Details of amendments: Require infrastructure improvements detailed above to be an integral part of the approval

86.5

Submission date: 16 February 2023

**Attend a hearing**

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

**Declaration**

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

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

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

No

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

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

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



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

Attn: Planning Technician  
Auckland Council  
Level 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)

Yueliang He

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

**Address for service of Submitter**

680 Whitford- Maraetai Road Beachlands 2571

Telephone:

224226436

Fax/Email:

hexinyu5@hotmail.com

Contact Person: (Name and designation, if applicable)

## Scope of submission

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

Plan Change/Variation Number

PC 88 (Private)

Plan Change/Variation Name

Beachlands South

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

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

Plan provision(s)

The whole plan change

Or

Property Address

Or

Map

Or

Other (specify)

## Submission

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

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

The proposed development appears to be high quality and well designed and offers a lot of benefits for the community including schools, parks, a coastal walkway, employment opportunities and other public amenities. This combined with the roading and transport improvements will benefit the wider community.

87.1

87.2

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

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

I 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

*Handwritten signature*

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

*10, Mar 2023*  
Date

**Notes to person making submission:**

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

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

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

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

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

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

(a) adversely affects the environment; and

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

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

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



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

Attn: Planning Technician  
Auckland Council  
Level 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)

Yueliang He

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

**Address for service of Submitter**

680 Whitford- Maraetai Road Beachlands 2571

Telephone:

224226436

Fax/Email:

hexinyu5@hotmail.com

Contact Person: (Name and designation, if applicable)

## Scope of submission

This is a submission on the following proposed plan change / variation to an exist ng plan:

Plan Change/Variation Number

PC 88 (Private)

Plan Change/Variation Name

Beachlands South

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

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

Plan provision(s)

The whole plan change

Or

Property Address

Or

Map

Or

Other (specify)

## Submission

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

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

The proposed development appears to be high quality and well designed and offers a lot of benefits for the community including schools, parks, a coastal walkway, employment opportunities and other public amenities. This combined with the roading and transport improvements will benefit the wider community.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

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

I wish to be heard in support of my submission

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

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



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

10, Mar 2023

Date

**Notes to person making submission:**

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

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

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

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

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

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

(a) adversely affects the environment; and

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

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Angela Turner  
**Date:** Friday, 17 February 2023 8:00:58 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Angela Turner

Organisation name:

Agent's full name:

Email address: angesturner@gmail.com

Contact phone number: 021661825

Postal address:  
48 Intrepid Crescent  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Plan change 88

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 area currently can't handle the amount of cars/residences. The constant traffic jams leaving the area in the morning are frustrating. The local primary schools are bulging at the seams & slowly but surely their outdoor spaces are being taken up with classrooms, yet the health board will complain of obese children. If and I say IF this development is given the green light the locks infrastructure needs to be fixed, roads, a High School, swimming pool, more facilities for medical, grocery stores, public transport. Beachlands/Maraetai has had exponential growth over the last 10years yet the infrastructure has been slow come on council stop taking money from developers without there being rules in place for what they need to do to an area.

88.1

88.2

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

Details of amendments: Please see above statement



Submission date: 17 February 2023

**Attend a hearing**

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

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Eugenie Wendelien Hansen  
**Date:** Friday, 17 February 2023 11:45:17 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Eugenie Wendelien Hansen

Organisation name:

Agent's full name:

Email address: wenhansen49@gmail.com

Contact phone number:

Postal address:

10 Tui Brae  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Infrastructure proposed by BSL not adequate for the existing rural community regarding water infrastructure & waste water management

Roading surfaces will be impacted by the heavy trucks useage & BSL does not make any contribution for this.

Schools. The land offered by BSL is commendable but the Goverment has not plans for a addional schools at present and this may take some time to come to fruition. Therefore may more students will be bussed to othr schools who are also at capacity. EXisting Full Primary are at compacity.

89.1

Property address: 10 Tui Brae

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:

Severely impact existing Beachlands community and our property

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

Details of amendments: Reduce the high rise Money for roading

89.2  
89.3

Submission date: 17 February 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Shelly Young  
**Date:** Saturday, 18 February 2023 12:16:16 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Shelly Young

Organisation name:

Agent's full name:

Email address: dusty.boy1979@gmail.com

Contact phone number:

Postal address:

16 puriri road

Beachlands

Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

PC 88 Beachlands south.

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:

It is not require in the area. Needs to keep its quaint community rural feel.

90.1

Road will not support this. Crime will be increase.

90.2

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

90.3

Submission date: 18 February 2023

**Attend a hearing**

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

**Declaration**

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

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

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

No

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

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

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



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

Attn: Planning Technician  
Auckland Council  
Level 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)

Alison Christine Jura

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

Address for service of Submitter

125 Second View Ave

Beachlands Manukau 2018

Telephone:

0212300420

Fax/Email:

ajajura@yahoo.co.nz

Contact Person: (Name and designation, if applicable)

#### Scope of submission

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

Plan Change/Variation Number

PC 88 (Private)

Plan Change/Variation Name

Beachlands South

The specific provisions that my submission relates to are:

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

Plan provision(s)

Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Or

Property Address

Or

Map

Or

Other (specify)

#### Submission

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

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

- ① Inadequate Roading to cope with increased population
- ② Inadequate schooling & no future provisions planned
- ③ No future planning for water supply (continue on a separate sheet if necessary)

91.1

I seek the following decision by Council:

- Accept the proposed plan change / variation
- Accept the proposed plan change / variation with amendments as outlined below
- Decline the proposed plan change / variation
- If the proposed plan change / variation is not declined, then amend it as outlined below.

- I 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

A. C. Gurd  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

17 February 2023  
Date

**Notes to person making submission:**

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

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

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

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

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

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

(a) adversely affects the environment; and

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

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Brenda Milbank  
**Date:** Saturday, 18 February 2023 1:16:04 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Brenda Milbank

Organisation name:

Agent's full name:

Email address: brendamilbank@gmail.com

Contact phone number:

Postal address:

Whitford  
2571

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Property address:

Map or maps:

Other provisions:

Lack of roading upgrade between Beachlands and Howick / Ormiston.

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:

Too much traffic on a single country road, dangerous in peak hour to access side roads or turn off a side street onto main road. No bike lanes, no footpaths so you are forced to use your car.

92.1

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

Details of amendments: Widening of roads to Howick and Ormiston - double lanes each way plus new Mangamangaroa bridge. Footpaths /cycle lanes to allow safe walking and cycling. More roundabouts to allow side street traffic to access whitford road.

92.2  
92.3

Submission date: 18 February 2023

**Attend a hearing**

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

**Declaration**

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

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

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

No

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Greg Lowe  
**Date:** Saturday, 18 February 2023 1:31:05 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Greg Lowe  
Organisation name:  
Agent's full name:  
Email address: gelowe1@gmail.com  
Contact phone number:  
Postal address:  
75 Pine Harbour Parade  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Zoning changes from rural to future urban mixed residential mixed use etc.

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 will change the character of the Beachlands area. We moved out here to get away from city living. These proposed changes will radically alter the landscape and put huge additional strain on the already under performing infrastructure around the area.

93.1  
93.2

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

Submission date: 18 February 2023

**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.

CAUTION: This email message and any attachments contain information that may be confidential and may be LEGALLY PRIVILEGED. If you are not the intended recipient, any use, disclosure or copying of this message or attachments is strictly prohibited. If you have received this email message in error please notify us immediately and erase all copies of the message and attachments. We do not accept responsibility for any viruses or similar carried with our email, or any effects our email may have on the recipient computer system or network. Any views expressed in this email may be those of the individual sender and may not necessarily reflect the views of Council.

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

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



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

Attn: Planning Technician  
Auckland Council  
Level 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/Ms/Ms (Full Name)

Stacy Joseph Shramana

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

Address for service of Submitter

2/8 Stanniland Street, Sunnyhills 2010

Telephone: 09 576 3705 Fax/Email: —

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 88 (Private)

Plan Change/Variation Name Beachlands South

The specific provisions that my submission relates to are:

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

Plan provision(s) Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Or Property Address

Or Map

Or Other (specify)

### Submission

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

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

The roading now is taxed, and cannot cope with current demand.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

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

The infrastructure should be in place before any more development. I come out to Maraetai Beach School, to teach.

94.1

I wish to be heard in support of my submission

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

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

Stacy Joseph Shramana

18-02-2023

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

Date

Stacy Joseph Shramana

Notes to person making submission:

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

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

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

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

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

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

(a) adversely affects the environment; and

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

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Scott Jason Marsden  
**Date:** Sunday, 19 February 2023 12:45:53 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Scott Jason Marsden

Organisation name:

Agent's full name: scott marsden

Email address: scottmarsden@xtra.co.nz

Contact phone number:

Postal address:

16 Tui Brae  
Pine Harbour  
Auckland  
Auckland 2571

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Proposed rezoning

Property address: 307 Ha South of Beachlands Village in the area of Formosa Golf Course

Map or maps: Those referenced by Auckland City Council in their correspondence date 20 January 2023

Other provisions:

None

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

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

The reason for my or our views are:

1. The proposal if approved will lead to changes that will impact forever the identity of Beachheads as a rural community and the fabric/character and visualisation of the Beachlands Village. The visual photographs produced by Beachlands South Limited show that post the proposed rezoning there will be development that includes at least 1390 dwellings that are at least 5 or 6 stories in height. This is in stark contrast to the existing Beachlands skyline. If Beachlands is to retain its status as a rural community under the Auckland City Council Unitary Plan then any proposal to move dwelling construction from essentially single/double level dwellings to a high proportion of high-density housing, changes the Beachlands status diametrically.

95.1

2. My submission is that the proposal should be rejected until such time as agreement is reached with Beachlands South Limited that they will provide at their cost, all infrastructure (including but not

95.2

limited to roading, water, sewerage, flood management, waste management, power, transport, telecommunications) and associated services that Auckland City Council deem appropriate to support the additional 3900 plus dwellings that are proposed subsequent to this proposed plan change.

95.2

Critically:

- Roading upgrades are required to support the additional populations that come with 3900 plus new dwellings identified in Stage 1 of the proposed developments. Specifically, the existing rural two lane road between Beachlands and Whitford needs to be upgraded to a four lane road. This upgrade would also need to include the provision of safe and efficient entry/exit ways for communities along the roadway in particular, the upgrading Jack Lachlan Drive to cope with the increased traffic volumes.

95.3

- The proposal is for the use of bore water for all uses including residential, community and commercial across the proposed rezoned areas. Whilst I am no expert on these matters, common sense suggests that this will not work for a development of the size proposed by this rezoning application. On that basis town water needs to be available for all dwellings post the rezoning.

95.4

- The sewerage system proposed seems to be inadequate to process wastewater for a development of the size proposed. The proposal that wastewater could be dispersed across the existing ground water systems will not work; any proposal needs to consider the needs of a more environmentally conscious community, and have consideration for an area that has in the past had issues with water egress into nearby streams and creeks. A properly considered and well developed wastewater system is required and one that is flood proof.

95.5

Finally, a development of the size proposed cannot proceed without proper and full infrastructure (as indicated above) and, that infrastructure should be a paid for by those wanting rezone and re develop the area in the rezoning application.

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

Details of amendments: Beachlands South Limited to provide at their cost all infrastructure as outlined above

Submission date: 19 February 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Gregory Bannan  
**Date:** Sunday, 19 February 2023 1:01:01 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Gregory Bannan

Organisation name:

Agent's full name: Gregory Bannan

Email address: g-cbannan@xtra.co.nz

Contact phone number:

Postal address:  
g-cbannan@xtra.co.nz  
Auckland  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Proposed rezoning

Property address: : 307 Ha South of Beachlands Village in the area of Formosa Golf Course

Map or maps: Those referenced by Auckland City Council in their correspondence date 20 January 2023

Other provisions:  
None

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

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

The reason for my or our views are:

1. The proposal if approved will lead to changes that will impact forever the identity of Beachheads as a rural community and the fabric/character and visualisation of the Beachlands Village. The visual photographs produced by Beachlands South Limited show that post the proposed rezoning there will be development that includes at least 1390 dwellings that are at least 5 or 6 stories in height. This is in stark contrast to the existing Beachlands skyline. If Beachlands is to retain its status as a rural community under the Auckland City Council Unitary Plan then any proposal to move dwelling construction from essentially single/double level dwellings to a high proportion of high-density housing, changes the Beachlands status diametrically.

96.1

2. My submission is that the proposal should be rejected until such time as agreement is reached with Beachlands South Limited that they will provide at their cost, all infrastructure (including but not

96.2



limited to roading, water, sewerage, flood management, waste management, power, transport, telecommunications) and associated services that Auckland City Council deem appropriate to support the additional 3900 plus dwellings that are proposed subsequent to this proposed plan change.

96.2

Critically:

- Roading upgrades are required to support the additional populations that come with 3900 plus new dwellings identified in Stage 1 of the proposed developments. Specifically, the existing rural two lane road between Beachlands and Whitford needs to be upgraded to a four lane road. This upgrade would also need to include the provision of safe and efficient entry/exit ways for communities along the roadway in particular, the upgrading Jack Lachlan Drive to cope with the increased traffic volumes.

96.3

- The proposal is for the use of bore water for all uses including residential, community and commercial across the proposed rezoned areas. Whilst I am no expert on these matters, common sense suggests that this will not work for a development of the size proposed by this rezoning application. On that basis town water needs to be available for all dwellings post the rezoning.

96.4

- The sewerage system proposed seems to be inadequate to process wastewater for a development of the size proposed. The proposal that wastewater could be dispersed across the existing ground water systems will not work; any proposal needs to consider the needs of a more environmentally conscious community, and have consideration for an area that has in the past had issues with water egress into nearby streams and creeks. A properly considered and well developed wastewater system is required and one that is flood proof.

96.5

Finally, a development of the size proposed cannot proceed without proper and full infrastructure (as indicated above) and, that infrastructure should be a paid for by those wanting rezone and re develop the area in the rezoning application.

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

Details of amendments: Beachlands South Limited to provide at their cost all infrastructure as outlined above

Submission date: 19 February 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Stephen Gregory Marsden  
**Date:** Sunday, 19 February 2023 1:15:53 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Stephen Gregory Marsden

Organisation name:

Agent's full name:

Email address: mekfour@hotmail.com

Contact phone number:

Postal address:  
 24 Beachlands rd  
 Beachlands  
 Auckland 2018

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

##### My submission relates to

Rule or rules:  
 Proposed rezoning

Property address: 307 Ha South of Beachlands Village in the area of Formosa Golf Course

Map or maps: Those referenced by Auckland City Council in their correspondence date 20 January 2023

Other provisions:  
 None

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

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

The reason for my or our views are:

1. The proposal if approved will lead to changes that will impact forever the identity of Beachheads as a rural community and the fabric/character and visualisation of the Beachlands Village. The visual photographs produced by Beachlands South Limited show that post the proposed rezoning there will be development that includes at least 1390 dwellings that are at least 5 or 6 stories in height. This is in stark contrast to the existing Beachlands skyline. If Beachlands is to retain its status as a rural community under the Auckland City Council Unitary Plan then any proposal to move dwelling construction from essentially single/double level dwellings to a high proportion of high-density housing, changes the Beachlands status diametrically.
2. My submission is that the proposal should be rejected until such time as agreement is reached with Beachlands South Limited that they will provide at their cost, all infrastructure (including but not

97.1

97.2

limited to roading, water, sewerage, flood management, waste management, power, transport, telecommunications) and associated services that Auckland City Council deem appropriate to support the additional 3900 plus dwellings that are proposed subsequent to this proposed plan change.

97.2

Critically:

- Roading upgrades are required to support the additional populations that come with 3900 plus new dwellings identified in Stage 1 of the proposed developments. Specifically, the existing rural two lane road between Beachlands and Whitford needs to be upgraded to a four lane road. This upgrade would also need to include the provision of safe and efficient entry/exit ways for communities along the roadway in particular, the upgrading Jack Lachlan Drive to cope with the increased traffic volumes.

97.3

- The proposal is for the use of bore water for all uses including residential, community and commercial across the proposed rezoned areas. Whilst I am no expert on these matters, common sense suggests that this will not work for a development of the size proposed by this rezoning application. On that basis town water needs to be available for all dwellings post the rezoning.

97.4

- The sewerage system proposed seems to be inadequate to process wastewater for a development of the size proposed. The proposal that wastewater could be dispersed across the existing ground water systems will not work; any proposal needs to consider the needs of a more environmentally conscious community, and have consideration for an area that has in the past had issues with water egress into nearby streams and creeks. A properly considered and well developed wastewater system is required and one that is flood proof.

97.5

Finally, a development of the size proposed cannot proceed without proper and full infrastructure (as indicated above) and, that infrastructure should be a paid for by those wanting rezone and re develop the area in the rezoning application.

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

Details of amendments: : Beachlands South Limited to provide at their cost all infrastructure as outlined above

Submission date: 19 February 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Christine Bannan  
**Date:** Sunday, 19 February 2023 1:15:55 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Christine Bannan

Organisation name:

Agent's full name:

Email address: cmbannan@me.com

Contact phone number:

Postal address:

18 Tui Brae  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Proposed rezoning

Property address: 307 Ha South of Beachlands Village in the area of Formosa Golf Course

Map or maps: Those referenced by Auckland City Council in their correspondence date 20 January 2023

Other provisions:

None

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:

1. The proposal if approved will lead to changes that will impact forever the identity of Beachheads as a rural community and the fabric/character and visualisation of the Beachlands Village. The visual photographs produced by Beachlands South Limited show that post the proposed rezoning there will be development that includes at least 1390 dwellings that are at least 5 or 6 stories in height. This is in stark contrast to the existing Beachlands skyline. If Beachlands is to retain its status as a rural community under the Auckland City Council Unitary Plan then any proposal to move dwelling construction from essentially single/double level dwellings to a high proportion of high-density housing, changes the Beachlands status diametrically.

98.1

2. My submission is that the proposal should be rejected until such time as agreement is reached with Beachlands South Limited that they will provide at their cost, all infrastructure (including but not

98.2

limited to roading, water, sewerage, flood management, waste management, power, transport, telecommunications) and associated services that Auckland City Council deem appropriate to support the additional 3900 plus dwellings that are proposed subsequent to this proposed plan change.

98.2

Critically:

- Roading upgrades are required to support the additional populations that come with 3900 plus new dwellings identified in Stage 1 of the proposed developments. Specifically, the existing rural two lane road between Beachlands and Whitford needs to be upgraded to a four lane road. This upgrade would also need to include the provision of safe and efficient entry/exit ways for communities along the roadway in particular, the upgrading Jack Lachlan Drive to cope with the increased traffic volumes.

98.3

- The proposal is for the use of bore water for all uses including residential, community and commercial across the proposed rezoned areas. Whilst I am no expert on these matters, common sense suggests that this will not work for a development of the size proposed by this rezoning application. On that basis town water needs to be available for all dwellings post the rezoning.

98.4

- The sewerage system proposed seems to be inadequate to process wastewater for a development of the size proposed. The proposal that wastewater could be dispersed across the existing ground water systems will not work; any proposal needs to consider the needs of a more environmentally conscious community, and have consideration for an area that has in the past had issues with water egress into nearby streams and creeks. A properly considered and well developed wastewater system is required and one that is flood proof.

98.5

Finally, a development of the size proposed cannot proceed without proper and full infrastructure (as indicated above) and, that infrastructure should be a paid for by those wanting rezone and re develop the area in the rezoning application.

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

Details of amendments: Beachlands South Limited to provide at their cost all infrastructure as outlined above

Submission date: 19 February 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Sean Patrick Cleary  
**Date:** Sunday, 19 February 2023 1:30:52 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Sean Patrick Cleary

Organisation name:

Agent's full name:

Email address: seanpcleary@yahoo.co.uk

Contact phone number:

Postal address:  
108 Beachlands rd  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Proposed rezoning

Property address: 307 Ha South of Beachlands Village in the area of Formosa Golf Course

Map or maps: Those referenced by Auckland City Council in their correspondence date 20 January 2023

Other provisions:  
none

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

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

The reason for my or our views are:

1. The proposal if approved will lead to changes that will impact forever the identity of Beachheads as a rural community and the fabric/character and visualisation of the Beachlands Village. The visual photographs produced by Beachlands South Limited show that post the proposed rezoning there will be development that includes at least 1390 dwellings that are at least 5 or 6 stories in height. This is in stark contrast to the existing Beachlands skyline. If Beachlands is to retain its status as a rural community under the Auckland City Council Unitary Plan then any proposal to move dwelling construction from essentially single/double level dwellings to a high proportion of high-density housing, changes the Beachlands status diametrically.

99.1

2. My submission is that the proposal should be rejected until such time as agreement is reached with Beachlands South Limited that they will provide at their cost, all infrastructure (including but not

99.2

limited to roading, water, sewerage, flood management, waste management, power, transport, telecommunications) and associated services that Auckland City Council deem appropriate to support the additional 3900 plus dwellings that are proposed subsequent to this proposed plan change.

99.2

Critically:

- Roading upgrades are required to support the additional populations that come with 3900 plus new dwellings identified in Stage 1 of the proposed developments. Specifically, the existing rural two lane road between Beachlands and Whitford needs to be upgraded to a four lane road. This upgrade would also need to include the provision of safe and efficient entry/exit ways for communities along the roadway in particular, the upgrading Jack Lachlan Drive to cope with the increased traffic volumes.

99.3

- The proposal is for the use of bore water for all uses including residential, community and commercial across the proposed rezoned areas. Whilst I am no expert on these matters, common sense suggests that this will not work for a development of the size proposed by this rezoning application. On that basis town water needs to be available for all dwellings post the rezoning.

99.4

- The sewerage system proposed seems to be inadequate to process wastewater for a development of the size proposed. The proposal that wastewater could be dispersed across the existing ground water systems will not work; any proposal needs to consider the needs of a more environmentally conscious community, and have consideration for an area that has in the past had issues with water egress into nearby streams and creeks. A properly considered and well developed wastewater system is required and one that is flood proof.

99.5

Finally, a development of the size proposed cannot proceed without proper and full infrastructure (as indicated above) and, that infrastructure should be a paid for by those wanting rezone and re develop the area in the rezoning application.

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

Details of amendments: Beachlands South Limited to provide at their cost all infrastructure as outlined above

Submission date: 19 February 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Michelle Marie Pietras  
**Date:** Sunday, 19 February 2023 1:30:53 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Michelle Marie Pietras

Organisation name:

Agent's full name:

Email address: shellbell445@hotmail.com

Contact phone number:

Postal address:  
108 Beachlands rd  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Proposed rezoning

Property address: 307 Ha South of Beachlands Village in the area of Formosa Golf Course

Map or maps: : Those referenced by Auckland City Council in their correspondence date 20 January 2023

Other provisions:  
none

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

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

The reason for my or our views are:

1. The proposal if approved will lead to changes that will impact forever the identity of Beachheads as a rural community and the fabric/character and visualisation of the Beachlands Village. The visual photographs produced by Beachlands South Limited show that post the proposed rezoning there will be development that includes at least 1390 dwellings that are at least 5 or 6 stories in height. This is in stark contrast to the existing Beachlands skyline. If Beachlands is to retain its status as a rural community under the Auckland City Council Unitary Plan then any proposal to move dwelling construction from essentially single/double level dwellings to a high proportion of high-density housing, changes the Beachlands status diametrically.
2. My submission is that the proposal should be rejected until such time as agreement is reached with Beachlands South Limited that they will provide at their cost, all infrastructure (including but not

100.1

100.2

limited to roading, water, sewerage, flood management, waste management, power, transport, telecommunications) and associated services that Auckland City Council deem appropriate to support the additional 3900 plus dwellings that are proposed subsequent to this proposed plan change.

Critically:

- Roading upgrades are required to support the additional populations that come with 3900 plus new dwellings identified in Stage 1 of the proposed developments. Specifically, the existing rural two lane road between Beachlands and Whitford needs to be upgraded to a four lane road. This upgrade would also need to include the provision of safe and efficient entry/exit ways for communities along the roadway in particular, the upgrading Jack Lachlan Drive to cope with the increased traffic volumes.

100.3

- The proposal is for the use of bore water for all uses including residential, community and commercial across the proposed rezoned areas. Whilst I am no expert on these matters, common sense suggests that this will not work for a development of the size proposed by this rezoning application. On that basis town water needs to be available for all dwellings post the rezoning.

100.4

- The sewerage system proposed seems to be inadequate to process wastewater for a development of the size proposed. The proposal that wastewater could be dispersed across the existing ground water systems will not work; any proposal needs to consider the needs of a more environmentally conscious community, and have consideration for an area that has in the past had issues with water egress into nearby streams and creeks. A properly considered and well developed wastewater system is required and one that is flood proof.

100.5

Finally, a development of the size proposed cannot proceed without proper and full infrastructure (as indicated above) and, that infrastructure should be a paid for by those wanting rezone and re develop the area in the rezoning application.

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

Details of amendments: Beachlands South Limited to provide at their cost all infrastructure as outlined above

Submission date: 19 February 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Cheryl Lynette Marsden  
**Date:** Sunday, 19 February 2023 2:15:58 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Cheryl Lynette Marsden

Organisation name:

Agent's full name:

Email address: [ianmars@xtra.co.nz](mailto:ianmars@xtra.co.nz)

Contact phone number:

Postal address:

20 Thistle close

Beachlands

Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Proposed rezoning

Property address: 307 Ha South of Beachlands Village in the area of Formosa Golf Course

Map or maps: Those referenced by Auckland City Council in their correspondence date 20 January 2023

Other provisions:

None

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

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

The reason for my or our views are:

1. The proposal if approved will lead to changes that will impact forever the identity of Beachheads as a rural community and the fabric/character and visualisation of the Beachlands Village. The visual photographs produced by Beachlands South Limited show that post the proposed rezoning there will be development that includes at least 1390 dwellings that are at least 5 or 6 stories in height. This is in stark contrast to the existing Beachlands skyline. If Beachlands is to retain its status as a rural community under the Auckland City Council Unitary Plan then any proposal to move dwelling construction from essentially single/double level dwellings to a high proportion of high-density housing, changes the Beachlands status diametrically.

2. My submission is that the proposal should be rejected until such time as agreement is reached with Beachlands South Limited that they will provide at their cost, all infrastructure (including but not

101.1

101.2

limited to roading, water, sewerage, flood management, waste management, power, transport, telecommunications) and associated services that Auckland City Council deem appropriate to support the additional 3900 plus dwellings that are proposed subsequent to this proposed plan change.

Critically:

- Roading upgrades are required to support the additional populations that come with 3900 plus new dwellings identified in Stage 1 of the proposed developments. Specifically, the existing rural two lane road between Beachlands and Whitford needs to be upgraded to a four lane road. This upgrade would also need to include the provision of safe and efficient entry/exit ways for communities along the roadway in particular, the upgrading Jack Lachlan Drive to cope with the increased traffic volumes.

101.3

- The proposal is for the use of bore water for all uses including residential, community and commercial across the proposed rezoned areas. Whilst I am no expert on these matters, common sense suggests that this will not work for a development of the size proposed by this rezoning application. On that basis town water needs to be available for all dwellings post the rezoning.

101.4

- The sewerage system proposed seems to be inadequate to process wastewater for a development of the size proposed. The proposal that wastewater could be dispersed across the existing ground water systems will not work; any proposal needs to consider the needs of a more environmentally conscious community, and have consideration for an area that has in the past had issues with water egress into nearby streams and creeks. A properly considered and well developed wastewater system is required and one that is flood proof.

101.5

Finally, a development of the size proposed cannot proceed without proper and full infrastructure (as indicated above) and, that infrastructure should be a paid for by those wanting rezone and re develop the area in the rezoning application.

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

Details of amendments: Beachlands South Limited to provide at their cost all infrastructure as outlined above

Submission date: 19 February 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Ian Reid Marsden  
**Date:** Sunday, 19 February 2023 2:30:54 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Ian Reid Marsden

Organisation name:

Agent's full name:

Email address: ianmars@xtra.co.nz

Contact phone number:

Postal address:

20 Thistle close

Beachlands

Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Proposed rezoning

Property address: 307 Ha South of Beachlands Village in the area of Formosa Golf Course

Map or maps: Those referenced by Auckland City Council in their correspondence date 20 January 2023

Other provisions:

none

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

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

The reason for my or our views are:

1. The proposal if approved will lead to changes that will impact forever the identity of Beachheads as a rural community and the fabric/character and visualisation of the Beachlands Village. The visual photographs produced by Beachlands South Limited show that post the proposed rezoning there will be development that includes at least 1390 dwellings that are at least 5 or 6 stories in height. This is in stark contrast to the existing Beachlands skyline. If Beachlands is to retain its status as a rural community under the Auckland City Council Unitary Plan then any proposal to move dwelling construction from essentially single/double level dwellings to a high proportion of high-density housing, changes the Beachlands status diametrically.

2. My submission is that the proposal should be rejected until such time as agreement is reached with Beachlands South Limited that they will provide at their cost, all infrastructure (including but not

102.1

102.2

limited to roading, water, sewerage, flood management, waste management, power, transport, telecommunications) and associated services that Auckland City Council deem appropriate to support the additional 3900 plus dwellings that are proposed subsequent to this proposed plan change.

Critically:

- Roading upgrades are required to support the additional populations that come with 3900 plus new dwellings identified in Stage 1 of the proposed developments. Specifically, the existing rural two lane road between Beachlands and Whitford needs to be upgraded to a four lane road. This upgrade would also need to include the provision of safe and efficient entry/exit ways for communities along the roadway in particular, the upgrading Jack Lachlan Drive to cope with the increased traffic volumes.

102.3

- The proposal is for the use of bore water for all uses including residential, community and commercial across the proposed rezoned areas. Whilst I am no expert on these matters, common sense suggests that this will not work for a development of the size proposed by this rezoning application. On that basis town water needs to be available for all dwellings post the rezoning.

102.4

- The sewerage system proposed seems to be inadequate to process wastewater for a development of the size proposed. The proposal that wastewater could be dispersed across the existing ground water systems will not work; any proposal needs to consider the needs of a more environmentally conscious community, and have consideration for an area that has in the past had issues with water egress into nearby streams and creeks. A properly considered and well developed wastewater system is required and one that is flood proof.

102.5

Finally, a development of the size proposed cannot proceed without proper and full infrastructure (as indicated above) and, that infrastructure should be a paid for by those wanting rezone and re develop the area in the rezoning application.

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

Details of amendments: Beachlands South Limited to provide at their cost all infrastructure as outlined above

Submission date: 19 February 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Chrissy Willcocks  
**Date:** Sunday, 19 February 2023 3:00:52 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Chrissy Willcocks

Organisation name:

Agent's full name:

Email address: seajunternz@gmail.com

Contact phone number:

Postal address:

14 Tui Brae  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Proposed rezoning

Property address: 307 Ha South of Beachlands Village in the area of Formosa Golf Course

Map or maps: Those referenced by Auckland City Council in their correspondence date 20 January 2023

Other provisions:

none

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

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

The reason for my or our views are:

1. The proposal if approved will lead to changes that will impact forever the identity of Beachheads as a rural community and the fabric/character and visualisation of the Beachlands Village. The visual photographs produced by Beachlands South Limited show that post the proposed rezoning there will be development that includes at least 1390 dwellings that are at least 5 or 6 stories in height. This is in stark contrast to the existing Beachlands skyline. If Beachlands is to retain its status as a rural community under the Auckland City Council Unitary Plan then any proposal to move dwelling construction from essentially single/double level dwellings to a high proportion of high-density housing, changes the Beachlands status diametrically.

2. My submission is that the proposal should be rejected until such time as agreement is reached with Beachlands South Limited that they will provide at their cost, all infrastructure (including but not

103.1

103.2

limited to roading, water, sewerage, flood management, waste management, power, transport, telecommunications) and associated services that Auckland City Council deem appropriate to support the additional 3900 plus dwellings that are proposed subsequent to this proposed plan change.

Critically:

- Roading upgrades are required to support the additional populations that come with 3900 plus new dwellings identified in Stage 1 of the proposed developments. Specifically, the existing rural two lane road between Beachlands and Whitford needs to be upgraded to a four lane road. This upgrade would also need to include the provision of safe and efficient entry/exit ways for communities along the roadway in particular, the upgrading Jack Lachlan Drive to cope with the increased traffic volumes.

103.3

- The proposal is for the use of bore water for all uses including residential, community and commercial across the proposed rezoned areas. Whilst I am no expert on these matters, common sense suggests that this will not work for a development of the size proposed by this rezoning application. On that basis town water needs to be available for all dwellings post the rezoning.

103.4

- The sewerage system proposed seems to be inadequate to process wastewater for a development of the size proposed. The proposal that wastewater could be dispersed across the existing ground water systems will not work; any proposal needs to consider the needs of a more environmentally conscious community, and have consideration for an area that has in the past had issues with water egress into nearby streams and creeks. A properly considered and well developed wastewater system is required and one that is flood proof.

103.5

Finally, a development of the size proposed cannot proceed without proper and full infrastructure (as indicated above) and, that infrastructure should be a paid for by those wanting rezone and re develop the area in the rezoning application.

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

Details of amendments: Beachlands South Limited to provide at their cost all infrastructure as outlined above

Submission date: 19 February 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Brenda Mary Saunders  
**Date:** Sunday, 19 February 2023 3:16:01 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Brenda Mary Saunders

Organisation name:

Agent's full name: Kevin Andrew Saunders and Brenda Mary Saunders

Email address: bmsaunders@outlook.com

Contact phone number:

Postal address:  
69 Bell Road  
Beachlands  
Beachlands 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Property address:

Map or maps:

Other provisions:

Inadequate infrastructure in local area to support a development of this size. In light of climate change, the intention to build on a known flood plain and flood prone land is likely to be a huge risk that could come back to bite Council at a later date.

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

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

The reason for my or our views are:

I object to this proposal on the grounds that there is inadequate infrastructure in existence or planned in the local area to ensure the development's success. On the contrary, the addition of 3,000 dwellings in this area without improvements to power, water, sewerage, roading or education is likely to have a detrimental effect on the existing and proposed population of the area.

The proposed development is to be built on a known flood plain and flood prone area. The catastrophic impacts of Cyclone Gabrielle should have taught us one thing – that building housing on this type of land without making sure it can withstand the challenges of severe weather events and climate change in the future is foolhardy and irresponsible. The developers seem to have the attitude that infrastructure is “not their problem”, so will Council step up and lead the way with some innovative and forward thinking to benefit future generations?

I call for an immediate moratorium on the proposal to allow a thorough review of the plans and time

104.1

104.2

to ensure that the requisite infrastructure be built before any new development starts. I note that Mayor Wayne Brown himself said in an interview published in the NZ Herald on February 19, 2023 that we need a fresh approach:

“We need to have a big, grown-up conversation. The events of the last two weeks have drawn big questions about building on cliffs, which is generally wealthy people, and bigger questions about intensification in stormwater paths, which generally affects poorer people.”

There are examples of new developments on floodplains where stormwater infrastructure prevented flooding, like a Kainga Ora development at Northcote, but in Māngere, there were rushed developments before the infrastructure was put in and homes got flooded, Brown said.

“I think the last council did their best to limit the impacts of Plan Change 78, but I think it’s time to review that again. Did we do enough because we have learned some very severe lessons in the last two weeks,” he said.

The UK, for example, has already learned the harsh lessons of building on flood plains and is now taking a more cautious approach to planning as this UK Guardian article shows: Building new homes on land prone to flooding 'making damage worse' | Planning policy | The Guardian My objection can be summarized as “Infrastructure first, development second”.

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

Submission date: 19 February 2023

### **Attend a hearing**

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

### **Declaration**

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

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

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

No

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Hunter Willcocks  
**Date:** Sunday, 19 February 2023 3:45:52 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Hunter Willcocks

Organisation name:

Agent's full name:

Email address: [huntsnz@gmail.com](mailto:huntsnz@gmail.com)

Contact phone number:

Postal address:

14 Tui Brae  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Proposed rezoning

Property address: 307 Ha South of Beachlands Village in the area of Formosa Golf Course

Map or maps: Those referenced by Auckland City Council in their correspondence date 20 January 2023

Other provisions:

none

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

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

The reason for my or our views are:

1. The proposal if approved will lead to changes that will impact forever the identity of Beachheads as a rural community and the fabric/character and visualisation of the Beachlands Village. The visual photographs produced by Beachlands South Limited show that post the proposed rezoning there will be development that includes at least 1390 dwellings that are at least 5 or 6 stories in height. This is in stark contrast to the existing Beachlands skyline. If Beachlands is to retain its status as a rural community under the Auckland City Council Unitary Plan then any proposal to move dwelling construction from essentially single/double level dwellings to a high proportion of high-density housing, changes the Beachlands status diametrically.
2. My submission is that the proposal should be rejected until such time as agreement is reached with Beachlands South Limited that they will provide at their cost, all infrastructure (including but not

105.1

105.2

limited to roading, water, sewerage, flood management, waste management, power, transport, telecommunications) and associated services that Auckland City Council deem appropriate to support the additional 3900 plus dwellings that are proposed subsequent to this proposed plan change.

Critically:

- Roading upgrades are required to support the additional populations that come with 3900 plus new dwellings identified in Stage 1 of the proposed developments. Specifically, the existing rural two lane road between Beachlands and Whitford needs to be upgraded to a four lane road. This upgrade would also need to include the provision of safe and efficient entry/exit ways for communities along the roadway in particular, the upgrading Jack Lachlan Drive to cope with the increased traffic volumes.

105.3

- The proposal is for the use of bore water for all uses including residential, community and commercial across the proposed rezoned areas. Whilst I am no expert on these matters, common sense suggests that this will not work for a development of the size proposed by this rezoning application. On that basis town water needs to be available for all dwellings post the rezoning.

105.4

- The sewerage system proposed seems to be inadequate to process wastewater for a development of the size proposed. The proposal that wastewater could be dispersed across the existing ground water systems will not work; any proposal needs to consider the needs of a more environmentally conscious community, and have consideration for an area that has in the past had issues with water egress into nearby streams and creeks. A properly considered and well developed wastewater system is required and one that is flood proof.

105.5

Finally, a development of the size proposed cannot proceed without proper and full infrastructure (as indicated above) and, that infrastructure should be a paid for by those wanting rezone and re develop the area in the rezoning application.

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

Details of amendments: Beachlands South Limited to provide at their cost all infrastructure as outlined above

Submission date: 19 February 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Zach Willcocks  
**Date:** Sunday, 19 February 2023 4:00:53 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Zach Willcocks

Organisation name:

Agent's full name:

Email address: zachsnz@gmail.com

Contact phone number:

Postal address:

16 Tui Brae  
Pine Harbour  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Proposed rezoning

Property address: 307 Ha South of Beachlands Village in the area of Formosa Golf Course

Map or maps: Those referenced by Auckland City Council in their correspondence date 20 January 2023

Other provisions:

none

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

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

The reason for my or our views are:

1. The proposal if approved will lead to changes that will impact forever the identity of Beachheads as a rural community and the fabric/character and visualisation of the Beachlands Village. The visual photographs produced by Beachlands South Limited show that post the proposed rezoning there will be development that includes at least 1390 dwellings that are at least 5 or 6 stories in height. This is in stark contrast to the existing Beachlands skyline. If Beachlands is to retain its status as a rural community under the Auckland City Council Unitary Plan then any proposal to move dwelling construction from essentially single/double level dwellings to a high proportion of high-density housing, changes the Beachlands status diametrically.

2. My submission is that the proposal should be rejected until such time as agreement is reached with Beachlands South Limited that they will provide at their cost, all infrastructure (including but not

106.1

106.2

limited to roading, water, sewerage, flood management, waste management, power, transport, telecommunications) and associated services that Auckland City Council deem appropriate to support the additional 3900 plus dwellings that are proposed subsequent to this proposed plan change.

Critically:

- Roading upgrades are required to support the additional populations that come with 3900 plus new dwellings identified in Stage 1 of the proposed developments. Specifically, the existing rural two lane road between Beachlands and Whitford needs to be upgraded to a four lane road. This upgrade would also need to include the provision of safe and efficient entry/exit ways for communities along the roadway in particular, the upgrading Jack Lachlan Drive to cope with the increased traffic volumes.

106.3

- The proposal is for the use of bore water for all uses including residential, community and commercial across the proposed rezoned areas. Whilst I am no expert on these matters, common sense suggests that this will not work for a development of the size proposed by this rezoning application. On that basis town water needs to be available for all dwellings post the rezoning.

106.4

- The sewerage system proposed seems to be inadequate to process wastewater for a development of the size proposed. The proposal that wastewater could be dispersed across the existing ground water systems will not work; any proposal needs to consider the needs of a more environmentally conscious community, and have consideration for an area that has in the past had issues with water egress into nearby streams and creeks. A properly considered and well developed wastewater system is required and one that is flood proof.

106.5

Finally, a development of the size proposed cannot proceed without proper and full infrastructure (as indicated above) and, that infrastructure should be a paid for by those wanting rezone and re develop the area in the rezoning application.

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

Details of amendments: Beachlands South Limited to provide at their cost all infrastructure as outlined above

Submission date: 19 February 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Stephen Leach  
**Date:** Sunday, 19 February 2023 5:15:54 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Stephen Leach  
Organisation name:  
Agent's full name:  
Email address: [stephenleach@outlook.co.nz](mailto:stephenleach@outlook.co.nz)  
Contact phone number: 02102403049  
Postal address:  
22 blakewell place  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
6.8, 6.9, 6.10

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

The roading, waste and water infrastructure cannot support the increased housing proposed in the Beachlands area.

107.1

Public transport is not practical in the area to the city, and traffic is already very heavy in the mornings, evenings and even weekends. Another road MUST be built in order to facilitate more people if the houses are being built.

107.2

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

Details of amendments: Secondary school built. Additional roads in/out of Beachlands provided. Town supply provided for

107.3

Submission date: 19 February 2023

**Attend a hearing**

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

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Shaun Bannan  
**Date:** Sunday, 19 February 2023 7:00:52 pm

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Shaun Bannan

Organisation name:

Agent's full name:

Email address: sbannan@hotmail.com

Contact phone number:

Postal address:

18 Tui Brae  
 Beachlands  
 Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

Proposed rezoning

Property address: 307 Ha South of Beachlands Village in the area of Formosa Golf Course

Map or maps: Those referenced by Auckland City Council in their correspondence date 20 January 2023

Other provisions:

None

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

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

The reason for my or our views are:

1. The proposal if approved will lead to changes that will impact forever the identity of Beachheads as a rural community and the fabric/character and visualisation of the Beachlands Village. The visual photographs produced by Beachlands South Limited show that post the proposed rezoning there will be development that includes at least 1390 dwellings that are at least 5 or 6 stories in height. This is in stark contrast to the existing Beachlands skyline. If Beachlands is to retain its status as a rural community under the Auckland City Council Unitary Plan then any proposal to move dwelling construction from essentially single/double level dwellings to a high proportion of high-density housing, changes the Beachlands status diametrically.

2. My submission is that the proposal should be rejected until such time as agreement is reached with Beachlands South Limited that they will provide at their cost, all infrastructure (including but not limited to roading, water, sewerage, flood management, waste management, power, transport,

108.1

108.2

telecommunications) and associated services that Auckland City Council deem appropriate to support the additional 3900 plus dwellings that are proposed subsequent to this proposed plan change.

Critically:

- Roading upgrades are required to support the additional populations that come with 3900 plus new dwellings identified in Stage 1 of the proposed developments. Specifically, the existing rural two lane road between Beachlands and Whitford needs to be upgraded to a four lane road. This upgrade would also need to include the provision of safe and efficient entry/exit ways for communities along the roadway in particular, the upgrading Jack Lachlan Drive to cope with the increased traffic volumes.

108.3

- The proposal is for the use of bore water for all uses including residential, community and commercial across the proposed rezoned areas. Whilst I am no expert on these matters, common sense suggests that this will not work for a development of the size proposed by this rezoning application. On that basis town water needs to be available for all dwellings post the rezoning.

108.4

- The sewerage system proposed seems to be inadequate to process wastewater for a development of the size proposed. The proposal that wastewater could be dispersed across the existing ground water systems will not work; any proposal needs to consider the needs of a more environmentally conscious community, and have consideration for an area that has in the past had issues with water egress into nearby streams and creeks. A properly considered and well developed wastewater system is required and one that is flood proof.

108.5

Finally, a development of the size proposed cannot proceed without proper and full infrastructure (as indicated above) and, that infrastructure should be a paid for by those wanting rezone and redevelop the area in the rezoning application.

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

Details of amendments: Beachlands South Limited to provide at their cost all infrastructure as outlined above

Submission date: 19 February 2023

**Attend a hearing**

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

**Declaration**

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

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

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Deborah Garty](#)  
**To:** [Unitary Plan](#)  
**Subject:** Proposed Beachlands new subdivision Formosa Golf Course.  
**Date:** Monday, 20 February 2023 6:56:51 am

---

I am opposed to this new subdivision going ahead at this present time. Infrastructure is already stretched to it's limits with the current population in this area. There is only 1 road into Beachlands and this is already congested at peak times of the day. The sewerage system is at capacity. There is a desperate need for a junior high school and secondary school in the area as children are standing on the bus, some being left behind as there is no room for them. Primary schools have reached their limits.

109.1  
109.2  
109.3

There is a major need for an upgraded road to this area, the sewerage and electrical supply to be upgraded and the schooling issue to be addressed, before this new development should proceed at this time.

Kind regards,  
Deborah Garty  
027 5366093

# Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 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) Ba ry Wade

Organisation Name (if submission is made on behalf of Organisation)

Whitford Estuaries Conservation Society Incorporated

Address for service of Submitter

150 Wades Rd, R. D. 1, Howick, Auckland 2571

Telephone: 5309 180 Fax/Email: info@riverestate.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 88 (Private)

Plan Change/Variation Name Beachlands South

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s) Appendix 13 and 18: Appendix 11, and attachments 8 and 13

Or  
Property Address

Or  
Map

Or  
Other (specify)

## Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

WECS are opposed to any treated wastewater discharge into the Waikopua/ Whitford Embayment or the Tamaki Strait. 110.1

The current WWTP is already over capacity and discharges are currently happening into the stream this year.

WECS are also concerned with respect to the increased traffic volumes and scant dismissive regard to this issue. 110.2

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

**ALL wastewater must be connected to the Auckland wastewater network** 110.1

**The access roads of Whitford and intersections must be built to take the increased traffic volumes, which are already above the understated volumes in the reports.** 110.2

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

Signature of Submitter  
(or person authorised to sign on behalf of submitter)

02/20/2023

Date

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could  /could not  gain an advantage in trade competition through this submission.

**If you could gain an advantage in trade competition through this submission please complete the following:**

I am  / am not  directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Sarah Buckland  
**Date:** Tuesday, 21 February 2023 2:15:16 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Sarah Buckland

Organisation name:

Agent's full name:

Email address:

Contact phone number:

Postal address:

17 Karaka Road

Beachlands

Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Property address:

Map or maps:

Other provisions:

Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

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:

Concerns re traffic, increased road use, no updates to current infrastructure to manage this, traffic control, power usage, land useage, noise etc.

111.1

111.2

I or we seek the following decision by council: Decline the plan change

Submission date: 21 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Melissa Fahey  
**Date:** Monday, 20 February 2023 5:18:18 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Melissa Fahey

Organisation name:

Agent's full name:

Email address: melissafaheynz@gmail.com

Contact phone number:

Postal address:  
38 Brownhill Road  
Whitford  
Auckland 2576

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Road infrastructure upgrades are completely inadequate

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:  
Whitford Maraetai Road already has very high traffic volumes without any verge. It is already difficult and dangerous for cars to turn onto the road from side roads such as Clifton Road during peak travel times with cues often running from the village back past Clifton Road in morning traffic. It is also dangerous for cyclists. Doubling the population of Beachlands without any material improvement to the road network will result in deaths and serious injuries.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: Significant road infrastructure improvements needed

Submission date: 20 February 2023

112.1

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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# Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 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) Paul Andrew Hebditch

### Organisation Name (if submission is made on behalf of Organisation)

### Address for service of Submitter

16 Fern Place, Beachlands, Auckland 2018

Telephone:  Fax/Email:

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

Plan Change/Variation Name

### 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)**

Surrounding road network inefficient operation and safety concerns with the rezoning and development of the Plan Change 88 (Private)  
Surrounding road network inefficient operation and safety concerns with the rezoning and development of the Plan Change 88 (Private)

## 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:

The Whitford-Maraetai Road is currently almost at capacity during rush hour. Significant upgrade to the road needs to happen before additional dwellings in PC88 (Private) are constructed.

See attached for further information.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

Consent to PC88 (Private) to be conditional on the upgrade of the Whitford-Maraetai Road works being completed.

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

Signature of Submitter  
(or person authorised to sign on behalf of submitter)

02/20/2023  
Date

**Notes to person making submission:**

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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.

# Appendix to Submission on a notified proposal for policy statement or plan change or variation.

**Submitter Details:** Paul Hebditch, 16 Fern Place, Beachlands, Auckland 2018. 0272519299

## Plan Change 88 Beachlands South

Specific Provision Other: Surrounding road network inefficient operation and safety concerns with the rezoning and development of 110 Jack Lachlan Drive; and 620, 680, 682, 702, 712, 722, 732, 740, 746 758 and 770 Whitford-Maraetai Road, Beachlands. Further information:

- 1 The current Road infrastructure is insufficient to support any further residential development in the area. This is supported by the Auckland Council document “Proposed Plan Change 78 - Intensification (PC78) Proposed Plan Change 78 - Intensification to the Auckland Unitary Plan (Operative in part) Section 32 and section 77J / 77L new or additional qualifying matter: INFRASTRUCTURE – BEACHLANDS TRANSPORT CONSTRAINTS CONTROL EVALUATION REPORT”. Excerpts of some of the valid points follow:
  - a. *“Beachlands is predominantly a car-reliant coastal settlement positioned on a peninsula. Although there are ferry and bus options these are limited and infrequent with capacity constraints. The Whitford-Maraetai Road is the only road connection to the wider regional destinations to the west and has limited capacity to accommodate additional traffic. Significant investment (including acquisitions) would be required to upgrade the road and the surrounding rural roading network.”*
  - b. *“The inability to provide new dwellings with adequate access to employment, education and community services, including by public and active transport is a significant resource management issue. Providing for the level of intensity anticipated by the Medium Density Residential Standards (‘MDRS’) and Policy 3 of the National Policy Statement for Urban Development (‘NPS-UD’) within the constrained Beachlands area does not align with Objective 1 of the NPS-UD which emphasises the importance of a well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.”*
  - c. *“. In summary, the Beachlands Transport Constraint is a necessary qualifying matter to be included in PPC78 to justify limiting further residential intensification in areas subject significant transport infrastructure constraints. This is considered necessary to achieve:*
    - i. *• the overarching objective of the NPS-UD for well-functioning urban environments which enable people and communities to provide for their social, cultural, economic and environmental wellbeing and health and safety; and*
    - ii. *• RPS objectives seeking to provide for quality compact urban environments”*
  - d. *“Although there are ferry and bus options these are limited and infrequent with capacity constraints. Residents currently travel outside of Beachlands for the majority of employment, education and community service opportunities.”*
- 2 Previous 4 lane road plan should be implemented prior to development commencing. 113.2
- 3 No traffic light intersections should be incorporated into the BSLP intersection roading upgrade design in order to keep the Maraetai Beachlands road flowing at at least 80km/h. Traffic on the road during the working week continuously flows from around 6am until 9am and having traffic lights interrupting that flow will cause severe backlogs. Flyovers or tunnels should be implemented to preserve the traffic flow. 113.3
- 4 Beachlands is a satellite suburb of Auckland and a large majority of the working residents depend on an efficient roading network for access to multiple work destinations. The current public transport system only supports those working in the City (Pine Harbour Ferry 113.4

## Appendix to Submission on a notified proposal for policy statement or plan change or variation.

**Submitter Details:** Paul Hebditch, 16 Fern Place, Beachlands, Auckland 2018. 0272519299

### Plan Change 88 Beachlands South

- with limited hours) or those working in Botany/Ormiston (again with limited hours). It is literally impossible to get to Manukau on the bus (we have tried it). Having a private car is essential for living in this satellite suburb).
- 5 Fletcher homes is currently constructing a further 250 homes adding to the road network deficiencies.
- 6 The outcome of the PC78 Intensification of Beachlands will also, over time, add to the road network deficiencies. 113.5
- 7 No confirmation from the Ministry of Education has been announced stating that a High School will be built in the area therefore the number of school children having to leave the area to attend school will significantly increase as well, adding to the intense traffic jams around the time the busses do their transfer in Whitford on school mornings.
- 8 BSLP's traffic volume information is dated November 2018 which is significantly out of date as intensification of the Countdown area as well as Pine Harbour has happened since then. Additionally the Integrated Transport Assessment hardly mentions the Whitford-Maraetai road negative impact.
- 9 The following statement from BSLP application is highly contentious as they are assuming that the population will consist of office working professionals only. As these are the most likely career options for the city. A large majority of the people I know who live in Beachlands are tradespeople who have to travel to East Tamaki, Manukau, Onehunga for example. It is arrogant to assume that trips from Beachlands to South or East Auckland will reduce in favour of catching the ferry to the city regardless of councils land use data stating that 18,000 new jobs will be created in the CBD in the next 10 years. 113.6
- a. *“Whitford-Maraetai Road Congestion – No significant capacity improvements are planned for this road and are considered unlikely to happen considering the Te Tāruke-ā-Tāwhiri:Auckland's Climate Plan in place to achieve the reduction in transport emissions. The exception being intersection upgrades to mitigate the effects of the development. As a result, the proportion of trips from Beachlands to South or East Auckland is likely to reduce in favour of trips to Auckland CBD due to increasing congestion on the road and more available jobs in the city. The number of jobs in Auckland CBD is estimated to increase by approximately 18,000 in the next 10 years based on council's land use data. Ferry is the most convenient transport mode from Beachlands to reach these jobs in the city centre.”*
- 10 The assumption that Beachlands will become “a largely self contained system” with the addition of the BSLP development needs to be proved before this application can be approved. There is no confirmation of a High School. There is suggestions that another medical centre could be introduced but currently Beachlands Medical Centre is at capacity but there has not confirmation that this is happening. Currently you can wait up until 3 weeks before you can see your GP. 113.7
- 11 As stated in the BSLP application, *“funding for the 2021 to 2031 Auckland Regional Land Transport Plan (RLTP) has recently been finalised and made public. While there is no funding identified for the road network around the PPC area, the transport effects of the rezoning and development will be mitigated by funding arranged by the applicant for the live zoned land. This will involve local road improvements and intersection improvements”*. The \$75m allocation to roading and upgrade to ferry terminal in their plan will be for the roads within the development and the one intersection on Whitford-Maraetai Road that will be traffic light controlled along with the roundabout at Jack Lachlan drive. This will not do anything to 113.8

## Appendix to Submission on a notified proposal for policy statement or plan change or variation.

Submitter Details: Paul Hebditch, 16 Fern Place, Beachlands, Auckland 2018. 0272519299

### Plan Change 88 Beachlands South

improve the Whitford-Maraetai Road and not mitigate ANY congestion issues along said road arising from the redevelopment of the land.

- 12 According to the Regional Policy Statement refer Appendix 4: Regional Policy Statement Objectives and Policies Assessment Table. *“B2.4.2 Policies (6) Ensure development is adequately serviced by existing infrastructure or is provided with infrastructure prior to or at the same time as residential intensification.” “Furthermore the surrounding road network can operate safely and efficiently with the rezoning in place”* The current roading infrastructure along the Whitford-Maraetai Road is not adequate to service the proposed development and in now way would operate efficiently with the rezoning in place.

113.1

# Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 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) Susan Elizabeth Denby

### Organisation Name (if submission is made on behalf of Organisation)

### Address for service of Submitter

16 Fern Place, Beachlands, Auckland 2018

Telephone:  Fax/Email:

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

Plan Change/Variation Name

### 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)**

Surrounding road network inefficient operation and safety concerns with the rezoning and development of the Plan Change 88 (Private)  
Surrounding road network inefficient operation and safety concerns with the rezoning and development of the Plan Change 88 (Private)

## 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:

The Whitford-Maraetai Road is currently almost at capacity during rush hour. Significant upgrade to the road needs to happen before additional dwellings in PC88 (Private) are constructed.

See attached for further information.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

Consent to PC88 (Private) to be conditional on the upgrade of the Whitford-Maraetai Road works being completed.

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

Signature of Submitter  
(or person authorised to sign on behalf of submitter)

02/20/2023  
Date

**Notes to person making submission:**

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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.

## Appendix to Submission on a notified proposal for policy statement or plan change or variation.

**Submitter Details:** Susan Denby, 16 Fern Place, Beachlands, Auckland 2018. 0272696206

### Plan Change 88 Beachlands South

Specific Provision Other: Surrounding road network inefficient operation and safety concerns with the rezoning and development of 110 Jack Lachlan Drive; and 620, 680, 682, 702, 712, 722, 732, 740, 746 758 and 770 Whitford-Maraetai Road, Beachlands. Further information:

- 1 The current Road infrastructure is insufficient to support any further residential development in the area. This is supported by the Auckland Council document "Proposed Plan Change 78 - Intensification (PC78) Proposed Plan Change 78 - Intensification to the Auckland Unitary Plan (Operative in part) Section 32 and section 77J / 77L new or additional qualifying matter: INFRASTRUCTURE – BEACHLANDS TRANSPORT CONSTRAINTS CONTROL EVALUATION REPORT". Excerpts of some of the valid points follow:
  - a. *"Beachlands is predominantly a car-reliant coastal settlement positioned on a peninsula. Although there are ferry and bus options these are limited and infrequent with capacity constraints. The Whitford-Maraetai Road is the only road connection to the wider regional destinations to the west and has limited capacity to accommodate additional traffic. Significant investment (including acquisitions) would be required to upgrade the road and the surrounding rural roading network."*
  - b. *"The inability to provide new dwellings with adequate access to employment, education and community services, including by public and active transport is a significant resource management issue. Providing for the level of intensity anticipated by the Medium Density Residential Standards ('MDRS') and Policy 3 of the National Policy Statement for Urban Development ('NPS-UD') within the constrained Beachlands area does not align with Objective 1 of the NPS-UD which emphasises the importance of a well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future."*
  - c. *". In summary, the Beachlands Transport Constraint is a necessary qualifying matter to be included in PPC78 to justify limiting further residential intensification in areas subject significant transport infrastructure constraints. This is considered necessary to achieve:*
    - i. *• the overarching objective of the NPS-UD for well-functioning urban environments which enable people and communities to provide for their social, cultural, economic and environmental wellbeing and health and safety; and*
    - ii. *• RPS objectives seeking to provide for quality compact urban environments"*
  - d. *"Although there are ferry and bus options these are limited and infrequent with capacity constraints. Residents currently travel outside of Beachlands for the majority of employment, education and community service opportunities."*
- 2 Previous 4 lane road plan should be implemented prior to development commencing. 114.2
- 3 No traffic light intersections should be incorporated into the BSLP intersection roading upgrade design in order to keep the Maraetai Beachlands road flowing at at least 80km/h. Traffic on the road during the working week continuously flows from around 6am until 9am and having traffic lights interrupting that flow will cause severe backlogs. Flyovers or tunnels should be implemented to preserve the traffic flow. 114.3
- 4 Beachlands is a satellite suburb of Auckland and a large majority of the working residents depend on an efficient roading network for access to multiple work destinations. The current public transport system only supports those working in the City (Pine Harbour Ferry 114.4



## Appendix to Submission on a notified proposal for policy statement or plan change or variation.

**Submitter Details:** Susan Denby, 16 Fern Place, Beachlands, Auckland 2018. 0272696206

### Plan Change 88 Beachlands South

- with limited hours) or those working in Botany/Ormiston (again with limited hours). It is literally impossible to get to Manukau on the bus (we have tried it). Having a private car is essential for living in this satellite suburb).
- 5 Fletcher homes is currently constructing a further 250 homes adding to the road network deficiencies.
  - 6 The outcome of the PC78 Intensification of Beachlands will also, over time, add to the road network deficiencies.
  - 7 No confirmation from the Ministry of Education has been announced stating that a High School will be built in the area therefore the number of school children having to leave the area to attend school will significantly increase as well, adding to the intense traffic jams around the time the busses do their transfer in Whitford on school mornings. 114.5
  - 8 BSLP's traffic volume information is dated November 2018 which is significantly out of date as intensification of the Countdown area as well as Pine Harbour has happened since then. Additionally the Integrated Transport Assessment hardly mentions the Whitford-Maraetai road negative impact.
  - 9 The following statement from BSLP application is highly contentious as they are assuming that the population will consist of office working professionals only. As these are the most likely career options for the city. A large majority of the people I know who live in Beachlands are tradespeople who have to travel to East Tamaki, Manukau, Onehunga for example. It is arrogant to assume that trips from Beachlands to South or East Auckland will reduce in favour of catching the ferry to the city regardless of councils land use data stating that 18,000 new jobs will be created in the CBD in the next 10 years. 114.6
    - a. *“Whitford-Maraetai Road Congestion – No significant capacity improvements are planned for this road and are considered unlikely to happen considering the Te Tāruke-ā-Tāwhiri:Auckland's Climate Plan in place to achieve the reduction in transport emissions. The exception being intersection upgrades to mitigate the effects of the development. As a result, the proportion of trips from Beachlands to South or East Auckland is likely to reduce in favour of trips to Auckland CBD due to increasing congestion on the road and more available jobs in the city. The number of jobs in Auckland CBD is estimated to increase by approximately 18,000 in the next 10 years based on council's land use data. Ferry is the most convenient transport mode from Beachlands to reach these jobs in the city centre.”*
  - 10 The assumption that Beachlands will become “a largely self contained system” with the addition of the BSLP development needs to be proved before this application can be approved. There is no confirmation of a High School. There is suggestions that another medical centre could be introduced but currently Beachlands Medical Centre is at capacity but there has not confirmation that this is happening. Currently you can wait up until 3 weeks before you can see your GP. 114.7
  - 11 As stated in the BSLP application, *“funding for the 2021 to 2031 Auckland Regional Land Transport Plan (RLTP) has recently been finalised and made public. While there is no funding identified for the road network around the PPC area, the transport effects of the rezoning and development will be mitigated by funding arranged by the applicant for the live zoned land. This will involve local road improvements and intersection improvements”*. The \$75m allocation to roading and upgrade to ferry terminal in their plan will be for the roads within the development and the one intersection on Whitford-Maraetai Road that will be traffic light controlled along with the roundabout at Jack Lachlan drive. This will not do anything to 114.8



## Appendix to Submission on a notified proposal for policy statement or plan change or variation.

**Submitter Details:** Susan Denby, 16 Fern Place, Beachlands, Auckland 2018. 0272696206

### Plan Change 88 Beachlands South

improve the Whitford-Maraetai Road and not mitigate ANY congestion issues along said road arising from the redevelopment of the land.

- 12 According to the Regional Policy Statement refer Appendix 4: Regional Policy Statement Objectives and Policies Assessment Table. *“B2.4.2 Policies (6) Ensure development is adequately serviced by existing infrastructure or is provided with infrastructure prior to or at the same time as residential intensification.” “Furthermore the surrounding road network can operate safely and efficiently with the rezoning in place”* The current roading infrastructure along the Whitford-Maraetai Road is not adequate to service the proposed development and in now way would operate efficiently with the rezoning in place.

114.1

### Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 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/Ms/Ms (Full Name)

MAYREEN ELIZABETH PEPPER

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

65 MARAETAI SCHOOL ROAD MARAETAI  
AUCKLAND 2018

Telephone:

02111 74266

Fax/Email:

pepper.simon@outlook.com

Contact Person: (Name and designation, if applicable)

#### Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 88 (Private)

Plan Change/Variation Name

Beachlands South

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Or

Property Address

Or

Map

Or

Other (specify)

#### Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

Insufficient infrastructure, particularly Roading (the existing 2 lane road needs to be increased to 4 lanes)

The sewerage system as proposed is inadequate and disposing to existing land will not work

Water supply using bore water is inadequate for a development of that size

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

Provide a 4 lane road from Whitford Rd along Whitford Maratani Rd to the site including upgrading Jack Lachlan Drive

Replace the proposed disposal of sewerage system with one that does not rely on disposal to existing ground

Replace the proposed supply of water from bores to another system which will cope with the development and approved by Watercare

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

Date 19/2/2023

**Notes to person making submission:**  
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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  
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## Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
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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)

Mr Terence Bruce Ellis

#### Organisation Name (if submission is made on behalf of Organisation)

#### Address for service of Submitter

14 Pony Park Place, Beachlands, Auckland, 2018

Telephone:

95365348

Fax/Email:

terryellis.nz@gmail.com

Contact Person: (Name and designation, if applicable)

### Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 88 (Private)

Plan Change/Variation Name

Beachlands South

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

PC88 in its entirety

Or

Property Address

Or

Map

Or

Other (specify)

### Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

PC88 does not address and nullify the very serious and detailed issues regarding residential intensification within the Beachlands and Maraetai coastal towns as outlined within the Approved Auckland Council 2022 PC78 Intensification Plan.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

Future developments in the proposed new town of Beachlands South, are in keeping with the approved recommendations (Option 3) for residential intensification within the PC78 Intensification Plan document:

Section 32 and section 77J / 77L new or additional qualifying matter: INFRASTRUCTURE – BEACHLANDS TRANSPORT CONSTRAINTS CONTROL EVALUATION REPORT

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

T B Ellis  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

02/20/2023  
Date

**Notes to person making submission:**

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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.

The following Auckland Council analysis report:

**Section 32 and section 77J / 77L new or additional qualifying matter: INFRASTRUCTURE – BEACHLANDS TRANSPORT CONSTRAINTS CONTROL EVALUATION REPORT**

Produced by Auckland Council and which enabled an informed planning decision on making Beachlands precinct a “Qualifying Matter” within the 2022 revised PC78 Intensification Plan, outlines several key areas that make high urban intensification high risk within this Auckland precinct, without significant Local and Central Government investment.

116.6

- Whilst proposed change PC88 outlines a potential urban utopia (albeit sitting some 20 kilometres or more from the nearest high density urban precincts of Ormiston, Botany and Manukau), it does not address the issues outlined in the above referenced document.
- That document outlines the key areas of risk relating to intensification within the existing Beachlands and Maraetai townships and the need for a measured and gradual increase in residential intensification to enable existing infrastructure to adapt over time as funding becomes available.

The above document outlines the following key choke point areas of risk:

**Overview of the constraint / qualifying matter**

*22. Beachlands is predominantly a car-reliant coastal settlement positioned on a peninsula. Although there are ferry and bus options these are limited and infrequent with capacity constraints (discussed further below). Residents currently travel outside of Beachlands for the majority of employment, education and community service opportunities.*

*23. If PPC78 was applied to the Beachlands area with no qualifying matters, it is estimated the overall increase in yield from the AUP(OP)(OP) could be an additional 18,788 dwellings (with a total of 21,202 dwellings possible). There are however limited education, shopping or employment options due to limited land supply and other infrastructure servicing in the area. Accordingly, it is expected that residents would continue to travel outside of Beachlands to access those opportunities.*

- There is no commitment from central government to provide funding for any additional schooling facilities as outlined in “aspirational comments” within the proposed plan change PC88.
- PC88 outlines an area for light commercial use. However, that would not be sufficient to sustain the level of employment that is provided in areas such as East Tamaki, Mt Wellington etc where a vast number of existing Beachlands residents work.

116.1

**Roading networks**

*24. The Whitford-Maraetai Road is the only road connection to the wider regional destinations to the west and has limited capacity to accommodate additional traffic and is expected to reach capacity prior to the development of additional dwellings that could be enabled under the NPS-UD. Significant investment (including acquisition of private land) and major upgrades / improvement projects to the Whitford-Maraetai Road corridor would be required to accommodate potential growth. The existing rural road network surrounding Beachlands would require upgrades to urbanise the network to cater for this potential plan enabled demand from housing growth in the area. This cost is estimated to exceed \$200 million and is currently unbudgeted for.*

116.2

- As well as commuters’ needing to travel outside of the Beachlands precinct for work, would the provision of some light commercial activity proposed by PC88 be a sufficiently attractive proposition for businesses to either setup or relocate to Beachlands given the current road network issues?

**Ferries**

*25. The existing ferry service operating out of Pine Harbour Ferry Terminal runs between Pine Harbour and Auckland City Centre. The terminal currently caters for ferries with a capacity for 98 people, per sailing and prior to Covid (2020) was running close to capacity. The terminal could provide for ferries catering for up to 150 seats, however this would only provide an increase of 48 seats. Weekend services are not currently available and services on Monday to Friday operate:*

- every 20mins between 6.20am – 10.20am and 3.20pm – 5.20pm
- every 40-60mins until 7pm.
- a 7.30pm service and a 8.30pm service on Friday only.

*26. To provide for the level of increase in ferry capacity that is likely to be required from additional housing development, funding of a new ferry terminal site in the vicinity of the current Pine Harbour marina area would be*

1



required. As an initial estimate, for a proposed development in 2019 for 1,500 – 2,000 dwellings found costs to develop a new ferry terminal to be between \$10 million and \$13 million for the required infrastructure and dredging requirements. It is anticipated that costs would be significantly higher to cater for an additional 18,788 dwellings that could be enabled under PPC78 with no qualifying matter applied. Proposed growth would require a number of new vessels of 150 plus seated capacity which would incur further capital investment and operational costs. An increase in demand would require an increase in service frequency which would increase operating costs by approximately 25% - 40%. These capital and operating costs are currently unbudgeted.

116.3

- **Submitters additional Comment:** NOTE - Following the publication of this report, the Pine Harbour to Auckland CBD ferry service has been improved with a weekend service being approved and implemented by Auckland Transport from January 2023, which provides a ferry service Saturday and Sunday (10:20, 11:40, 15:20, 17:20 – plus 20:30 & 22:30 on Saturday only).
- The existing Pine Harbour car parking facility has already reached maximum capacity, this combined with existing Terraced Housing & Apartment Building (THAB) dwellings in the Pine Harbour zone has resulted in car parking congestion in the surrounding streets. PC88 does not address how this will be resolved, in fact likely to be exacerbated with commuters from existing Beachlands, Beachlands South and other surrounding areas parking in all nearby streets, once the car park capacity has been reached (currently by 8am).

### **Bus**

27. The current bus service is a local service 739. This service operates on a limited frequency and hours of operation. This service is being provided more for general accessibility reasons rather than mode shift / reducing vehicle traffic. In May 2019, prior to the Covid pandemic, the bus had low patronage, averaging 8.6 boardings per hour Monday to Friday. Currently the Ministry of Education provides school bus services to Howick College from the Beachlands / Maraetai area.

116.4

- Easy and frequent public transport access to business and commercial areas in Manukau, East Tamaki, Mount Wellington and Penrose is not addressed. Local government funding for these types of services is not budgeted for, and with the current fiscal challenges facing Auckland Council - not likely to be provided for a very long time (in fact face potential further cut backs from its already limited service).

### **Walking and cycling**

28. There is an existing footpath and road network for pedestrian and cycle movement within the Beachlands area. However, given the geographical location, walking and cycling is not a practical form of transport to areas outside Beachlands.

116.5

- Document **Section 32 and section 77J / 77L new or additional qualifying matter: INFRASTRUCTURE – BEACHLANDS TRANSPORT CONSTRAINTS CONTROL EVALUATION REPORT**, has already highlighted the infrequency and lack of use of the current service supporting the existing Beachlands community. It is highly probable that new residents of Beachlands South will follow the trends in existing Beachlands, requiring increased focus on the ability to sustain a high level of private vehicles on the roading network.
- Local speedy and convenient access to schooling (both existing and future planned), shopping and community services is not addressed either, other than to say walkways and cycle paths will be provided, along with a potential bus route through the new township.
- Residents shopping locally will still need to transport goods bought. Walking, cycling or even waiting for a bus will not be sufficient.
- The proposed plan change PC88 not only ignores the issues outlined in the Auckland Council report, but significantly exacerbates the matter by proposing a new township sitting alongside Beachlands, named Beachlands South, which aims to develop some additional 3,000 dwellings and some light industrial commercial activity, sitting alongside the existing Beachlands precinct on land that is currently used for farming, a golf course leisure facility and some residential lifestyle blocks. All of which currently sit outside of the Auckland City wide Plan PC78 Intensification Plan boundary.
- PC88 does not provide a valid reason for overturning the existing PC78 Intensification Plan qualifying matter for Beachlands precinct other than for commercial gain.

116.6

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Chris Currell  
**Date:** Monday, 20 February 2023 9:00:39 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Chris Currell  
Organisation name:  
Agent's full name: Chris Currell  
Email address: chriscurrrell1@gmail.com  
Contact phone number: 021721905  
Postal address:  
37 intrepid crescent  
Beachlands  
Beachlands 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Property address: Entire development  
Map or maps:  
Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
The infrastructure is not available to support this development, it has been made clear that the developers would not upgrade the road or other infrastructure such as schools to a suitable standard .

117.1

I or we seek the following decision by council: Decline the plan change

Submission date: 20 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes



**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Maria Currell  
**Date:** Monday, 20 February 2023 9:00:39 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Maria Currell

Organisation name:

Agent's full name: Maria Currell

Email address: Mariacurrell16@gmail.com

Contact phone number:

Postal address:  
37 intrepid crescent  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
All of it

Property address: 37 intrepid crescent

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
I dont think the infrastructure is in place to deal with any more houses being built.

I or we seek the following decision by council: Decline the plan change

Submission date: 20 February 2023

**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

118.1

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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### Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



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Auckland 1142

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| For office use only |
| Submission No:      |
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#### Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms (Full Name)

PHILIP PAUL MADIGAN

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

21A MARAETAI HEIGHTS RD  
MARAETAI 2018

Telephone: 029 129 4900 Fax/Email: marnerd963@gmail.com

Contact Person: (Name and designation, if applicable)

#### Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number PC 88 (Private)

Plan Change/Variation Name Beachlands South

The specific provisions that my submission relates to are:  
(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s) Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Or Property Address

Or Map

Or Other (specify)

#### Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)



I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

The proposed intersection improvements will not improve the future traffic flows sufficiently | 119.1

There is not enough information on dealing with wastewater. What is proposed won't work for 3000 houses | 119.2

Bore water will not have enough capacity for 3000 houses | 119.3

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

Provide a 4 lane road from Whitford Rd along Whitford Maraetai Rd to the site including upgrading Jack Lachlan Drive | 119.1

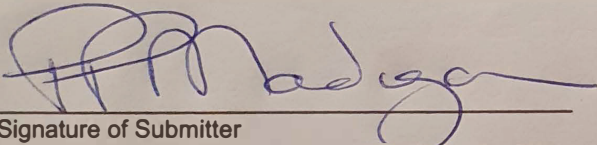
Replace the proposed disposal of sewerage system with one that does not rely on disposal to existing ground | 119.2

Replace the proposed supply of water from bores to another system which will cope with the development and approved by Watercare | 119.3

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing



Signature of Submitter  
(or person authorised to sign on behalf of submitter)

20<sup>th</sup> February 2023

Date

**Notes to person making submission:**

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# Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



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Auckland 1142

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| For office use only |
| Submission No:      |
| Receipt Date:       |

## Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

CHRISTINA MARY OPIE

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

23A HAWKE CRESC BEACHLANDS 2018

Telephone:

021 985 386

Fax/Email:

STINE OPIE 2@GMAIL.COM

Contact Person: (Name and designation, if applicable)

## Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 88 (Private)

Plan Change/Variation Name

Beachlands South

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Or

Property Address

Or

Map

Or

Other (specify)

## Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

Insufficient infrastructure, particularly Roading (the existing 2 lane road needs to be increased to 4 lanes) | 120.1

The sewerage system as proposed is inadequate and disposing to existing land will not work | 120.2

Water supply using bore water is inadequate for a development of that size | 120.3

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

Provide a 4 lane road from Whitford Rd along Whitford Maraetai Rd to the site including upgrading Jack Lachlan Drive | 120.1

Replace the proposed disposal of sewerage system with one that does not rely on disposal to existing ground | 120.2

Replace the proposed supply of water from bores to another system which will cope with the development and approved by Watercare | 120.3

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

Signature of Submitter  
(or person authorised to sign on behalf of submitter)

Date 17/2/23

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could  / could not  gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am  / am not  directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Simon Watts  
**Date:** Tuesday, 21 February 2023 7:45:09 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Simon Watts  
Organisation name:  
Agent's full name:  
Email address: [simon@bwmedia.co.nz](mailto:simon@bwmedia.co.nz)  
Contact phone number:  
Postal address:

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Beachlands South Development

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

The proposed subdevelopment "Beachlands South" will put extra strain on an already overloaded infrastructure in Beachlands area. Whitford-Maraetai Road is already barely fit for use with the amount of daily traffic. Speed limit reductions have only led to more congestion and not a reduction of accidents. The addition of 1000s of more cars will bring the road to a stand still at peak times.

121.1

The Beachlands area relies on a "volunteer" Fire Service, the addition of more development will put added strain on an already busy service.

121.2

The basic idea of such a large development is complete insanity given the limited infrastructure.

I or we seek the following decision by council: Decline the plan change

Submission date: 21 February 2023

**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.

CAUTION: This email message and any attachments contain information that may be confidential and may be LEGALLY PRIVILEGED. If you are not the intended recipient, any use, disclosure or copying of this message or attachments is strictly prohibited. If you have received this email message in error please notify us immediately and erase all copies of the message and attachments. We do not accept responsibility for any viruses or similar carried with our email, or any effects our email may have on the recipient computer system or network. Any views expressed in this email may be those of the individual sender and may not necessarily reflect the views of Council.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Ferdi Du Plessis  
**Date:** Tuesday, 21 February 2023 7:45:10 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Ferdi Du Plessis

Organisation name:

Agent's full name:

Email address: ferdi.john.du.plessis@gmail.com

Contact phone number:

Postal address:  
37 Thistle close  
Beachlands  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Property address:

Map or maps:

Other provisions:

Transport and types of housing.

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:

There is a sever shortage of housing in Auckland. The Beachlands area needs more rental properties as there is a very limited supply. The most objections would be due to the impact on traffic. Traffic can be alleviated by: 1) Smart Traffic light signals at the Whitford roundabout (no roundabout). Smart traffic light system at the intersection between Jack Lachlandrive and the Whitford /Maraetai road.

122.1

122.2

I or we seek the following decision by council: Approve the plan change without any amendments

Details of amendments:

Submission date: 21 February 2023

**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.

CAUTION: This email message and any attachments contain information that may be confidential and may be LEGALLY PRIVILEGED. If you are not the intended recipient, any use, disclosure or copying of this message or attachments is strictly prohibited. If you have received this email message in error please notify us immediately and erase all copies of the message and attachments. We do not accept responsibility for any viruses or similar carried with our email, or any effects our email may have on the recipient computer system or network. Any views expressed in this email may be those of the individual sender and may not necessarily reflect the views of Council.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Catherine Watts  
**Date:** Tuesday, 21 February 2023 9:15:21 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Catherine Watts  
Organisation name:  
Agent's full name: Catherine Watts  
Email address: catherine.watts@saintkentigern.com  
Contact phone number:  
Postal address:  
10 Third View Ave  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
rezone the northern portion of the land (159.54 hectares) from Rural – Countryside Living zone to a mixture of Future Urban, Residential – Mixed Housing Urban, Business - Local Centre, Business – Light Industry; Business – Mixed Use; and Open Space zones

Property address: Beachlands South

Map or maps: Formosa Golf Course and surrounds

Other provisions:  
3000+ medium density homes and increased traffic on Whitford-Maraetai Rd

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

- The recent development of housing around Jack Lachlan Rd and Pine Harbour is already putting significant impact on the infrastructure and roading on the Pohutukawa Coast.  
- The move to release another approx. 160 hectares of land to medium density housing is going to change the area completely.

123.1

- Whitford Maraetai Rd is only 2 lanes. The traffic in the morning and afternoons is bumper to bumper. It isn't fit for purpose for this kind of development.  
-Any road accidents are attended to by our volunteer fire brigade who are already stretched with the current population. Adding potentially 6000 more cars to the road will increase risks of traffic accidents. Lowering the speed does not help, it creates more frustration and traffic jams  
-All College students are bussed out of the area - even if land is earmarked for a high school the

123.2

123.3

|  |       |
|--|-------|
| Ministry of Education has not signed it off and could be ten years away if they do future proof this.  |       |
| -The medical centre is unable to cope with the current population  | 123.4 |
| -The beauty of the environment, particularly with so many people already coming to the beaches in summer from other areas, will cause environmental impact                       | 123.5 |
| - The sewage treatment plant is over capacity  | 123.6 |
| -There is no reticulated water and the bore will not cope. Water tanks for such an increase of population is not sustainable - water tanker trucks on road is already and hazard | 123.7 |
| -Beachlands School has no more space to grow and with the increase in population will not be have enough spaces for new enrolments   | 123.3 |

I or we seek the following decision by council: Decline the plan change

Submission date: 21 February 2023

### Attend a hearing

Do you wish to be heard in support of your submission? No

### Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Elizabeth Scarborough](#)  
**To:** [raymondb062@gmail.com](mailto:raymondb062@gmail.com); [Unitary Plan](#)  
**Subject:** Beachlands South Development .  
**Date:** Tuesday, 21 February 2023 10:46:58 am

---

To whom this may concern,

My wife and I who have now lived in Beachlands for 11 yrs strongly oppose the Development .

It is far too big for the present infrastructure available in Beachlands .

124.1

We strongly oppose the high density housing.

The artist’s impression showing all the high rise apartments is not in keeping with the present environment and destroys the village atmosphere as at present.

124.2

Whilst some of the improvements proposed would be helpful ,at present the roading to Beachlands hardly copes with present volumes of traffic and the proposed increase in population would most definitely overload it without huge improvements .

124.3

The number of buses for students at High Schools , the number of trucks loaded with logs, the number of trucks loaded with construction materials are seriously causing more than usual wear and tear on roads not intended for this use.

Parking at Pine Harbour Marina for Ferry Service is almost at capacity now.

Increased Ferry activity using present jetty conformation would be impossible.

124.4

At present Berth owners pay for the channel to be dredged.

Would they be expected to also cover extra ferry use of the channel.?

Marina was originally built for pleasure boating not as a full on Ferry Terminal.

Would increased use of bores for water reduce the water table making present bores unable to reach lower level?

124.5

Regards Ian and Elizabeth Scarborough .

**From:** [Jodi Litherland](#)  
**To:** [Unitary Plan](#)  
**Subject:** PC88 - Beachlands South Submission  
**Date:** Tuesday, 21 February 2023 10:51:50 am  
**Attachments:** [image003.png](#)

---

Good Morning

I would like to make a submission regarding the Beachlands South objective to build dwellings on the current Formosa Golf Course.

I have been a resident of Beachlands for over ten years, and in this time, I have seen multiple houses built in a very short time. The pressure on our infrastructure has taken its toll and there is now a constant stream of traffic and delays from 5.30am to around 10am every weekday morning. What used to take me 25 minutes to get into Pakuranga, now takes me 45 on a good day. As there is only one way in and out, I am concerned how it is possible to have more residents with more cars using the same road, that is already at capacity. It is unrealistic to expect that any new residents to the area will use public transport, as this infrastructure is also an inefficient means of transport for those who currently use it. There are constant ferry cancellations and the morning sailings from 7.00am are already at capacity, often leaving commuters behind to take the next one.

125.1

125.2

The roads are continually being repaired due to the current amount of traffic that offer wear and tear on a daily basis.

Should you require any clarification regarding this, you are welcome to come and view the morning stream of traffic that operates between the hours mentioned previously.

Sincerely





**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Joel Lindsey  
**Date:** Tuesday, 21 February 2023 4:15:14 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Joel Lindsey  
Organisation name:  
Agent's full name: J M W LINDSEY  
Email address: joellindsey@outlook.com  
Contact phone number:  
Postal address:  
joellindsey@outlook.com  
whitford  
auckland 2571

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Transportation  
Change in Countryside / Rural

Property address: 80 Potts Road

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

We live on Potts Road, the intersection of Clifton Rd (and Henson Rd) urgently requires a roundabout or traffic lights as the current traffic flows in peak hours make it very difficult to get out into traffic across the road safely. | 126.1

The ferry service is at capacity during peak hours (in reality this is a one hour window not two hours) and the proposed service upgrade doesn't appear at all adequate. | 126.3

The Whitford-Maraetai (and Whitford) Roads are heavily congested at peak hours and the village bypass is required now. Heavy vehicle traffic for the proposed housing development will only make it a lot worse. | 126.2

The proposed intensification is not supported by public transport solutions like urban town centres provide - a single ferry upgrade isn't a solution when there is a skeleton bus service and the vast majority of local commuters drive their cars not take the ferry (not everyone works in the CBD...). | 126.3

I or we seek the following decision by council: Decline the plan change

Submission date: 21 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Michael J Carroll  
**Date:** Tuesday, 21 February 2023 6:30:14 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Michael J Carroll

Organisation name:

Agent's full name: Michael J Carroll

Email address: mcarroll@minimac.co.nz

Contact phone number:

Postal address:  
mcarroll@minimac.co.nz  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Property address: 254 Jack Lachlan Drive

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

The Beachlands roading and transport infrastructure is frail and stretched near its limit at present. Queues are predominant on roads during work times and ferries are stretched.

When the council introduced PC78, it proposed to stop future secondary dwellings in Beachlands. Secondary dwellings had always been acceptable until this point. The council's primary reason for this change was that the transport infrastructure was not capable of managing intensification.

The council should be consistent in its application of this approach as to be otherwise would open it to challenge and court cases, which ratepayers do not need to see happening. It would deliver no gain to anyone.

127.1

127.2

I or we seek the following decision by council: Decline the plan change

Submission date: 21 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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# Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 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) Ms Barbara Jan Miller

### Organisation Name (if submission is made on behalf of Organisation)

### Address for service of Submitter

14 Pony Park Place, Beachlands, Auckland, 2018

Telephone:  Fax/Email:

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

Plan Change/Variation Name

### 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)

## 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:

PC88 does not address and nullify the very serious and detailed issues regarding residential intensification within the Beachlands and Maraetai coastal towns as outlined within the Approved Auckland Council 2022 PC78 Intensification Plan.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

Future developments in the proposed new town of Beachlands South, are in keeping with the approved recommendations (Option 3) for residential intensification within the PC78 Intensification Plan document:

Section 32 and section 77J / 77L new or additional qualifying matter: INFRASTRUCTURE – BEACHLANDS TRANSPORT CONSTRAINTS CONTROL EVALUATION REPORT

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

B J Miller

22nd February 2023

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.

128  
.1

# Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 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) Gavin Fisher

### Organisation Name (if submission is made on behalf of Organisation)

### Address for service of Submitter

67 Seventh View Ave Beachlands 2018

Telephone:  Fax/Email:

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

Plan Change/Variation Name

### 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)

## 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:

Road network will not be able to support the additional traffic

Insufficient infrastructure to support, Waste water, education and local policing

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

I 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

*J Fisher*

Signature of Submitter  
(or person authorised to sign on behalf of submitter)

02/22/2023

Date

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

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If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could  /could not  gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am  / am not  directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

### Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 24, 135 Albert Street  
Private Bag 92300  
Auckland 1142

|                             |
|-----------------------------|
| For office use only         |
| Submission No:              |
| Receipt Date:<br>22/02/2023 |

#### Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) MS MARGARET CECILIA RAMSEY

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

22 OMANA HEIGHTS ROAD, MARAETAI, AUCKLAND 2018

Telephone: 0273 933522 Fax/Email: MAGS.BRAVEHEART@GMAIL.COM

Contact Person: (Name and designation, if applicable)

#### Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number PC 88 (Private)

Plan Change/Variation Name Beachlands South

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s) Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Or  
Property Address

Or  
Map

Or  
Other (specify)

#### Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

- Insufficient infrastructure, particularly Roading (the existing 2 lane road needs to be increased to 4 lanes) | 130.1
- The sewerage system as proposed is inadequate and disposing to existing land will not work | 130.2
- Water supply using bore water is inadequate for a development of that size | 130.3
- POLLUTION OF LOCAL STREAMS & MARINE (continue on a separate sheet if necessary) | 130.4

*WILL BE INEVITABLE*

I seek the following decision by Council:

- Accept the proposed plan change / variation
- Accept the proposed plan change / variation with amendments as outlined below
- Decline the proposed plan change / variation  - 1st
- If the proposed plan change / variation is not declined, then amend it as outlined below.  - 2nd
- Provide a 4 lane road from Whitford Rd along Whitford Maraetai Rd to the site including upgrading Jack Lachlan Drive | 130.1
- Replace the proposed disposal of sewerage system with one that does not rely on disposal to existing ground | 130.2
- Replace the proposed supply of water from bores to another system which will cope with the development and approved by Watercare | 130.3

- 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

M. Ramsey  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

10/2/2023  
Date

**Notes to person making submission:**  
 If you are making a submission to the Environmental Protection Authority, you should use Form 16B.  
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 If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.  
 I could  / could not  gain an advantage in trade competition through this submission.  
 If you could gain an advantage in trade competition through this submission please complete the following:  
 I am  / am not  directly affected by an effect of the subject matter of the submission that:  
 (a) adversely affects the environment; and  
 (b) does not relate to trade competition or the effects of trade competition.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Karen Cowie  
**Date:** Wednesday, 22 February 2023 4:36:20 pm  
**Attachments:** [671 Whitford-Maraetai Road.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Karen Cowie

Organisation name:

Agent's full name:

Email address: nowacowie@gmail.com

Contact phone number:

Postal address:  
671 Whitford-Maraetai Road  
Beachlands  
Auckland 2571

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

##### My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:

My concern is the increase in the volume of vehicles on the road and our safety when trying to get out of our accessway.

We live on Whitford-Maraetai Road and even at 6am in the morning, I can't turn right out of my driveway without waiting for anywhere between 2 to 15 or more vehicles which are travelling from Beachlands toward Whitford to pass before it is safe for me to pull out. This waiting period becomes longer during peak hours.

With an additional 3000 homes in the area, this will only get worse and become increasingly more dangerous to exit our accessway.

I would like to include the intersection of Jack Lachlan and Whitford-Maraetai Road for consideration as it is in the exact same situation we are.

In essence I don't have an issue with the development but the Auckland Council has got to give due consideration to the safety of the existing residents and make provision to update the infrastructure to accommodate the growing population. As well as committing to keep the roads maintained. The increase in volume of vehicles will mean that the road deteriorates quicker and thus becomes more dangerous.

131.1

And finally if the council & the ministry of education were proactive and built a school in the area that would reduce the current volume of traffic as students wouldn't need to travel out of the area to attend a secondary school.

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

My concern is the increase in the volume of vehicles on the road and our safety when trying to get out of our accessway.

We live on Whitford-Maraetai Road and even at 6am in the morning, I can't turn right out of my driveway without waiting for anywhere between 2 to 15 or more vehicles which are travelling from Beachlands toward Whitford to pass before it is safe for me to pull out. This waiting period becomes longer during peak hours.

With an additional 3000 homes in the area, this will only get worse and become increasingly more dangerous to exit our accessway.

I would like to include the intersection of Jack Lachlan and Whitford-Maraetai Road for consideration as it is in the exact same situation we are.

In essence I don't have an issue with the development but the Auckland Council has got to give due consideration to the safety of the existing residents and make provision to update the infrastructure to accommodate the growing population. As well as committing to keep the roads maintained. The increase in volume of vehicles will mean that the road deteriorates quicker and thus becomes more dangerous.

And finally if the council & the ministry of education were proactive and built a school in the area that would reduce the current volume of traffic as students wouldn't need to travel out of the area to attend a secondary school.

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: Upgrade to transport infrastructure, specifically roads.

Submission date: 22 February 2023

Supporting documents  
671 Whitford-Maraetai Road.pdf

### **Attend a hearing**

Do you wish to be heard in support of your submission? No

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

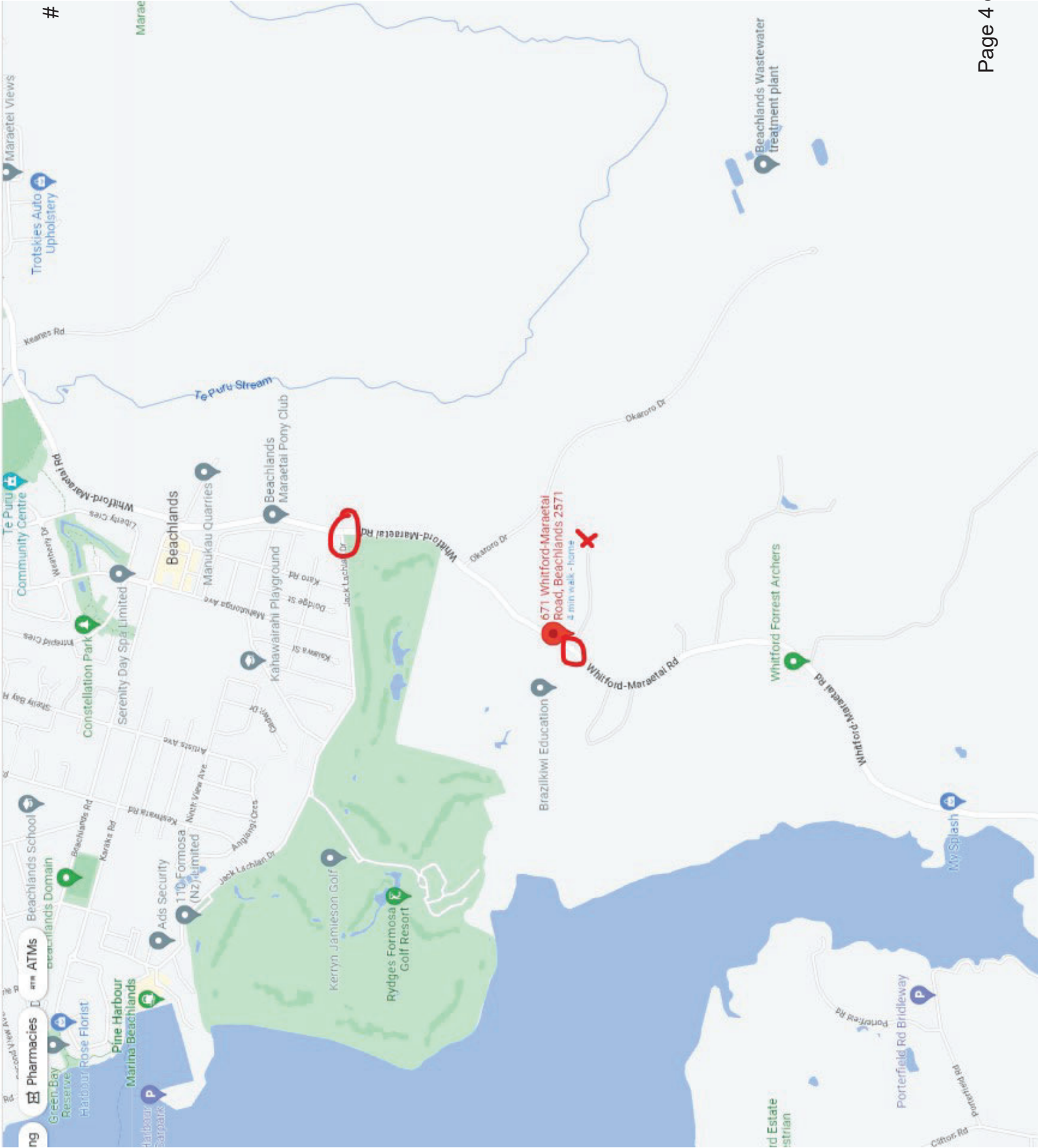
- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

CAUTION: This email message and any attachments contain information that may be confidential and may be LEGALLY PRIVILEGED. If you are not the intended recipient, any use, disclosure or copying of this message or attachments is strictly prohibited. If you have received this email message in error please notify us immediately and erase all copies of the message and attachments. We do not accept responsibility for any viruses or similar carried with our email, or any effects our email may have on the recipient computer system or network. Any views expressed in this email may be those of the individual sender and may not necessarily reflect the views of Council.





**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - John and Robyn Randle  
**Date:** Wednesday, 22 February 2023 5:00:31 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: John and Robyn Randle

Organisation name:

Agent's full name: John Murray Randle

Email address: robyn.randle@outlook.co.nz

Contact phone number:

Postal address:  
299 Whitford Maraetai Rd  
RD 1 Howick  
Auckland 2571

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

This road Whitford Maraetai Rd is not up to standard now for the volume of traffic that goes through it daily now & you want to allow another huge subdivision. The road needs approving first.

132.1

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

If the main road is improved for the volume of traffic

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: Whiford Maraetai Rd improved , this has been an issue for many years & nothing has been done about it.

Submission date: 22 February 2023

**Attend a hearing**



Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Kurt Willcocks  
**Date:** Wednesday, 22 February 2023 6:30:37 pm

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Kurt Willcocks

Organisation name:

Agent's full name:

Email address: seahunternz@gmail.com

Contact phone number:

Postal address:

14 Tui Brae  
 Beachlands  
 Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

Proposed rezoning

Property address: 307 Ha South of Beachlands Village in the area of Formosa Golf Course

Map or maps: Those referenced by Auckland City Council in their correspondence date 20 January 2023

Other provisions:

none

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

1. The proposal if approved will lead to changes that will impact forever the identity of Beachheads as a rural community and the fabric/character and visualisation of the Beachlands Village. The visual photographs produced by Beachlands South Limited show that post the proposed rezoning there will be development that includes at least 1390 dwellings that are at least 5 or 6 stories in height. This is in stark contrast to the existing Beachlands skyline. If Beachlands is to retain its status as a rural community under the Auckland City Council Unitary Plan then any proposal to move dwelling construction from essentially single/double level dwellings to a high proportion of high-density housing, changes the Beachlands status diametrically.

2. My submission is that the proposal should be rejected until such time as agreement is reached with Beachlands South Limited that they will provide at their cost, all infrastructure (including but not

133.1

133.2

limited to roading, water, sewerage, flood management, waste management, power, transport, telecommunications) and associated services that Auckland City Council deem appropriate to support the additional 3900 plus dwellings that are proposed subsequent to this proposed plan change.

Critically:

- Roading upgrades are required to support the additional populations that come with 3900 plus new dwellings identified in Stage 1 of the proposed developments. Specifically, the existing rural two lane road between Beachlands and Whitford needs to be upgraded to a four lane road. This upgrade would also need to include the provision of safe and efficient entry/exit ways for communities along the roadway in particular, the upgrading Jack Lachlan Drive to cope with the increased traffic volumes.

133.3

- The proposal is for the use of bore water for all uses including residential, community and commercial across the proposed rezoned areas. Whilst I am no expert on these matters, common sense suggests that this will not work for a development of the size proposed by this rezoning application. On that basis town water needs to be available for all dwellings post the rezoning.

133.4

- The sewerage system proposed seems to be inadequate to process wastewater for a development of the size proposed. The proposal that wastewater could be dispersed across the existing ground water systems will not work; any proposal needs to consider the needs of a more environmentally conscious community, and have consideration for an area that has in the past had issues with water egress into nearby streams and creeks. A properly considered and well developed wastewater system is required and one that is flood proof.

133.5

Finally, a development of the size proposed cannot proceed without proper and full infrastructure (as indicated above) and, that infrastructure should be a paid for by those wanting rezone and re develop the area in the rezoning application.

133.2

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: Beachlands South Limited to provide at their cost all infrastructure as outlined above

Submission date: 22 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Leonard Smith  
**Date:** Wednesday, 22 February 2023 6:30:41 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Leonard Smith

Organisation name:

Agent's full name:

Email address: leonardcharm@gmail.com

Contact phone number:

Postal address:

70 Karaka rd  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Proposed rezoning

Property address: 307 Ha South of Beachlands Village in the area of Formosa Golf Course

Map or maps: Those referenced by Auckland City Council in their correspondence date 20 January 2023

Other provisions:

none

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

1. The proposal if approved will lead to changes that will impact forever the identity of Beachheads as a rural community and the fabric/character and visualisation of the Beachlands Village. The visual photographs produced by Beachlands South Limited show that post the proposed rezoning there will be development that includes at least 1390 dwellings that are at least 5 or 6 stories in height. This is in stark contrast to the existing Beachlands skyline. If Beachlands is to retain its status as a rural community under the Auckland City Council Unitary Plan then any proposal to move dwelling construction from essentially single/double level dwellings to a high proportion of high-density housing, changes the Beachlands status diametrically.

134.1

2. My submission is that the proposal should be rejected until such time as agreement is reached with Beachlands South Limited that they will provide at their cost, all infrastructure (including but not

134.2

limited to roading, water, sewerage, flood management, waste management, power, transport, telecommunications) and associated services that Auckland City Council deem appropriate to support the additional 3900 plus dwellings that are proposed subsequent to this proposed plan change.

Critically:

- Roading upgrades are required to support the additional populations that come with 3900 plus new dwellings identified in Stage 1 of the proposed developments. Specifically, the existing rural two lane road between Beachlands and Whitford needs to be upgraded to a four lane road. This upgrade would also need to include the provision of safe and efficient entry/exit ways for communities along the roadway in particular, the upgrading Jack Lachlan Drive to cope with the increased traffic volumes.

134.3

- The proposal is for the use of bore water for all uses including residential, community and commercial across the proposed rezoned areas. Whilst I am no expert on these matters, common sense suggests that this will not work for a development of the size proposed by this rezoning application. On that basis town water needs to be available for all dwellings post the rezoning.

134.4

- The sewerage system proposed seems to be inadequate to process wastewater for a development of the size proposed. The proposal that wastewater could be dispersed across the existing ground water systems will not work; any proposal needs to consider the needs of a more environmentally conscious community, and have consideration for an area that has in the past had issues with water egress into nearby streams and creeks. A properly considered and well developed wastewater system is required and one that is flood proof.

134.5

Finally, a development of the size proposed cannot proceed without proper and full infrastructure (as indicated above) and, that infrastructure should be a paid for by those wanting rezone and re develop the area in the rezoning application.

134.2

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: Beachlands South Limited to provide at their cost all infrastructure as outlined above

Submission date: 22 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Charmaine Smith  
**Date:** Wednesday, 22 February 2023 6:45:33 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Charmaine Smith

Organisation name:

Agent's full name:

Email address: leonardcharm@gmail.com

Contact phone number:

Postal address:

70 Karaka rd  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Proposed rezoning

Property address: 307 Ha South of Beachlands Village in the area of Formosa Golf Course

Map or maps: Those referenced by Auckland City Council in their correspondence date 20 January 2023

Other provisions:

none

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

1. The proposal if approved will lead to changes that will impact forever the identity of Beachheads as a rural community and the fabric/character and visualisation of the Beachlands Village. The visual photographs produced by Beachlands South Limited show that post the proposed rezoning there will be development that includes at least 1390 dwellings that are at least 5 or 6 stories in height. This is in stark contrast to the existing Beachlands skyline. If Beachlands is to retain its status as a rural community under the Auckland City Council Unitary Plan then any proposal to move dwelling construction from essentially single/double level dwellings to a high proportion of high-density housing, changes the Beachlands status diametrically.

135.1

2. My submission is that the proposal should be rejected until such time as agreement is reached with Beachlands South Limited that they will provide at their cost, all infrastructure (including but not

135.2

limited to roading, water, sewerage, flood management, waste management, power, transport, telecommunications) and associated services that Auckland City Council deem appropriate to support the additional 3900 plus dwellings that are proposed subsequent to this proposed plan change.

Critically:

- Roading upgrades are required to support the additional populations that come with 3900 plus new dwellings identified in Stage 1 of the proposed developments. Specifically, the existing rural two lane road between Beachlands and Whitford needs to be upgraded to a four lane road. This upgrade would also need to include the provision of safe and efficient entry/exit ways for communities along the roadway in particular, the upgrading Jack Lachlan Drive to cope with the increased traffic volumes.

135.3

- The proposal is for the use of bore water for all uses including residential, community and commercial across the proposed rezoned areas. Whilst I am no expert on these matters, common sense suggests that this will not work for a development of the size proposed by this rezoning application. On that basis town water needs to be available for all dwellings post the rezoning.

135.4

- The sewerage system proposed seems to be inadequate to process wastewater for a development of the size proposed. The proposal that wastewater could be dispersed across the existing ground water systems will not work; any proposal needs to consider the needs of a more environmentally conscious community, and have consideration for an area that has in the past had issues with water egress into nearby streams and creeks. A properly considered and well developed wastewater system is required and one that is flood proof.

135.5

Finally, a development of the size proposed cannot proceed without proper and full infrastructure (as indicated above) and, that infrastructure should be a paid for by those wanting rezone and re develop the area in the rezoning application.

135.2

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: Beachlands South Limited to provide at their cost all infrastructure as outlined above

Submission date: 22 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Angela Heenan  
**Date:** Wednesday, 22 February 2023 6:45:40 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Angela Heenan

Organisation name:

Agent's full name:

Email address: sathomesnz@gmail.com

Contact phone number:

Postal address:

11 Tui Brae  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Proposed rezoning

Property address: 307 Ha South of Beachlands Village in the area of Formosa Golf Course

Map or maps: Those referenced by Auckland City Council in their correspondence date 20 January 2023

Other provisions:

none

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

1. The proposal if approved will lead to changes that will impact forever the identity of Beachheads as a rural community and the fabric/character and visualisation of the Beachlands Village. The visual photographs produced by Beachlands South Limited show that post the proposed rezoning there will be development that includes at least 1390 dwellings that are at least 5 or 6 stories in height. This is in stark contrast to the existing Beachlands skyline. If Beachlands is to retain its status as a rural community under the Auckland City Council Unitary Plan then any proposal to move dwelling construction from essentially single/double level dwellings to a high proportion of high-density housing, changes the Beachlands status diametrically.

136.1

2. My submission is that the proposal should be rejected until such time as agreement is reached with Beachlands South Limited that they will provide at their cost, all infrastructure (including but not

136.2

limited to roading, water, sewerage, flood management, waste management, power, transport, telecommunications) and associated services that Auckland City Council deem appropriate to support the additional 3900 plus dwellings that are proposed subsequent to this proposed plan change.

Critically:

- Roading upgrades are required to support the additional populations that come with 3900 plus new dwellings identified in Stage 1 of the proposed developments. Specifically, the existing rural two lane road between Beachlands and Whitford needs to be upgraded to a four lane road. This upgrade would also need to include the provision of safe and efficient entry/exit ways for communities along the roadway in particular, the upgrading Jack Lachlan Drive to cope with the increased traffic volumes.

136.3

- The proposal is for the use of bore water for all uses including residential, community and commercial across the proposed rezoned areas. Whilst I am no expert on these matters, common sense suggests that this will not work for a development of the size proposed by this rezoning application. On that basis town water needs to be available for all dwellings post the rezoning.

136.4

- The sewerage system proposed seems to be inadequate to process wastewater for a development of the size proposed. The proposal that wastewater could be dispersed across the existing ground water systems will not work; any proposal needs to consider the needs of a more environmentally conscious community, and have consideration for an area that has in the past had issues with water egress into nearby streams and creeks. A properly considered and well developed wastewater system is required and one that is flood proof.

136.3

Finally, a development of the size proposed cannot proceed without proper and full infrastructure (as indicated above) and, that infrastructure should be a paid for by those wanting rezone and re develop the area in the rezoning application.

136.2

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: Beachlands South Limited to provide at their cost all infrastructure as outlined above

Submission date: 22 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Russell Heenan  
**Date:** Wednesday, 22 February 2023 6:45:49 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Russell Heenan

Organisation name:

Agent's full name:

Email address: sathomesnz@gmail.com

Contact phone number:

Postal address:

11 Tui Brae  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Proposed rezoning

Property address: 307 Ha South of Beachlands Village in the area of Formosa Golf Course

Map or maps: Those referenced by Auckland City Council in their correspondence date 20 January 2023

Other provisions:

none

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

1. The proposal if approved will lead to changes that will impact forever the identity of Beachheads as a rural community and the fabric/character and visualisation of the Beachlands Village. The visual photographs produced by Beachlands South Limited show that post the proposed rezoning there will be development that includes at least 1390 dwellings that are at least 5 or 6 stories in height. This is in stark contrast to the existing Beachlands skyline. If Beachlands is to retain its status as a rural community under the Auckland City Council Unitary Plan then any proposal to move dwelling construction from essentially single/double level dwellings to a high proportion of high-density housing, changes the Beachlands status diametrically.

137.1

2. My submission is that the proposal should be rejected until such time as agreement is reached with Beachlands South Limited that they will provide at their cost, all infrastructure (including but not

137.2

limited to roading, water, sewerage, flood management, waste management, power, transport, telecommunications) and associated services that Auckland City Council deem appropriate to support the additional 3900 plus dwellings that are proposed subsequent to this proposed plan change.

Critically:

- Roading upgrades are required to support the additional populations that come with 3900 plus new dwellings identified in Stage 1 of the proposed developments. Specifically, the existing rural two lane road between Beachlands and Whitford needs to be upgraded to a four lane road. This upgrade would also need to include the provision of safe and efficient entry/exit ways for communities along the roadway in particular, the upgrading Jack Lachlan Drive to cope with the increased traffic volumes.

137.3

- The proposal is for the use of bore water for all uses including residential, community and commercial across the proposed rezoned areas. Whilst I am no expert on these matters, common sense suggests that this will not work for a development of the size proposed by this rezoning application. On that basis town water needs to be available for all dwellings post the rezoning.

137.4

- The sewerage system proposed seems to be inadequate to process wastewater for a development of the size proposed. The proposal that wastewater could be dispersed across the existing ground water systems will not work; any proposal needs to consider the needs of a more environmentally conscious community, and have consideration for an area that has in the past had issues with water egress into nearby streams and creeks. A properly considered and well developed wastewater system is required and one that is flood proof.

137.5

Finally, a development of the size proposed cannot proceed without proper and full infrastructure (as indicated above) and, that infrastructure should be a paid for by those wanting rezone and re develop the area in the rezoning application.

137.2

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: Beachlands South Limited to provide at their cost all infrastructure as outlined above

Submission date: 22 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Bret Vogel  
**Date:** Wednesday, 22 February 2023 9:30:33 pm

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Bret Vogel

Organisation name:

Agent's full name:

Email address: [bretvogel1@mac.com](mailto:bretvogel1@mac.com)

Contact phone number:

Postal address:

48 Rewa Rd  
Maraetai  
Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

rezone the northern portion of the land (159.54 hectares) from Rural – Countryside Living zone to a mixture of Future Urban, Residential – Mixed Housing Urban, Business - Local Centre, Business – Light Industry; Business – Mixed Use; and Open Space zones  
rezone the southern portion (147.58 hectares) from Rural – Countryside Living zone to Future Urban Zone, requiring a future plan change to zone the land for development

Property address:

Map or maps:

Other provisions:

Oppose building a ton of houses on the Formosa land or anywhere else out here prior to infrastructure, services, school, and water are in place.

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:

Everyone out here already feels like we've got more people than the roads, water, and other infrastructure can handle. There's no high school, busses overcrowded, no real jobs out here, so horrible for emissions, public transport is a joke, bus routes woefully inadequate unless you work at Botany Town Centre. Nobody in their right mind thinks this is a good idea. Develop the infrastructure, get awesome public transport, water, and build some more roads to alleviate traffic going in first. This seems like a stupid shortsighted money grab and it's hard to believe that someone isn't profiting off this... we need more houses, yes, and I don't mind them being out here,

138.1

but without doing the work first, people's quality of life out here will take a huge hit. You want to build something? Build a highschool!

138.2

I or we seek the following decision by council: Decline the plan change

Submission date: 22 February 2023

### **Attend a hearing**

Do you wish to be heard in support of your submission? No

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Sarah Owen  
**Date:** Wednesday, 22 February 2023 10:45:31 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Sarah Owen

Organisation name:

Agent's full name: S L Owen

Email address: sarah\_l\_owen@yahoo.co.uk

Contact phone number:

Postal address:  
sarah\_l\_owen@yahoo.co.uk  
Whitford  
Auckland 2576

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
With regard to this plan change, I am particularly concerned about the traffic management plan.

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:  
Being a resident of Whitford for just over two years, during that time I have witnessed the increase in traffic between Beachlands to Whitford through to Ormiston but also through to Somerville (Howick). With secondary school in Beachlands, the majority of children attend schools in the Howick area with others further afield. Whilst the introduction of the ferry service is fantastic, it only caters for City workers. Improvements need to be made to road infrastructure before more residents move into the area.

Please tell me why when planning a new community such as Flat Bush, Ormiston and Whitford, do you not have a suitable public transportation plan prior to building houses?

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

139.1

Details of amendments: Improved traffic management

Submission date: 22 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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# Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 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/Ms/Miss/Ms (Full Name)

Graham Smith

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

25 Pohutukawa Road, Beachlands 2018

Telephone:

021466205

Fax/Email:

graham-smith@hotmail.com

Contact Person: (Name and designation, if applicable)

## Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 88 (Private)

Plan Change/Variation Name

Beachlands South

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Or

Property Address

Or

Map

Or

Other (specify)

## Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

- The proposed intersection improvements will not improve the future traffic flows sufficiently | 140.1
  - There is not enough information on dealing with wastewater. What is proposed won't work for 3000 houses | 140.2
  - Bore water will not have enough capacity for 3000 houses | 140.3
- (continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

Provide a 4 lane road from Whitford Rd along Whitford Maraetai Rd to the site including upgrading Jack Lachlan Drive | 140.1

Replace the proposed disposal of sewerage system with one that does not rely on disposal to existing ground | 140.2

Replace the proposed supply of water from bores to another system which will cope with the development and approved by Watercare | 140.3

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

Signature of Submitter  
(or person authorised to sign on behalf of submitter)

14 Feb 23.  
Date

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could  / could not  gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am  / am not  directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Shayne Skinner  
**Date:** Thursday, 23 February 2023 1:01:07 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Shayne Skinner

Organisation name:

Agent's full name: Shayne Skinner

Email address: shayne.skinner@airnz.co.nz

Contact phone number:

Postal address:

82 Karaka rd  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

rezone the northern portion of the land (159.54 hectares) from Rural – Countryside Living zone to a mixture of Future Urban, Residential – Mixed Housing Urban, Business - Local Centre, Business – Light Industry; Business – Mixed Use; and Open Space zones  
rezone the southern portion (147.58 hectares) from Rural – Countryside Living zone to Future Urban Zone, requiring a future plan change to zone the land for development

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

I oppose the rezoning of this land as there are no provisions for upgrading the whitford-maraetai rd to a dual carriage way. This road is dangerous and has a high crash rate, the road is often closed or reduced to one lane affecting people getting to and from their place of work or schooling. It will simply not cope with an extra 3000 house holds in this area.

141.1

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: Upgrade Whitford-Maraetai rd to dual carriage way

Submission date: 23 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Brian Slingsby  
**Date:** Thursday, 23 February 2023 2:45:39 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Brian Slingsby  
Organisation name:  
Agent's full name:  
Email address: brian.nz.slingsby@gmail.com  
Contact phone number: 095309191  
Postal address:  
126 Potts Road  
Whitford  
Auckland 2571

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Road safety  
Property address: Whitford Maraetai Road  
Map or maps:  
Other provisions:  
No improvements to current road between Whitford village to Beachlands  
Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified  
Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
As stated in the Executive Summary of the submitted document  
23.2 Mode share - existing car use is at 80% some 6% higher than Auckland ave  
3.5 Existing road network  
3.51 Whitford Maraetai road is currently recognised as over capacity with safety issues  
1700vehicles per hr per lane prior to any proposed developement  
Significant road improvements including traffic lights or roundabouts are required at all intersections  
off Whitford Maraetai Road especially Clifton Road intersection prior to any further developement

142.1

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: Improvements to intersection of Whitford Maraetai Road and Clifton Road

with traffic light or Roundabout to improve road safety and access

Submission date: 23 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?

Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Steven Lucas  
**Date:** Thursday, 23 February 2023 3:15:52 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Steven Lucas

Organisation name:

Agent's full name:

Email address: swellno1@gmail.com

Contact phone number: +64212548020

Postal address:  
2 Pohutukawa Road  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Property address:

Map or maps:

Other provisions:

The whole development

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Beachlands and Maraetai have already been significantly developed on the grounds that housing was required, and the presence of the ferry service and road made the Pohutukawa Coast a transport hub. Also the commercial development at the Pohutukawa Shopping centre would save on travel out of the area for shopping and provide employment opportunities for locals.

The reality has been:

1) many people continue to work outside the area so traffic on the Whitford-Maraetai road has increased significantly with substantial delays at the Whitford roundabout daily which were previously unknown. I understand there are no proposals to wide the W-M road or alter any of the traffic interchanges. Also the majority of the local roads are of very poor quality and degrade rapidly with current traffic volumes.

143.1

Also as the sole road to the area, it is frequently closed due to accidents

2) local schools are overcrowded and there is no secondary school increasing the bus travel for students

143.2

|   |       |
|---|-------|
| 3) the ferry service is efficient but has limited capacity, is very weather dependant and the shuttles required when cancellations ensue only add to the congestion. I see limited opportunity for expansion of the ferry service to cope with an increased population. Also fewer people work in the CBD, and the ferry only has this as a destination whereas Auckland is a very spread out city. | 143.3 |
| 3) Local medical services were expanded to cope with previous development, but it is becoming increasingly difficult to get local GP appointments. This is both a building and doctor numbers issue which would be compounded by the proposed development.  | 143.4 |
| 4) There are relatively few locals working in the commercial area especially the Countdown supermarket where most staff are from South Auckland so the promise of local employment has not materialized. Basically what we have is a 'SuperDairy' with a slightly expanded DIY store so we still shop outside Beachlands most of the time.  | 143.5 |
| 5) We are still using tank water and previous development was justified on the capacity of the Waikato aquifer to supply bore water-will this still cope with the expanded population?  | 143.6 |
| 6) The development will lose one of the best golf courses in the country.   | 143.7 |
| 7) Given the recent storms and their impact- will the ground support the development given that significant areas of previously absorbant ground will be covered with houses and concrete etc.  | 143.8 |
| What about the run off into the Gulf compounded by the out flows from the expanded sewage works required for the development.   | 143.9 |

In conclusion, I am unsure of the response to this plan change notification, but the local population has spent many many hours engaging with previous processes and we appear to have been ignored entirely.

I or we seek the following decision by council: Decline the plan change

Submission date: 23 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Christine Jansen  
**Date:** Thursday, 23 February 2023 6:00:37 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Christine Jansen  
Organisation name:  
Agent's full name: Christine Jansen  
Email address: christinejjansen@gmail.com  
Contact phone number:  
Postal address:  
73 Pine Harbour Parade  
Beachlands  
Auckland. 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Property address: 110 Jack Lachlan Drive; and 620, 680, 682, 702, 712, 722, 732, 740, 746 758 and 770 Whitford Maraetai Road, Beachlands.

Property address:

Map or maps:

Other provisions:  
Private Plan Change request to rezone approximately 307 hectares of land in Beachlands from Rural – Countryside Living to a mix of business, residential, open space and Future Urban zones.

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

1. Proposed rezoning from rural countryside living to a mixed use including high density apartment dwellings and townhouses will severely degrade the visual amenity value of Beachlands and Pine Harbour.
2. Sewerage and waste water treatment and disposal will require a major upgrade of Watercare facility as there is not the capacity. On land disposal as proposed potentially will pollute the Maraetai-Whitford aquifer and the local beaches, negatively impact endangered bird breeding grounds that adjoin the development.

144.1

144.2

- 3. Proposed water supply from a new borefield and some existing bores has not been assessed in terms of potential impacts on the aquifer. There are numerous private bores in Beachlands drawing from this aquifer. The GWE and Tonkin and Taylor reports do not provide any results of drawdown testing, aquifer recharge, rates, transmissivity, is it a confined or unconfined aquifer, or the capacity of the aquifer to produce potable water for this development and any impacts on existing users. There has been no assessment of potential for salt water incursion if the proposed abstraction rates take place.

144.3
- 4. Existing roading will need upgrading to two lanes each way to cope with doubling of population and traffic movements. New roundabouts will be required at entry ways to the development for safe turning.

144.4
- 5. Land set aside for schooling does not guarantee the Ministry of Education will build a new school here. They would have to buy the land first off the developer. There is no certainty that they will nor within a realistic time frame.

144.5
- 6. There is an active landslide on the west part of the proposed plan change area that is moving out onto the adjoining beach, (Kahawairahi Beach) and indicates land instability in this area. Intensive housing not appropriate here.

144.6

I or we seek the following decision by council: Decline the plan change

Submission date: 23 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Melinda Krushinska  
**Date:** Thursday, 23 February 2023 8:00:37 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Melinda Krushinska

Organisation name:

Agent's full name:

Email address: Galaxyapp97@gmail.com

Contact phone number:

Postal address:

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Plan Change 88 for Beachlands area

Property address: Beachland South property block - Formosa golf Course

Map or maps: Formosa Golf Course and entire land property submitted for plane change 88.

Other provisions:

Intention to build 3000 houses by developers Beachland South.

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 support redevelopment of Formosa Golf Course. It must stay as golf course as it is.  
Do not support build of additional 3000 houses. Beachlands has no roads, sewer, water infrastructure to accommodate 3000 additional houses.

145.1

I or we seek the following decision by council: Decline the plan change

Submission date: 23 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Equal Justice Project  
**Date:** Thursday, 23 February 2023 8:00:37 pm  
**Attachments:** [Submission on PC 88 \(Private\) - Beachland's South.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Equal Justice Project

Organisation name: Equal Justice Project

Agent's full name:

Email address: [advocacy@equaljusticeproject.co.nz](mailto:advocacy@equaljusticeproject.co.nz)

Contact phone number: 02041467105

Postal address:

C/O University of Auckland Faculty of Law Private Bag 92019  
Auckland  
Auckland 1142

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

All of the Rules

Property address: The properties at 110 Jack Lachlan Drive; and 620, 680, 682, 702, 712, 722, 732, 740, 746, 758 and 770 Whitford-Maraetai Road, Beachlands.

Map or maps:

Other provisions:

See attached

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

See attached

I or we seek the following decision by council: Decline the plan change

Submission date: 23 February 2023

Supporting documents

[Submission on PC 88 \(Private\) - Beachland's South.pdf](#)

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?

Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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## Submission on PC 88 (Private): Beachland's South Equal Justice Project

### Introduction

1. The Equal Justice Project ('EJP') is a non-partisan pro bono charitable entity (CC54347) that utilises law students' legal training and knowledge to advocate for change, including the promotion of effective climate action in Auckland.
2. The EJP welcomes the opportunity to make submissions on Plan Change 88 (Private) Beachland's South.
3. By way of introduction, following the release of the third Intergovernmental Panel on Climate Change (IPCC) on 4 April 2022, the UN Secretary-General said that:<sup>1</sup>

"We are on a fast track to climate disaster. Major cities under water. Unprecedented heatwaves. Terrifying storms. Widespread water shortages. The extinction of a million species of plants and animals. This is not fiction or exaggeration. It is what science tells us will result from our current energy policies. We are on a pathway to global warming of more than double the 1.5°C limit agreed on in Paris. Some Government and business leaders are saying one thing but doing another. Simply put, they are lying. And the results will be catastrophic. This is a climate emergency."

4. At COP27 on 8 November 2022, the UN Secretary-General followed this extraordinary statement above by then saying that: "We are on a highway to climate hell with our foot on the accelerator."<sup>2</sup>
5. The New Zealand Parliament declared a climate change emergency in December 2020. Similar declarations have been made in many other jurisdictions. Parliament's declaration includes recognition of: "the devastating impact that volatile and extreme weather will have on New Zealand and the wellbeing of New Zealanders, on our primary industries, water availability, and public health, through flooding, sea-level rise, and wildfire damage." Parliament's emergency declaration stated that "climate change is one of the greatest challenges of our time" and that "New Zealand has committed to taking urgent action on greenhouse gas mitigation and climate change adaptation." Included in the declaration is a commitment to implement the policies required to meet the targets in the Climate Change Response (Zero Carbon) Amendment Act 2019, and to increase support for striving towards 100 percent renewable electricity generation, low carbon energy, and transport systems.<sup>3</sup>
6. In its Report *New Directions for Resource Management in New Zealand* (June 2020), the Resource Management Review Panel devoted an entire chapter to climate change and natural hazards. At the outset of Chapter 6 on climate change and natural hazards, the Review Panel observed:<sup>4</sup>

"Climate change is often described as the defining issue of our time. Limiting global warming to 1.5 degrees Celsius above pre-industrial levels will require rapid, far-reaching and unprecedented changes in all aspects of society. We are already experiencing the effects of climate change, including through flooding and coastal erosion that threaten our essential infrastructure and the safety of whole communities. We need to respond with urgency."

7. These Submissions are being made following the disastrous climate change induced floods and slips that have wreaked havoc across the upper North Island in early 2023. The Prime Minister Chris Hipkins acknowledged that a cause of these floods and slips is climate change.<sup>5</sup> If ever there

<sup>1</sup> <https://www.un.org/sg/en/content/sg/statement/2022-04-04/secretary-generals-video-message-the-launch-of-the-third-ipcc-report-scroll-down-for-languages>

<sup>2</sup> <https://www.rnz.co.nz/news/world/478257/cop27-we-re-on-a-highway-to-climate-hell-un-boss>

<sup>3</sup> [https://www.parliament.nz/en/pb/hansard-debates/rhr/combined/HansDeb\\_20201202\\_20201202\\_08](https://www.parliament.nz/en/pb/hansard-debates/rhr/combined/HansDeb_20201202_20201202_08)

<sup>4</sup> Report of the Resource Management Review Panel, *New Directions for Resource Management in New Zealand* (June 2020), page 164.

<sup>5</sup> <https://www.youtube.com/watch?v=NScyur2wglc>

was a 'wake-up call' to turn the words of the New Zealand Parliament's declaration of a climate change emergency into action, this has to be it.

## Submissions

Private Plan Change (88) seeks to rezone approximately 307 hectares of land south of the Beachlands township. This includes the properties at 110 Jack Lachlan Drive; and 620, 680, 682, 702, 712, 722, 732, 740, 746, 758 and 770 Whitford-Maraetai Road, Beachlands. Specifically, this plan change aims to:

- rezone the northern portion of the land (159.54 hectares) from Rural – Countryside Living zone to a mixture of Future Urban, Residential – Mixed Housing Urban, Business - Local Centre, Business – Light Industry; Business – Mixed Use; and Open Space zones
- rezone the southern portion (147.58 hectares) from Rural – Countryside Living zone to Future Urban Zone, requiring a future plan change to zone the land for development
- introduce a new precinct (with six sub-precincts), aiming to guide residential, commercial, recreational and educational development and to replace the existing Whitford precinct (and sub-precinct) provision
- extend the Stormwater Management Area Flow 1 control over the plan change area.

Our submission relates to the entire Plan Change.

The EJP opposes the entire Plan Change.

The decision the EJP seeks from the Council is to decline Plan Change (88).

## Reasons for opposing the entire Plan Change

Our reasons for opposing the entire Plan Change are set out below.

### Resource Management Amendment Act 2020

First, the Resource Management Amendment Act 2020 ('**RMAA2020**') has reintroduced specific consideration of climate change and these provisions had effect from 30 November 2022.<sup>6</sup> We believe they apply to Plan Change (88).<sup>7</sup>

In particular, the RMAA2020 provisions state that Councils must have regard to emissions reduction plans and national adaptation plans under the CCRA (as amended by the Climate Change Response (Zero Carbon) Amendment Act 2019) when making and amending regional policy statements, regional plans and district plans (sections 61, 66, 74 RMA).

#### **61 Matters to be considered by regional council (policy statements)**

... when preparing or changing a regional policy statement, the regional council shall have regard to—

- (d) any emissions reduction plan made in accordance with section 5ZI of the Climate Change Response Act 2002; and
- (e) any national adaptation plan made in accordance with section 5ZS of the Climate Change Response Act 2002.

<sup>6</sup> Resource Management Amendment Act 2020 Commencement Order 2021.

<sup>7</sup> Although it should be noted that the Review Panel did support the Resource Management Amendment Act 2020 Bill that was before Parliament and the proposal to remove the statutory barriers to RMA consideration of greenhouse gas emissions. See Report of the Resource Management Review Panel, *New Directions for Resource Management in New Zealand* (June 2020), page 178.



**66 Matters to be considered by regional council (plans)**

... when preparing or changing a regional plan, the regional council shall have regard to—

- (d) any emissions reduction plan made in accordance with section 5ZI of the Climate Change Response Act 2002; and
- (e) any national adaptation plan made in accordance with section 5ZS of the Climate Change Response Act 2002.

**74 Matters to be considered by territorial authority**

... when preparing or changing a district plan, a territorial authority shall have regard to—

- (d) any emissions reduction plan made in accordance with section 5ZI of the Climate Change Response Act 2002; and
- (e) any national adaptation plan made in accordance with section 5ZS of the Climate Change Response Act 2002.

We note that an emissions reduction plan has been made in accordance with section 5ZI of the Climate Change Response Act 2002 - *Te hau mārohi ki anamata: Towards a productive, sustainable and inclusive economy: Aotearoa New Zealand's First Emissions Reduction Plan* (June 2022).<sup>8</sup> In addition, a national adaptation plan has also been made in accordance with section 5ZS of the Climate Change Response Act 2002 – *Urutau, ka taurikura: Kia tū pakari a Aotearoa i ngā huringa āhuarangi Adapt and thrive: Building a climate-resilient New Zealand Aotearoa New Zealand's First National Adaptation Plan* (August 2022).<sup>9</sup>

Plan Change (88) does not have regard to either *Te hau mārohi ki anamata: Towards a productive, sustainable and inclusive economy: Aotearoa New Zealand's First Emissions Reduction Plan* (June 2022) nor *Urutau, ka taurikura: Kia tū pakari a Aotearoa i ngā huringa āhuarangi Adapt and thrive: Building a climate-resilient New Zealand Aotearoa New Zealand's First National Adaptation Plan* (August 2022).

146.1

**Emissions Reduction and Plan Change (88)**

As noted in *Te hau mārohi ki anamata: Towards a productive, sustainable and inclusive economy: Aotearoa New Zealand's First Emissions Reduction Plan* (June 2022):<sup>10</sup>

“Well-functioning urban environments can reduce emissions and improve wellbeing Urban environments with a variety of mixed-use, medium- and high-density development that is connected to urban centres, as well as active and public transport routes, will help reduce greenhouse gas emissions. That is partly because they provide more options for people to travel between where we work, live, play and learn. Well-planned urban areas provide an opportunity to realise wider benefits too. They enable a greater supply and diversity of housing to be built at pace and scale, improving affordability. Good access to active and public transport routes that safely take people to workplaces and education centres can provide greater access to learning and job opportunities for households, improve public health and wellbeing and strengthen community cohesion.”

In terms of climate change and as noted by Auckland Council, the potential adverse impacts of future development from Plan Change (88), including the use of additional private vehicles are proposed to be offset through the Plan Change by forest sequestration and sustainable building including energy efficiency and rain tanks for potable water. While the proposed precinct policies encourage the development of energy efficient buildings including on-site energy generation, there are no rules in the precinct that require it. Additional capacity would support increased ferry usage, but currently most

<sup>8</sup> <https://environment.govt.nz/assets/publications/Aotearoa-New-Zealands-first-emissions-reduction-plan.pdf>

<sup>9</sup> <https://environment.govt.nz/assets/publications/climate-change/MFE-AoG-20664-GF-National-Adaptation-Plan-2022-WEB.pdf>

<sup>10</sup> *Te hau mārohi ki anamata: Towards a productive, sustainable and inclusive economy: Aotearoa New Zealand's First Emissions Reduction Plan* (June 2022), page 127.

people in Beachlands travel to East/South Auckland for work and will still be reliant on private vehicles. “At this coarse level of assessment, it is not possible to determine whether there would be a significant increase in greenhouse gas emissions, but it is anticipated that an ongoing reliance on private vehicles would have an impact on council’s goals to reduce Vehicle Kilometres Travelled and greenhouse gas emissions.”<sup>11</sup>

Auckland Council noted further in its *Tauākī whakaaweawe āhuarangi* - Climate impact statement that accompanied the Report accepting the private plan change request:<sup>12</sup>

#### Tauākī whakaaweawe āhuarangi Climate impact statement

121. Council declared a climate emergency in Auckland, in June 2019. The decision included a commitment for all council decision-makers to consider the climate implications of their decisions. In particular, consideration needs to be given to: a) how the proposed decision will impact on greenhouse gas emissions and the approach to reduce emissions; b) what effect climate change could have over the lifetime of a proposed decision and how these effects are being taken into account.

122. It is noted that the decision whether to adopt, accept, reject or deal with the private plan change request is a decision relative to those procedural options, rather than a substantive decision on the plan change request itself.

123. The request, if subsequently approved or approved with modifications, would provide for approximately 3800 dwellings across the proposed “live” zone and FUZ - more than doubling the existing population of Beachlands. The township has limited public transport and services with no secondary school and limited employment opportunities. Travel to work data identifies that in 2018 approximately 78% of employees leave Beachlands for work.

124. A sustainability strategy is provided in support of the request, identifying six key focus areas including “Low-carbon development” and “Transport – modal shift and healthy streets”. The strategy for a low-carbon development includes reduced embodied and operational energy for buildings and infrastructure, and sequestration through native planting. Locating higher density housing close to centres and public transport, along with connected walking and cycling network within the precinct are proposed to support modal shift. The request provides opportunities for an additional primary school and a new secondary school, as well as providing for approximately 960 jobs reducing the need to travel outside the area.

125. Other initiatives identified in the sustainability strategy include supporting car-share schemes and producing a Travel Management Plan to achieve modal shift. However, these are not included in the precinct.

126. A key element of the proposed low-carbon development is the modal shift, and the applicant supports the enhancement of the existing ferry service (capacity and frequency), including the identification of development thresholds associated with upgrades to the ferry service. However, the applicant is only proposing to contribute towards upgrades to the ferry capacity, leaving some uncertainty as to whether required upgrades to the ferry infrastructure can be implemented to support increased capacity.

127. As outlined above, in 2018 only 6% of trips to work were by ferry with most people travelling to East Auckland employment areas by private vehicles. The applicant’s transport assessment anticipates an increased ferry service could double ferry patronage to around 13%. It is noted that Mr Edwards considers the transport assessment to be very

<sup>11</sup> Agenda, *Komiti mō te Whakarite Mahere, te Taiao, me ngā Papa Rēhia / Planning, Environment and Parks Committee* (8 December 2022), page 54.

<sup>12</sup> Agenda, *Komiti mō te Whakarite Mahere, te Taiao, me ngā Papa Rēhia / Planning, Environment and Parks Committee* (8 December 2022), page 54.

optimistic about the internal capture of trips and ferry transport assumptions. The coarse assessment of transport effects of Mr Edwards indicates that the applicant's assessment appears to underestimate the number of trips by private vehicles. Therefore, the proposal is anticipated to remain heavily reliant on private vehicles which would increase Vehicle Kilometres Travelled and could increase greenhouse gas emissions from transport.

128. If accepted for processing, climate impacts can be considered in the future hearing report on the request. At that time the potential impacts on Auckland's overall greenhouse gas emissions may be considered (whether it encourages car dependency, enhance connections to public transit, walking and cycling or support quality compact urban form), and whether the request elevates or alleviates climate risks (such as flooding and stress on infrastructure).

129. At this coarse level of assessment, it is not possible to determine whether there would be a significant increase in greenhouse gas emissions, but it is anticipated that an ongoing reliance on private vehicles would have an impact on council's goals to reduce Vehicle Kilometres Travelled and greenhouse gas emissions."

The EJP would like to add further that Plan Change (88), like any other development proposed in Auckland, will result in an increase in Vehicle Kilometres Travelled ("Vkt") and greenhouse gas emissions because:

- residents will consider themselves residents of Auckland city, as a whole, and will make use of the amenities, services, retail, education, etc in a large segment of Auckland. There is no public transport or cycling network for these trips that will be easier than driving. They will therefore drive, if they can, or be chauffeured if they can't. A small increase in additional ferry capacity to one location in the city will not mitigate this.
- the new residences will increase the Vkt of visitors too. This will include tradespeople, friends and visitors, community service providers, people maintaining council asset, couriers, and trucks delivering to retail outlets. This is a lost opportunity for emissions reductions. Instead of making shorter trips, trips by more sustainable travel modes or trips to more places per trip - as would happen if these new dwellings were added within the built environment via intensification, each of these people will have to make longer trips to visit this development, and will drive.
- Plan Change (88) fails the 'climate test' because Auckland cannot provide a low car lifestyle overall without residential development being built in proximity to the amenities of the city. Development must be within the existing built environment.

146.2

The EJP cannot see Plan Change (88) suggesting anything other than an increase in Vkt and a complete undermining of the direction towards a Quality Compact Urban Form. Plan Change (88) will have long term, substantial and difficult-to-reverse negative impacts on Auckland's greenhouse gas emissions.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Linda Whickman  
**Date:** Friday, 24 February 2023 1:00:55 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Linda Whickman

Organisation name:

Agent's full name:

Email address: whickman49@outlook.com

Contact phone number:

Postal address:

Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Property address: Formosa golf course and Rydges Hotel

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

There is already insufficient infrastructure for the existing Beachlands population and therefore an increase in population of this magnitude is not feasible. As a small example only half of the students attending Howick college have the ability to catch a designated bus, there is insufficient capacity.

Trying to exit at roundabout onto whitford maraetai rd can already take 20 mins in the morning

147.1

147.2

147.3

I or we seek the following decision by council: Decline the plan change

Submission date: 24 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Robert Jaffrey Gray  
**Date:** Friday, 24 February 2023 7:30:17 am

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Robert Jaffrey Gray

Organisation name:

Agent's full name:

Email address: bob@graynz.net

Contact phone number: 021971860

Postal address:  
 36 First View Ave  
 Beachlands  
 Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

- rezone the northern portion of the land (159.54 hectares) from Rural – Countryside Living zone to a mixture of Future Urban, Residential – Mixed Housing Urban, Business - Local Centre, Business – Light Industry; Business – Mixed Use; and Open Space zones
- rezone the southern portion (147.58 hectares) from Rural – Countryside Living zone to Future Urban Zone, requiring a future plan change to zone the land for development
- introduce a new precinct (with six sub-precincts), aiming to guide residential, commercial, recreational and educational development and to replace the existing Whitford precinct (and sub-precinct) provisions
- extend the Stormwater Management Area Flow 1 control over the plan change area.

Property address:

Map or maps: pc88-appendix-1-plan-change-zoning-map.pdf

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

The plan change represents a profound and enormous change to the Beachlands village. and community and is unwanted by many (most?) in the community.

Infrastructure such as transport links, parks, water supply and community facilities are not in place to accommodate this unconstrained growth.

148.1

The plan change will lead to longer journeys to access work, education, recreation and other amenities resulting in greater emissions and congestion. Climate change is here - now - and last week's cyclone should be a wake-up call to Council that we cannot go on allowing urban sprawl to cover rural land with tract housing.

148.2

The construction work will take years and the already overloaded road access will hardly be mitigated by the minor improvements proposed.

There is already very substantial housing growth in Beachlands and nearby Maraetai with large projects underway. This addition is neither wanted nor needed.

148.3

I or we seek the following decision by council: Decline the plan change

Submission date: 24 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Clevedon Community and Business Association  
**Date:** Friday, 24 February 2023 9:30:19 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Clevedon Community and Business Association

Organisation name: Clevedon Community and Business Association

Agent's full name:

Email address: secretary@clevedon.co.nz

Contact phone number: 0275383844

Postal address:

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

The Plan Change in its entirety.

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

The application states that the proposed private plan change “provides a location for the Ministry of Education to establish a primary and secondary school within the site.” The CCBA support the proposal to provide for a secondary school within the site. The need for a local secondary school has been identified and the CCBA support the establishment of this school by the Ministry as soon as possible.

149.1

The CCBA also request that on and off-road trail connections to the wider Pohutukawa Coast environment are enabled by the Plan Change.

149.2

The CCBA also note that the increase in population provided for by the Plan Change will require better ferry services and public transport connections. The CCBA request that these are considered by the applicant.

149.3

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested



Details of amendments: Ensure that the secondary school is provided for, that trails connections to the wider community are enabled, and that improvements to ferry and public transport services are considered.

Submission date: 24 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**Submission on a notified proposal for policy statement or plan change or variation**

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 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)

Yvonne Clave

**Organisation Name (if submission is made on behalf of Organisation)**

**Address for service of Submitter**

23 Weatherly Drive Beachlands Auckland 2018

Telephone:

0292009014

Fax/Email:

yvonne@epnz.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 88 (Private)

Plan Change/Variation Name

Beachlands South

**The specific provisions that my submission relates to are:**

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Or

Property Address

Or

Map

Or

**Other (specify)**

**Submission**

**My submission is:** (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

150.1

Current state of road, road access and infrastructure is already poor and requires repair / immediate action. There are no school and adding more houses is going to cause a lot more road congestion. Please address these issues before letting the builders buy/build on the land. Adding problem on top of a problem doesn't resolve it.

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

150.2

1) Infrastructure to be added / upgraded first

150.3

2) Better roading access / quality of roads to avoid loss of lives.

150.4

3) Supply water mains / schools to be built in the plan

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

Signature of Submitter *Janece*  
(or person authorised to sign on behalf of submitter)

Date 20.2.23

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could  / could not  gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am  / am not  directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Karen McKnight  
**Date:** Friday, 24 February 2023 9:45:18 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Karen McKnight

Organisation name:

Agent's full name:

Email address: themcknights@xtra.co.nz

Contact phone number:

Postal address:  
42 Pine Harbour Parade  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Roading, public transport, waste water, rezoning, 1300 buildings

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:  
I do not think the infrastructure as it is now Would sustain all the plans the council is now submitting.

151.1

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: Infrastructure for roading increased to take volume of traffic with the amount of buildings council has submitted.

151.2

Submission date: 24 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Lesley Pearce  
**Date:** Tuesday, 28 February 2023 3:45:34 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Lesley Pearce  
Organisation name:  
Agent's full name: Lesley Pearce  
Email address: pl.pearce2410@gmail.com  
Contact phone number: 0211314193  
Postal address:  
128 Beachlands Road  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Please note: this submission replaces my previous submission 152.  
Roads and Transport:

The main arterial road is Whitford-Maraetai Road. This is a 2 lane rural country road with known safety issues including plenty of inadequate repairs and many accidents. The journey from Beachlands to Howick (17km) takes on average 45 minutes in morning traffic. This traffic is expected to increase exponentially with the new development (Covid Fast Track) at 109 Beachlands Road of 258 new dwellings, which is in progress.

152.1

I am very concerned that all the infrastructure needed for the proposed Beachlands South development are ad hoc at best.

152.2

Property address:

Map or maps:

Other provisions:  
there is no high school planned for this area

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
Please note: this submission replaces my previous submission 152.  
All my family live in Beachlands and experience daily the inadequate Whitford-Maraetai Road. Even though the speed limit has been reduced, there are still safety issues due to the poor condition of this road. Public transport do not meet our needs, as busses are too infrequent, hence most people

152.3

here use their own vehicles. School buses have many students standing on the bus trips and this is allowed by the MoE.

I or we seek the following decision by council: Decline the plan change

Submission date: 28 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

[Have your say on Auckland Council's annual budget 2023 and 2024.](#)



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### Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



AUCKLAND COUNCIL  
24 FEB 2023  
CBD - ALBERT ST

Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto: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/Me(Full Name)

\_\_\_\_\_ Sheena Terry \_\_\_\_\_

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

\_\_\_\_\_ 64 Rewa Rd, Maraetai Beach, Auckland 2018 \_\_\_\_\_

Telephone:

02102326688

Fax/Email:

sheenaterry@outlook.com

Contact Person: (Name and designation, if applicable)

#### Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 88 (Private)

Plan Change/Variation Name

Beachlands South

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Or

Property Address

\_\_\_\_\_

Or

Map

\_\_\_\_\_

Or

Other (specify)

\_\_\_\_\_

#### Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to **754**)

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:

- Insufficient Infrastructure, particularly Roading (the existing 2 lane road needs to be increased to 4 lanes) 153.1
  - The sewerage system as proposed is inadequate and disposing to existing land will not work 153.2
  - Water supply using bore water is inadequate for a development of that size 153.3
- (continue on a separate sheet if necessary)*

I seek the following decision by Council:

- Accept the proposed plan change / variation
- Accept the proposed plan change / variation with amendments as outlined below
- Decline the proposed plan change / variation
- If the proposed plan change / variation is not declined, then amend it as outlined below.

- Provide a 4 lane road from Whitford Rd along Whitford Marætal Rd to the site including upgrading Jack Lachlan Drive 153.4
- Replace the proposed disposal of sewerage system with one that does not rely on disposal to existing ground 153.5
- Replace the proposed supply of water from bores to another system which will cope with the development and approved by Watercare 153.6

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at a hearing

Signature of Submitter  
(or person authorised to sign on behalf of submitter)

Date 11.2.2023.

**Notes to person making submission:**  
 If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could  / could not  gain an advantage in trade competition through this submission.  
 If you could gain an advantage in trade competition through this submission please complete the following:

I am  / am not  directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and  
 (b) does not relate to trade competition or the effects of trade competition.

# Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 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/Ms/Miss/Ms (Full Name)

KELVIN MICHAEL TERRY

Organisation Name (If submission is made on behalf of Organisation)

Address for service of Submitter

64 REWA ROAD, MARAETAI, AUCKLAND 2018

Telephone:

0211115116

Fax/Email:

zerokmt@gmail.com

Contact Person: (Name and designation, if applicable)

## Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 88 (Private)

Plan Change/Variation Name

Beachlands South

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Or

Property Address

Or

Map

Or

Other (specify)

## Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them

Faint, illegible text at the top of the page, possibly a header or introductory paragraph.

Second section of faint, illegible text, appearing to be a list or series of entries.

Third section of faint, illegible text, continuing the list or series of entries.

Fourth section of faint, illegible text, possibly a summary or concluding paragraph.

Fifth section of faint, illegible text, appearing to be a list or series of entries.

Sixth section of faint, illegible text, possibly a final note or signature area.

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:

- Insufficient infrastructure, particularly Roading (the existing 2 lane road needs to be increased to 4 lanes) 154.1
- The sewerage system as proposed is inadequate and disposing to existing land will not work 154.2
- Water supply using bore water is inadequate for a development of that size 154.3
- AT THE MOMENT ROAD MAINTENANCE IS POOR (continue on a separate sheet if necessary)

I seek the following decision by Council:

- Accept the proposed plan change / variation
- Accept the proposed plan change / variation with amendments as outlined below
- Decline the proposed plan change / variation
- If the proposed plan change / variation is not declined, then amend it as outlined below.
- Provide a 4 lane road from Whitford Rd along Whitford Maraetai Rd to the site including upgrading Jack Lachlan Drive 154.4
- Replace the proposed disposal of sewerage system with one that does not rely on disposal to existing ground 154.5
- Replace the proposed supply of water from bores to another system which will cope with the development and approved by Watercare 154.6

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at a hearing

Signature of Submitter  
(or person authorised to sign on behalf of submitter)

Date 10/2/23

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

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I could  / could not  gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am  / am not  directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

## Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 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)

Mr Kenneth Mervyn Clough

#### Organisation Name (if submission is made on behalf of Organisation)

#### Address for service of Submitter

24 Te Pene Road, Maraetai, Auckland 2018

Telephone:

92820382

Fax/Email:

0226481857

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 88 (Private)

Plan Change/Variation Name

Beachlands South

#### The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Rezoning of 307 Ha south of Beachlands Village in the area of Formosa Golf Course from rural to future urban residential etc.

Or

Property Address

Or

Map

Or

Other (specify)

### Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)



I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are: 155.1

Firstly, the Whitford-Maraetai, Sandstone and Gorge Roads are all in need of urgent upgrades and will deteriorate significantly with increased traffic.

Double laneing the Whitford round-a-bout sounds nice but will be of little benefit to the safety and state of the feeder roads.

Hotel provision will potentially introduce intoxicated drivers to our roading, adding an additional road safety hazard to other drivers.

(continue on a separate sheet if necessary) 155.2

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.  155.3

Build communities of secure lifestyle retirement homes with garaging and motorhome parking combined with appropriate facilities.

With Little employment opportunity, social housing is pointless. It contributes nothing to the community and denies tenants the opportunity to establish themselves financially and become self sufficient home owners. This provision should be abandoned. 155.4

High density housing will increase stress on the existing water and waste water infrastructure. Stand alone homes should be built.

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission  155.5

If others make a similar submission, I will consider presenting a joint case with them at a hearing

Signature on additional copy of this page

02/24/2023

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.

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:

Firstly, the Whitford-Maraetai, Sandstone and Gorge Roads are all in need of urgent upgrades and will deteriorate significantly with increased traffic.

Double laneing the Whitford round-a-bout sounds nice but will be of little benefit to the safety and state of the feeder roads.

Hotel provision will potentially introduce intoxicated drivers to our roading, adding an additional road safety hazard to other drivers.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

Build communities of secure lifestyle retirement homes with garaging and motorhome parking combined with appropriate facilities.

With Little employment opportunity, social housing is pointless. It contributes nothing to the community and denies tenants the

opportunity to establish themselves financially and become self sufficient home owners. This provision should be abandoned.

High density housing will increase stress on the existing water and waste water infrastructure. Stand alone homes should be built.

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

*Kerley*

Signature of Submitter  
(or person authorised to sign on behalf of submitter)

24-2-2023

Date

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could  / could not  gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am  / am not  directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.



**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Fire and Emergency New Zealand  
**Date:** Friday, 24 February 2023 4:00:30 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Fire and Emergency New Zealand

Organisation name: Beca Limited

Agent's full name: Jessica Mangos

Email address: [Jessica.Mangos@beca.com](mailto:Jessica.Mangos@beca.com)

Contact phone number: 033743150

Postal address:

[Jessica.Mangos@beca.com](mailto:Jessica.Mangos@beca.com)

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Private Plan Change 88

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

We do not support or oppose - however please see attached.

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: See attached

Submission date: 24 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?

Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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## Form 5

### Submission on notified proposal for policy statement or plan, change or variation

#### *Clause 6 of Schedule 1, Resource Management Act 1991*

**To:** Auckland Council

**Submission on:** Private Plan Change 88 – Beachlands South

**Name of Submitter:** Fire and Emergency New Zealand

This is a submission on the following proposed plan change (the **proposal**): Proposed Private Plan 88: Beachlands South. Beachlands South Limited Partnerships (BSLP) seeks to rezone approximately 307 hectares of land south of the Beachlands Township. The northern portion of the land (159.54ha) is proposed to be rezoned to a mixture of residential, business and open space zones. The southern portion of the land (147.5761ha) is to be rezoned Future Urban.

Fire and Emergency could not gain an advantage in trade competition through this submission.

The specific provisions of the proposal that Fire and Emergency's submission relates to are:

- Ensuring the proposal provides acceptable emergency responder access and firefighting water supply in accordance with New Zealand Fire Service Fire Fighting Water Supplies Code of Practice SNZ PAS 4508:2008.

#### **Fire and Emergency's submission is:**

In achieving the sustainable management of natural and physical resources under the Resource Management Act 1991 (RMA), decision makers must have regard to the health and safety of people and communities. Furthermore, there is a duty to avoid, remedy or mitigate actual and potential adverse effects on the environment. The risk of fire represents a potential adverse effect of low probability but high potential impact. Fire and Emergency has a responsibility under the Fire and Emergency New Zealand Act 2017 to provide for firefighting activities to prevent or limit damage to people, property and the environment. As such, Fire and Emergency has an interest in the land use provisions of the District Plan to ensure that, where necessary, appropriate consideration is given to fire safety and operational firefighting requirements.

In order for Fire and Emergency to achieve their principal objective which includes reducing the incidence of unwanted fire and the associated risk to life and property, protecting and preserving life, and preventing or limiting injury, damage to property land, and the environment, Fire and Emergency requires adequate water supply be available for firefighting activities; and adequate access for new developments and subdivisions to ensure that Fire and Emergency can respond to emergencies.

The provision for adequate water supply is therefore critical. It is important to Fire and Emergency that any new subdivision or land use has access to adequate water supply (whether reticulated or non-reticulated). This essential emergency supply will provide for the health, safety and wellbeing of people and the wider community, and therefore contributes to achieving the purpose of the RMA. The details provided within the application are not sufficient to determine compliance with the Code of Practice.

The access for emergency responders is also dependent on fire appliances being able to access around the entire site. The minimum roading width for emergency access should not be less than 4 m with a height clearance (including trees or overhanging eaves) along access ways of at least 4 m.

**Fire and Emergency seek the following decision from the local authority:**

That the development is designed in accordance with the SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice. | 156.1

That the proposed roads development is designed in accordance with the relevant transport standards to ensure that fire appliances can easily access each road even with cars parked either side of the road. | 156.2

Fire and Emergency does wish to be heard in support of its submission.

If others make a similar submission, Fire and Emergency will consider presenting a joint case with them at a hearing.



Signature of person authorised to sign on behalf of  
**Fire and Emergency**

**Date:** 24/02/2023  
**Electronic address for service of person making submission:** Jessica.Mangos@beca.com  
**Telephone:** 03 374 3150

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Michaela Campbell  
**Date:** Friday, 24 February 2023 5:15:30 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Michaela Campbell

Organisation name:

Agent's full name: Michaela Campbell

Email address: Michaela@ilikespace.co.nz

Contact phone number:

Postal address:

Michaela@ilikespace.co.nz

Beachlands

Beachlands 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Formosa development

Property address: Formosa golf corse

Map or maps: Beachlands

Other provisions:

All new development in Beachlands

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

Infrastructure can not handle this development

I or we seek the following decision by council: Decline the plan change

Submission date: 24 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

157.1

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.

CAUTION: This email message and any attachments contain information that may be confidential and may be LEGALLY PRIVILEGED. If you are not the intended recipient, any use, disclosure or copying of this message or attachments is strictly prohibited. If you have received this email message in error please notify us immediately and erase all copies of the message and attachments. We do not accept responsibility for any viruses or similar carried with our email, or any effects our email may have on the recipient computer system or network. Any views expressed in this email may be those of the individual sender and may not necessarily reflect the views of Council.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Jenny Barrett  
**Date:** Friday, 24 February 2023 6:30:30 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Jenny Barrett

Organisation name:

Agent's full name:

Email address: jenny.barrett@hotmail.com

Contact phone number:

Postal address:  
12 Te Puru Drive  
Maraetai  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Formosa housing plan

Property address:

Map or maps:

Other provisions:  
Infrastructure

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:  
No plans to upgrade roaming or surrounding infrastructure to accommodate new housing

I or we seek the following decision by council: Decline the plan change

Submission date: 24 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

158.1

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Jacob Mackenzie  
**Date:** Friday, 24 February 2023 7:00:21 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Jacob Mackenzie

Organisation name:

Agent's full name:

Email address: jacob.t.mackenzie@outlook.com

Contact phone number:

Postal address:  
jacob.t.mackenzie@outlook.com  
Beachlands  
Beachlands 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Plan change 88

Property address: Beachlands south

Map or maps: Plan Change 88

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:

Complete lack of infrastructure, particularly road infrastructure, to home thousands of more people in the Beachlands area. | 159.1

Lack of a highschool to school young people locally, meaning roads are put under even more commute stress. | 159.2

Plan lacks foresight and practical thought regarding key infrastructure (improvements) required. Develop infrastructure and then follow up by developing thousands of new homes if deemed practicable. | 159.3

Recent events should be making you all starkly aware of the need to plan diligently before developing simply for the sake of it.

I or we seek the following decision by council: Decline the plan change

Submission date: 24 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Sam shephard  
**Date:** Friday, 24 February 2023 8:00:18 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Sam shephard

Organisation name:

Agent's full name:

Email address: samshephard88@gmail.com

Contact phone number:

Postal address:  
7 George Town drive  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Map

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:  
Road infrastructure must be improved first

I or we seek the following decision by council: Decline the plan change

Submission date: 24 February 2023

**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

160.1

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Chantal Ward-Tuala  
**Date:** Friday, 24 February 2023 8:00:19 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Chantal Ward-Tuala

Organisation name:

Agent's full name:

Email address: chantaltuala97@gmail.com

Contact phone number: 0272340902

Postal address:

P.O. Box 23  
Beachlands  
Auckland 2147

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Property address:

Map or maps:

Other provisions:

Adding a ridiculous amount of housing that would cause chaos through the entire community as this area does not have enough capable infrastructure to cater to that amount of influx in population to the area

161.1

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

The state of the roads are already unsatisfactory enough to cater to the population of people travelling to and from Beachlands/maraetai on a daily basis, it would cause chaos until the roads and infrastructure are fixed

I or we seek the following decision by council: Decline the plan change

Submission date: 24 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?

Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Deborah Christine Forman  
**Date:** Friday, 24 February 2023 10:00:19 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Deborah Christine Forman

Organisation name:

Agent's full name:

Email address: debbie@forman.gen.nz

Contact phone number:

Postal address:  
15 Porterfield Road,  
Whitford  
Auckland 2571

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Re zoning of 307Ha South of Beachlands Village in the area of Formosa Folf Course from Rural to future Urban Residential etc

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:  
Increase in traffic on already inadequate roads. Congestion through Whitford village- the only road to motorways and highschoools.

I or we seek the following decision by council: Decline the plan change

Submission date: 24 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

162.1

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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# Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 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) Karen Carter

### Organisation Name (if submission is made on behalf of Organisation)

N/A

### Address for service of Submitter

14 Campbell Road, Maraetai, 2018

Telephone:  Fax/Email:

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

Plan Change/Variation Name

### 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)

## 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:

There is insufficient infrastructure or plans to improve infrastructure to support a development of this size.

163.1

Please see attached for more information

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

Vastly reduce the number of proposed dwelling.

163.2

Ensure that the development size is aligned with existing infrastructure capacity and limitations

Ensure any additional infrastructure is funded by the developers not rate payers and in place before housing is complete

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

163.3

Karen Carter

02/24/2023

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.

- Developments/ population growth in East and South Auckland need to align with investment in infrastructure e.g. health, education, roading etc.... This proposal makes no effort to address infrastructure issues that the development will cause. For example, Middlemore Hospital is not able to cope with the current population it serves. The Primary Schools are already adding buildings reducing the outdoor play areas which are essential for their health and wellbeing. There is no high school and no provision in the plan for a guaranteed high school to cater for growth.

163.1
- The Whitford/ Maraetai Road is already sub-standard. Trucks and vehicles associated with the construction of the development and traffic once the development is complete will cause further damage to the road

• Traffic along the Whitford/ Maraetai is already heavy at peak times. Without additional lanes travel will be unbearable

163.4
- The proposal assumes an increase in use of public transport. There is no data to support this assumption. I work at Middlemore Hospital, public transport does not run to and from the hospital and if it did, it would not be time efficient for me to use it

• The Pine Harbour ferry is already full at peak times, ferries are often cancelled as stock is old and undergoing maintenance. Unless Auckland Transport is going to invest in more and/ or bigger ferries the current service could not cope with more commuters

• Unless Auckland Transport or Pine Harbour invest in multi-storey car parking for the ferry, the current car parks will not be sufficient for people who will need to drive to the ferry (there is currently no connecting bus service from Maraetai or Beachlands to the ferry). It is naïve to assume everybody is physically able to walk from their homes in the new development to the ferry terminal hence you should assume more car parks would be needed

163.5
- I understand Auckland Transport are promoting use of the Pine Harbour Ferry with Beachlands, Maraetai and Omana as a destination. A high density urban development hardly aligns with this campaign

• I am concerned about the proposed use of the existing bore for water supply. I have not seen evidence that the bore will sustain the number of new properties proposed

163.6
- I am completely opposed to the proposed discharging of treated waste water into ponds and the coastal environment. We have already seen Formosa flout regulations and pump untreated waste into the sea, while this may have been the previous owners, it highlights the ability for process to be ignored putting the environment and health at risk. The run off into the sea around Auckland already results in beach closures and risks to health.

163.7
- I do not believe local health care providers will be able to support the growth.

**From:** [kmjpike99@gmail.com](mailto:kmjpike99@gmail.com)  
**To:** [Unitary Plan](#)  
**Subject:** PC88 : Beachlands South  
**Date:** Saturday, 25 February 2023 8:04:58 am

---

Dear Sir/Madam

Regarding the planned re-zoning of approx 307ha of land south of Beachlands from Rural-countryside Living zone to a mix of business, residential, open space and Future Urban zones,

I wish to put in a Submission **against** this proposal.

I have lived in Maraetai for over forty years now and I strongly believe that there is not sufficient infrastructure in place to support the plan change.

164.1

The Maraetai-Whitford-Howick road traffic has had significant growth over the last decade and is already extremely congested during rush hour times with workers and school children travelling through the area. Weekend travellers to/from the area adds further pressure.

I also believe that there is insufficient sewage facilities to support such a plan change which would obviously involve thousands more vehicles on our access roads.

164.2

I am not against progress, and in the future, once the Howick - Maraetai roads have been widened to double lanes both ways and sewage treatment plant extended or upgraded then it could be a feasible change, but for now until major upgrading and improvements of infrastructure have been made to support such a plan change I feel it would put a crippling strain on the existing roading and other infrastructure facilities.

Already there are many accidents on our Howick-Maraetai roads and every time there is an accident, even a fairly mild one, it involves a road closure which forces travellers to go many many kilometres out of their way to get home or to work.

Therefore I wish to submit my strong opposition to the planned change.

Yours sincerely  
Katie Pike  
[kmjpike99@gmail.com](mailto:kmjpike99@gmail.com)  
45 AngiAngi Crescent,  
Beachlands 2018  
021 300 064

Sent from my iPhone

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Daniel udy  
**Date:** Saturday, 25 February 2023 9:00:33 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Daniel udy  
Organisation name:  
Agent's full name:  
Email address: dan@rpmproperty.co.nz  
Contact phone number: 0275326839  
Postal address:  
2018  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**  
Plan change number: Plan Change 88  
Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Formosa  
Property address:  
Map or maps:  
Other provisions:  
Do you support or oppose the provisions you have specified? I or we support the specific provisions identified  
Do you wish to have the provisions you have identified above amended? Yes  
The reason for my or our views are:  
I see the benefits of the subdivision if there is a high school and roading upgrades as stated  
I or we seek the following decision by council: Approve the plan change without any amendments

165.1  
165.2

Details of amendments:  
Submission date: 25 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes  
Would you consider presenting a joint case at a hearing if others have made a similar submission?

No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Stephen David Melrose  
**Date:** Saturday, 25 February 2023 7:45:33 pm

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Stephen David Melrose

Organisation name:

Agent's full name: Stephen Melrose

Email address: melroses.house@gmail.com

Contact phone number:

Postal address:

53 Bell Road  
 Beachlands  
 Manukau 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

Light industry zoning.  
 Local sewage treatment facilities  
 More traffic on the roads

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:

People choose to live in beachlands maraetai because they like this area. They have decided that they would like to live here so much, that they are prepared to forgo optimum public transport and many other conveniences that larger towns and centre's have. Originally there was no sewage system in beachlands maraetai. There was a lot of argument in the community to stop a coastal pipeline outlet for the new system. In the end a land based dispersal system was put forward and accepted. Even this premium system has problems in most summers where a high nutrient load that travels down the te puru stream, causes a certain weed/algae to proliferate and ruin the beaches and smell badly. This was even before the current expansions within beachlands and maraetai. Any more houses will need to be connected to aucklands main water treatment plant in order to prevent degradation of the local,coastline in future. Please keep in mind that for a lot of the population of inner South auckland, this coastline provides a low cost

166.1

outing on the weekends and evenings, particularly in summer. It's great for them because there are not rows of houses looking down on them for a great part of the coastline, and the beaches are fabulous.

There is no logical reason to artificially create a light industrial zone way out here. This is just an excuse to pretend that new residents will be able, to work locally. As said earlier, people live here and visit here for, the location ie coastline, a light industrial, zone will not contribute to that, and in fact will create a lesser appeal for the area, and a greater load, on any sewage system.

166.2

The roads are already tricky and congested with the existing extra subdivisions traffic. Increasing the traffic , degrading the appeal with lite industrial, the possibility of degradation of th coastline may result in those who like the area, leaving. Those who replace the people who move out will do so only because property values will become affordable, not because they value the area, and so it's appeal Will degenerate further.

166.3

Please do not judge my submission for any lack of professionalism, or hard facts. Please do consider my submission with the honesty with which it was written.

I or we seek the following decision by council: Decline the plan change

Submission date: 25 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Peter John Williams  
**Date:** Sunday, 26 February 2023 10:00:10 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Peter John Williams

Organisation name:

Agent's full name: Peter Williams

Email address: [pjwcchdw@outlook.com](mailto:pjwcchdw@outlook.com)

Contact phone number:

Postal address:

Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Property address: Jack Lachlan Drive Beachlands

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:

Without significant improvements to the inadequate existing Roothing there should be no further development at all taking place. | 167.1

This areas infrastructure cannot support anymore development on this scale. | 167.2

The proposals released by the developers regarding water supply, sewage disposal and storm water appear to be little more than fanciful and corner cutting. | 167.3

For a development of this size all of these important services must be under the control of the Auckland City Council thru Watercare and directly connected to their systems. | 167.4

The suggestion that excess sewage overflows could be discharged onto the local beach is appalling. | 167.5

I believe that the Developers with their proposed Plan are trying to circumvent best practice to the detriment of the community.

This particularly apparent with the proposal to construct dwellings over three stories thereby exacerbating further the communities problems.

| 167.6

If the last few weeks have shown Aucklanders anything it is how we have suffered due to our overstretched infrastructure due to good practice development requirements being ignored by the relevant authorities.

I or we seek the following decision by council: Decline the plan change

Submission date: 26 February 2023

### **Attend a hearing**

Do you wish to be heard in support of your submission? No

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Jason Shaw  
**Date:** Sunday, 26 February 2023 2:00:21 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Jason Shaw

Organisation name:

Agent's full name:

Email address: [jason@rucon.co.nz](mailto:jason@rucon.co.nz)

Contact phone number:

Postal address:  
9 Mahutonga Ave  
Beachland  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Rezoning of 307Ha South of Beachlands Village in the are of Formosa Gold Course from rural to future Urban Residential etc

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

|  |       |
|--|-------|
| The current and proposed infrastructure is not suitable for the number of new dwellings proposed.  | 168.1 |
| The developer is not going to contribute funding towards Roothing, water, waste water, schooling and public transport, taking the stance that these problems already exist, therefore it is not their problem. This current proposal would just add to the current infrastructure issue, not make them any better. Also more pressure would also be put on the local volunteer fire brigade. | 168.2 |
|  | 168.3 |

I or we seek the following decision by council: Decline the plan change

Submission date: 26 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Maria Money  
**Date:** Sunday, 26 February 2023 2:00:30 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Maria Money

Organisation name:

Agent's full name: Maria Money

Email address: maria.c.money@gmail.com

Contact phone number:

Postal address:  
9 Mahutonga Avenue  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

The current and proposed infrastructure is not suitable for the number of new dwellings proposed. The developer is not going to contribute funding towards Roading, water, waste water, schooling and public transport, taking the stance that these problems already exist, therefore it is not their problem. This current proposal would just add to the current infrastructure issue, not make them any better. Also more pressure would also be put on the local volunteer fire brigade.

169.1  
169.2  
169.3

I or we seek the following decision by council: Decline the plan change

Submission date: 26 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Jeanette Hilton  
**Date:** Sunday, 26 February 2023 4:15:09 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Jeanette Hilton  
 Organisation name:  
 Agent's full name:  
 Email address: jeanettehilton873@yahoo.com  
 Contact phone number: 021 536 550  
 Postal address:  
 55a first view ave  
 Beachlands  
 Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
 Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
 Property address: Formosa golf course  
 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 area does not have the infrastructure to cope with all this housing ,and also it is destroying the way of life out here,

170.1  
 170.2

I or we seek the following decision by council: Decline the plan change

Submission date: 26 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
 Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Lynne Richardson  
**Date:** Sunday, 26 February 2023 4:46:06 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Lynne Richardson

Organisation name:

Agent's full name:

Email address: [lynne-richardson@xtra.co.nz](mailto:lynne-richardson@xtra.co.nz)

Contact phone number:

Postal address:  
51 Pinebrook Lane  
Maraetai  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Rezone approximately 307ha of land south of Beachlands from Rural – Countryside Living Zone to a mix of business, residential, open space and Future Urban zones

Property address: 110 Jack Lachlan Drive, 620-770 Whitford-Maraetai Road

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Insufficient transport links, no remedy for improving Whitford-Maraetai Road, no provision for extra public transport. Excessive development will overload the existing road with traffic mornings & evenings. Route is currently congested as it is.

171.1  
171.2

I or we seek the following decision by council: Decline the plan change

Submission date: 26 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Helen Els  
**Date:** Sunday, 26 February 2023 5:00:11 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Helen Els  
Organisation name:  
Agent's full name:  
Email address: hbuistels@gmail.com  
Contact phone number: 02108439334  
Postal address:  
77 Intrepid Crescent  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
High Density Housing Beachlands

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:  
Beachlands and Maraetai have been swamped with high density new builds. There is one small medical centre and no secondary school, one loop road into the area and insufficient infrastructure.

172.1  
172.2  
172.3

I or we seek the following decision by council: Decline the plan change

Submission date: 26 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Serena Waldron  
**Date:** Sunday, 26 February 2023 5:30:09 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Serena Waldron

Organisation name:

Agent's full name:

Email address:

Contact phone number:

Postal address:  
2 Fourth View Ave  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Stop Formosa development

Property address: Pine harbour

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:  
No infrastructure planned for pohutukawa coast  
No appropriate schooling for extra children on coast

173.1  
173.2

I or we seek the following decision by council: Decline the plan change

Submission date: 26 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Richard Peter Betts  
**Date:** Sunday, 26 February 2023 6:00:13 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Richard Peter Betts

Organisation name:

Agent's full name:

Email address: richardpbetts@gmail.com

Contact phone number:

Postal address:  
144 Seventh View Ave  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
The proposed development at Formosa golf course.

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
The lack of improvements planned for the roading, wastewater and other infrastructure. The current infrastructure in place is struggling, particularly the roading. Adding a significant population will make things far worse.  
There needs to be provisions added for additional primary and a high school.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

|  |       |
|--|-------|
| Details of amendments: New or significantly upgraded roading for the coast from or midtown and howic to Beachlands, Maraetai & Clevedon. Add additional capacity to the water & wastewater. Put in additional schools. Add a real bus service. | 174.1 |
|  | 174.2 |
|  | 174.3 |
| Submission date: 26 February 2023  | 174.4 |

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Pam Bruinsma  
**Date:** Sunday, 26 February 2023 6:15:07 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Pam Bruinsma  
Organisation name:  
Agent's full name:  
Email address: bruinsma\_pm@hotmail.com  
Contact phone number:  
Postal address:  
18 Puriri Road  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Formas development in pine harbour Beachlands auckland  
Property address: Formosa Beachlands  
Map or maps:  
Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

The road structure won't cope there needs to be inforstructure first schools primary and high school, and more space between houses the proposed are far to close you are literally sitting on top of neighbors and single dewellings rather than apartments that come with extre bodycorp fees

175.1  
175.2  
175.3

I or we seek the following decision by council: Approve the plan change without any amendments

Details of amendments:

Submission date: 26 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Colin Nicholas Nunweek  
**Date:** Sunday, 26 February 2023 7:00:16 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Colin Nicholas Nunweek

Organisation name:

Agent's full name:

Email address: colin.nunweek@gmail.com

Contact phone number:

Postal address:  
17 Hapukupuku Ave  
Beachlands  
Aucklands 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Rezoning of 307Ha South of Beachlands village

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

The documentation supporting the application identify that the Beachlands - Whitford road is beyond capacity, while upgrades to this road are in the regional plan (4 lane-ing, Whitford bypass) they are not funded and are unlikely to be realized before 2050. The applicants are not committing any support to these upgrades and seem to support an approach of "if we make the problem bad enough AT will have to step in"

The additional traffic on this road link is likely to exacerbate the existing problems and safety concerns. A reasonable response from AT assuming that the development was to go ahead would be to lower the speed limit on the Beachlands - Whitford from the current 80km/h to 60km/h, further isolating the Beachlands community and degrading a link used by ~80% of Beachlands workers. Beachlands also currently lacks a secondary school with the majority of students traveling by bus to Howick Collage, the MOE within the last 12 months has declined the suggestion of a Beachlands secondary school. The end result of this will be existing students and new residents traveling on an over capacity road and increasing both the exposure risk to students and the greenhouse gas

/particulate/NOX emissions associated with extra busses and longer journey times .

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: The applicants need to make a material contribution to the upgrading and expansion of the Beachlands - Whitford Rd, sufficient that works would be prioritised by AT and upgrades completed inline with the first new residents of the proposed development.

176.1

Submission date: 26 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Will Owen  
**Date:** Sunday, 26 February 2023 7:30:10 pm

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Will Owen

Organisation name:

Agent's full name:

Email address: will@playgolf.co.nz

Contact phone number: 0275344367

Postal address:

64 Pine Harbour Parade

Beachlands

Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

Number of dwellings allowed

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 infrastructure on the Pohutakawa Coast is extremely fragile. The road from Whitford and out to Clevedon are of poor quality and are very busy at times. With the population of the Beachlands almost doubling due to these plans the roading will not cope and the quality of life for the vast majority of residents will deteriorate. | 177.1

The recent weather events in Auckland proved just how vulnerable this area is, especially with bad weather events becoming worst and more frequent. I see there are no firm plans for a high school in these plans. This is ridiculous as our kids already have to stand up on one of numerous busses that travel to and from Howick each day. | 177.2

I or we seek the following decision by council: Decline the plan change

Submission date: 26 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Fiona Fraser  
**Date:** Sunday, 26 February 2023 7:45:10 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Fiona Fraser  
Organisation name:  
Agent's full name:  
Email address: fionalouisefraser@gmail.com  
Contact phone number:  
Postal address:  
2018  
Maraetai  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
The building of 3000 new homes will significantly and negatively impact the existing community

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
The proposed development will have a terrible impact on the community and make this area unliveable. The roads are already poorly maintained and without any budget for infrastructure work, the proposed housing development is a terrible idea.

178.1

178.2

I or we seek the following decision by council: Decline the plan change

Submission date: 26 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Amy Stewart  
**Date:** Sunday, 26 February 2023 8:00:16 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Amy Stewart

Organisation name:

Agent's full name:

Email address: amystewart@live.com

Contact phone number: 021883420

Postal address:

2018  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Formosa and surrounding houses to go ahead with building as long as there's is upgrades on the road. They need to Make way for a school and high school to take the heavy traffic commute to more local

179.1

Property address: Formosa

Map or maps: Beachlands - Formosa

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

The new buildings are fine as long as there is room for school/high school to cater and take on the more numbers of families to take the pressure off a Already busy/traffic area to and from would make it ideal and more local and less traffic to have the facilities of a high school out here

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: 1 high school

179.2

Submission date: 26 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - toni stairmand  
**Date:** Monday, 27 February 2023 8:00:57 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: toni stairmand

Organisation name:

Agent's full name:

Email address: toni.stairmand@gmail.com

Contact phone number:

Postal address:

beachlands  
auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Plan Change 88

Property address: PC 88 (Private): Beachlands South

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
the infrastructure does not support this development

180.1

I or we seek the following decision by council: Decline the plan change

Submission date: 27 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Orders](#)  
**To:** [Unitary Plan](#)  
**Subject:** FW: Plan opposition  
**Date:** Monday, 27 February 2023 8:06:20 am

---

Dear Sir/Madam

Regarding the planned re-zoning of approx 307ha of land south of Beachlands from Rural-countryside Living zone to a mix of business, residential, open space and Future Urban zones,

I wish to put in a Submission **against** this proposal.

I have lived in Maraetai for over forty years now and I strongly believe that there is not sufficient infrastructure in place to support the plan change.

The Maraetai-Whitford-Howick road is already extremely congested during rush hour times with workers and school children travelling through the area.

I also believe that there is insufficient sewage facilities to support such a plan change which would obviously involve thousands more vehicles on our access roads.

I am not against progress, and in the future, once the Howick - Maraetai roads have been widened to double lanes both ways and sewage treatment plant extended or upgraded then it could be a feasible change, but for now until major upgrading and improvements of infrastructure have been made to support such a plan change I feel it would put a crippling strain on the existing roading and other infrastructure facilities.

Already there are many accidents on our Howick-Maraetai roads and every time there is an accident, even a fairly mild one, it involves a road closure which forces travellers to go many many kilometers out of their way to get home or to work.

Therefore I wish to submit my strong opposition to the planned change.

Regards

Darron Crawford

181.1

181.2

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - David Cartledge  
**Date:** Monday, 27 February 2023 9:46:06 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: David Cartledge  
 Organisation name:  
 Agent's full name:  
 Email address: Davewantsaboat@gmail.com  
 Contact phone number:  
 Postal address:

Maraetai 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
 Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
 Property address: Formosa development  
 Map or maps:  
 Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
 Roaring not adequate for the population now  
 No provision for water or wastewater  
 Public transport adequate

182.1  
 182.2  
 182.3

I or we seek the following decision by council: Decline the plan change

Submission date: 27 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Kim Beere  
**Date:** Monday, 27 February 2023 10:15:58 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Kim Beere

Organisation name:

Agent's full name: Kim Beere

Email address: kimbeere@forcelogistics.co.nz

Contact phone number:

Postal address:  
59 Te Pene Road  
Maraetai Beach  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Property address: PC 88 Beachlands South

Map or maps: PC 88 Beachlands South

Other provisions:

No requirement for developers to improve road access to the area or upgrade waste treatment facilities and local infrastructure.

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

We already have major congestion on the Whitford Maraetai Road and other major roads in the area during peak hours and the roads are falling apart due the amount of heavy traffic and volume of vehicles currently using them. The increase in housing will increase this volume of traffic and their is no requirement on the developers to improve vehicle access to the area to deal with the greatly increased number of vehicles that will be required to travel in and out of the area for work. Using the ferry service is not an option for many people as they work in East Tamaki and area's the ferries to do go to. Using the bus service is also not an option due the limitations on where the buses travel to and the time frames the buses take especially with transfers required to get to most places.

The increased number of residents will but additional pressures on our small primary and intermediate schools and dramatically increase the number of high school students needing use buses to commute out of area for schooling. This will put further pressure of heavy vehicles on the



Whitford Maraetai Road which is already at capacity during peak hours and in bad repair due the lack of maintenance and heavy vehicle usage of the road.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: Double lane Whitford Maraetai Road, Whitford Road and Ormiston Road.

183.1

Submission date: 27 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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## Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 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)

Jasper Grant Murdoch Campbell

#### Organisation Name (if submission is made on behalf of Organisation)

#### Address for service of Submitter

13 Ealing Crescent, Beachlands, Auckland.

Telephone:

2749654113

Fax/Email:

jasper.campbell@gmail.com

Contact Person: (Name and designation, if applicable)

### Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 88 (Private)

Plan Change/Variation Name

Beachlands South

#### The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Or

Property Address

Or

Map

Or

Other (specify)

### Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

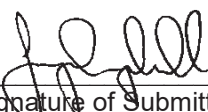
The reasons for my views are:

The infrastructure in the area is already overwhelmed by recent development in the area. Continuing to inflate the population so rapidly with no thought for roading development is totally irresponsible and will severely compromise the quality of life for the existing residents and the incoming residents. Already we are facing a severe congestion problem and everyone can see another Whangaparoa peninsular situation is occurring where traffic congestion prevents ease of travel, wastes alot of time stuck in traffic. Why the council does not take learn from these mistakes and develop infrastructure prior to mass development i bewildering and completely irresponsible. (continue on a separate sheet if necessary)

I seek the following decision by Council:

- Accept the proposed plan change / variation
- Accept the proposed plan change / variation with amendments as outlined below
- Decline the proposed plan change / variation
- If the proposed plan change / variation is not declined, then amend it as outlined below.  | 184.1
- Defer further development until roading network in the area is developed sufficiently to account for current and future popul

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at a hearing

  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

02/27/2023  
Date

**Notes to person making submission:**  
 If you are making a submission to the Environmental Protection Authority, you should use Form 16B.  
 Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.  
 If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.  
 I could  /could not  gain an advantage in trade competition through this submission.  
 If you could gain an advantage in trade competition through this submission please complete the following:  
 I am  / am not  directly affected by an effect of the subject matter of the submission that:  
 (a) adversely affects the environment; and  
 (b) does not relate to trade competition or the effects of trade competition.

# Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 24, 135 Albert Street  
Private Bag 92300  
Auckland 1142

AUCKLAND COUNCIL  
27 FEB 2023  
CBD - ALBERT ST

|                     |
|---------------------|
| For office use only |
| Submission No:      |
| Receipt Date:       |

## Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Mr and Mrs J Beddoe

Organisation Name (if submission is made on behalf of Organisation)

## Address for service of Submitter

26 Columbia Crescent Beachlands 2018

Telephone:  Fax/Email:

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

Plan Change/Variation Name

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)

## 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:

|  |       |
|--|-------|
| poor roads, poor public transport, over subscribed (one)doctors surgery. No other medical facilities in the close vicinity .                 | 185.1 |
| No recreational facilities for shool children , ie swimming pool.Poor parking for families with more than one car in new                     | 185.2 |
| local developments. No onsite petrol; station or electric vehicle public charging stalons. No senior schools available unless buses provided | 185.3 |


(continue on a separate sheet if necessary)

I seek the following decision by Council:

- Accept the proposed plan change / variation
- Accept the proposed plan change / variation with amendments as outlined below
- Decline the proposed plan change / variation
- If the proposed plan change / variation is not declined, then amend it as outlined below.

rethink it with people in mind not just profit.

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at a hearing

  
 Signature of Submitter  
 (or person authorised to sign on behalf of submitter)

02/20/2023  
 Date

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could  /could not  gain an advantage in trade competition through this submission.

**If you could gain an advantage in trade competition through this submission please complete the following:**

I am  / am not  directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Lloyd Williams  
**Date:** Monday, 27 February 2023 12:16:20 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Lloyd Williams

Organisation name: Private person

Agent's full name:

Email address: [Lloydwilliams@xtra.co.nz](mailto:Lloydwilliams@xtra.co.nz)

Contact phone number:

Postal address:  
376 Great South Road Opaheke Papakura  
Papakura  
Auckland 2113

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Marina Usage

Property address:

Map or maps:

Other provisions:  
Lack of Parking and increased Marine traffic by larger Ferries

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
There are currently no proper plans showing the proposed vehicle parking areas or lack of them. Also there are no details of the size and frequency of the proposed Marine Traffic, and or Berthing facilities that will need to be upgraded.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: As above, it is irresponsible on the part of Council to approve Marina changes without specific details, including additional building development and checking on a previous consent allowing Houses to be built in the existing Marina Carpark.

186.1

Submission date: 27 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Margaret Ann Nicholls  
**Date:** Monday, 27 February 2023 1:31:00 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Margaret Ann Nicholls

Organisation name:

Agent's full name:

Email address: margn@waimama.co.nz

Contact phone number:

Postal address:

11 Te Pene Rd

Maraetai

Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Transport, water. Roads

Property address: Beachlands South

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

The roads are not adequate to cope with the number of dwellings projected. The water is not adequate to cope with the number projected. The waste water is not adequate to cope with the numbers projected. The public transport is not adequate to cope with the numbers projected

187.1

I or we seek the following decision by council: Decline the plan change

Submission date: 27 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**



Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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## Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 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)

David Paul Lloyd

#### Organisation Name (if submission is made on behalf of Organisation)

#### Address for service of Submitter

Telephone:

21338445

Fax/Email:

dplloyd@outlook.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 88 (Private)

Plan Change/Variation Name

Beachlands South

#### The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Or

Property Address

Or

Map

Or

Other (specify)

### Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

After reading the documentation associated with the proposal, realise that no consideration has been given to the huge increase in traffic between Maraetai and Whitford.

The only upgrades mentioned in the proposal are a few roundabouts. This is typical of NZ developments where infrastructure lags the development by many years.

Even AT believes Maraetai - Whitford Rd is currently not suitable for the current traffic load. The existing Rd is often littered with vehicles that have crashed.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.  188.1

Widen the Mareatai Whitford road to 4 lanes.

Ensure the road is as straight as possible and that the connection between Whitford and Ormiston also allows for seamless traffic flow.

Construction should not start until roading and other infrastructure is in place.

Roading upgrades as/ above should be a condition of Beachlands South going ahead and should be paid for by the developer.

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

David Lloyd  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

02/27/2023  
Date

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could  /could not  gain an advantage in trade competition through this submission.

If you **could** gain an advantage in trade competition through this submission please complete the following:

I am  / am not  directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Julio de Faria  
**Date:** Monday, 27 February 2023 3:01:06 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Julio de Faria

Organisation name: N/A

Agent's full name: N/A

Email address: julcor@xtra.co.nz

Contact phone number:

Postal address:  
31/1 Seventh View Avenue  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Proposed rezoning

Property address: 307 Ha South of Beachlands Village in the area of Formosa Golf Course

Map or maps: Those referenced by Auckland City Council in their correspondence date 20 January 2023

Other provisions:  
None

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:

My submission is that the proposal should be rejected until such time as agreement is reached with Beachlands South Limited that they will provide at their cost, all infrastructure (including but not limited to roading, water, sewerage, flood management, waste management, power, transport, telecommunications) and associated services that Auckland City Council deem appropriate to support the additional 3900 plus dwellings that are proposed subsequent to this proposed plan change.

189.1

It is critical that roading upgrades are required to support the additional population and traffic load that come with 3900 plus new dwellings identified in Stage 1 of the proposed developments. The upgrade should change the Beachlands /Maraetai road to Whitford from a two lane to a four lane road.

189.2

The proposal is for the use of bore water for all uses including residential, community and

189.3

commercial across the proposed rezoned areas. Is any study been made to insure the viability of bore water for new dwellings and the existing ones? why not mandate the use of rain water tanks like the rest of the existing community ?

189.3

I also have concerns about the proposed sewerage system as how environmental friendly is going to be.

The size and proposed dwelling construction , from single/double level to high rise high density dwellings, is in total opposition to the Auckland City Council Unitary Plan . The proposal if approved will lead to changes that will impact forever the identity of Beachheads.

189.4

I or seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: Beachlands South Limited to provide at their cost all infrastructure as outlined above

Submission date: 27 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Corinne Jean de Faria  
**Date:** Monday, 27 February 2023 3:16:06 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Corinne Jean de Faria

Organisation name: N/A

Agent's full name: N/A

Email address: [julcor@xtra.co.nz](mailto:julcor@xtra.co.nz)

Contact phone number:

Postal address:  
31/1 Seventh View Avenue  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Proposed rezoning

Property address: 307 Ha South of Beachlands Village in the area of Formosa Golf Course

Map or maps: Those referenced by Auckland City Council in their correspondence date 20 January 2023

Other provisions:  
None

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:

My submission is that the proposal should be rejected until such time as agreement is reached with Beachlands South Limited that they will provide at their cost, all infrastructure (including but not limited to roading, water, sewerage, flood management, waste management, power, transport, telecommunications) and associated services that Auckland City Council deem appropriate to support the additional 3900 plus dwellings that are proposed subsequent to this proposed plan change.

190.1

It is critical that roading upgrades are required to support the additional population and traffic load that come with 3900 plus new dwellings identified in Stage 1 of the proposed developments. The upgrade should change the Beachlands /Maraetai road to Whitford from a two lane to a four lane road.

190.2

The proposal is for the use of bore water for all uses including residential, community and

190.3

commercial across the proposed rezoned areas. Is any study been made to insure the viability of bore water for new dwellings and the existing ones? why not mandate the use of rain water tanks like the rest of the existing community ?

190.3

I also have concerns about the proposed sewerage system as how environmental friendly is going to be.

The size and proposed dwelling construction , from single/double level to high rise high density dwellings, is in total opposition to the Auckland City Council Unitary Plan . The proposal if approved will lead to changes that will impact forever the identity of Beachheads.

190.4

I or seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: : Beachlands South Limited to provide at their cost all infrastructure as outlined above

Submission date: 27 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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# Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



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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)

Mr Dennis Michael Gobey

### Organisation Name (if submission is made on behalf of Organisation)

### Address for service of Submitter

160 Seventh View Avenue, Beachlands, Auckland, 2018

Telephone:

2040968744

Fax/Email:

dennis.gobey@yahoo.co.nz

Contact Person: (Name and designation, if applicable)

## Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 88 (Private)

Plan Change/Variation Name

Beachlands South

### The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Or

Property Address

Or

Map

Or

Other (specify)

## Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)



I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

(1) There is simply no room in the lovely Beachlands community for another three thousand properties (Fletchers are building 300 houses on the only decent green site) High rise/medium density housing is only suitable for rapid transport. (2) It will be impossible to sell that many properties and th

(3) The infrastructure of Beachlands ,water, power, transport will simply not cope.

191.1

(4) The only road for people to get to work is unable to cope now, without doubling the population.

191.2

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

I 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

Dennis Gobey  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

02/27/2023  
Date

**Notes to person making submission:**

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If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could  /could not  gain an advantage in trade competition through this submission.

**If you could gain an advantage in trade competition through this submission please complete the following:**

I am  / am not  directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

# Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



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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) Mrs Lesley Scaggiante

### Organisation Name (if submission is made on behalf of Organisation)

### Address for service of Submitter

59 Intrepid Crescent, Beachlands, 2018

Telephone: 21662803 Fax/Email: lesleyscaggiante@gmail.com

Contact Person: (Name and designation, if applicable)

## Scope of submission

This is a submission on the following **proposed plan change / variation to an existing plan:**

Plan Change/Variation Number PC 88 (Private)

Plan Change/Variation Name Beachlands South

### The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s) Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Or  
Property Address

Or  
Map

Or  
Other (specify)

## Submission

**My submission is:** (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

Please see separate document attached

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

Please see separate document attached

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

27/2/2023  
Date

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could  /could not  gain an advantage in trade competition through this submission.

**If you could gain an advantage in trade competition through this submission please complete the following:**

I am  / am not  directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

I am by no means an expert – just a Mum that has lived in Beachlands for some 11 years and have seen the rapid growth of the Beachlands/Maraetai area. I realise that there is a need for housing in NZ but do think that certain areas are “ill equipped” to handle the “mass housing development” proposed on Ferosa e.g. no waterline, one road into and out of the metro areas, two schools that are at capacity, one very small shopping centre, one recreational facility etc.....

**Here is more detail of my concerns:**

**Reason 1) Roads** – already the roads cannot cater for the amount of people living in Beachland/Maraetai, with constant repairs needed due to weather conditions and the amount of traffic.

I would just like to mention that a whole lane has been blocked (for part of the way) up Sandstone Road for around 2 years now.....with no work in sight! How quickly then will Council be able to do the required repairs when the population of Beachlands has doubled.

With only two schools in the area many kids have to travel into the metro areas for school. Therefore, with more people this means more cars/buses travelling into schools

When there is an accident and the Whitford/Maraetai road is closed the only way in is to go via Maraetai Clevedon. Already that is a treacherous road with the constant threat of landslides and roads collapsing (it is right next to the coastline). There has been an incident where both routes were blocked and people had to park at Te Puru and walk home late at night!!

An alternative that has been proposed by the Developers are Ferry's and Buses. For one the ferry's do not go to East Tamaki/Manukau/Penrose?? In addition due to the “nature of work” of many individuals their car is needed (they are not office based), e.g. Sales, tradespeople, schools where bus service is not available.

In addition has parking been thought through? Already there is a huge problem with parking at one recent development just up from the Pine Harbour. The Townhouses have small garages and people have to park on the street – the streets are very narrow, thus allowing one vehicle through at a time!

Emergency evacuation – with all this in mind if there was an emergency evacuation from Beachlands/Maraetai I would hate to see the consequences.

***If proposed plan is not declined:*** Provide a 4 Lane Road to and from Beachlands to metro areas. Roads to be built before housing development starts – to cater for builders, trucks, heavy equipment

192.1

**Reason 2) Transport: School buses** – my Son travels from school to home and already the buses are overcrowded with kids standing all the way to the front... We have heard that AT have reported as “considering cutting existing bus services due to non-utilisation”. Will Auckland Transport be able to supply the additional buses required to cater for the huge increased population? There is only 1 bus after school so if children have extra activities after school they need to be picked up by car. Therefore no alternative transport (as proposed).

We have heard that there is no definite guarantee that a new, much needed school already, will even be built. I cannot see how the existing schools could cater for any more kids when they are already at capacity?

**If proposed plan is not declined:** triple the school bus supply. With buses leaving at staggered times in the afternoon.

192.2

**Reason 3) Water/Wastewater Management** – the proposed development is to use Bore Water. Has there been any investigation on whether the bore water will be sufficient for 3000+ dwellings? And multi level buildings as well? At the moment we have numerous water suppliers – but due to demand sometimes have to wait for days before our tank can be filled.

In addition we have heard that Watercare do not have the money to develop the required infrastructure for water, sewerage, drainage. What will become of beautiful Beachlands!!

**If proposed plan is not declined:** Watercare to supply sufficient evidence that they will be able to manage this development. Council Water supply to Beachlands/Maraetai (Waterline) before development.

192.4

**Reason 3) Shopping Centre and Amenities** – at present we have a Countdown, 2 small chemists, one doctors rooms, one gym, one sports ground, no swimming pool – which residents have wanted for years. If these are all to come only after the residential properties then that means more travel on the one road in and out....instead of growing the population shouldn't Council be looking at developing these to cater for the already rapidly increased population.

**If proposed plan is not declined:** shops and amenities to be developed before the residential building starts.....build the infrastructure etc before the residential properties start.

Where will the funding come from to develop infrastructure, amenities, medical facilities, Emergency Services?

192.3

**Reason 4) Medical and Emergency Facilities** – the closest emergency clinic is Botany. And closest Hospital Middlemore. This already presents a problem for any medical emergencies.

We have one "Volunteer Fire Station" and "One Police Man" (that I know of)...not enough to cater for existing population, let alone an increase to that proposed.

In addition as mentioned before if there is an accident and the road is closed – any emergency could be life threatening.

**If proposed plan is not declined:** Council to build emergency facilities before housing development

192.5

  
\_\_\_\_\_  
Signature of Submitter

27/2/2023  
\_\_\_\_\_  
Date

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Nicole Hillis  
**Date:** Tuesday, 28 February 2023 7:30:33 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Nicole Hillis

Organisation name:

Agent's full name:

Email address: hillis.nic@gmail.com

Contact phone number:

Postal address:  
96B Karaka Road  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Property address:

Map or maps:

Other provisions:

The lack of plan to upgrade the infrastructure needed to support this development

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Beachlands is already struggling with the current infrastructure in place, with the addition of more homes it will not cope.

Additionally, ferry services will become inaccessible due to lack of parking and limited ferry capacity

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: Upgrade infrastructure and ferry services before the development goes ahead.

193.1

Submission date: 28 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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# Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 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)

Mr Peter John Reilly

### Organisation Name (if submission is made on behalf of Organisation)

### Address for service of Submitter

148 Eighth View Avenue, Beachlands, Auckland 2018

Telephone:

64211425534

Fax/Email:

peter@reilly.net.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 88 (Private)

Plan Change/Variation Name

Beachlands South

### The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Or

Property Address

Or

Map

Or

Other (specify)

## Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)



I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

1. I am concerned about the ability of the Whitford-Maraetai Road & infrastructure to cope with the resulting increase in population and resulting traffic congestion from the proposed urban residential development in Beachlands.

194.1

2. I am also concerned about sustainability of the water supply, waste water and storm water systems.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

I submit the following conditions must be satisfied before approval is provided:

1. The Whitford-Maraetai Road road and infrastructure must be improved to cope with future increase in population.

2. Conclusive technical evidence must be provided to confirm that the water supply, waste water and storm water systems are sustainable with minimal environmental impact such as too higher demand on ground water supply and flooding.

194.2

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

02/28/2023

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.

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If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could  /could not  gain an advantage in trade competition through this submission.

If you **could** gain an advantage in trade competition through this submission please complete the following:

I am  / am not  directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Jordan McPherson-Whimp  
**Date:** Tuesday, 28 February 2023 11:45:39 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Jordan McPherson-Whimp

Organisation name:

Agent's full name:

Email address: jmcphersonwhimp@xtra.co.nz

Contact phone number: 095365562

Postal address:  
76 Karaka Road  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Property address: Jack Lachlan Drive (Formosa land development )

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Increase in pollution. Damage to the environment as well as decrease in green space. Infrastructure, particularly the roading between Beachlands and Whitford is already not suitable for the population size as it is very heavily congested during peak hours and during summer months with people coming out to the beach. The roading in Pine Harbour is currently too narrow for emergency vehicles and any large vehicles trying to negotiate their way around the streets. The quality of the roads are poor, it is breaking up in multiple places in both the residential areas and the main road to Whitford. There is also an increase in cyclists but no cycle lane for them which creates a danger for both the cyclists and motorists. Another issue is that the model depicted in the picture showing what the development will look like on the landscape is shocking in terms of it ruins the beautiful landscape permanently and for a country that advocates for beautiful green New Zealand this is very disappointing. Therefore I believe that this land should not be rezoned as residential

195.1

195.2

195.3

I or we seek the following decision by council: Decline the plan change

Submission date: 28 February 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

[Have your say on Auckland Council's annual budget 2023 and 2024.](#)



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email may be those of the individual sender and may not necessarily reflect the views of Council.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Shannon Therese Grace  
**Date:** Tuesday, 28 February 2023 12:15:29 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Shannon Therese Grace  
Organisation name:  
Agent's full name: Shannon Grace  
Email address: SHANNON.GRACE@NZ.PANASONIC.COM  
Contact phone number:  
Postal address:  
SHANNON.GRACE@NZ.PANASONIC.COM  
Maraetai  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Proposed Development of Beachlands South to rezone and develop 307 hectares of land from Jack Lachlan Drive South

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:

Rezoning and adding 3,000 dwellings would significantly impact the local and surrounding community. Doubling the size of the community with more buildings (some multi-storey) and high-density housing would put pressure on local community resources. The extra cars, parking on streets, limited local amenities and no provision for widening roads to accommodate extra traffic flow would negatively impact this region. Not to mention extra pressure and risks with amenities such as infrastructure eg water from existing bores, wastewater being discharged and impact on coastal environment. This development doesn't definitively give insight around expanded healthcare, education or leisure facilities for a community that would be doubled in size.

I or we seek the following decision by council: Decline the plan change

Submission date: 28 February 2023

**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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - David Wray  
**Date:** Tuesday, 28 February 2023 1:30:31 pm  
**Attachments:** [Submissions to Council.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: David Wray  
Organisation name:  
Agent's full name:  
Email address: dagger-reggie@xtra.co.nz  
Contact phone number: 0274 324437  
Postal address:  
73 Eighth View Avenue  
Beachlands  
2018  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Property address: 110 Jack Lachlan Drive and 620 Whitford- Maraetai Rd  
Map or maps:  
Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:  
The infrastructure in Beachlands area is at its limits now , especially the main roading network from Summerville roundabout to Countdown Roundabout in Beachlands. This road has to be double laned in each direction to cope with the increase in traffic from these housing developments. When finished there will be 20,000 people living in the Beachlands Maraetai and Omana areas.

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: See supporting documents

Submission date: 28 February 2023

197.1

Supporting documents  
Submissions to Council.pdf

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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## Submissions to Council

### Transport and Traffic

Double lanes both ways from Somerville roundabout to Countdown Beachlands.

Mangemangeroa bridge needs to be replaced with 4 lane bridge cutting across the bridge valley in a straight line to rejoin Whitford Road further east. This will greatly enhance the flow of traffic and the current bridge can not manage this increase in traffic being one lane each way without the steep approaches to both sides of current bridge and the angle of entry to both sides.

All roads leading off from Whitford-Maraetai road on the left hand sides must have a 50m extra lane to turn left only. This stops left turning traffic holding up straight traffic.

The double lane Sandstone Road coming from Ormiston Road must continue East Past the Whitford Golf Club and rejoin the Whitford-Maraetai Road at the Clifton Road Trig Road Intersection. There could be a large roundabout there, or sets of lights, or a small overbridge or tunnel to take this Sandstone Road extension under or over the Whitford-Maraetai Road so seamless merge like a zip from the left hand side. All roads joining these main two double laned roads shall have there own free left turn merging lanes.

Sandstone Road could also connected to Matthias Place if Matthias Place is not a private Road. Matthias place is a fully formed road and the width would need to be widened to make it a double lane in both directions.

High pressure P.E Pipe could be put in at same time as road widening for future town water supply. You cannot get away with not double laning these two main roads out of Flatbush and Somerville. The single main roads are at full capacity now.

### Town Water

Every house should have their own option to put in 2x 25000L underground concrete water tanks. The bore water taken from the ground at Formosa is not suitable for potable water unless it goes through a properly designed water treatment plant. I have seen this water first hand, The main kitchen chefs were refusing to use this "potable" water for cooking even after treatment.

If the dwellings don't want 2x 25000 tanks underground., they should be made to put in hidden 1 or 2000L tanks to catch rainwater off the roofs. This water can be used for toilet flushing and showers and only connected to these two internal devices. This is free water and I use this at present. Normal tap (potable) water would be connected to the treated bore water.

### Medical

Allowance should be made for a 24 hours emergency clinic in the Beachlands - Maraetai Region. This should incorporate local GPs daytime clinics of various specialties and a permanently based ambulance station. The Emergency department would be the first line treatment for serious patients before they are sent o to area hospitals. This doesn't have to be as big as a Main hospital E.D but

somewhere around 4 or 6 beds for emergency patients only. After these developments have come to fruition there could be 20,000 people living in the Beachlands, Maraetai, Omana area.

### **Schooling**

Land must be set aside for a decile 10 high school. Formosa I am led to believe has offered enough land for a secondary school, as a drawcard for the council to accept their development proposal. This school is probably 5 to 10 years in the future, but Beachlands Area is growing rapidly and there are busloads of kids at present being bussed to Howick College and Ormiston College.

### **Recreation Centre**

A public Recreation centre must be allowed for in the planning, and among the facilities should be a full sized public swimming pool. This could be incorporated into a secondary school, or as a separate facility

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Cheryl Christine Williams  
**Date:** Tuesday, 28 February 2023 2:31:23 pm

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Cheryl Christine Williams

Organisation name:

Agent's full name:

Email address: cheryl.christine.cw@gmail.com

Contact phone number:

Postal address:  
 48 Seventh View Avenue  
 Beachlands  
 Auckland 2018

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

##### My submission relates to

Rule or rules:  
 Beachlands South development. PC 88 (Private)

Property address: Jack Lachlan Drive, Beachlands

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:

Until such time as either existing infrastructure is considerably upgraded or new infrastructure is in place to provide for such a large increase in the population expected in the area with the proposed Beachlands South development this should be put on hold until such time as infrastructure is completed.

198.1

I am concerned with infrastructure for roading, water, waste water and discharge of sewerage. How are these going to be addressed? What provisions have been made for discharge of sewerage and what impact will this have on the environment?

The existing roads in particular are 'old' country roads and were not designed for such an increase in the population. Examples are the Whitford – Maraetai Road and Whitford Road to the roundabout at Somerville Road, Howick. Sandstone Road with the increased traffic is showing signs of subsidence.

The existing bridge at Mangemangeroa is inadequate for the amount of traffic and needs to be replaced.

Ferry patronage is designed only to take people to the central city, whereas the majority of residents travel by private vehicle to East Tamaki, Botany, Wiri or further afield.

Public transport only goes to Botany where transfers are required making a trip to Howick for example one hour 20 minutes.

198.2

If Beachlands South development goes ahead this will add further congestion to what are already 'choke points' in Howick, Botany, through Ormiston and at the top of Murphys Road where the road joins Redoubt Road and Mill Road.

I or we seek the following decision by council: Decline the plan change

Submission date: 28 February 2023

### **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.

Have your say on Auckland Council's annual budget 2023 and 2024.

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**Submission on a notified proposal for policy statement or plan change or variation**

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 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)

ALEXANDER JOHN MOORE

Organisation Name (If submission is made on behalf of Organisation)

B.M.O. RESIDENTS GROUP

Address for service of Submitter

230 JACK LACHLAN DRIVE, BEACHLANDS, AUCKLAND 2018

Telephone:

021939243

Fax/Email:

sandy.moore@outlook.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 88 (Private)

Plan Change/Variation Name

Beachlands South

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Or

Property Address

Or

Map

Or

Other (specify)

**Submission**

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are: ① JACK LACHLAN DRIVE IS NOT SUITABLE AS A MAIN ACCESS ROAD FOR SUCH A HUGE DEVELOPMENT. 199.1

② THE JACKLACHLAN/WHITFORD MARAETAI ROADS INTERSECTION IS ALREADY UNSAFE, IN THE EVENT OF HUGE INCREASED TRAFFIC IT NEEDS A COMPLETE RE-STRUCTURE / MORE LANE OR TRAFFIC LIGHTS (continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

REVISE THE ROADING PLAN, FIND ANOTHER ACCESS IN SEAO OF JACK LACHLAN DRIVE.

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

27/02/23  
Date

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could  / could not  gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am  / am not  directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.



**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Brent Smith  
**Date:** Wednesday, 1 March 2023 4:03:09 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Brent Smith  
Organisation name:  
Agent's full name:  
Email address: snappersmitty@gmail.com  
Contact phone number:  
Postal address:  
100 Karaka rd  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Proposed rezoning  
Property address: 307 Ha South of Beachlands Village in the area of Formosa Golf Course  
Map or maps: Those referenced by Auckland City Council in their correspondence date 20 January 2023  
Other provisions:  
none  
Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

1. The proposal if approved will lead to changes that will impact forever the identity of Beachheads as a rural community and the fabric/character and visualisation of the Beachlands Village. The visual photographs produced by Beachlands South Limited show that post the proposed rezoning there will be development that includes at least 1390 dwellings that are at least 5 or 6 stories in height. This is in stark contrast to the existing Beachlands skyline. If Beachlands is to retain its status as a rural community under the Auckland City Council Unitary Plan then any proposal to move dwelling construction from essentially single/double level dwellings to a high proportion of high-density housing, changes the Beachlands status diametrically.
2. My submission is that the proposal should be rejected until such time as agreement is reached with Beachlands South Limited that they will provide at their cost, all infrastructure (including but not

200.1

200.2

limited to roading, water, sewerage, flood management, waste management, power, transport, telecommunications) and associated services that Auckland City Council deem appropriate to support the additional 3900 plus dwellings that are proposed subsequent to this proposed plan change.

200.2

Critically:

- Roading upgrades are required to support the additional populations that come with 3900 plus new dwellings identified in Stage 1 of the proposed developments. Specifically, the existing rural two lane road between Beachlands and Whitford needs to be upgraded to a four lane road. This upgrade would also need to include the provision of safe and efficient entry/exit ways for communities along the roadway in particular, the upgrading Jack Lachlan Drive to cope with the increased traffic volumes.

200.3

- The proposal is for the use of bore water for all uses including residential, community and commercial across the proposed rezoned areas. Whilst I am no expert on these matters, common sense suggests that this will not work for a development of the size proposed by this rezoning application. On that basis town water needs to be available for all dwellings post the rezoning.

200.4

- The sewerage system proposed seems to be inadequate to process wastewater for a development of the size proposed. The proposal that wastewater could be dispersed across the existing ground water systems will not work; any proposal needs to consider the needs of a more environmentally conscious community, and have consideration for an area that has in the past had issues with water egress into nearby streams and creeks. A properly considered and well developed wastewater system is required and one that is flood proof.

200.5

Finally, a development of the size proposed cannot proceed without proper and full infrastructure (as indicated above) and, that infrastructure should be a paid for by those wanting rezone and re develop the area in the rezoning application.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: Beachlands South Limited to provide at their cost all infrastructure as outlined above

Submission date: 1 March 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Nicola Poad  
**Date:** Wednesday, 1 March 2023 4:03:11 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Nicola Poad

Organisation name:

Agent's full name:

Email address: nicas1515@gmail.com

Contact phone number:

Postal address:

100 Karaka rd

Beachlands

Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Proposed rezoning

Property address: 307 Ha South of Beachlands Village in the area of Formosa Golf Course

Map or maps: Those referenced by Auckland City Council in their correspondence date 20 January 2023

Other provisions:

none

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

1. The proposal if approved will lead to changes that will impact forever the identity of Beachheads as a rural community and the fabric/character and visualisation of the Beachlands Village. The visual photographs produced by Beachlands South Limited show that post the proposed rezoning there will be development that includes at least 1390 dwellings that are at least 5 or 6 stories in height. This is in stark contrast to the existing Beachlands skyline. If Beachlands is to retain its status as a rural community under the Auckland City Council Unitary Plan then any proposal to move dwelling construction from essentially single/double level dwellings to a high proportion of high-density housing, changes the Beachlands status diametrically.

201.1

2. My submission is that the proposal should be rejected until such time as agreement is reached with Beachlands South Limited that they will provide at their cost, all infrastructure (including but not

201.2

limited to roading, water, sewerage, flood management, waste management, power, transport, telecommunications) and associated services that Auckland City Council deem appropriate to support the additional 3900 plus dwellings that are proposed subsequent to this proposed plan change.

201.2

Critically:

- Roading upgrades are required to support the additional populations that come with 3900 plus new dwellings identified in Stage 1 of the proposed developments. Specifically, the existing rural two lane road between Beachlands and Whitford needs to be upgraded to a four lane road. This upgrade would also need to include the provision of safe and efficient entry/exit ways for communities along the roadway in particular, the upgrading Jack Lachlan Drive to cope with the increased traffic volumes.

201.3

- The proposal is for the use of bore water for all uses including residential, community and commercial across the proposed rezoned areas. Whilst I am no expert on these matters, common sense suggests that this will not work for a development of the size proposed by this rezoning application. On that basis town water needs to be available for all dwellings post the rezoning.

201.4

- The sewerage system proposed seems to be inadequate to process wastewater for a development of the size proposed. The proposal that wastewater could be dispersed across the existing ground water systems will not work; any proposal needs to consider the needs of a more environmentally conscious community, and have consideration for an area that has in the past had issues with water egress into nearby streams and creeks. A properly considered and well developed wastewater system is required and one that is flood proof.

201.5

Finally, a development of the size proposed cannot proceed without proper and full infrastructure (as indicated above) and, that infrastructure should be a paid for by those wanting rezone and re develop the area in the rezoning application.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: Beachlands South Limited to provide at their cost all infrastructure as outlined above

Submission date: 1 March 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Debra Jones  
**Date:** Wednesday, 1 March 2023 7:45:56 pm

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Debra Jones

Organisation name:

Agent's full name:

Email address: [hdjones5762@gmail.com](mailto:hdjones5762@gmail.com)

Contact phone number:

Postal address:  
 27 Mahutonga Avenue  
 Beachlands  
 Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

PC 88 (Private) rezoning of 307 Ha South of Beachlands Village in the area known as Formosa Golf Course from rural to Urban Residential

Property address: Beachlands South as above stated

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

The lack of consideration for a roading upgrade, there is already approximately 1700 trips to and from areas outside Beachlands, not to mention the current developments underway and the associated construction vehicles. Also the knock on effect on other suburbs with increased volumes of traffic.

202.1

Public transportation is not a viable option to get to work destinations in a timely manner not to mention the Pine Harbour Ferries limited docking facilities and not always able to operate due to adverse weather or not enough staff to run them.

I seriously doubt that there is enough potable water if the new development is not using tanks. With proposed wastewater to be treated onsite and to be discharged onto land or ponds then the coastal environment. I do not agree this is appropriate or given this is stage1 the additional future numbers

202.2

would not work.

I or we seek the following decision by council: Decline the plan change

Submission date: 1 March 2023

202.1

202.2

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Angie Henderson  
**Date:** Wednesday, 1 March 2023 9:46:18 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Angie Henderson  
Organisation name:  
Agent's full name:  
Email address: angie\_bartlett@hotmail.com  
Contact phone number:  
Postal address:  
8 Moana Terrace  
Maraetai  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Property address:  
Map or maps:  
Other provisions:  
Expansion and redevelopment of Rydges Formosa + agricultural land into 3000 residences in Beachlands

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:  
Lack resources to support additional 3000 dwellings, insufficient roads in and out of Beachlands, insufficient schooling. People have moved to Beachlands to escape the urban sprawl. This development is not welcome here!

I or we seek the following decision by council: Decline the plan change

Submission date: 1 March 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

203.1

**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.

[Have your say on Auckland Council's annual budget 2023 and 2024.](#)



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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Whittaker Hamilton  
**Date:** Wednesday, 1 March 2023 11:15:42 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Whittaker Hamilton

Organisation name:

Agent's full name: Whittaker Hamilton/ Hamilton Family Trust

Email address: whittakerhamilton@gmail.com

Contact phone number:

Postal address:  
whittakerhamilton@gmail.com  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Property address:

Map or maps:

Other provisions:  
All other related matters

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

This proposed development should be approved without change.

-It will provide economic benefit and much needed housing to the local area. Also opportunities for new businesses to open nearby.

-The developer has well thought through and mitigated many community concerns.

-School land has been set aside for future use which is great.

-The additional volume of traffic on roads into the area will mean Waka Kotahi can now justify additional spend and improvements to roads in future.

- The additional council rates gained will be able to go directly back into council revenue.

-Public transport will gain popularity and useage from the additional people set to move into this area.

I or we seek the following decision by council: Approve the plan change without any amendments

204.1

Details of amendments:

Submission date: 1 March 2023

**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.

[Have your say on Auckland Council's annual budget 2023 and 2024.](#)



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Form 5  
Submission on notified proposal for policy statement or plan, change or  
variation

*Clause 6 of Schedule 1, Resource Management Act 1991*

**To: Auckland Council**  
Attn: Planning Technician  
Private Bag 92300 Auckland 1142  
(email [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz))

**Name of submitter:** Beachlands Avenues Limited

**This is a submission on the following proposed variation to a proposed plan:**

Proposed Plan Change 88 (Private) (Beachlands South) to the Auckland Unitary Plan – Operative in Part.

**I could not gain an advantage in trade competition through this submission.**

**The specific provisions of the proposal that my submission relates to are:**

- (1) The Proposed Indicative Primary Road Corridor (School) Road intersection with Jack Lachlan Drive.

**My submission is:**

- The submitter supports the Proposed Plan Change except for the proposed location of the Indicative Primary Road Corridor (School) Road intersection with Jack Lachlan Drive (as shown on Precinct Plan 5 – Movement Network).
- The Proposed Plan Change will provide for, over time, a master-planned development of Beachlands South which will have a range of social and economic benefits to current and future residents. This gives effect to Policy B2.6.2(3) of the Auckland Regional Policy Statement. The urban development of Beachlands South is a logical and sound extension of Beachlands, which has expanded considerably in recent years and has become a well-functioning urban area with high amenity values.
- The submitter has been the major developer within the Beachlands Avenues area and is fully aware of the continuing demand from the Auckland community for a range of housing typologies in the Beachlands/Whitford area. There is no reason to expect this demand for new living opportunities in the Whitford/Beachlands/Maraetai area to decrease and across Auckland there continues to be high demand for housing in coastal and satellite towns.
- The submitter supports structure and master planning process rather than ad-hoc development. The benefits of structure and master planning can be seen at Pine Harbour and Beachlands Avenue.
- The submitter is the owner of 101 Jack Lachlan Drive (Lot 276 DP 517012). This 1.0347 ha site has frontage to Jack Lachlan Drive and is zoned Residential – Single House. Under Proposed Plan Change 78, the proposed zoning is

205.1

Residential – Mixed Housing Urban and a number of qualifying matters apply. The site remains undeveloped and is the last part of the former extensive Beachlands Avenues Limited landholdings which is to be developed.

- The subject site has a good aspect, high amenity values (which in part is contributed to by the extensive riparian planting undertaken as part of the previous subdivisions stages) and is within walking distance to Pine Harbour Marina and the ferry service.
- The only potential access to the future residential lots on this land is from Jack Lachlan Drive. It is likely that access off Jack Lachlan Drive will be via a single road.
- There is a significant potential risk that an ill-conceived development pattern and roading access on the opposite side of Jack Lachlan Drive (and within the Proposed Plan Change area) could compromise future access into this site and sterilise the residential use of the land.
- Sterilisation of the residential use of 101 Jack Lachlan Drive would be an inefficient use of the residential zoned land resource and would be contrary to the Auckland Unitary Plan – Operative in Part objectives and policies.
- Precinct Plan 5 – Movement Network shows an Indicative Primary Corridor (School) Road with an access point onto Jack Lachlan Drive close to opposite from 101 Jack Lachlan Drive.
- The Integrated Transport Assessment does not address the potential effects of this future Indicative Primary Road Corridor (School) Road intersection with Jack Lachlan Drive on any future access into 101 Jack Lachlan Drive. It is considered that the effects on 101 Jack Lachlan Drive need to be assessed and that the Proposed Plan Change needs to identify an intersection location which can efficiently and safely provide access to both 101 Jack Lachlan Drive and the Proposed Plan Change area (either through a single or staggered intersection). Furthermore, any intersection design being proposed by Beachlands South Limited Partnership needs to be able to be constructed in stages to reflect that land development on either side of Jack Lachlan Drive may progress at different times.
- Given the importance of identifying the specific location of this intersection to ensure the future development of properties on either side of Jack Lachlan Drive are not compromised by it, it is considered reasonable that the exact coordinates and concept design of this intersection are provided in the Beachlands South Precinct.
- The submitter has not been consulted in respect to the proposed roading network and effects on 101 Jack Lachlan Drive. The submitter is open to an approach from Beachlands South Limited Partnership to discuss this future intersection and to achieve a design that provides safe and efficient access to both properties.

205.2

**I seek the following decision from the local authority:**

Approve the Plan Change with the following modifications:

- That the Precinct Plan B – Movement Network is modified so that it shows the exact proposed location of the Primary Road Corridor (School) Road intersection with Jack Lachlan Drive in a position that does not compromise future access to 101 Jack Lachlan Drive.
- That a new Figure 20 is included in the Beachlands South Precinct which provides the concept design of this intersection and including the access into 101 Jack Lachlan Drive.

205.3

205.4

I wish/~~do not wish~~ to be heard in support of my submission.

If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Signature of submitter:



(David Hay, Planning Consultant to Beachlands Avenues Limited)

2 March 2023

Date

Electronic address for service of submitter:

david@osbornehay.co.nz

Telephone: 027 425-0234

Postal address PO Box 16, Warkworth 0941

Contact person: David Hay

**Figures:**



**Figure One: AUPOP Planning Map Showing the Subject Site (101 Jack Lachlan Drive) Outlined in Blue.**



**Figure Two: Part of Precinct Plan 5 with Intersection Location of Concern Shown by Red Arrow.**

**Attachments:**

None

Form 5  
Submission on notified proposal for policy statement or plan, change or  
variation

*Clause 6 of Schedule 1, Resource Management Act 1991*

**To: Auckland Council**  
Attn: Planning Technician  
Private Bag 92300 Auckland 1142  
(email [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz))

**Name of submitter:** Sielia Limited

**This is a submission on the following proposed variation to a operative plan:**

Proposed Plan Change 88 (Private) (Beachlands South) to the Auckland Unitary Plan – Operative in Part.

**I could not gain an advantage in trade competition through this submission.**

**The specific provisions of the proposal that my submission relates to are:**

(1) The Proposed Plan Change boundary and Future Urban Zone extent.

**My submission is:**

- The submitter supports the Proposed Plan Change. In particular, the Proposed Plan Change will provide for, over time, a master-planned development of Beachlands South which will have a range of social and economic benefits to current and future residents. Furthermore, this gives effect to Policy B2.6.2(3) of the Auckland Regional Policy Statement. In addition, the submitter supports the various environmental benefits which will arise over time including the protection of existing native vegetation.
- The submitter and associated companies have a long-history over many decades of undertaking development in the Whitford/Beachlands area. As long-term residents they understand the attraction for people to move into this area and to enjoy the many amenities and activities the area provides. There is no reason to expect this demand for new living opportunities in the Whitford/Beachlands/Maraetai area to decrease and across Auckland there continues to be high demand for housing in coastal and satellite towns.
- The submitter supports structure and master planning process rather than ad-hoc development. The benefits of structure and master planning can be seen at Pine Harbour and the newer developments in Beachlands. The identification of Future Urban Zoned land clearly identifies what land will be developed in the future and needs to be of a suitable size and with appropriate zone boundaries to allow for efficient structure planning in the future to create well-functioning urban environments with a range of lot sizes, housing typologies and price points.
- The submitter is the owner of 600 Whitford-Maraetai Road. This 22.4240 ha site adjacent to the southern end of the Proposed Plan Change area. The site

206.1



includes two residential dwellings and accessory buildings, extensive areas of protected native vegetation and areas of pasture currently utilised for grazing but suitable for future urban development. The site is not an economic farm unit.

- When travelling to Beachlands from Whitford, the subject site is viewed to the left as you travel up the hill from Waikopua Creek and then along the ridge. The site appears within the same visual catchment as the Proposed Plan Change area and visually is more strongly connected with the land to the north (Beachlands South) than to the south. In effect, the southern boundary of the site would be a natural and strong “visual gateway” into the new Beachlands South area.
- Although currently zoned Rural – Countryside Living, taking account of the topography of the site, the access to the esplanade reserve track, the extensive protected native vegetation (which provides a high level of amenity) and its accessibility to both Whitford and Beachlands (and including the public transportation hub at Pine Harbour which is approximately 2.6km away) a residential use of the site is more appropriate in the long-term. In particular, the site can be relatively easily developed for urban development (for example, Residential - Large Lot or Residential - Single House) and, with the development of Beachlands South, could have strong multi-mode connections to Pine Harbour and Beachlands.
- At the time of the previous subdivision which created this property, an esplanade reserve was formed and vested in Council. The submitter developed a wide metalled footpath, installed bridges and fencing and landscaping within this esplanade reserve before vesting in Council. Since then Council has not undertaken maintenance of this esplanade reserve and it is now in a poor state. The key reason for this may be that currently there is no public access to this reserve. The re-zoning of this site to Future Urban and then the later Structure Plan process provides the opportunity to ensure this esplanade reserve is appropriately connected to the future pedestrian and cycle network in Beachlands South and to the widened Whitford-Maraetai Road (which it is assumed would have a pedestrian/cycle path). This would open and improve accessibility by the public to this section of the coastline.
- On the opposite side from 600 Whitford-Maraetai Road is the Waikopua subdivision with a number of houses now constructed. This subdivision, which fronts the Whitford-Maraetai Road, consists of 15 lots ranging in size from 0.79 to 1.5 ha plus a 10 ha lot of protected vegetation. On the eastern side of the Whitford-Maraetai Road the majority of the adjoining properties fronting the road between the Waikopua Creek bridge and Beachlands have been subdivided into a range of countryside living lots so that the visual appearance and character is now more countryside living. The shifting of the proposed Plan Change boundary to the southern end of 600 Whitford-Maraetai Road would more closely align with where this countryside living character commences on the opposite side of the road.
- Waikopua Creek is one of three shallow, drowned valley estuaries that flow into the Whitford embayment on Auckland’s southeast coastline. The winding main channel creates a patchwork of native marine plants along the estuary, including mangroves, oioi, and saltmarsh ribbonwood. At the estuary mouth, extensive sandbanks provide feeding areas for shorebirds. It is considered that this Creek provides a more natural and defined boundary for the southern end of the



Proposed Plan Change where it can be practically implemented. Although there is a property between the subject site and Waikopua Creek, part of this site is subject to a Coastal Inundation 1% AEP + 1m control and therefore has limited urban development potential. The submitter would not oppose this additional property (460 Whitford Maraetai Road) being included within the Plan Change area in order for the Waikopua Creek being the definitive southern boundary.

- The vegetation on the northern part of the site is identified as a Significant Ecological Area, within this overlay extending north into the Proposed Plan Change area. Incorporating the subject site into the Proposed Plan Change area, provides the opportunity in the future structure plan process to better incorporate this full Significant Ecological Area and the other areas of native vegetation on the subject site into the overall Structure Plan and development of this area (which could include providing public access to these areas).
- The future servicing of the site has not been investigated. There appear to be no physical constraints why the future water and wastewater connections that will be required for the Beachlands South area could not be extended into the subject site. This would have the benefit of providing additional lots to cover the significant cost for the development of these services for Beachlands South. The alternative option is for these lots to be zoned Residential - Large Lot with the requirement for on-site servicing.
- Part of the site is designated by Auckland Transport for the Road Widening of Beachlands Road (Designation 1806). The implementation of the road widening could have a significant impact on this property. To date, the current landowner has not been consulted by Auckland Transport or Beachlands South Limited Partnership in respect to the road widening requirements. The incorporation of the subject site into the Plan Change area will provide the opportunity for a more integrated design of the road widening and the urban development of Beachlands South at the time of the future Structure Plan process.
- The future planned widening of the Whitford-Maraetai Road provides the opportunity for new accessways into the site to be formed. Alternatively, access in the form of local roads could be provided from Beachlands South in the future.
- The Proposed Plan Change documentation does not appear to address why the current southern boundary of the proposed Plan Change has been selected and/or why 600 Whitford-Maraetai Road has not been incorporated within the Plan Change area. There are no obvious reasons why this site has not been incorporated and it may be purely on the basis that it is not under the ownership of the Beachlands South Limited Partnership. Since the notification of the Proposed Plan Change, the submitter has had discussions with Beachlands South Limited Partnership representatives and it is understood that no reasons for incorporating this site into the Proposed Plan Change, in order to get a better long-term planning outcome for this area, have been identified.

Based on the above, the submitter supports the Proposed Plan Change. It is considered that the proposed Plan Change and Future Urban Zone southern boundary would be better positioned at the southern end of 600 Whitford-Maraetai Road, as shown on the attached plans. The reasons for this are:

- (i) The subject site appears visually as part of the currently Proposed Plan Change area. There appears to be no specific reason why the Proposed

Plan Change did not incorporate 600 Whitford-Maraetai Road and the currently proposed zoned boundary is not a strongly defined by a natural feature or similar.

- (ii) The Waikopua Creek provides a more natural and defensible defined boundary for the Proposed Plan Change area and the future urban development.
- (iii) The site can be efficiently developed in the future and logically integrated with the land to the immediate north to create a well-functioning urban environment. As part of this, the site can be incorporated into the future cultural landscape mapping of the Beachlands south area, the Beachlands South sustainability strategy and existing areas of native vegetation incorporated into the ecologically protected area network.
- (iv) No physical reasons have been identified why the site cannot be serviced in the future or additional access provided to it.
- (v) The future widening of the Whitford-Maraetai Road required for the Beachlands South development will adversely impact the site. The re-zoning of the site to Future Urban and its incorporation into the future structure plan process will allow the opportunity to better integrate the Whitford-Maraetai Road widening with the future use of the site and pedestrian/cycle connections through to the already established esplanade reserve walkway.
- (vi) Although the number of houses which could be established on this site will not be high (and will be dependant on the zoning), it will nevertheless contribute to the overall housing requirements in Auckland and will in part contribute to the infrastructure funding required for Beachlands South and to the sustainability of public transport (including the Pine Harbour Ferry) in this area. The incorporation of this property increases the Proposed Plan Change area by approximately 7%.
- (vii) Having considered the s32 analysis supporting the Proposed Plan Change, it is considered that this is applicable to the proposed re-zoning of the subject site.
- (viii) Incorporating this site into the Proposed Plan Change area and re-zoning it Future Urban is not contrary to the Auckland Regional Policy Statement. It is recognised that under the Landcare Research NZ Soils Atlas, part of the site is identified as having LUC2 soils but the extent of this has not been confirmed by on-site testing to date.

**I seek the following decision from the local authority:**

That the Proposed Plan Change is accepted with the following modifications:

- That the Proposed Plan Change extent is modified to incorporate 600 Whitford-Maraetai Road (plan attached). 206.2
- That 600 Whitford-Maraetai Road is zoned Future Urban (plan attached). 206.3
- The SMAF1 Area overlay is extended over 600 Whitford-Maraetai Road. 206.4

- The 10m landscape buffer along the Whitford-Maraetai Road frontage is extended along and within 600 Whitford-Maraetai Road. 206.5
- Precinct Plan 2 (Natural Features) would need to be updated prior to the hearing to incorporate the natural features on 600 Whitford-Maraetai Road. Upon completion of this, Precinct Plan 3 (Structuring Elements), Precinct Plan 4 (Cultural Landscape) and Precinct Plan 5 (Movement Network) would need to be updated. 206.6  
206.7  
206.8  
206.9
- Precinct Plan 7 (Earthworks Catchments) would need to be updated with 600 Whitford-Maraetai Road being incorporated into Catchment 5. 206.10
- Minor consequential changes to the Proposed Plan Change text will be required to reflect the increased Plan Change and Future Urban Zone areas. 206.11
- There are no known reasons why Council cannot incorporate this site into the Proposed Plan Change area.

I wish/~~do not wish~~ to be heard in support of my submission.

If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Signature of submitter:

*David Hay*

(David Hay, Planning Consultant to Sielia Limited)

2 March 2023

Date

Electronic address for service of submitter:

david@osbornehay.co.nz

Telephone: 027 425-0234

Postal address PO Box 16, Warkworth 0941

Contact person: David Hay

Figures:

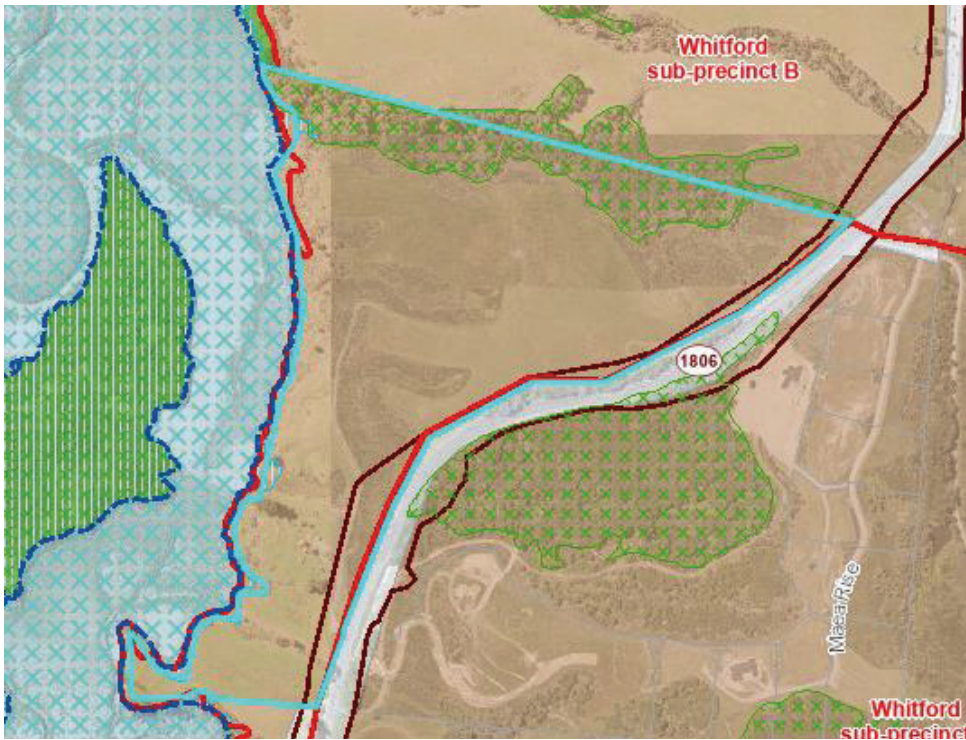


Figure One: AUPOP Planning Map Showing the Subject Site



Figure Two: Designation 1806 over 600 Whitford-Maraetai Road

**Attachments:**

Proposed Zoning Plan

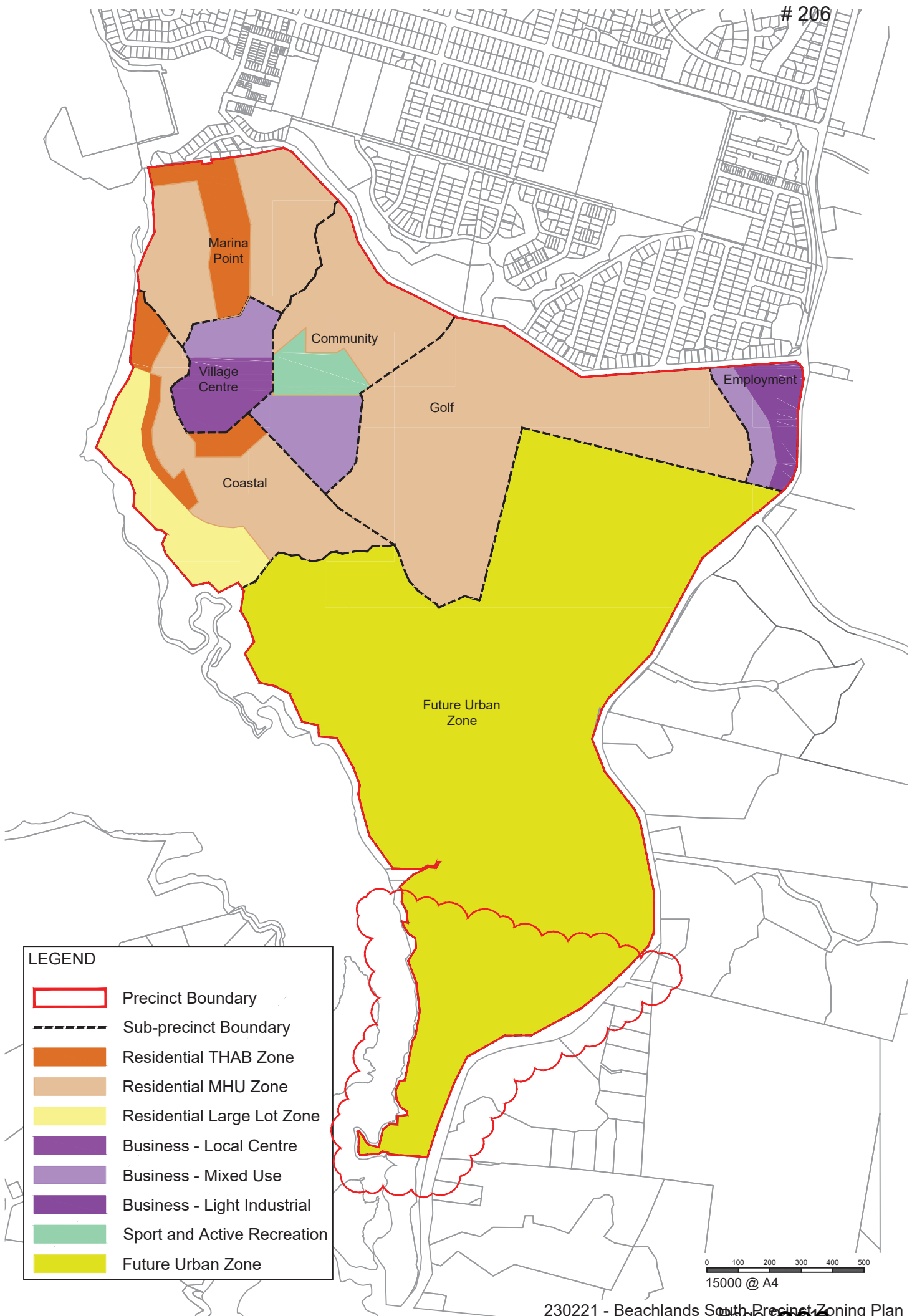
Proposed Sub-Precincts Plan

Record of Title















0 100 200 300 400 500  
15000 @ A4



**LEGEND**

|   |                             |
|---|-----------------------------|
|  | Precinct Boundary           |
|  | Sub-precinct Boundary       |
|  | Residential THAB Zone       |
|  | Residential MHU Zone        |
|  | Residential Large Lot Zone  |
|  | Business - Local Centre     |
|  | Business - Mixed Use        |
|  | Business - Light Industrial |
|  | Sport and Active Recreation |
|  | Future Urban Zone           |





**RECORD OF TITLE  
UNDER LAND TRANSFER ACT 2017  
FREEHOLD  
Search Copy**



  
 R.W. Muir  
 Registrar-General  
 of Land

**Identifier** **879425**  
**Land Registration District** **North Auckland**  
**Date Issued** 31 October 2019

**Prior References**  
 794920

---

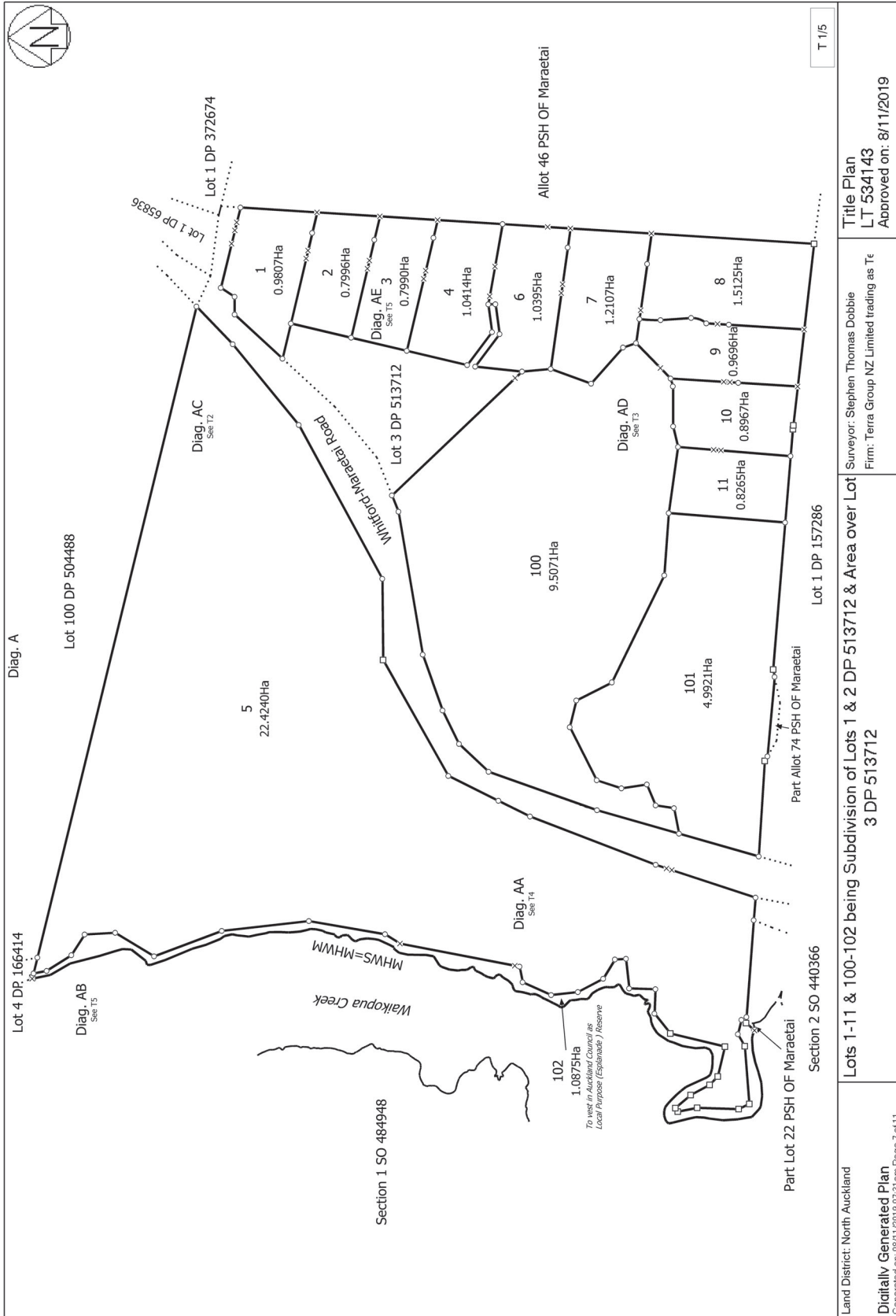
**Estate** Fee Simple  
**Area** 22.4240 hectares more or less  
**Legal Description** Lot 5 Deposited Plan 534143  
**Registered Owners**  
 Sielia Limited

---

**Interests**

11295022.2 Consent Notice pursuant to Section 221 Resource Management Act 1991 - 26.2.2019 at 12:59 pm  
 Subject to a maintenance access easement (in gross) over part marked L on DP 534143 in favour of Auckland Council  
 created by Easement Instrument 11495117.2 - 31.10.2019 at 6:10 pm  
 The easements created by Easement Instrument 11495117.2 are subject to Section 243 (a) Resource Management Act 1991  
 11495117.15 Consent Notice pursuant to Section 221 Resource Management Act 1991 - 31.10.2019 at 6:10 pm  
 12600445.1 Mortgage to Bank of New Zealand - 11.11.2022 at 10:43 am





|   |  |                         |
|---|--|-------------------------|
| Land District: North Auckland   | Surveyor: Stephen Thomas Dobbie            | Title Plan<br>LT 534143 |
| Digitally Generated Plan<br>Generated on: 08/11/2019 07:31 am Page 7 of 11                | Firm: Terra Group NZ Limited trading as Te | Approved on: 8/11/2019  |
| Lots 1-11 & 100-102 being Subdivision of Lots 1 & 2 DP 513712 & Area over Lot 3 DP 513712 |  |                         |
| Part Lot 22 PSH OF Maraetai<br>Section 2 SO 440366  |  | T 1/5                   |
| Part Allot 74 PSH OF Maraetai<br>Lot 1 DP 157286  |  |                         |
| Lot 100 DP 504488<br>Diag. A  |  |                         |
| Lot 4 DP 166414<br>Diag. AB   |  |                         |
| Lot 1 DP 65836<br>Lot 1 DP 372674   |  |                         |

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Michael John Dagg  
**Date:** Thursday, 2 March 2023 10:01:08 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Michael John Dagg

Organisation name:

Agent's full name:

Email address: mikedagg2@gmail.com

Contact phone number:

Postal address:

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Destruction of the existing golf course

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

The Formosa Auckland Country Club golf course is unique in the North Island of New Zealand. It is the only Bob Charles designed course in close proximity to a major metropolitan center. To destroy such a unique facility is tantamount to destroying a priceless work of art for the insurance money. Yes, you get a financial return, but the world is deprived of the work for eternity. One of our greatest sportsmen, who will not be with us for ever to vandalize this work could easily be described as un-kiwi. The loss to the local community of recreation space is also unacceptable, once it is gone it will never be replaced. Topically, the water catchment this facility provides is an important part of flood protection. I think you will find this specified in the original resource consent.

I or we seek the following decision by council: Decline the plan change

Submission date: 2 March 2023

**Attend a hearing**

207.1

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.

[Have your say on Auckland Council's annual budget 2023 and 2024.](#)



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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Carl Shelley  
**Date:** Thursday, 2 March 2023 10:16:38 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Carl Shelley  
 Organisation name:  
 Agent's full name:  
 Email address: carlos.427@outlook.com  
 Contact phone number:  
 Postal address:  
 50 Eighth View Ave  
 Beachlands  
 Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
 Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
 Infrastructure and green spaces  
 Property address:  
 Map or maps:  
 Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Infrastructure ie the roading is not capable or handling all the extra traffic especially if there is an accident and emergency services need to get get out to whitford or beachlands the point made in the proposal that a large percentage of residents will use public transport ( ferry or buses) is very far fetched and bordering on a lie just to get the plan past council and residents.

Also sewage just doesn't seem to be able to cope from my research.

And finally green spaces where they want to build is a massive green space and has a thriving eco system that Auckland is losing rapidly and we need to be smarter where we build, Abit of grass with a pond is not a green space no more lies to trick people make the developers be honest

208.1  
 208.2  
 208.3

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: Roothing, sewage and green spaces

Submission date: 2 March 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

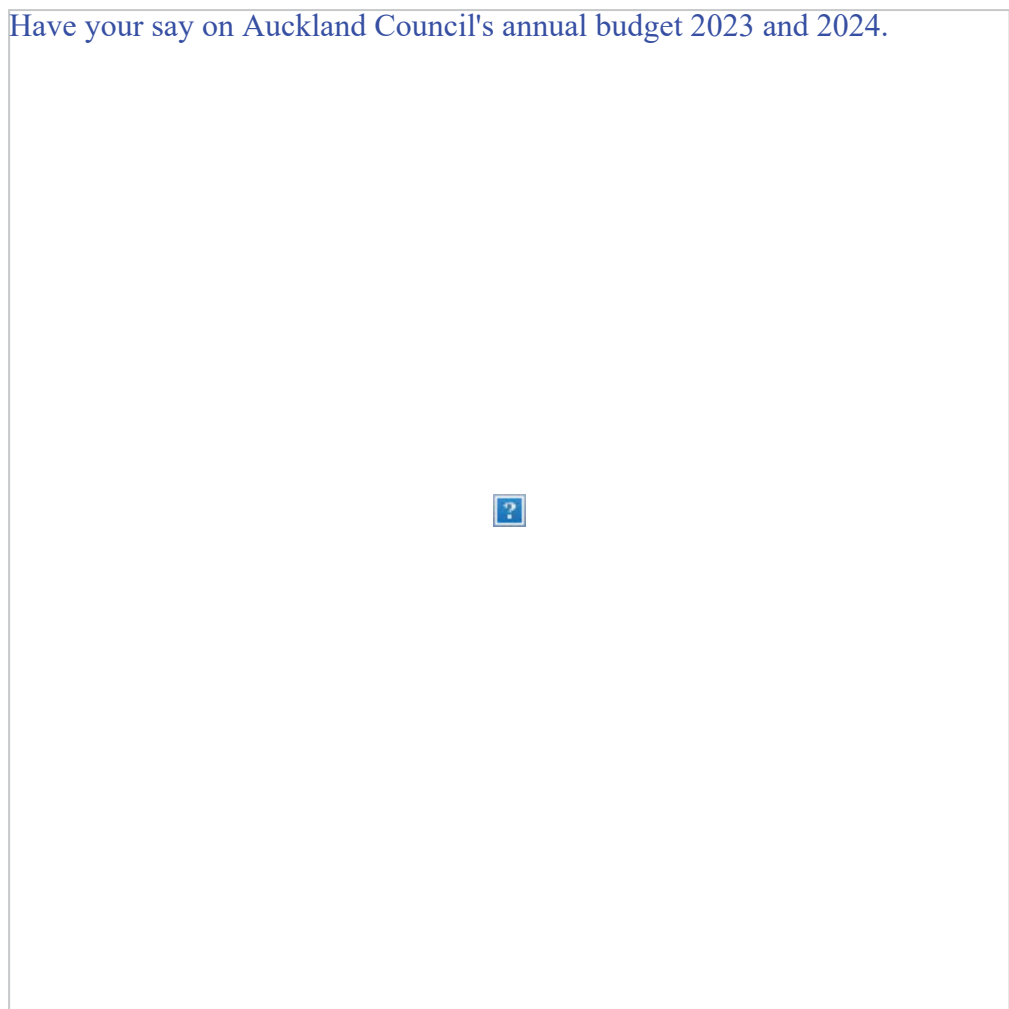
Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Antony John Horton  
**Date:** Thursday, 2 March 2023 11:46:00 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Antony John Horton

Organisation name:

Agent's full name: Tony Horton

Email address: tony.horton@me.com

Contact phone number: 021726456

Postal address:  
12 Pine Harbour Parade  
Beachlands  
Beachlands 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Roading and Infrastructure

Property address: 110 Jack Lachlan, 620-770 Whitfords Maraetai Roads

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:

Beachlands was small seaside village that developed naturally, since 2006 2 large developments took place at Pine Harbour and Spinnaker Bay, along with large development around Omana. Rooding is a high risk, no town water and a at capacity wastewater system are evident. The road has been on plans for some 20 years plus ( I have lived in the area since 1974). Very little has been done to fix the road by adding lanes, promised for decades. In a dry summer we cannot obtain adequate water supplies as we rely on trucks, which will clog up a worsening road. Commute times for the 3500 residents is additional 15 minutes each way now, Whitford being the bottleneck which has been planned to bypass since I was first in Whitford in 1974. To even show the lack of infrastructure Sandstone road has been reduced to one lane for 12 months with no work being done. The councils inability to fund this area is evident and so development should only take place when and after infrastructure is in place to cater for it, even if it is on a gradual basis. It is not meant to be an attack on council, just if they have no money to even fix a road, they cannot promise to build what we need and let's be realistic, do not allow development if that is the case.

209.1

209.2

209.3

I or we seek the following decision by council: Decline the plan change

Submission date: 2 March 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

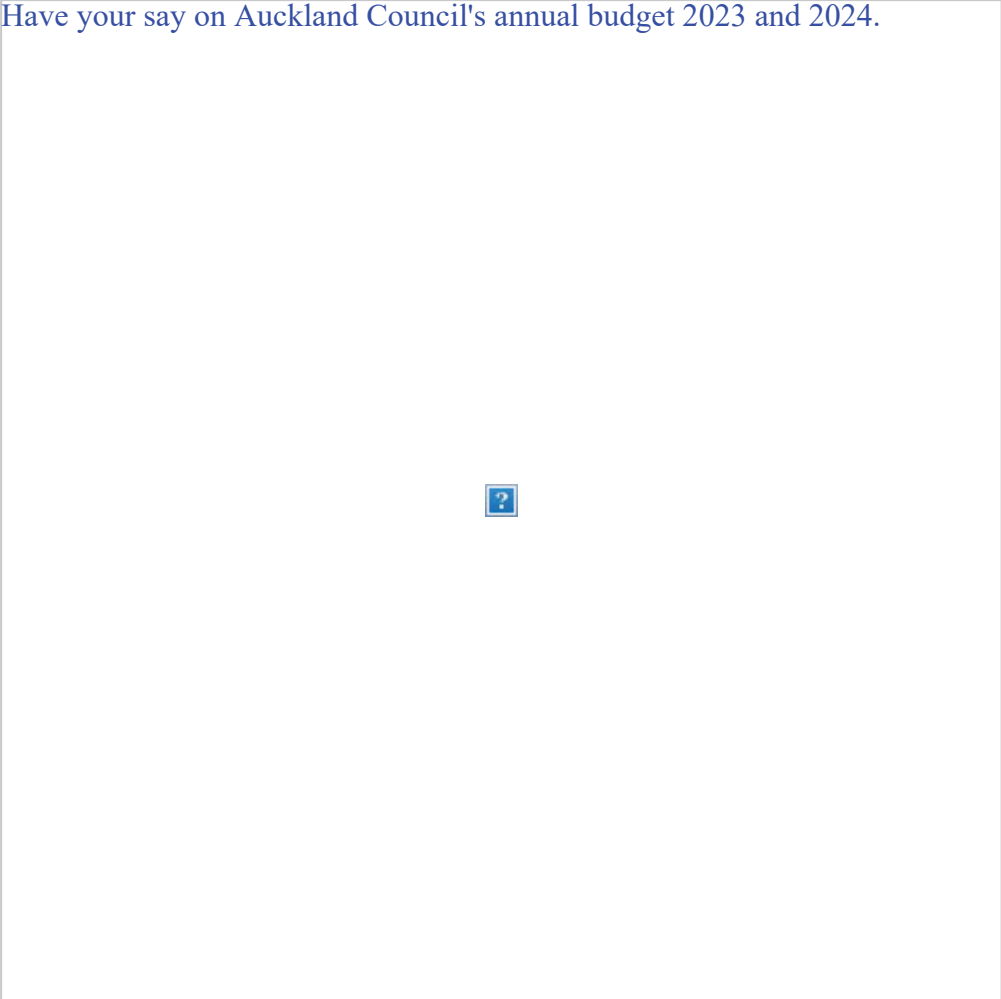
Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

[Have your say on Auckland Council's annual budget 2023 and 2024.](#)



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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Ian Olan  
**Date:** Thursday, 2 March 2023 11:46:16 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Ian Olan

Organisation name:

Agent's full name:

Email address: ian.olanz@gmail.com

Contact phone number:

Postal address:

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
(Optional)

Property address: (Optional)

Map or maps: (Optional)

Other provisions:  
(Optional)

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

There is no sufficient infrastructure to support the existing population, we don't have a high school, enough ferries, enough buses (one very hour) and the roads are in bad condition and the traffic is already diabolical as is only two lanes, we do not have reticulated water and the sewage systems will be put under distress.

This proposal is doubling the size of the population and will exacerbate all these problems or make living an excruciating experience, these aspects need to be deal with before any development is put in place.

The developers are not addressing these issues or contributing financially in a meaningful way to solve these existing problems.

I or we seek the following decision by council: Decline the plan change, but if approved, make the

210.1



amendments I requested

Details of amendments: More buses and routes (e.g. direct to Howick/Panmure), more ferries, better road, expanding the road to four lanes or at least three and alternating at rush hour, building a high school, put reticulated water, increase capacity of sewage system.

210.2  
210.3  
210.4

Submission date: 2 March 2023

**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.

[Have your say on Auckland Council's annual budget 2023 and 2024.](#)



**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Michael Box  
**Date:** Thursday, 2 March 2023 12:01:00 pm  
**Attachments:** [Submission - M Box.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Michael Box

Organisation name:

Agent's full name:

Email address: mbox@xtra.co.nz

Contact phone number:

Postal address:  
29 Mahutonga Ave  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Roading infrastructure and traffic management  
Health and wellbeing  
Education

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:  
Please see attached.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: Please see attached.

Submission date: 2 March 2023

Supporting documents  
Submission - M Box.pdf

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

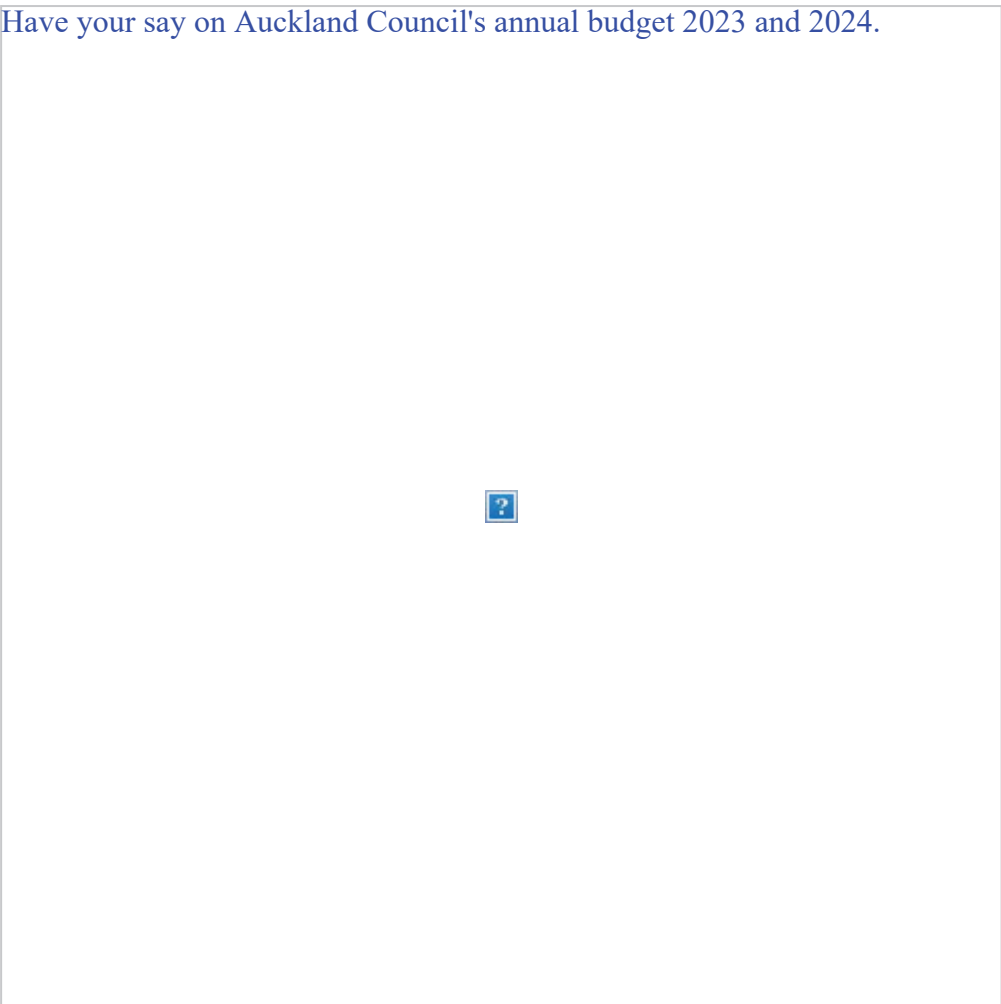
Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

[Have your say on Auckland Council's annual budget 2023 and 2024.](#)



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## SUBMISSION IN OPPOSITION OF PLAN CHANGE 88 (Private):

### Beachlands South

I am writing to voice my opposition to the proposed change, for the following reasons.

#### 1. **Roading infrastructure and traffic management**

There is very limited road access to and from the Beachlands community. One road is coastal, very narrow, and potentially dangerous in adverse weather conditions. The other, Whitford-Maraetai Rd, is almost entirely two lanes, poorly constructed, and often heavily congested, especially during peak traffic times. The Private Plan Change Request proposes to 'live zone' 159.54 hectares, to accommodate (among other things) 3,000 dwellings.

The developer has proposed that a significant number of people in the community would be able to travel to and from the local area using the Pine Harbour Ferry Service. Given that the ferries only travel to central Auckland, and the great majority of workers in the Beachlands community travel to other locations, this is a fallacious argument. Such an increase in the intensity of housing in the area would significantly increase road traffic, with likely adverse outcomes for the condition of the road. I understand that Auckland Transport is financially constrained to the point that it will not be addressing the issues for at least ten years.

211.1

#### 2. **Health and wellbeing**

The current medical facility is at capacity, with a long-standing shortage of doctors. Adding to the population in such a significant way is going to exacerbate the current delays in getting appointments with local general practitioners. My understanding is that most other medical practices within a reasonable driving distance are similarly unable to offer the standard of health care required for our community.

In the event that emergency or hospital care is needed, this would require transportation to Middlemore Hospital, which is already known to be at or beyond full capacity, and in need of significant renovation. Applying my argument above, regarding roading and traffic management, the time required for an ambulance or other emergency vehicle to reach a patient in Beachlands, Maraetai or the surrounding area, could be extensive, and a return journey to hospital may result in a life-threatening or life-ending delay.

There is potential harm to mental health when much of a person's 'free' time is taken up waiting in traffic queues, rather than investing in healthy exercise, recreation or rest.

211.2

3. **Education**

The proposal put forward by the developer makes much of a suggestion that land will be set aside and made available to the Ministry of Education for a secondary school. Preliminary investigation has shown that the Ministry of Education has no interest in such a facility. At present, most students at this level commute to Howick College or other schools, often relying on private transportation, as there are insufficient buses available, and these follow routes that are excessively time-consuming. Increasing the population in this area by some 3,000 households, will likely mean a significant increase in the number of students. The anticipated lack of a suitable local education centre is a very serious concern. It ties in with the first two issues I have raised.

211.3

Please note, I have chosen these three reasons as primary concerns. However, they are not exclusive. I'm also at odds with the developer in terms of their proposals for water supply, wastewater treatment, the offered 'upgrade' to the Pine Harbour Ferry service, and other public transport facilities.

211.4

I appreciate your taking the time to read and consider this submission.

MICHAEL (MIKE) BOX

2 March 2023

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Lew Gerick Hansen  
**Date:** Thursday, 2 March 2023 12:31:07 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Lew Gerick Hansen

Organisation name:

Agent's full name:

Email address: younglew48@gmail.com

Contact phone number:

Postal address:

10 Tui Brae  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Rezoning that changes the character of Beachlands re higher density housing creating:

- Pressure on the rural transport hub because of doubling of population
- Pressure on water system - use of bores
- Pressure on waste water system
- Pressure on capacity for schools

212.1

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Rezoning that changes the character of Beachlands re higher density housing creates:

- Pressure on the rural transport hub because of doubling of the population.
- \* BSL stated that the Pine Harbour ferries will provide Rapid Transit & relieve Pressure on the roads. However only 6% of the public use this system. Plans for more or bigger ferries are not practical.

\*The present public bus system is both underused & underfunded because of infrequency.

\*Most citizens travel by car using the Whiford/Maraetai Rd which is only 2 lane and is already extremely busy.

\*Traffic backups at the Whitford roundabout will not be alleviated with double lanes. \*\*Suggested

212.2

|  |       |
|--|-------|
| Change - 2 lanes but traffic lights paid for by BSL  |       |
| *Deterioration of roads will increase at a vast pace with the increased number of heavy trucks   |       |
| *More road repairs with be needed with the ensuing traffic holdups   |       |
| ** Suggested Change - Road repairs paid for by BSL or at least a significant monetary contribution for good quality road surfaces.   | 212.2 |
| - Pressure on water system - use of bores  |       |
| *Use of bores may decrease the water system for other bores  |       |
| ** Suggested Change - Compulsory & increased addition of the use of the roof areas for water tanks   | 212.3 |
| - Pressure on waste water system   |       |
| *In the light of recent flooding is it adequate?   |       |
| ** Suggested Change - Further research in to the impacts of what is planned and an increase in spongy areas rather than vast amounts of concrete   | 212.4 |
| - Pressure on capacity for schools   |       |
| *The local Beachlands School is already at capacity  |       |
| *Land will be donated by BSL supposedly for a High School but the Govt has no plans for a school till the population increases to a certain level but it will increase quite quickly before anything is concrete is done. Meanwhile pressure will increase on the roads. |       |
| ** Suggested Change - Land made available for both a Full Primary & High School & ground made ready for building by BSL early in the development   | 212.5 |

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: See above \*\*Suggested Changes

Submission date: 2 March 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Dorothy McKeen  
**Date:** Thursday, 2 March 2023 12:46:00 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Dorothy McKeen

Organisation name:

Agent's full name:

Email address: dmckeen@xtra.co.nz

Contact phone number:

Postal address:  
33 Te Pene Road  
Maraetai Beach  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
The planned housing for Formosa grounds

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:  
Building more houses at Beachlands without improving the current infrastructure does not make sense!  
To build a new subdivision without improving the roads ( a BIG issue!) does not make sense. The roads are dangerous, too narrow, and in poor state of repair.  
Education and health provision also need to be included in any future planning

I or we seek the following decision by council: Decline the plan change

Submission date: 2 March 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

213.1



**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.

[Have your say on Auckland Council's annual budget 2023 and 2024.](#)



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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Sophia Yakich  
**Date:** Thursday, 2 March 2023 1:16:05 pm

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Sophia Yakich

Organisation name:

Agent's full name: Sophia Yakich

Email address: virgo15-09@hotmail.com

Contact phone number: 0212515499

Postal address:

virgo15-09@hotmail.com

Auckland

Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

Subdivision of Beachlands land

Property address: beachlands

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 proposed subdivision ignores the community that has spoken up against this development. The reasons are as follows the roads are not coping as they are (speed limits have been reduced as the repair of the roads is unaffordable so the only way to maintain the roads is to reduce the speed - or so we have been told! Where is the money that is taken directly from the fuel tax for petrol cars and the RUC for diesel vehicles that has been collected for the last 40 years?). When the council/AT says there is no money to not upgrade but maintain the roads that are already in place, how can you even dream of putting in more housing? And to say you will fix the roads after the housing has gone in, well seems like the Tui add "Yeah Right"!!

Public transport - well where do we start, the ferry that runs into the city gets cancelled more often than anyone can cope with, especially with the strange weather that has been happening, the bus that runs into Botany - still does not provide people with ample choice of being able to travel for work to all parts of Auckland. I suppose it is all good if you work in Botany - but you will find that people in this area travel for work to other areas that are further than Botany Town centre.

214.1

Water supply is limited to rain water and existing bores in the area, placing a medium density housing in unacceptable as for the amount of water that this will use. These dwellings that we speak of are not run on tank water, but will require a bore to supply all the units/apartment's/flats (whatever you want to call them), this is unacceptable to place these new dwellings and run them off the existing waterways under the ground. What happens if the water supply underground is not enough for all the housing (bores can run dry), what happens in case of a major fire?

214.2

Waste water - to be treated on site and dumped! Dumped! Dumped! Dumped into our waterways, this is Unacceptable for our community we are NOT a THIRD WORLD COUNTRY!!!

214.3

Education - there is a primary/Intermediate school which has been bursting at the seams for the last 10 years in Beachlands /Mareitai area. There was conversation about a Secondary school being opened up around here but apparently Howick college numbers are decreasing so the all-mighty council has decided to get rid of the idea of a new school opened in this area but instead decided to bus more students into Howick. In the last 10 years we have seen how 2/3 school buses to Howick have become 7/8. So there will be more buses?? How many more?? And are they still travelling in the peak traffic times on the already fallen apart roads with the rest of the tax payers?

214.4

And of course who can forget healthcare... what health care??? Our closes hospital is Middlemore - and all you need to do is read the paper for the last 12 months to know that the hospital and the entire Healthcare system is not coping. Having a small medical centre here which already has a couple of days wait to see a GP, will not cope with doubling the population in Beachlands. And the council has always been good at making promises like you need progress before we can increase the infrastructure. But lets all be honest - Council has been struggling/not coping with the upkeep of the infrastructure. So lets cut the crap and be honest, stop screwing up our city more and more, get people into the council who live in the local areas which you are targeting for changes. People on the ground may be little but remember the council is there to serve the people!!

214.5

I or we seek the following decision by council: Decline the plan change

Submission date: 2 March 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

### Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 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)

NERINA CAROL GROVES

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

31 PINE HARBOUR PARADE  
BEACHLANDS

Telephone:

09-537-6591

Fax/Email:

nerina.groves@tra.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 88 (Private)

Plan Change/Variation Name

Beachlands South

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Or

Property Address

Or

Map

Or

Other (specify)

#### Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are: 1. 3,000 DWELLINGS NOT SUPPORTED BY 10 ROADING - AT PEAK NOW FEB 2023  
" 2. INFRASTRUCTURE NOT SPECIFIED BY DEVELOPER  
3. INSUFFICIENT POLICE SERVICES TO SUPPORT MORE  
4. (continue on a separate sheet if necessary) PEOPLE

215.1

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

215.2

1. ROADING TO BE IMPROVED BY TWO MORE LANES  
2. INFRASTRUCTURE TO BE IN PLACE BEFORE SUBDIVISION  
3. MORE POLICE STAFFING IN BEACHLANDS & SHROUNDS

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

NC Gms  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

26-02-2023  
Date

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

✓ Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could  / could not  gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am  / am not  directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

# Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 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)

STEPHEN ANDREW OPIE

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

23A HAWKE CRES BEACHLANDS 2018

Telephone:

0272913398

Fax/Email:

STEVEOPIE2@GMAIL.COM

Contact Person: (Name and designation, if applicable)

## Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 88 (Private) ✓

Plan Change/Variation Name

Beachlands South ✓

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc ✓

Or

Property Address

Or

Map

Or

Other (specify)

## Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)



I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

|   |       |
|---|-------|
| Insufficient infrastructure, particularly Roading (the existing 2 lane road needs to be increased to 4 lanes) |       |
| The sewerage system as proposed is inadequate and disposing to existing land will not work                    | 216.1 |
| Water supply using bore water is inadequate for a development of that size                                    |       |

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

216.2

Provide a 4 lane road from Whitford Rd along Whitford Maraetai Rd to the site including upgrading Jack Lachlan Drive

Replace the proposed disposal of sewerage system with one that does not rely on disposal to existing ground 216.3

Replace the proposed supply of water from bores to another system which will cope with the development and approved by Watercare 216.4

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

  
 \_\_\_\_\_  
 Signature of Submitter  
 (or person authorised to sign on behalf of submitter)

15/2/23  
 \_\_\_\_\_  
 Date

**Notes to person making submission:**  
 If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I ~~could~~  / could not  gain an advantage in trade competition through this submission.  
 If you could gain an advantage in trade competition through this submission please complete the following:

I am  / am not  directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and  
 (b) does not relate to trade competition or the effects of trade competition.

# Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



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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)

Coileen Agnes DRUMMOND

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

21 Karaka Road, Beachlands

Telephone:

09 536 5540

Fax/Email:

cdrummond@extra.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 88 (Private)

Plan Change/Variation Name

Beachlands South

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

✓ Plan provision(s)

Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Or

Property Address

Or

Map

Or

Other (specify)

## Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

Oppose



I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes   No

The reasons for my views are: The proposed amendment will absolutely over-  
whelm facilities in the area. The proposed 5th Beachlands 217.1  
Development was reasonable. This amendment is totally outside  
the reasonable views of the area. The main road is not coping  
now, what will happen with added (continue on a separate sheet if necessary) →

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

as attached sheet.

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

*adrenna*  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

18-02-23  
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.

construction vehicles coming and going. If a secondary school is not constructed promptly, more traffic with extra school buses going to and fro.

217.1

Storm water needs particular action – already we have pollution on our beaches because of poor drainage. Our cliff areas are very vulnerable to slips.

217.2

What becomes of the chateaus at Rydges? Does the golf course get reduced?

We do not require more little boxes on the hillside, we require more trees to replace those already demolished because of other developments in the area and restore our bird population which has been sadly displaced.

217.3

The introduction of another sports field, a park or gardens would be a more appropriate usage to enhance the area and make better returns on house values in the area.

**Submission on a notified proposal for policy statement or plan change or variation**

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 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)

Paul Michael Orriss

Organisation Name (if submission is made on behalf of Organisation)

N/A.

Address for service of Submitter

17 Omana Heights Dr Manurewa

Telephone:

0212563030

Fax/Email:

1paulorriss@gmail.com

Contact Person: (Name and designation, if applicable)

**Scope of submission**

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 88 (Private)

Plan Change/Variation Name

Beachlands South

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Or

Property Address

Or

Map

Or

Other (specify)

**Submission**

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)



I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are: That the increase in population will increase the traffic volume of the Whitford Mamatai Rd from an already stressed level at peak times to a dangerous inefficient pathway to the coast. The changes proposed by the plan do not correct a road that is long overdue for some effective safety upgrades. (continue on a separate sheet if necessary)

218.1

I seek the following decision by Council:

Accept the proposed plan change / variation  218.0

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.

- For road widening to take place including the bridge by Waikopua Rd
- High crash corners to be redesigned and altered

218.2

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

Signature of Submitter (or person authorised to sign on behalf of submitter)

20/2/2023  
Date

Notes to person making submission:

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could  / could not  gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am  / am not  directly affected by an effect of the subject matter of the submission that;

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Renette Brink  
**Date:** Friday, 3 March 2023 7:00:49 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Renette Brink  
Organisation name:  
Agent's full name:  
Email address: renettebrink101@gmail.com  
Contact phone number:  
Postal address:  
52 Eighth View Avenue  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Infrastructure  
Property address:  
Map or maps:  
Other provisions:  
Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified  
Do you wish to have the provisions you have identified above amended? Yes  
The reason for my or our views are:  
Lack of infrastructure, roads, ferries and parking.  
I or we seek the following decision by council: Decline the plan change  
Submission date: 3 March 2023

219.1

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Ian Wallace  
**Date:** Friday, 3 March 2023 8:30:47 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Ian Wallace  
Organisation name:  
Agent's full name:  
Email address: beachlands@yahoo.com  
Contact phone number:  
Postal address:  
13 Beachlands Road  
BEachlands  
BEachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Increase of Plan change 88  
Property address:  
Map or maps:  
Other provisions:  
Increase of this development to 3000 dwellings

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
We are very concerned about this plan change due to the detrimental effect this will have on current beachlands/Pohutakawa coast resources and current lifes that we enjoy and have moved here for. Rooding, public transport congestion, secondary schooling are all inadequate currently in this area, how is adding another 3000 property's going to improve this? also we are very concerned about effect to the environment due to over development that this obviously is!

I or we seek the following decision by council: Decline the plan change

Submission date: 3 March 2023

**Attend a hearing**

220.1

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.

[Have your say on Auckland Council's annual budget 2023 and 2024.](#)



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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Steve West  
**Date:** Friday, 3 March 2023 11:15:57 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Steve West  
Organisation name:  
Agent's full name: Stephen West  
Email address: stephenwest57@gmail.com  
Contact phone number:  
Postal address:  
stephenwest57@gmail.com  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Property address: 38 Cadwil Drive, Beachlands  
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:

Beachlands is a beautiful peaceful small community, already expanded greatly over the last 10+ years, with this and the already agreed developments the infrastructure is struggling to support the current community, these and any future developments impact on people's lives, wildlife, environmental impact etc etc.

There are government plans ie Road to Zero, that will fail further with just adding additional traffic on the roads. Therefore with a proposed doubling of people, will need a minimum doubling of road capacity, we understand currently only 6% use ferries, this will remain at 6% even with a population increase.

We currently look over towards the golf course, with the proposed development, all the views and quiet that we moved to Beachlands for will be destroyed.

We do not understand why we need this development in Beachlands, where there is only one way in and out, such a development for Auckland needs to be near a full roading/public transport hub. We could understand if these were lifestyle sections, low density, but the proposal is not in keeping with the existing environment with the proposed high density/high rise buildings.

221.1

221.2

I or we seek the following decision by council: Decline the plan change

Submission date: 3 March 2023

**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.

[Have your say on Auckland Council's annual budget 2023 and 2024.](#)



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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Chantelle Pinch  
**Date:** Friday, 3 March 2023 3:30:56 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Chantelle Pinch  
Organisation name:  
Agent's full name:  
Email address: chantellepinch@yahoo.co.nz  
Contact phone number:  
Postal address:  
100 first view ave  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Roding  
Property address: Whitford Maraetai Rd  
Map or maps:  
Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
I only support the provision and plan if the developer pays to upgrade Whitford Maraetai Rd to 4 lanes to support the extra population on the roads.

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: Upgrade the main road to 4 lanes.

Submission date: 3 March 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

222.1

**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.

Have your say on Auckland Council's annual budget 2023 and 2024.



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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Mark Regan Casey  
**Date:** Friday, 3 March 2023 4:00:53 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Mark Regan Casey

Organisation name:

Agent's full name:

Email address: qcsab@hotmail.com

Contact phone number:

Postal address:  
8 Fantail Crescent  
Maraetai  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Rezoning of northern and southern portion.

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
The infrastructure of Beachlands and Maraetai is straining to cope with the current population. The huge increase in population under PC88 and associated requirements on roads, waste water, electricity grid and medical facilities will overwhelm current facilities.

I or we seek the following decision by council: Decline the plan change

Submission date: 3 March 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

223.1

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.

[Have your say on Auckland Council's annual budget 2023 and 2024.](#)



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**Submission on a notified proposal for policy statement or plan change or variation**

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 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)

Elisabeth van Stiphout

**Organisation Name (if submission is made on behalf of Organisation)**

**Address for service of Submitter**

92 Beachlands Road, Beachlands

Telephone:

21370158

Fax/Email:

eldirnz@gmail.com

Contact Person: (Name and designation, if applicable)

**Scope of submission**

This is a submission on the following **proposed plan change / variation to an existing plan:**

Plan Change/Variation Number

PC 88 (Private)

Plan Change/Variation Name

Beachlands South

**The specific provisions that my submission relates to are:**

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Or

Property Address

Or

Map

Or

Other (specify)

**Submission**

**My submission is:** (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I support the specific provisions identified above

# 224

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

224.1 I do not believe that the proposed plans sufficiently resolve the traffic constraints that will only worsen with more cars on the road and no AC funding to mitigate the impact.

224.2 There are no clear plans on how to deal with storm water and sewage given that Watercare has no ability (funding) to increase capacity and the impact this may have on the surrounding environment.

224.3 There are no clear plans for additional schooling and understand that the Min. of Education sees no reason to add extra local capacity for the foreseeable future

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

224.4 The developer be made solely accountable for the increase in traffic movements between Beachlands/Maraetai and a motorway access point.

224.5 The developer to demonstrate how it will contain all storm water and sewage from the new development now and in the future

224.6 The developer to fund an independent review of the impact on the local and surrounding environment and infrastructure, (water, roading, & public transport)

224.7 An independent review to be funded looking at the impact of ~1,000 dwellings allocated to Kainga Ora on the local community

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

  
\_\_\_\_\_  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

02/17/2023  
\_\_\_\_\_  
Date

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could  /could not  gain an advantage in trade competition through this submission.

**If you could gain an advantage in trade competition through this submission please complete the following:**

I am  / am not  directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.



# Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 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) Mr Dirk de Jong

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

92 Beachlands Road, Beachlands

Telephone:  Fax/Email:

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

Plan Change/Variation Name

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) \_\_\_\_\_

## 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:

- 225.1 There are currently 2 roads that provide access to Beachlands/Maraetai and both are severely compromised - 1 due to coastal erosion and the other sheer volume of traffic leaving no alternatives in an emergency.
- 225.2 The proposal to take water from the Pine Harbour aquifer seems flawed as you will have a large community reliant on one source which could become contaminated or disappear due to over use..
- 225.3 There are no clear plans to contain storm water and sewage and no available independent reviews available to assess local impact on the community and environment.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

- 225.4 Instruct the developer to commission an independent report to assess the impact of a large community of social housing on the current community of Beachlands.
- 225.5 Change the plan from high to low density housing more in keeping with the current community to reduce the impact on the environment and local community.
- 225.6 Seek compensation from the developer for the extra infrastructure (water, roading, transport) that will be needed to cater for the planned influx of an extra ~10,000 people
- 225.7 Seek confirmation from the Min. of Education that extra schooling will be funded to cater for the influx of an extra ~10,000 people (from primary to high school)

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

Signature of Submitter  
(or person authorised to sign on behalf of submitter)

02/17/2023  
Date

Notes to person making submission:

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could  /could not  gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am  / am not  directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Suzanne Mevissen  
**Date:** Friday, 3 March 2023 8:45:56 pm

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Suzanne Mevissen

Organisation name:

Agent's full name: Suzanne Mevissen

Email address: suzelea18@gmail.com

Contact phone number:

Postal address:  
 suzelea18@gmail.com  
 Beachlands  
 Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:

Lack of suitable transport infrastructure to support a development of this size. There are minimal public transport options out of Beachlands and Maraetai - the ferry being the best public transport but only useful if commuting to the CBD. The majority of the population of this area have no choice but to commute by car. This development will exacerbate the problems associated with insufficient transport infrastructure.

226.1

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

There is one two lane road in and out of Beachlands. It is a very dangerous road and there are a number of bottle necks that will only be made worse by the proposed development at Beachlands South.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: Substantially reduce the number of dwellings able to be developed until suitable traffic infrastructure is in place

226.2

Submission date: 3 March 2023

**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

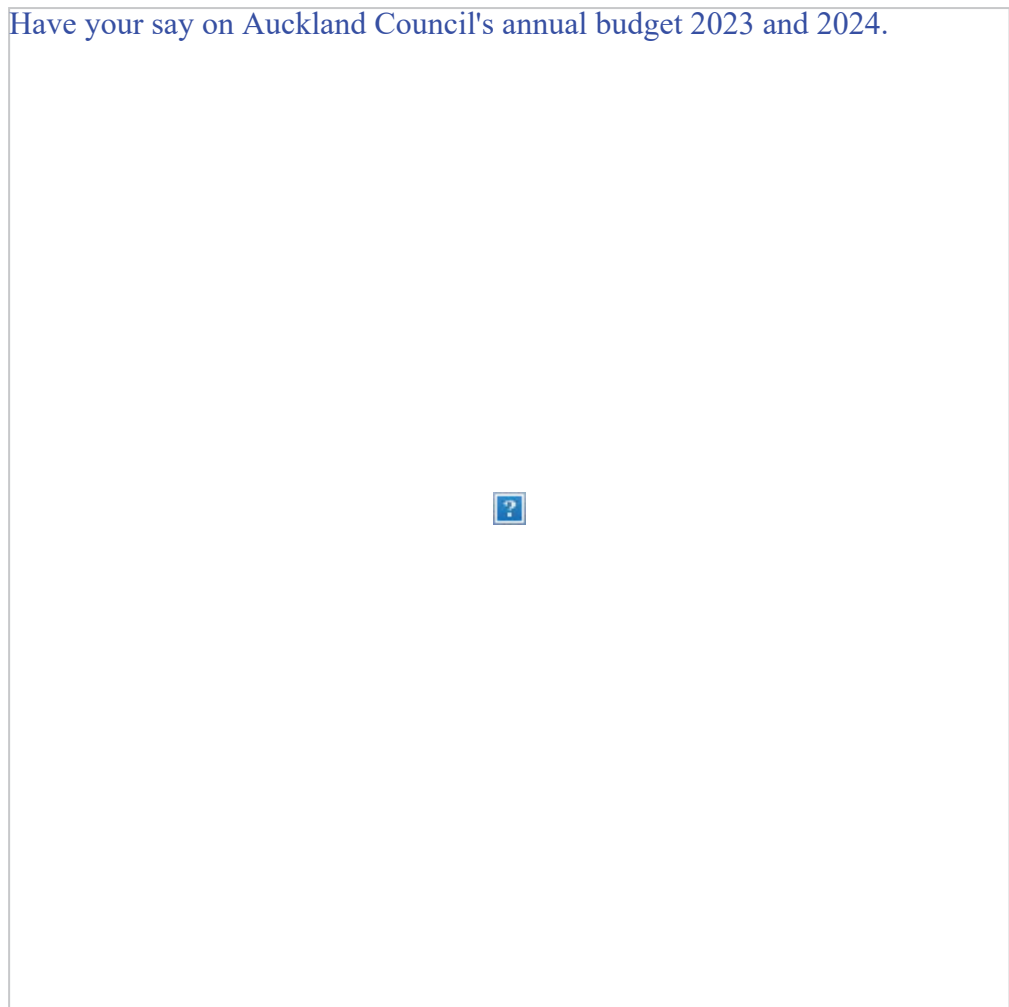
Are you directly affected by an effect of the subject matter of this submission that:

- 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.

Have your say on Auckland Council's annual budget 2023 and 2024.



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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Oleg Bartsaikin  
**Date:** Saturday, 4 March 2023 10:45:40 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Oleg Bartsaikin  
Organisation name:  
Agent's full name:  
Email address: omegaqsservices@gmail.com  
Contact phone number: 0272977244  
Postal address:  
4 Te Makuru Lane  
Maraetai  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Infrastructure between Beachlands/ Maraetai and Auckland ammended to 4 lanes prior development discussions starts

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

Current Infrastructure cannot support the development.

- 1. There is a single 2 lane road in-out (Whitford Rd). Some sections of the road are in poor condition and require maintenance. Majority of the local working population is using their cars to commute between town and Maraetai. | 227.1
- 2. Public transport is a shamble, so we cannot rely on it. | 227.2
- 3. Medical practice in Beachlands is the only one and fully committed. We need a new medical centre. | 227.3
- 4. Water supply and water treatment issues. What will happened with another heavy rain fall? The local beaches will be unswimmable like in central Auckland. | 227.3
- 5 No housing NZ dwellings. People invested their lives, health into the area and would like to maintain the value of the area growing. | 227.4

Put the infrastructure in place first. Then we can discuss the development.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

227.5

Details of amendments: Road infrastructure 4 lanes installed prior to development discussion starts.

Submission date: 4 March 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Debra Black  
**Date:** Saturday, 4 March 2023 11:00:48 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Debra Black  
Organisation name:  
Agent's full name:  
Email address: egoliblacks@gmail.com  
Contact phone number:  
Postal address:  
215 Jack Lachlan DR  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Infrastructure  
Property address: Formosa Golf Course  
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:  
Roding will not manage traffic from Beachlands to Whitford, Beachlands needs a High School.Water etc.

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: Roding, Emergency Services, High School

Submission date: 4 March 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

228.1



**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Karen Kerr  
**Date:** Saturday, 4 March 2023 11:15:42 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Karen Kerr

Organisation name:

Agent's full name:

Email address: karenjkerr1@gmail.com

Contact phone number:

Postal address:  
280 Jack Lachlan Drive  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Rezoning approximately 307 hectares of land south of the Beachlands township.

Property address: 110 Jack Lachlan Drive; and 620, 680, 682, 702, 712, 722, 732, 740, 746, 758 and 770 Whitford-Maraetai Road, Beachlands.

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:

I do not believe that the current infrastructure for this area can support a development of this magnitude without significant investment, particularly the roading which is currently struggling to accommodate the existing traffic. The belief that public transport will resolve this issue is not realistic unless you are working in the CBD and can catch a ferry. The bus is not an option for everyone due to the limited area it feeds and the time it would take to get to destinations.

I or we seek the following decision by council: Decline the plan change

Submission date: 4 March 2023

**Attend a hearing**

229.1

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.

[Have your say on Auckland Council's annual budget 2023 and 2024.](#)



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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Blair Nix  
**Date:** Saturday, 4 March 2023 1:45:44 pm

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Blair Nix

Organisation name:

Agent's full name:

Email address: [blair.nix@mii.com](mailto:blair.nix@mii.com)

Contact phone number:

Postal address:  
 280 Jack Lachlan Drive  
 Beachlands  
 Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

The rezoning approximately 307 hectares of land south of the Beachlands township. This includes the properties at 110 Jack Lachlan Drive; and 620, 680, 682, 702, 712, 722, 732, 740, 746, 758 and 770 Whitford-Maraetai Road, Beachlands.

Property address: 110 Jack Lachlan Drive; and 620, 680, 682, 702, 712, 722, 732, 740, 746, 758 and 770 Whitford-Maraetai Road, Beachlands.

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

I believe the existing roadway out of this area does not have the capacity to accommodate a development of this size. It has been suggested by the developers that a large portion of people in the new development will use public transport, this is simply not possible from an area this far out of Auckland.

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: We need to see the road widened and improved before a substantial population growth is approved.

230.1

Submission date: 4 March 2023

**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

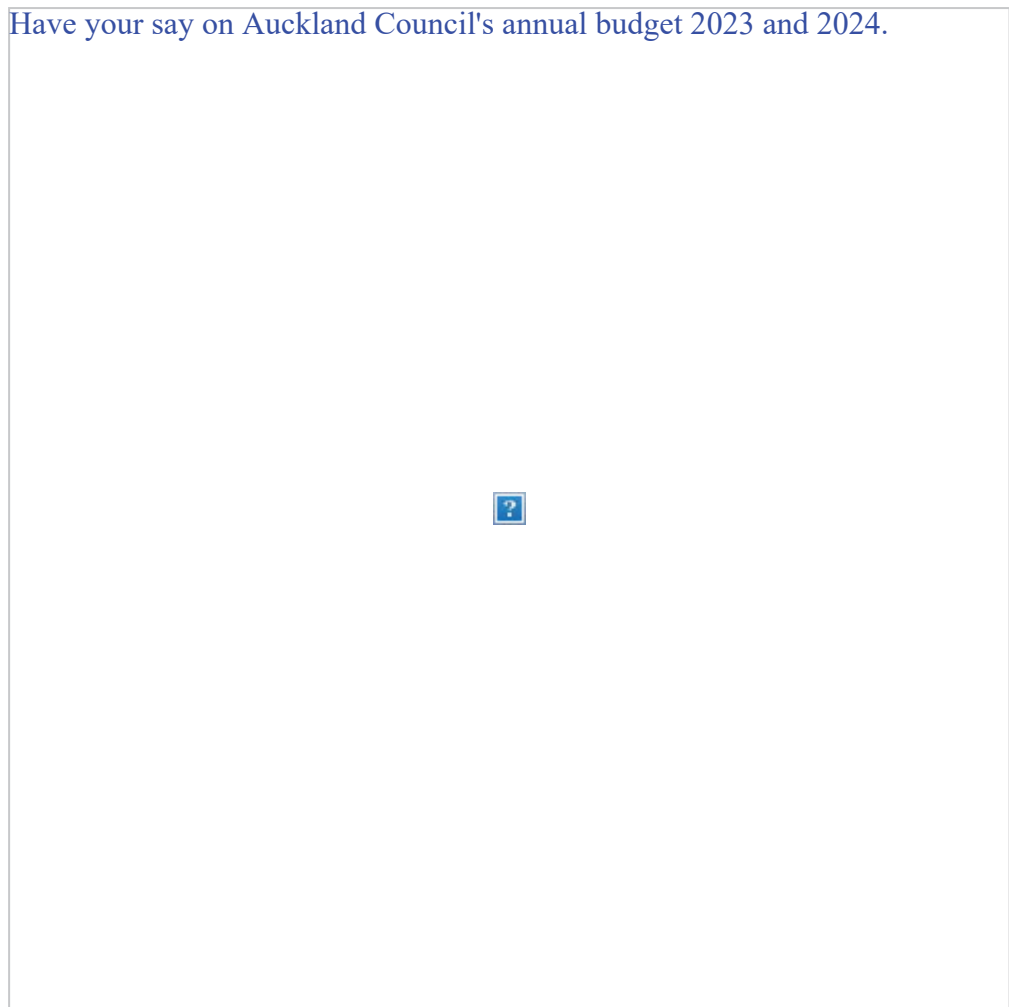
Are you directly affected by an effect of the subject matter of this submission that:

- 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.

Have your say on Auckland Council's annual budget 2023 and 2024.



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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Nithya Balakrishnan  
**Date:** Saturday, 4 March 2023 11:15:43 pm

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Nithya Balakrishnan

Organisation name:

Agent's full name: Nithya Balakrishnan

Email address: Nithyabalki@gmail.com

Contact phone number:

Postal address:  
71 Eighth View Avenue  
Beachlands  
Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:  
Pc 88 Appendix 7 and pc 88 appendix 11

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 plans provided does not make any provisions for the increased traffic that Beachlands Maraetai community faces. There is a delay of 25 to 30 min every day during peak hours at the junctions of whitford flat bush and whitford Summerville. Adding another 3000 houses on top if the new developments added will not help the situation. First the infrastructure has to be upgraded to support existing communities and then upgrade infrastructure to take on more. Plz don't bring families first and then think about upgrading infrastructure.

I or we seek the following decision by council: Decline the plan change

Submission date: 4 March 2023

### Attend a hearing

231.1

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.

[Have your say on Auckland Council's annual budget 2023 and 2024.](#)



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**From:** [Ivan Peter](#)  
**To:** [Unitary Plan](#)  
**Subject:** Submission - Proposed Development of Beachlands South  
**Date:** Sunday, 5 March 2023 11:40:11 am  
**Attachments:** [BDSC-logo\\_43x43px\\_19535e23-843b-48e3-b2d8-e383a03d9b54.png](#)  
[Knowledge-with-character\\_253px\\_d9cec97f-cbf0-415f-9528-6a8c372b5666.png](#)

Good Morning

I, Ivan Connell Peter of 9 Flaxfield Lane, Beachlands **oppose** the proposed development as put forward by the Russel Group. There is absolutely no way this development can go ahead and my reasons are as follows :

1. **ROADING**

There is only one main road that services Whitford. Maraetai and Omana at the moment. The volume of traffic on this road has affected the state of the road and the poor condition of the main road is a recipe for disaster – one has to look at the number of accidents on the road to verify this. Another development at Formosa is going to add to the huge volume of traffic that this road has to cope with as well as the huge increase in the number of vehicles using this road. The ferry service will not ease this as there is only a limited number of people who use the ferry to work. A poor infrastructure has accounted for the extensive problems this area is facing.

232.1

2. **TRANSPORT**

Public transport to and from the area is very inadequate. A larger ferry at Pine Harbour will not ease the situation as the harbour cannot accommodate a large ferry because of the lack of space – to even suggest this is quite ludicrous. The bus service in the mornings is really transporting secondary school students from the area as well as Clevedon to Howick and Botany – had we built a secondary school in the area this will not be a problem – but that is another issue that has been given very little thought or consideration.

232.2

232.3

3. **WATER**

Another issue that appears to have been overlooked by the developers. There simply isn't enough water to service the new development and the residents of the area are certainly NOT going to pick up the tab when the water in the new development runs out!! Again very little thought by the developers. Have they considered the well being of the residents in BMO and the strain this new development will put on the residents here – really making big money isn't everything.

232.4

Therefore I totally oppose this and hope all the others affected do likewise.

Grumpy!!  
Ivan Peter



**Ivan Peter**  
 Teacher  
 i.peter@bdsc.school.nz

Botany Downs Secondary College  
 575 Chapel Rd, East Tamaki, Auckland, NZ  
 +64 9 273 2310 ext 291 | [www.bdsc.school.nz](http://www.bdsc.school.nz)





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# Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 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) Mfr & Mrs Rose

### Organisation Name (if submission is made on behalf of Organisation)

### Address for service of Submitter

247 Trig Rd

Whitford

Telephone:  Fax/Email:

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

Plan Change/Variation Name

### 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)

## 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:

This sort of urban sprawl goes completely against today's thinking and there is limited supporting infrastructure.

Already there is a clear need for a 4 lane carriage way between Whitford & Beachlands - and what of & what of suitable medical (A & E) and Educational resources. See attached

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

No development is to go ahead then it cannot happen until the 4 lane carriage way between Beachlands & Whitford is in place z(perhaps the developer can provide the funds for this, for council to pay back at a later date when the budget allows. Land must be allocated for an Accident & Emergency centre & suitable schools before development goes ahead.

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

David Rose  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

03/05/2023  
Date

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

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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.

Why we oppose the Plan Change & Development of the Formosa site.

This sort of urban sprawl goes completely against today's thinking and there is very limited supporting infrastructure in place.

233.1

Surely we are looking to lessen our urban footprint around Auckland, not increase it.

Already there is a clear need for a 4 lane carriage way between Whitford & Beachlands – based on existing traffic numbers and the safety record of the present road layout, which is dismal. We hear the sirens almost daily.

What of suitable medical (Accident & Emergency) and educational centres for such a boost in population? When would such services be provided? By who and at what cost?

233.2

Has thought gone into the impact all the extra traffic generated will have on the main arteries beyond Whitford – Ormiston Rd & Ti Rakau Drive – which are already overloaded most weekday mornings & late afternoons. If so what sort of planning has been done to mitigate the impact of this proposed subdivision? We see nothing in the proposal that suggests this has been seriously considered.

Water supply and the provision of an adequate wastewater system are also need to be addressed. Will what is being proposed actually cope with the eventual growth in a way that is both ecologically sound and sustainable, so close to the coast?

233.3

Should the development go ahead the roading & service infrastructure needs to be in place beforehand, not arrive afterwards.

233.4

Perhaps, as part of any agreement reached, the developer could be required to loan council the money for building the necessary 4 lane road (which could be paid back once the development is providing the necessary rates) and provide the land immediately for the necessary schools & an emergency medical centre so those bodies can get to work promptly.

233.5

233.6

David & Angenieta Rose  
247 Trig Rd  
Whitford

**From:** [Freddy Brignone](#)  
**To:** [Unitary Plan](#)  
**Subject:** Beachlands development  
**Date:** Sunday, 5 March 2023 4:19:02 pm

---

Dear sir, madam

I urge you to stop or prevent the development of Formosa golf course in Beachlands. The area barely supports the increase in traffic as it is, with queues forming on all sides of the Whitford roundabout and at the Beachlands/Maraetai roundabout. The awful development of Ormiston where people are packed on top of each other has already added to our traffic woes, without adding thousands of people to an already congested area subject to regular power cuts.

234.1

I do not understand the council's motivation to concrete over every piece of available land, especially when we're told to do our bit for climate change and the environment. Most new developments don't have nearly enough trees to counter the effects of building and carbon emissions resulting from such developments. Ormiston being one of the worst I have ever seen.

The Formosa course could be a real asset to the area and the people of Auckland if it was turned into a public park.

234.2

I urge you to block the development on environmental grounds. The local roads and local infrastructure will not handle the increase in traffic or the population. If the recent weather events have taught us one thing, it is to stop building for the sake of packing people in badly designed developments.

Please consider making Auckland better for us and the next generations instead of turning it into an unliveable slum.

Regards,

Freddy Brignone  
Beachlands

Sent from my iPhone

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Andrew Buckingham  
**Date:** Sunday, 5 March 2023 4:30:21 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Andrew Buckingham

Organisation name:

Agent's full name: Andrew Buckingham

Email address: asbucko@gmail.com

Contact phone number:

Postal address:

9 Whites Road

Whitford

Whitford 2571

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Traffic

Property address: 9 Whites Road, Whitford

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:

As a resident of the Broomfields Peninsula for almost 20 years, the volume of traffic on Whitford Road has increased substantially since we settled in this location. There have been no traffic improvements in that period despite a growing population in Beachlands. Additional housing at Beachlands will inevitably create further traffic on Whitford Road. At times it is now almost impossible to turn right out of Broomfields Road or Wades Road onto Whitford Road due to traffic congestion. Council needs to either implement roading improvements such as dual lane roading from Beachlands to Somerville or impose conditions on the developer which achieve this. Otherwise the Plan Change should be declined.

235.1

235.2

I or we seek the following decision by council: Decline the plan change

Submission date: 5 March 2023

**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.

[Have your say on Auckland Council's annual budget 2023 and 2024.](#)



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# Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 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) Stephen murray cox

### Organisation Name (if submission is made on behalf of Organisation)

### Address for service of Submitter

88 Carlton Crescent Maraetai, Auckland, 2018

Telephone:  Fax/Email:

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

Plan Change/Variation Name

### 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)

## 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:

Insufficient infrastructure, particularly roading (the existing 2 lane road will not be able to cope with the increase in traffic.)

236.1

The sewerage system as proposed is inadequate and disposing to existing land will not work.

Water supply using bore water is inadequate for a development of that size.

(continue on a separate sheet if necessary)

236.2

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

Provide a 4 lane road from Whitford Road along Whitford Maraetai Road to the site including upgrading Jack Lachlan Drive.

236.3

Replace the proposed disposal disposal of sewerage system with one that does not rely on disposal to existing ground.

236.4

Replace the proposed supply of water from bores to another system which will cope with the development and approved by Watercare.

236.5

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

S.M.COX

05/03/2023

Signature of Submitter  
(or person authorised to sign on behalf of submitter)

Date

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could  /could not  gain an advantage in trade competition through this submission.

**If you could gain an advantage in trade competition through this submission please complete the following:**

I am  / am not  directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Nigel Ewels  
**Date:** Sunday, 5 March 2023 6:15:21 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Nigel Ewels  
Organisation name:  
Agent's full name: Nigel Ewels  
Email address: nigelewels@hotmail.com  
Contact phone number:  
Postal address:  
36 Campbell Rd  
Maraetai  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88  
Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

I believe that the proposed development will put significant strain on the transport, water, waste water and other infrastructure of the area. The development will greatly increase the population of the area and neither the developers or Council have proposed adequate investments in the range of infrastructure and support needed for such an increase. Without it we can expect a negative social outcome from the development if it goes ahead.

I or we seek the following decision by council: Decline the plan change

Submission date: 5 March 2023

**Attend a hearing**

237.1

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.

[Have your say on Auckland Council's annual budget 2023 and 2024.](#)



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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Hamish Sutherland  
**Date:** Sunday, 5 March 2023 8:00:19 pm

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Hamish Sutherland

Organisation name:

Agent's full name: Samantha Sutherland

Email address: hasutherland@gmail.com

Contact phone number:

Postal address:  
 62 Second View Ave  
 Beachlands  
 Beachlands 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:  
 Private plan change

Property address: This includes the properties at 110 Jack Lachlan Drive; and 620, 680, 682, 702, 712, 722, 732, 740, 746, 758 and 770 Whitford-Maraetai Road, Beachlands.

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

The plan change does not take include any provisions to upgrade the Whitford Maraetai Road which is currently at near capacity. The plan change will double the population in Beachlands and assumes people living in the area and moving into the area will use public transport and the existing pine harbour ferry with no provisions for extending the ferry service which the developers have no control over. There is not enough provision for parking in the new development, the developer makes assumptions that public transport will be used but currently 75% of residents use a car to transport themselves out of the area to work and school and only a small amount use the hourly bus service or ferry. The ferry car parking is currently at full capacity and there is nowhere to extend it, the developer suggest a shuttle bus but has not offered who will provide this and does not offer parking facilities close to the ferry for its own homeowner or the rest of residents in the area. The developer proposes high intensity housing/apartments close to the ferry (high frequency public transport) which is currently at capacity, and this in turn creates more pressure on the existing

238.1

238.2

|   |       |
|---|-------|
| transport, and less opportunities for street parking by ferry users as the apartment dwellers will have limited off street parking, which will create traffic safety issues for all residents as they negotiate the narrow streets surrounding the Pine harbour marina. The developer wants to create a modal shift to public transport but we currently have only one bus an hour, which goes to botany, to travel to howick in peak times would take 1 hour 30 min or 20 minutes by private car. Most residents travel by car as the public transport is not fit for purpose for the diverse areas residents travel to for work/school/shopping and this is not addressed. The main arterial road into Beachlands is at near capacity already and upgrades have been neglected. The area is completely isolated if the road is blocked by an accident or major weather event and the only other road into the area is a deteriorating coastal road which was blocked by a slip in the last major weather event and Maraetai beach road is often flooded - the developer is relying on AT to upgrade the roads and this must be completed before we allow any further development - there is currently hundreds of new homes being built on Beachlands Road in a development which will add hundreds of cars to this existing road with no potential upgrades planned. The local board itself had concerns about the traffic generated by the new plan changes. Howick local board is opposed to the development due to the inflow of traffic into their area. The developer suggests the existing Pine harbour ferry service supports higher intensity development but does not offer proof of this when over 75% of residents use the road to travel. Who is upgrading the ferry - it is privately owned land? | 238.3 |
|   | 238.2 |
|   | 238.4 |
|   | 238.5 |

I or we seek the following decision by council: Decline the plan change

Submission date: 5 March 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Samantha Sutherland  
**Date:** Sunday, 5 March 2023 8:00:22 pm

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Samantha Sutherland

Organisation name:

Agent's full name: Samantha Sutherland

Email address: samantha\_sutherland@hotmail.com

Contact phone number:

Postal address:  
 62 Second View ave  
 Beachlands  
 Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:  
 Private plan change request

Property address: This includes the properties at 110 Jack Lachlan Drive; and 620, 680, 682, 702, 712, 722, 732, 740, 746, 758 and 770 Whitford-Maraetai Road, Beachlands.

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

The plan change does not take include any provisions to upgrade the Whitford Maraetai Road which is currently at near capacity. The plan change will double the population in Beachlands and assumes people living in the area and moving into the area will use public transport and the existing pine harbour ferry with no provisions for extending the ferry service which the developers have no control over. There is not enough provision for parking in the new development, the developer makes assumptions that public transport will be used but currently 75% of residents use a car to transport themselves out of the area to work and school and only a small amount use the hourly bus service or ferry. The ferry car parking is currently at full capacity and there is nowhere to extend it, the developer suggest a shuttle bus but has not offered who will provide this and does not offer parking facilities close to the ferry for its own homeowner or the rest of residents in the area. The developer proposes high intensity housing/apartments close to the ferry (high frequency public transport) which is currently at capacity, and this in turn creates more pressure on the existing

239.1

239.2

|   |       |
|---|-------|
| transport, and less opportunities for street parking by ferry users as the apartment dwellers will have limited off street parking, which will create traffic safety issues for all residents as they negotiate the narrow streets surrounding the Pine harbour marina. The developer wants to create a modal shift to public transport but we currently have only one bus an hour, which goes to botany, to travel to howick in peak times would take 1 hour 30 min or 20 minutes by private car. Most residents travel by car as the public transport is not fit for purpose for the diverse areas residents travel to for work/school/shopping and this is not addressed. The main arterial road into Beachlands is at near capacity already and upgrades have been neglected. The area is completely isolated if the road is blocked by an accident or major weather event and the only other road into the area is a deteriorating coastal road which was blocked by a slip in the last major weather event and Maraetai beach road is often flooded - the developer is relying on AT to upgrade the roads and this must be completed before we allow any further development - there is currently hundreds of new homes being built on Beachlands Road in a development which will add hundreds of cars to this existing road with no potential upgrades planned. The local board itself had concerns about the traffic generated by the new plan changes. Howick local board is opposed to the development due to the inflow of traffic into their area. The developer suggests the existing Pine harbour ferry service supports higher intensity development but does not offer proof of this when over 75% of residents use the road to travel. Who is upgrading the ferry - it is privately owned land? | 239.3 |
|   | 239.2 |
|   | 239.4 |
|   | 239.5 |

I or we seek the following decision by council: Decline the plan change

Submission date: 5 March 2023

**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.

Have your say on Auckland Council's annual budget 2023 and 2024.

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# Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 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)

M / Mrs / Miss / Ms (Full Name)

GERARD ANTHONY WADE

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

21 KIBBLEWHITE AVENUE, BEACHLANDS AUCKLAND

Telephone:

021356455

Fax/Email:

mrsol7@gmail.com

Contact Person: (Name and designation, if applicable)

## Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 88 (Private)

Plan Change/Variation Name

Beachlands South

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Or

Property Address

[Empty box]

Or

Map

[Empty box]

Or

Other (specify)

## Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are: I DO NOT BELIEVE THE ROAD INTO BLEAKLANDS IS  
ADQUATE FOR THE DEVELOPMENT

THE FERRY TO THE CITY PROPOSAL IS ABSOLUTELY NOT VIABLE.

LAND FOR A SCHOOL SHOULD BE INCLUDED IN THE DEVELOPMENT  
REGARDLESS OF THE EDUCATION DEPT. STANCE. (continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.


HAVE SUFFICIENT ROADING INFRASTRUCTURE IN PLACE "PRIOR" TO COMMENCEMENT 240.1  
OF DEVELOPMENT

REVISE THE FERRY PLAN PROPOSAL TO ONE THAT WILL ACTUALLY WORK 240.2

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

07/03/23  
Date

**Notes to person making submission:**

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If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could  / could not  gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am  / am not  directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - David Powley  
**Date:** Sunday, 5 March 2023 9:00:50 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: David Powley

Organisation name:

Agent's full name:

Email address: david@brightlight.co.nz

Contact phone number: 021417217

Postal address:  
21 Mahutonga Avenue  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Property address: 21 mahutonga avenue, beachlands

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:

Ferry Service : Given the unstable weather we often encounter in Beachlands there are no reliable ferry options available from the marina. The current ferry is often canceled due to windy conditions and the marina is not currently big enough to accommodate larger vessels. This puts a lot of pressure on commuters having to find travel options by road which happens regularly.

241.1

Road travel: There is only one road that is currently shared by motorists and cyclists. Currently, there are cars falling off the roads just about on a weekly basis, the condition of these road is poor and there is no space for cyclists to safely travel on the road currently. Traffic is already at its limit for the current population of beachlands.

241.2

Land use : Beachlands is currently a nice laid out centre with nice-sized sections for families to enjoy. The locals look after the area and their properties. I believe that the project proposal is too big and does not allow the community to grow at a reasonable pace with regard to the infrastructure and services required to double the size of the population. The project should be staged in a more

241.3

sustainable nature. It should be downsized by at least 50% to 75% and allow the area to adapt as reasonable-sized developments are allowed.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

241.4

Details of amendments: reduce size of project by 50-75%, allow beachlands area to maintain its quality development to date.

Submission date: 5 March 2023

**Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

Have your say on Auckland Council's annual budget 2023 and 2024.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - David Longstaff  
**Date:** Sunday, 5 March 2023 9:45:26 pm

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: David Longstaff

Organisation name:

Agent's full name: Julie Longstaff

Email address: dave\_julz@hotmail.com

Contact phone number: 0211014930

Postal address:  
dave\_julz@hotmail.com  
Beachlands  
Beachlands 2018

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

##### **My submission relates to**

Rule or rules:  
110 Jack Lachlan Drive; and 620, 680, 682, 702, 712, 722, 732, 740, 746, 758 and 770 Whitford-Maraetai Road, Beachlands.

We do not need any more housing in Beachlands when the roads are in such a terrible state. 3000 + dwellings which is about 6000 extra vehicles on our roads that are not coping with the amount of traffic now. If this can't be sorted prior to building it should not be going ahead

Odour from the wastewater treatment plant before we are all NORTH of the ponds

State houses in this new development is only bringing more crime and devalue the existing houses. What are these tenants in state housing going to bring to our area!! Certainly not jobs just more crime.

Trucks building this development will only worsen the already terrible roads. Who is this going to effect certainly not the developers on the local road users.

There is not been enough foresight by the developers on how this will effect the existing users of these roads

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions

identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

We do not need any more housing in Beachlands when the roads are in such a terrible state. 3000 + dwellings which is about 6000 extra vehicles on our roads that are not coping with the amount of traffic now. If this can't be sorted prior to building it should not be going ahead

242.1

Odour from the wastewater treatment plant before we are all NORTH of the ponds. Te Puru outlet is not going to cope with extra wastewater or grey water

242.2

State houses in this new development is only bringing more crime and devalue the existing houses. What are these tenants in state housing going to bring to our area!! Certainly not jobs just more crime.

242.3

Trucks building this development will only worsen the already terrible roads. Who is this going to effect certainly not the developers on the local road users.

242.4

There is not been enough foresight by the developers on how this will effect the existing users of these roads

I or we seek the following decision by council: Decline the plan change

Submission date: 5 March 2023

### **Attend a hearing**

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?  
Yes

### **Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Harry Stephen Jones  
**Date:** Monday, 6 March 2023 9:45:15 am

---

The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Harry Stephen Jones

Organisation name:

Agent's full name:

Email address: [hdjones5762@gmail.com](mailto:hdjones5762@gmail.com)

Contact phone number:

Postal address:  
 27 Mahutonga Avenue  
 Beachlands  
 Auckland 2018

### Submission details

#### This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

#### My submission relates to

Rule or rules:

- Roading
- Public Transport
- Water Supply
- Waste Water
- Education
- Recreation
- Health and well Being

Property address: Re-Zoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential, etc...

Map or maps:

Other provisions:

Re-Zoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential, etc...

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:

Roading - The current roading is insufficient as it is, and is grid locked most mornings. The road is very poor in sections, dangerous in others, and uneven. Heavy trucks use this road causing further damage. I have lost count of the number of vehicles that have left the road in accidents. We see them sitting in paddocks with police tape around them, like trophies.

243.1

- The applicant wishes to build a further 3000 dwellings, but has only offered to 'UPGRADE' some Road intersections. This is hardly going to help anyone, as the main road will remain stressed and unchanged, causing Chaos on the road. Whitford is already a bottleneck, and now we want another few thousand vehicles on an already stretched transport route. Totally unreasonable. We are still waiting for the council to upgrade the existing road - let alone bring more traffic and further heavy vehicles. 243.1
- Oh and by the way - where are all these extar vehicles supposed to fuel up.? There is no Petrol stations in Beachlands and only one small one in Maraetai. Where is this in the applicants plan.?
- Public Transport - A great idea, but I still cant get to concert on the weekends because there are no Ferries running at these times. And I'm right near the terminal. I have to travel by road to work, as I start at 6.00am in the morning and I have to get to Highbrook Business park. Most others in our community have to do the same thing. Buses may work for some - but they do not cut it for us business folk. So we have to drive over the ONLY usable road way to Beachlands, through Whitford, and either head towards Howick, or head towards Ormiston. So all pressue will now be on Whitford. 243.2
- Water Supply - The applicant suggests that the water supply will come form existing bores, and a 'POTENTIAL' agreement with Pine Harbour Living. This seems hardly adequate for the scale of the application, and I would suggest that Tank water be mandatory. All the existing Fletcher sub-divisions are on Tank water. I thought we were supposed to embrace self sufficiency.? We use Tank water and are very happy to do so, managing our own resources is a good thing. The applicant should be forced to embrace Tank Water like everyone else. 243.3
- 243.4
- Waste Water - The applicant suggests that this should be treated on site, and while we understand this is normal practice in large rural areas, surely we should be looking to the future. Waste should be handled as it is in the fletcher sub-divisions. Lets make this manditory as well. 243.5
- Education - Apparently the applicant is willing to make land available for a school, which is great. But that does not mean that the Ministry of Education will build a school. I would like to hear from The Ministry as to its input on this. The effective doubling of the population should raise the issue of new schools.? The hundreds of kids who currently catch buses to school, would reduce, and offer better local security for them and their parents. 243.6
- Recreation - are there open spaces for dog walking, rugby fields, soccer fields, play areas, swimming pools.? Green belt areas should be part of the plan. 243.7
- Health and well being - Are there any plans to increase the medical services, doctors, chemists, physio services, etc, for this new influx of people.? 243.8
- Are there plans for a seperate shopping center that is accessible to the newly developed zone, or do we expect everyone to overwhelm the current two small shopping centers with new traffic volumes that they were not designed for.?

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: Refer to above reasons

Submission date: 6 March 2023

### **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.

Have your say on Auckland Council's annual budget 2023 and 2024.



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# Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 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) Mr Neil Woolridge

### Organisation Name (if submission is made on behalf of Organisation)

### Address for service of Submitter

14 Artists Avenue, Beachlands, 2018

Telephone:  Fax/Email:

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

Plan Change/Variation Name

### 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)

## 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

244.1

The reasons for my views are:

1. I am concerned about the ability of the Whitford-Maraetai Road & infrastructure to cope with the resulting increase in population and resulting traffic congestion from the proposed urban residential development in Beachlands.

2. I am also concerned about sustainability of the water supply, waste water and storm water systems.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

244.2

I submit the following conditions must be satisfied before approval is provided:

1. The Whitford-Maraetai Road road and infrastructure must be improved to cope with future increase in population

2. Conclusive technical evidence must be provided to confirm that the water supply, waste water and storm water systems are sustainable with minimal environmental impact such as too higher demand on ground water supply and flooding.

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

244.3

If others make a similar submission, I will consider presenting a joint case with them at a hearing

*Neil Woolridge*

Signature of Submitter  
(or person authorised to sign on behalf of submitter)

03/06/2023

Date

**Notes to person making submission:**

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could  /could not  gain an advantage in trade competition through this submission.

If you **could** gain an advantage in trade competition through this submission please complete the following:

I am  / am not  directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Sean Patrick Omeara  
**Date:** Monday, 6 March 2023 11:18:08 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Sean Patrick Omeara

Organisation name:

Agent's full name:

Email address: nzkingfisher@yahoo.com

Contact phone number:

Postal address:

Maraetai  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Auckland Unitary Plan

Property address: the properties at 110 Jack Lachlan Drive; and 620, 680, 682, 702, 712, 722, 732, 740, 746, 758 and 770 Whitford-Maraetai Road, Beachlands.

Map or maps:

Other provisions:

Public transport, roading, local medical and supermarket facilities are inadequate at present, this development will put further strain on an already upset and fed up community.

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

The unitary plan was created as a long-term plan for our city, it was agreed that part of that plan was to give us a green space between the urban areas of Howick and Beachlands.

245.1

This plan change is asking to remove part of this green space, which is not only aesthetically unpleasant, the results of this development intensification will also put additional pressures on local infrastructure, medical facilities, further deteriorate a sub-standard road that we are already having to negotiate.

245.2

At present, traffic is already backed up 4-5km queues some days in various bottleneck places (Whitford roundabout, Howick gorge roundabout, Whitford-Park Road, Ara-Kotinga Road to name a

few). There is sometimes a 2+ week to be seen at the medical centre. This development will only increase these times and queues. More cars on the road will statistically mean more deaths. | 245.3

I oppose this PC-88 plan change for these reasons above and wish the land to remain as green space. | 245.4

I or we seek the following decision by council: Decline the plan change

Submission date: 6 March 2023

**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.

[Have your say on Auckland Council's annual budget 2023 and 2024.](#)



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**Submission on a notified proposal for policy statement or plan change or variation**

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 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)

Alana Hodgson

**Organisation Name (if submission is made on behalf of Organisation)**

**Address for service of Submitter**

17 Puriri Road, Beachlands, Auckland.

Telephone:

0274 766 339

Fax/Email:

alana.hodgie@gmail.com

Contact Person: (Name and designation, if applicable)

**Scope of submission**

**This is a submission on the following proposed plan change / variation to an existing plan:**

Plan Change/Variation Number

PC 88 (Private)

Plan Change/Variation Name

Beachlands South

**The specific provisions that my submission relates to are:**

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Or

Property Address

Or

Map

Or

Other (specify)

**Submission**

**My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)**

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

- No infrastructure for an extra 3,000 people and vehicles, 246.1
- Beachlands a Maraetai school at capacity now. 246.2
- The proposed development, especially multi level building destroy the rural and sea views, they are environmentally ugly. (continue on a separate sheet if necessary) 246.3

I seek the following decision by Council:

- Accept the proposed plan change / variation
- Accept the proposed plan change / variation with amendments as outlined below
- Decline the proposed plan change / variation
- If the proposed plan change / variation is not declined, then amend it as outlined below. 
  - Main road to be up graded. 246.4
  - New College for the area. New primary school. 246.5
  - No multi level buildings. 246.6
  - Building must be in keeping with our coastal environment and community.
- 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

A. M. Hodgson.  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

1.3.23.  
Date

**Notes to person making submission:**  
If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could  / could not  gain an advantage in trade competition through this submission.  
If you could gain an advantage in trade competition through this submission please complete the following:

I am  / am not  directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

**SUBMISSION ON PROPOSED PLAN CHANGE PC 88 (Private) – Beachlands South**

Yvonne Box  
 29 Mahutonga Avenue, Beachlands, Auckland 2018  
 Ph: 021 759 040  
 Email: [yvonne@real-estate-coach.co.nz](mailto:yvonne@real-estate-coach.co.nz)

**Preamble**

I am not averse to urban intensification and development of land that is not otherwise required for agricultural and horticultural sustainability. My submission arises from the balanced consideration of the proposal, and what I perceive to be positive or negative impacts, both in the immediate and long term future of the Beachlands (and surrounding area) communities.

My submission is focused on the current and future needs not only of the present residents, but also those who would be encouraged to move to this 'new community' only to find that the reality of life here is far different from what has been suggested by the developer.

For the sake of brevity, I have focused my submission on a single issue. However, this is far from my only concern. I have not indulged – at this time – with submitting detailed analysis of the Auckland Unitary Plan, the Assessment of Environmental Effects or other key documents which are available to Auckland Council for expert consideration.

**Road transport infrastructure and capacity**

In respect of Proposed Plan Change 78, Section 32 and section 77J / 77L, the Auckland Council reported as follows:

Residents currently travel outside of Beachlands for the majority of employment, education and community service opportunities.

The Whitford-Maraetai Road is the only road connection to the wider regional Destinations to the west and has limited capacity to accommodate additional traffic and is expected to reach capacity prior to the development of additional dwellings That could be enabled under the NPS-UD.

The proposal, in its current form, indicates a bus route on a single primary collector road, a number of secondary collector roads, within the precinct boundary, and some modest intersection improvements, such as the one at the eastern end of Jack Lachlan Drive, leading onto Whitford-Maraetai Rd. However, the existing rural road network (Whitford-Maraetai Rd to Whitford roundabout, and beyond that towards Manurewa, Flat Bush and East Tamaki, Botany and Howick), would be largely unchanged.

At present, the primary road in and out of Beachlands is in a generally poor state, with very limited maintenance, mostly comprising the periodic patching of potholes.

It is understandable that, because Beachlands was initially a small, relatively geographically isolated and sparsely populated coastal village, these roads were never designed for heavy vehicles or high traffic volumes. Increasing the daily traffic flows by such a considerable margin will only exacerbate this problem.

247.1

The closest motorway interchanges are at East Tamaki (approximately 20km) and Manukau City (approximately 21km) from the eastern end of Jack Lachlan Drive), both of which are already utilised at near or actual capacity levels during peak traffic times.

The most recent published Census data (2018), indicated that approximately 80% of travel out of Beachlands is by private vehicle to destinations primarily in the south and east of Auckland. The purpose of such trips is usually work or education, in locations such as East Tamaki, Auckland Airport, Howick, Penrose, and to a lesser extent further afield such as the Waikato. 6% of travel is by the Pine Harbour Ferry service. Any suggestion that this service can be improved and expanded by bringing in larger vessels carries with it several significant implications, such as maneuverability of the vessels themselves, the reality of passengers accessing the ferry, and the obvious limitation of destination – the central city.

247.2

Only approximately 1% of travel is via the bus service, as this has inherent limitations. The local bus travels to and from Whitford, Ormiston, and Botany. Any destinations beyond that, even including the relatively close proximity centres of Howick and Manukau, require bus changes, causing inherent delays. Those of us who require to travel further afield, such as the North Shore, Western Suburbs or South to Pukekohe, for example, have essentially no choice but to travel by private vehicle.

While it is admirable to take the view that many residents would have migrated to electric vehicles at some point in the future, these are likely to be subject to the risk of insufficient electricity supply to provide effective charging.) There is also the cost issue – not every road user in Beachlands has the financial capacity to purchase a new or nearly new vehicle.

Jeremy Hsu, writing in the Technology section of *New Scientist*, 22 September 2022<sup>1</sup>  
comments:

If drivers primarily charge vehicles at home during the night, that could lead to a 25 per cent surge in peak net electricity demand when states reach 50 per cent electric vehicle ownership, and possibly surpass grid capacity at even higher levels of ownership.

The capacity to take on traffic from the number of vehicles used by an estimated population of up to 10,000 people, which I would allow might be as high as 2,000 more vehicles per weekday, would add considerably to congestion, delays, and emissions. There is the further increased risk of traffic accidents and incidents, which may be jointly or separately attributed to the increasingly poor condition of local roads, driver fatigue, and the type of frustration and impatience that is seemingly inherent in many New Zealand drivers.

247.1

<sup>1</sup> <https://www.newscientist.com/article/2339237-too-many-electric-cars-charging-at-night-may-overload-electricalgrid/#:~:text=The%20growth%20in%20electric%20car,charging%20primarily%20at%20home%20over%20night.>

A further issue related to transport is that regarding the provision of emergency healthcare to residents. With frequently congested, poorly maintained and largely narrow roads for several kilometres into Beachlands, the likelihood of being assisted by an ambulance if needed, for medical care and transport to a hospital, is severely impeded. As it is, the nearest public hospital, Middlemore, is already, I understand operating at full capacity and higher for much of the year. Does that mean that patients would need to be further transported to another hospital for care? They certainly can't rely on a rescue helicopter being any more available.

247.3

Having regard to all the above, it is very challenging to see how the proposed development will contribute in any positive way to a "multi-modal" transport network.

If this community was in close proximity to a major arterial road or motorway, I would have no issues whatever about this proposal. Other developments have, I understand, been established with reasonable success, however, always close to transport infrastructure. I have some sympathy with city planners, struggling to resource the growing population demands, but firmly believe that there are far more logical and easily implemented places for such a huge development than isolated, infrastructure-poor, Beachlands.

YVONNE BOX (Mrs)

B. App. Sci, Dip. Com, FREINZ

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Yvonne Margaret Box  
**Date:** Monday, 6 March 2023 6:15:21 pm  
**Attachments:** [Submission - Proposed plan change.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Yvonne Margaret Box

Organisation name:

Agent's full name:

Email address: yvonne@real-estate-coach.co.nz

Contact phone number:

Postal address:  
29 Mahutonga Avenue  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:

Property address:

Map or maps:

Other provisions:  
Roading and transport infrastructure.

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:  
Please see attached document.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: Please see attached document.

Submission date: 6 March 2023

Supporting documents  
Submission - Proposed plan change.pdf

**Attend a hearing**

Do you wish to be heard in support of your submission? No

**Declaration**

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

[Have your say on Auckland Council's annual budget 2023 and 2024.](#)



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## **Before you fill out the attached submission form, you should know:**

You need to include your full name, an email address, or an alternative postal address for your submission to be valid. Also provide a contact phone number so we can contact you for hearing schedules (where requested).

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Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious.
- It discloses no reasonable or relevant case.
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.



### Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 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) Dario Scaggiante

**Organisation Name (if submission is made on behalf of Organisation)**

**Address for service of Submitter**

59 Intrepid Crescent, Beachlands, 2018

Telephone:  Fax/Email:

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

Plan Change/Variation Name

**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)

#### 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:

Please see my reasons in document attached

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation


If the proposed plan change / variation is not declined, then amend it as outlined below.

Please see my comments in document attached

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

Date 11/3/23

**Notes to person making submission:**

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I could  /could not  gain an advantage in trade competition through this submission.

*If you could gain an advantage in trade competition through this submission please complete the following:*

I am  / am not  directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

I have huge doubts that this mass housing development proposed on Ferosa will benefit the existing community or even the new residents that will reside in this new development.

**There are a number of areas of concern:**

- 1) There is one road in and out of Beachlands and Maraetai. The roads are constantly damaged with repairs rarely being done. The road is treacherous with many accidents and even deaths. I cannot see the road coping with an increased population of 3900 people....if the road is blocked this means a trip along the Maraetai Beach road through Clevedon. This road is already dangerous and there is no way of increasing lanes as it is right on the coastline.

Even though the proposal advises there will be more buses and ferries there is no shopping centre, pool, large sporting facilities, large medical facilities or schools – which will mean people will have to travel into and out of metro areas.

In addition there will need to be more buses transporting kids from schools and these

Even if there are more buses I am sure AT will not be able to supply the amount of transport required for such a large increase of people. And ferries are only able to transport port to port – not internally....in addition some jobs cannot be done using public transport!

248.1

**If the development is not declined Council will need to provide increased roading (more lanes) definitely before any development takes place**

248.2

- 2) The proposed development is to use Bore Water. Has there been any investigation on whether the bore water will be sufficient for 3000+ dwellings? And multi level buildings as well?

In addition we have heard that Watercare do not have the money to develop the required infrastructure for water, sewerage, drainage.

248.3

**If the development is not declined: Watercare to supply sufficient evidence that they will be able to manage this development. Council Water supply to Beachlands/Maraetai (Waterline) before development.**

248.4

- 3) Medical and Emergency Facilities are minimal in Beachlands – the closest emergency clinic is Botany. And closest Hospital Middlemore.

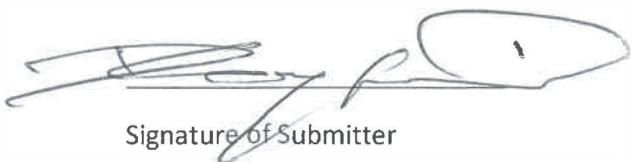
We have one “Volunteer Fire Station” and “One Police Man” – this is definitely not enough to cater for existing population, let alone an increase to that proposed.

In addition as mentioned before if there is an accident and the road is closed – any emergency could be life threatening.

248.5

**If proposed plan is not declined: Council to build emergency facilities before housing development**

248.6



Signature of Submitter

1/3/23,  
Date

**Before you fill out the attached submission form, you should know:**

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## Submission on a notified proposal for policy statement or plan change or variation

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FORM 5



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Auckland Council  
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For office use only

Submission No:

Receipt Date:

### Submitter details

**Full Name or Name of Agent (if applicable)**

Mr/Mrs/Miss/Ms(Full  
Name)

Dario Scaggiante

**Organisation Name (if submission is made on behalf of Organisation)**

**Address for service of Submitter**

59 Intrepid Crescent, Beachlands, 2018

Telephone:

274303363

Fax/Email:

dariolesley@gmail.com

Contact Person: (Name and designation, if applicable)

### Scope of submission

**This is a submission on the following proposed plan change / variation to an existing plan:**

Plan Change/Variation Number

PC 88 (Private)

Plan Change/Variation Name

Beachlands South

**The specific provisions that my submission relates to are:**

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Or

Property Address

Or

Map

Or

Other (specify)

### Submission

**My submission is:** (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

Please see my reasons in document attached

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation


If the proposed plan change / variation is not declined, then amend it as outlined below.

Please see my comments in document attached

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

Date 11/3/23

**Notes to person making submission:**

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*If you could gain an advantage in trade competition through this submission please complete the following:*

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(b) does not relate to trade competition or the effects of trade competition.

I have huge doubts that this mass housing development proposed on Ferosa will benefit the existing community or even the new residents that will reside in this new development.

**There are a number of areas of concern:**

- 1) There is one road in and out of Beachlands and Maraetai. The roads are constantly damaged with repairs rarely being done. The road is treacherous with many accidents and even deaths. I cannot see the road coping with an increased population of 3900 people....if the road is blocked this means a trip along the Maraetai Beach road through Clevedon. This road is already dangerous and there is no way of increasing lanes as it is right on the coastline.

Even though the proposal advises there will be more buses and ferries there is no shopping centre, pool, large sporting facilities, large medical facilities or schools – which will mean people will have to travel into and out of metro areas.

In addition there will need to be more buses transporting kids from schools and these

Even if there are more buses I am sure AT will not be able to supply the amount of transport required for such a large increase of people. And ferries are only able to transport port to port – not internally....in addition some jobs cannot be done using public transport!

**If the development is not declined Council will need to provide increased roading (more lanes) definitely before any development takes place**

- 2) The proposed development is to use Bore Water. Has there been any investigation on whether the bore water will be sufficient for 3000+ dwellings? And multi level buildings as well?

In addition we have heard that Watercare do not have the money to develop the required infrastructure for water, sewerage, drainage.

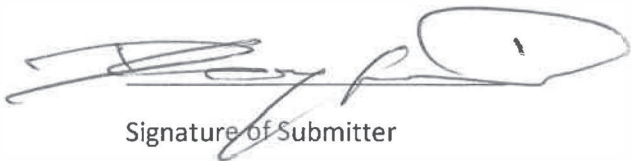
**If the development is not declined: Watercare to supply sufficient evidence that they will be able to manage this development. Council Water supply to Beachlands/Maraetai (Waterline) before development.**

- 3) Medical and Emergency Facilities are minimal in Beachlands – the closest emergency clinic is Botany. And closest Hospital Middlemore.

We have one “Volunteer Fire Station” and “One Police Man” – this is definitely not enough to cater for existing population, let alone an increase to that proposed.

In addition as mentioned before if there is an accident and the road is closed – any emergency could be life threatening.

**If proposed plan is not declined: Council to build emergency facilities before housing development**



Signature of Submitter

1/3/23,  
Date



**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Caroline Houghton-Brown  
**Date:** Monday, 6 March 2023 8:46:25 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Caroline Houghton-Brown

Organisation name:

Agent's full name:

Email address: choughtonbrown@gmail.com

Contact phone number:

Postal address:  
20 Swordfish Place  
Maraetai  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

**My submission relates to**

Rule or rules:  
Roding, water, health and wellbeing

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

I believe there is a considerable lack of intention to improve roads and traffic management for this huge increase in population. In adverse weather particularly, the roads are totally unsafe before the development has begun. The roading and all intersections need to be completed before any further development starts. With the proposed wastewater plan, this is extremely unacceptable management that will potentially create substantial pollution and ill-health. There is also not enough potable water to supply an extra 9000 people. Climate change and drier weather will only get worse and this plan does not support future development.

249.1

249.2

249.3

249.4

I or we seek the following decision by council: Decline the plan change

Submission date: 6 March 2023

**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.

[Have your say on Auckland Council's annual budget 2023 and 2024.](#)



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# Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991  
FORM 5



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|                     |
|---------------------|
| For office use only |
| Submission No:      |
| Receipt Date:       |

## Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms (Full Name)

Adele Fox

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

3 Waterford Way, Beachlands, Auckland 2018

Telephone:

027662 9897

Fax/Email:

foxyten@xtra.co.nz

Contact Person: (Name and designation, if applicable)

## Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 88 (Private)

Plan Change/Variation Name

Beachlands South

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Or

Property Address

Or

Map

Or

Other (specify)

## Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

Roading

Lack of public transport

Schooling

Our community way of life will be adversely affected by a development of this size. (continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

I 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

A.C. Fox
Signature of Submitter
(or person authorised to sign on behalf of submitter)

6/03/2023
Date

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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
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REASONS FOR MY VIEWS ARE:

## ROADING

- Roads are not fit for purpose: | 250.1
  - There is too much traffic now causing congestion at the Whitford roundabout, and more cars on the road from proposed development will make that significantly worse.
  - Proposed Whitford bypass now not in 30 year plan.
  - No direct access to motorway and more traffic will only add to congestion.
  - Takes a minimum of 30 minutes to get to motorway now in weekday rush hours, not the 20 minutes in developer's submission.
  - Roads are in a state of disrepair now due to a lack of maintenance, made worse by heavy traffic vehicles used by current development, and will be made worse again by proposed new development.
  - Auckland Transport have stated there is no money available for roading upgrades.
  - Only one road in and out of Beachlands. Huge problems when there are accidents on the Whitford Maraetai Road.

## PUBLIC TRANSPORT

- Our community is not well served with public transport options: | 250.2
  - Most people travel by car to get to work, causes congestion.
  - The developers are proposing that they will contribute to upgrading the existing ferry service. How can they do this – they don't own the Marina or the ferry business.

## SCHOOLING

- We are near crisis point with education facilities: | 250.3
  - Our primary schools are bursting at the seams now.
  - We need a secondary school in the very near future.
  - Developers are saying they will put land aside for a new school. Any new schools are at the discretion of the Ministry of Education, and they have publicly stated there are no new schools planned for Beachlands.

## DESTRUCTION OF COMMUNITY WAY OF LIFE

- The Beachlands community has small community semi-rural way of life that will be compromised and destroyed by this development:
  - Beachlands population has at least doubled in the last 10 years due to development.
  - The new proposed development will at least double it again in the next 10 years.
  - Our infrastructure is struggling to cope now.
  - The sheer number of people will create gridlock in our community and will make it look and feel like an inner city suburb.
  - We would expect Auckland Council to protect us from rampant development and offer different lifestyle choices for its citizens.

| 250.4

# Submission on a notified proposal for policy statement or plan change or variation

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|                     |
|---------------------|
| For office use only |
| Submission No:      |
| Receipt Date:       |

## Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms (Full Name)

GRANT FOX

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

3 WATERFORD WAY, BEACHLANDS, AUCKLAND 2018

Telephone:  Fax/Email:   
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

Plan Change/Variation Name

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)

## 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: Roading & congestion issues  
Lack of public transport  
Education  
Destruction of our community way of life.  
(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

[Signature]  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

06/03/2023  
Date

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(b) does not relate to trade competition or the effects of trade competition.



REASONS FOR MY VIEWS ARE:

## ROADING

- Roads are not fit for purpose: | 251.1
  - There is too much traffic now causing congestion at the Whitford roundabout, and more cars on the road from proposed development will make that significantly worse.
  - Proposed Whitford bypass now not in 30 year plan.
  - No direct access to motorway and more traffic will only add to congestion.
  - Takes a minimum of 30 minutes to get to motorway now in weekday rush hours, not the 20 minutes in developer's submission.
  - Roads are in a state of disrepair now due to a lack of maintenance, made worse by heavy traffic vehicles used by current development, and will be made worse again by proposed new development.
  - Auckland Transport have stated there is no money available for roading upgrades.
  - Only one road in and out of Beachlands. Huge problems when there are accidents on the Whitford Maraetai Road.

## PUBLIC TRANSPORT

- Our community is not well served with public transport options: | 251.2
  - Most people travel by car to get to work, causes congestion.
  - The developers are proposing that they will contribute to upgrading the existing ferry service. How can they do this – they don't own the Marina or the ferry business.

## SCHOOLING

- We are near crisis point with education facilities: | 251.3
  - Our primary schools are bursting at the seams now.
  - We need a secondary school in the very near future.
  - Developers are saying they will put land aside for a new school. Any new schools are at the discretion of the Ministry of Education, and they have publicly stated there are no new schools planned for Beachlands.



## DESTRUCTION OF COMMUNITY WAY OF LIFE

- The Beachlands community has small community semi-rural way of life that will be compromised and destroyed by this development:
  - Beachlands population has at least doubled in the last 10 years due to development.
  - The new proposed development will at least double it again in the next 10 years.
  - Our infrastructure is struggling to cope now.
  - The sheer number of people will create gridlock in our community and will make it look and feel like an inner city suburb.
  - We would expect Auckland Council to protect us from rampant development and offer different lifestyle choices for its citizens.

251.4