

# **AUCKLAND UNITARY PLAN OPERATIVE IN PART**

## **PROPOSED PLAN CHANGE 111 (Private)**

### **Hobsonville Grove**

## **SUMMARY OF DECISIONS REQUESTED**

**Enclosed:**

- **Explanation**
- **Summary of Decisions Requested**
- **Submissions**

## **Explanation**

- You may make a “further submission” to support or oppose any submission already received (see summaries that follow).
- You should use Form 6.
- Your further submission must be received by 30 June 2025
- Send a copy of your further submission to the original submitter as soon as possible after submitting it to the Council.

## **Summary of Decisions Requested**

Plan Change 111 - Hobsonville Grove				
Summary of Decisions Requested				
Sub #	Sub Point	Submitter Name	Address for Service	Summary of Decisions Requested
1	1.1	Monique Hietbrink	<a href="mailto:moniquemomberg@gmail.com">moniquemomberg@gmail.com</a>	Decline the plan change
2	2.1	Wenxi Xiao	<a href="mailto:wenxixiao@hotmail.com">wenxixiao@hotmail.com</a>	Decline the plan change
3	3.1	Marmoris Limited	<a href="mailto:andy.chrissie@xtra.co.nz">andy.chrissie@xtra.co.nz</a>	Decline the plan change
4	4.1	Hsiu Ho Lin	<a href="mailto:seitale@gmail.com">seitale@gmail.com</a>	if plan change is not declined then amend it as outlined in the submission
	4.2	Hsiu Ho Lin	<a href="mailto:seitale@gmail.com">seitale@gmail.com</a>	Requested outcomes: 1. That the proposed collector road be realigned to avoid significant adverse impacts on 17 Trig Road, as illustrated in Image A2 (Appendix 5, Page 40 - Integrated Transport Assessment); 2. That the design and implementation of any roading infrastructure in the vicinity of 17 Trig Road be revised to ensure minimal impact on the property, including its integrity, current use, amenity, and long-term planning opportunities.
5	5.1	Willem van der Steen	<a href="mailto:willemvdsteen@gmail.com">willemvdsteen@gmail.com</a>	Decline the plan change
6	6.1	Ministry of Education	<a href="mailto:eden.rima@beca.com">eden.rima@beca.com</a>	Approve the plan change with requested amendments in Appendix 2A [error noted as attachment is titled Attachment 1]
6	6.2	Ministry of Education	<a href="mailto:eden.rima@beca.com">eden.rima@beca.com</a>	Amend Objective I1.2 (4) objectives to include '...education opportunities'
6	6.3	Ministry of Education	<a href="mailto:eden.rima@beca.com">eden.rima@beca.com</a>	Amend Policy I1.3(9) to read 'Require publicly reticulated wastewater and water supply network to be available, <u>and if necessary upgraded</u> , to service any subdivision or development within the precinct.
6	6.4	Ministry of Education	<a href="mailto:eden.rima@beca.com">eden.rima@beca.com</a>	Amend to include a new policy (13) to Policies I1.3 which reads <u>Recognise that the precinct is part of a newly developing residential area, and that there is a potential need for educational facilities to establish within the Precinct.</u>
7	7.1	Kyle Tseng	<a href="mailto:chunkaitseng@gmail.com">chunkaitseng@gmail.com</a>	Approve the plan change without any amendments
8	8.1	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Decline the plan change unless the Council's issues raised in this submission are properly addressed
8	8.2	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Without limiting its primary relief, in the event that PPC111 is granted in part or in full, ACS seeks: amendments to the precinct provisions as outlined in the submission and in Schedule 1; and such further, other, or consequential relief to PPC111's explanatory text, objectives, policies, activity table, standards, matters of discretion, assessment criteria, special information requirements, and maps/plans that reflects or respond to the reasons for this submission.
8	8.3	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Delete the proposed THAB zone from the AUP zoning maps and replace with MHU zone. Any consequential amendments to the Hobsonville Grove precinct provisions and plans, including the deletion of sub-precincts.
8	8.4	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Delete from I1.10.2 Hobsonville Precinct Plan 2 reference to the 'Indicative Neighbourhood Retail Opportunity' and the consequential deletion of provisions relating to retail opportunities from all other relevant precinct provisions.
8	8.5	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Provide an acoustic assessment to describe the noise effects on noise sensitive activities within the vicinity of the existing Upper Harbour Highway and the planned Spedding Road corridor will experience and any proposed amendments to the precinct provisions to mitigate potential adverse effects.
8	8.6	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Add specific stormwater objectives and policies to ensure desired outcomes and actions are implemented; add a stormwater infrastructure standard which must stipulate the stormwater management requirements specific to the plan change area.
8	8.7	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Inclusion of sufficient high-level information and the development of the precinct provisions to ensure delivery of the staging of development and implementation of proposed stormwater infrastructure and services. The precinct provisions must identify dependencies and necessary sequencing so that the works completed as each stage is completed can stand alone, providing adequate stormwater management should further stages be delayed or fail to proceed.
8	8.8	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Additional information and mitigation is sought and additional precinct provisions should be provided to ensure that the effects of development enabled by the plan change will not result in flooding and no new risks are created.
8	8.9	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Include precinct provisions, such as in the precinct description and assessment criteria, that require mana whenua culture and traditions to be explicitly integrated into the new development
8	8.10	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Amend the precinct provisions to be consistent with the protocols the council wishes to adopt to incorporate MDRS.

Plan Change 111 - Hobsonville Grove				
Summary of Decisions Requested				
Sub #	Sub Point	Submitter Name	Address for Service	Summary of Decisions Requested
8	8.11	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Amend I1.1 Precinct description as follows: The purpose of the Hobsonville Grove Precinct is to provide for the planned expansion of Whenuapai <u>and to develop a liveable, compact, and accessible community with high quality residential development.</u> <del>and to</del> It will also incorporate the Medium Density Residential Standards contained in Schedule 3A of the Resource Management Act 1991.  The Precinct will enable a range of housing typologies to be provided in a location <del>that is accessible</del> <u>within a moderate walking distance</u> to amenities, public transport, and employment and education opportunities...
8	8.12	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Amend I1.1 Precinct description as follows: ... <u>Subdivision and development is restricted until the land within the Hobsonville Grove is able to be connected to operational bulk water supply and wastewater infrastructure with sufficient capacity to service development of the precinct, and new transport infrastructure connections to Westpoint Drive are operational.</u>
8	8.13	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Amend I1.1 Precinct description to more fully describe the precinct's approach to manage stormwater and flood risk including that stormwater management will be undertaken in accordance with 'an approved Stormwater Management Plan'.
8	8.14	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Amend Objective I1.2(3) as follows:  The Hobsonville Grove Precinct is developed <u>in a comprehensive and integrated way to facilitate for high and high-quality medium density housing, typologies and small scale retail opportunities.</u>
8	8.15	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Add a new Objective I1.2(3) as follows:  <u>Subdivision and development provide for the safe and efficient operation of the current and future transport network for all modes.</u>
8	8.16	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Delete objective I1.2(4)  Subdivision, use, and development achieves a well connected environment for living and working, with convenient connections to parks, walkways, transport infrastructure and education opportunities.  Provide a new objective I1.2(4) as follows:  <u>Transport infrastructure that is required to service subdivision and development within the precinct: (a) provides for safe and integrated walking and cycling connections within the precinct and to existing and future green networks adjoining the precinct. (b) Supports the planned upgrades to Spedding Road arterial corridor. (c) Mitigates transport effects on the surrounding road network; and (d) Provides connectivity to future subdivision and development of adjacent sites. (e) Provides connectivity across Rawiri Stream to Westpoint Drive.</u>
8	8.17	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Amend objective I1.2.(6) as follows:  Subdivision and development is coordinated with and does not occur in advance of the availability of <u>operational infrastructure including transport infrastructure, bulk wastewater, water supply and stormwater services.</u>
8	8.18	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Amend Objective I1.2.(5) as follows:  The Hobsonville Grove Precinct is a walkable neighbourhood, with local amenities and a street-based environment that contributes <u>positively</u> to pedestrian amenity, safety, and convenience.
8	8.19	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Amend Policy I1.3(7) as follows:  <del>(71A) Subdivision and development are undertaken</del> <u>Hobsonville Grove Precinct is developed in general accordance with the I1.10.2 Hobsonville Grove Precinct Plan 2.</u>
8	8.20	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Amend Policy I1.3(10) as follows:  Avoid subdivision, use and development prior to the availability of <del>reticulated</del> <u>operational bulk water supply</u> , and wastewater and <del>transport</del> stormwater infrastructure to service development in the Hobsonville Grove Precinct.

Plan Change 111 - Hobsonville Grove

Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Summary of Decisions Requested
8	8.21	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	<p>Delete Policy I1.3(11)</p> <p><del>Require any subdivision and development within the precinct to incorporate linkages to adjacent land, including active mode connections to Westpoint Drive and Spedding Road, and public open space.</del></p> <p>Replace with three new policies:</p> <p>Add a new Policy I1.3(8A) as follows:</p> <p><u>Require subdivision and development to provide the transport infrastructure identified on I1.10.2 Precinct Plan 2 and in accordance with Table I1.10.3.</u></p> <p>Add a new policy I1.3(8B) as follows:</p> <p><u>Ensure that subdivision and development provide for safe and efficient future road and active mode connections to adjoining sites and to Spedding Road corridor as shown in Hobsonville Grove I1.10.1 Precinct Plan 2.</u></p> <p>Add a new policy I1.3.(8C) as follows:</p> <p><u>Avoid subdivision and development occurring in advance of the availability of operational transport infrastructure connecting the precinct's internal road network to Westpoint Drive, as identified on Hobsonville Grove I1.10.2 Precinct Plan 2 and in Table I10.3</u></p>
8	8.22	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	<p>Amend Policy I1.3(17) as follows:</p> <p><del>Provide</del> <u>Enable the provision of public open space at the time of subdivision that is accessible, predominantly edged by roads and served by walkways and cycleways and meets the the needs of the community, if that is required to realise Council open space strategies for Whenuapai and the Precinct.</u></p>
8	8.23	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	<p>Amend the introduction to I1.4 as follows:</p> <p>All relevant....Activity Table I14.1 <u>below</u>.</p> <p><u>A blank in the activity table status column means the activity status in the relevant overlay, Auckland-wide or zone provision applies.</u></p> <p>Add a new activity to I1.4 Activity table as follows:</p> <p><u>(AA1) Activities listed as permitted, restricted discretionary or discretionary activities in Table H5.4.1 Activity Table in the Residential - Mixed Housing Urban Zone.</u></p>
8	8.24	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	<p>Retain the non-complying activity status of (A1)</p> <p>Amend Table I1.4.1 Activity table (A1) as follows:</p> <p><b>Table I1.4.1 Activity Table</b></p> <p><del>Activities-Use and development that does not comply with Standards I1.6.1.1 (Water supply and wastewater infrastructure).</del></p> <p>NC</p>

Plan Change 111 - Hobsonville Grove				
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8	8.25	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Amend Table I1.4.1 Activity table (A2) as follows:  Activities Use and development that does not comply with Standards I1.6.1.2 (Transportation connections)  <del>RD</del> NC
8	8.26	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Add a new subdivision activity to I1.4.1 Activity table as follows;  (A13A) Subdivisions listed in Chapter E38 Subdivision
8	8.27	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Amend I1.4.1 Activity table (A13) as follows:  Subdivision of land in accordance with an approved land use consent for the purpose of the construction, or use of dwellings as permitted or restricted discretionary activities in the precinct <u>and meeting Standard I1.7.1.1 Standards for controlled subdivision activities.</u>
8	8.28	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Amend I1.4.1 Activity table (A17) as follows:  <del>Subdivision of vacant lots, subdivision around four or more legally established or consented dwellings or subdivision that creates land to vest in Auckland Council that does not comply with Standard I1.6.1.2 (Transportation connections).</del>  RD NC
8	8.29	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Amend I1.4.1 Activity table (A18) as follows:  <del>Subdivision of vacant lots, subdivision around four or more legally established or consented dwellings, or subdivision that creates land to vest in Auckland Council that does not comply with Standard I1.6.1.1 (Water supply and wastewater infrastructure).</del>  NC
8	8.30	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Delete I1.6.1.1(1)(b) and replace with an appropriate alternative method should bulk water supply and wastewater infrastructure with sufficient capacity not be available to support development within the precinct.
8	8.31	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Amend Standard I1.6.1.2 Transportation connections to include implementation of the bridge across Rawiri Stream to Westpoint Drive as a requirement of subdivision and development.
8	8.32	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Amend Standard I1.6.1.2 Transportation connections to delete clause (2) and then adding a new separate standard to address road function and design. Consequential to this amendment, amend I1.4.1 Activity Table include this activity as well as the provision of appropriate matters of assessment and assessment criteria provided.
8	8.33	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Move MDRS standards I1.7.1.1 Standards for controlled activities, to section I1.6.1 Standards and renumber accordingly.
8	8.34	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Add a new section 'Matters of control' as follows:  <u>The Council will reserve its control to the following matters when assessing a controlled activity resource consent application, in addition to the matters specified for the relevant controlled activities in the zone, Auckland-wide, or overlay provisions:</u>  (1) All controlled subdivision activities in Table I1.4.1 (a) <u>compliance with an approved resource consent or consistency with a concurrent land use application or certificate of compliance;</u> (b) <u>compliance with the relevant overlay, Auckland-wide, precinct, and zone rules;</u> (c) <u>the effects of infrastructure provision</u>

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8	8.35	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Amend I1.8 Assessment criteria for controlled activities as follows:  <del>I1.8 Assessment criteria for controlled activities</del>  (4) The Council will consider the relevant assessment criteria below for controlled activities <del>from the list below</del> , in addition to the assessment criteria specified for the relevant controlled activities in the zone, Auckland-wide or overlay provisions:  <u>(1A) Subdivision</u>  (a) Compliance with an existing approved resource ... (c) whether there is appropriate ... to (23).
8	8.36	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Amend I1.9.1 Matters of discretion as follows:  <del>For development and subdivision that is a restricted discretionary activity in the Hobsonville Grove Precinct. The council will restrict its discretion to the following matters...</del>
8	8.37	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Amend I1.9.1 Matters of discretion as follows:  For development and subdivision that is a restricted discretionary activity in the Hobsonville Grove Precinct. The council will restrict its discretion to the following matters...
8	8.38	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Delete I1.10.1 Precinct Plan 1. - Sub-precincts
8	8.39	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Amend the heading of I1.10.2 Precinct Plan 2 as follows:  <del>I1.10.2 Precinct Plan 2 - Indicative road connections, neighbourhood park, and retail opportunity overlay.</del>  Amend Precinct Plan 2, including the key, as follows: <ul style="list-style-type: none"> <li>o Remove symbols and references to Hobsonville Grove sub-precincts A and B and Hobsonville Grove sub-precinct C</li> <li>o Show the indicative roads as lines with arrows pointing to their direction over adjacent properties</li> <li>o Show a collector road that indicates an efficient route to the school on Trig Road</li> <li>o Show how the collector roads will integrate with each other</li> <li>o Show an indicative collector road that connects to the future Spedding Road corridor</li> <li>o Delete symbols and references to 'Indicative Potential Connection Point'</li> <li>o Delete symbols and references to 'Indicative Neighbourhood Retail Opportunity'</li> <li>o Delete symbols and references to 'Hobsonville Road Building Height Restrictions'</li> <li>o Amend reference to the local park 'Indicative <u>open space</u> Local Park'</li> <li>o Identify walkways and cycleways including connections to Rawiri Stream green pathway</li> <li>o Show a north pointing compass</li> <li>o Delete all references to the Hobsonville Corridor and identification of its precinct boundary</li> </ul>
8	8.40	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Amend I603 Hobsonville Corridor Precinct to incorporate 84 Hobsonville Road changes on the precinct maps and provisions as necessary. ACS recommends the requestor discuss this amendment with Auckland Council.
8	8.41	Auckland Council	<a href="mailto:celia.davison@aucklandcouncil.govt.nz">celia.davison@aucklandcouncil.govt.nz</a>	Use the AUP numbering protocols and style guidelines to correct editorial issues with precinct provisions.
9	9.1	Watercare Services Limited	<a href="mailto:planchanges@water.co.nz">planchanges@water.co.nz</a>	Decline the plan change

Plan Change 111 - Hobsonville Grove				
Summary of Decisions Requested				
Sub #	Sub Point	Submitter Name	Address for Service	Summary of Decisions Requested
10	10.1	New Zealand Defence Force	rebecca.davies@nzdf.mil.nz acederman@tonkintaylor.co.nz	Approve the plan change subject to amendments [inferred]
10	10.2	New Zealand Defence Force	rebecca.davies@nzdf.mil.nz acederman@tonkintaylor.co.nz	Amend the precinct provisions to include provisions relating to bird strike risk including in relation to stormwater treatment (such as ponds and swales), and sediment retention ponds to be designed to avoid attracting birds, including no new areas of open/standing water within the PC111 area.
10	10.3	New Zealand Defence Force	rebecca.davies@nzdf.mil.nz acederman@tonkintaylor.co.nz	Amend the precinct provisions to include specific provisions relating to lighting, glare and reflectivity in order to avoid safety risks to aircraft.
10	10.4	New Zealand Defence Force	rebecca.davies@nzdf.mil.nz acederman@tonkintaylor.co.nz	Amend the Precinct chapter to reference Designation 4311 requirements  Amend I1.1 Precinct description to add a sentence referencing Designation 4311 (additions underlined):  ...  <u>Development in the precinct is subject to height restrictions identified in Designation 4311. Permanent structures must not infringe the Obstacle Limitation Surfaces (OLS) identified in Designation 4311. The use of temporary structures and construction equipment, is also subject to height restrictions under Designation 4311. Prior written approval from the New Zealand Defence Force is required for any proposed infringement of any such height restrictions.</u>
10	10.5	New Zealand Defence Force	rebecca.davies@nzdf.mil.nz acederman@tonkintaylor.co.nz	Amend II1.4.1 Activity table to add a sentence referencing Designation 4311 (additions underlined):  <u>Note 3</u>  <u>Development in the precinct is subject to height restrictions identified in Designation 4311. Permanent structures must not infringe the Obstacle Limitation Surfaces (OLS) identified in Designation 4311. The use of temporary structures and construction equipment is also subject to height restrictions under Designation 4311. Prior written approval from the New Zealand Defence Force is required for proposed infringement of any such height restrictions.</u>

## **Submissions**

**From:** [UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 111 - Monique Hietbrink  
**Date:** Friday, 28 March 2025 2:16:08 pm

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The following customer has submitted a Unitary Plan online submission.

### Contact details

Full name of submitter: Monique Hietbrink

Organisation name:

Agent's full name: Monique Momberg

Email address: moniquemomberg@gmail.com

Contact phone number: 0274985656

Postal address:  
143E Hobsonville Road  
West Harbour  
West Harbour 0618

### Submission details

#### This is a submission to:

Plan change number: Plan Change 111

Plan change name: PC 111 (Private): Hobsonville Grove

#### My submission relates to

Rule or rules:  
All parts

Property address: 84 and 100 Hobsonville 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:  
Over populating and over developing of West Harbour.

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

Submission date: 28 March 2025

### 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**

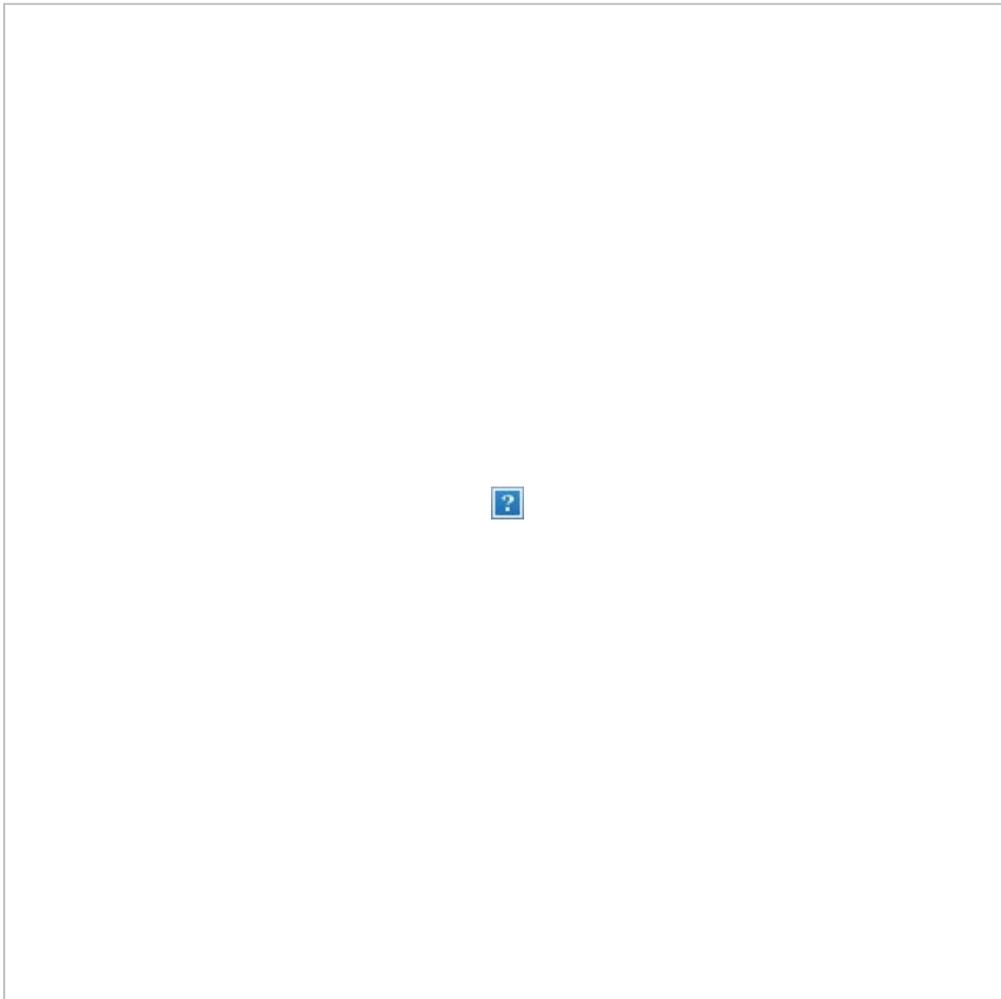
Could you gain an advantage in trade competition through this submission? No

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:** [UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 111 - WENXI XIAO  
**Date:** Tuesday, 1 April 2025 10:00:27 pm

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The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: WENXI XIAO

Organisation name:

Agent's full name:

Email address: wenxixiao@hotmail.com

Contact phone number:

Postal address:  
155A Hobsonville Rd  
West Harbour  
Auckland 0618

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 111

Plan change name: PC 111 (Private): Hobsonville Grove

**My submission relates to**

Rule or rules:

Property address: 155A Hobsonville 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? No

The reason for my or our views are:  
DO NOT WANT TO TOO MANY BUSINESS ZONE AROUND THE SUBURB

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

| 2.1

Submission date: 1 April 2025

**Attend a hearing**

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

**Declaration**

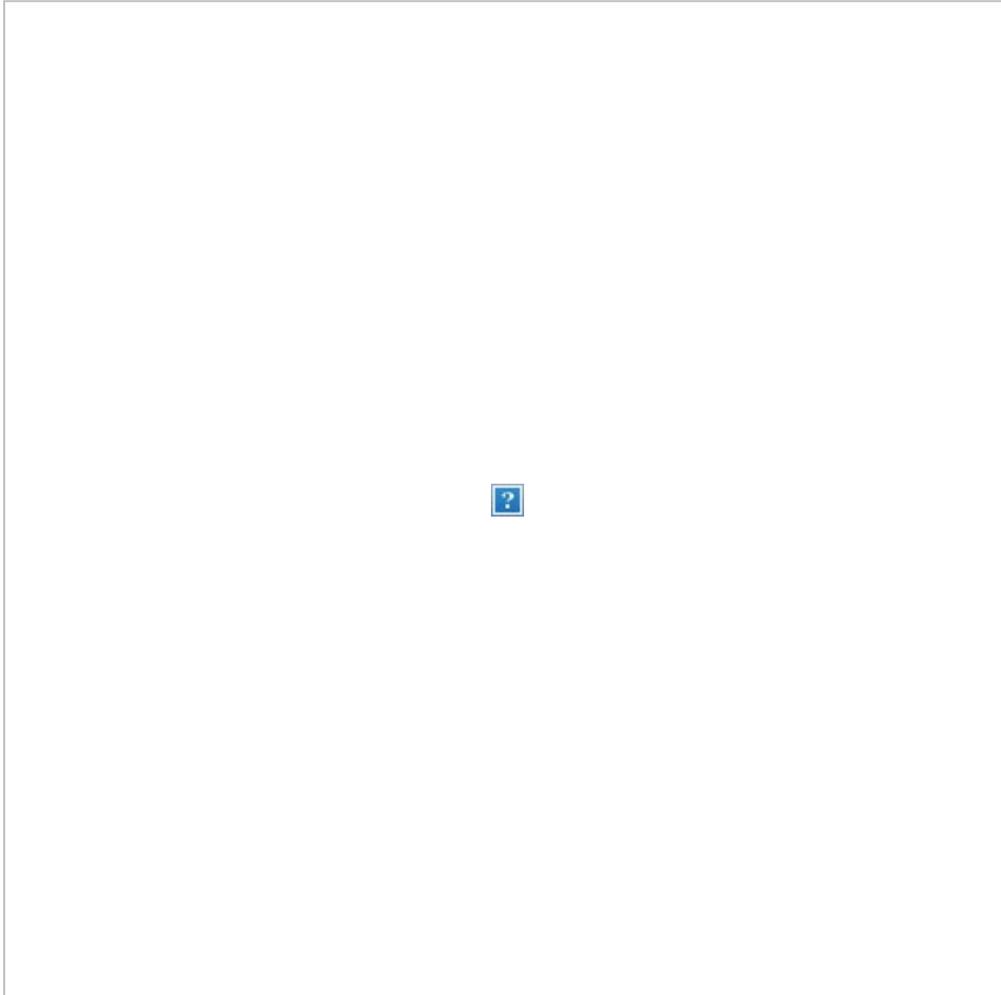
Could you gain an advantage in trade competition through this submission? No

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:** [UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 111 - Andrew Cunningham  
**Date:** Friday, 4 April 2025 2:15:30 pm

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Andrew Cunningham

Organisation name: Marmoris Ltd

Agent's full name:

Email address: andy.chrissie@xtra.co.nz

Contact phone number:

Postal address:  
371 Beach Road  
Campbells Bay  
Auckland 0630

#### **Submission details**

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

Plan change number: Plan Change 111

Plan change name: PC 111 (Private): Hobsonville Grove

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

Rule or rules:  
Change in zoning to include high intensity residential housing.

Property address: 84 and 100 Hobsonville Road ( affected party 3/80 Westpoint 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? No

The reason for my or our views are:  
Industrial zoned land within Auckland is very limited, converting existing zoned Light Industry to high intensity housing further limits availability for commercial space /use, lack of available land in Auckland for Industry.  
Inclusion of high intensity housing will significantly increase the use of the residents cars parking on the surrounding streets, inhibiting the maneuverability of trucks and commercial vehicles accessing businesses.  
With this rule change ( zone change ) there will be no buffer zone between Industry and intensive residential areas, leading to residents complaining about noise and other aspects.

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

Submission date: 4 April 2025

**Attend a hearing**

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

**Declaration**

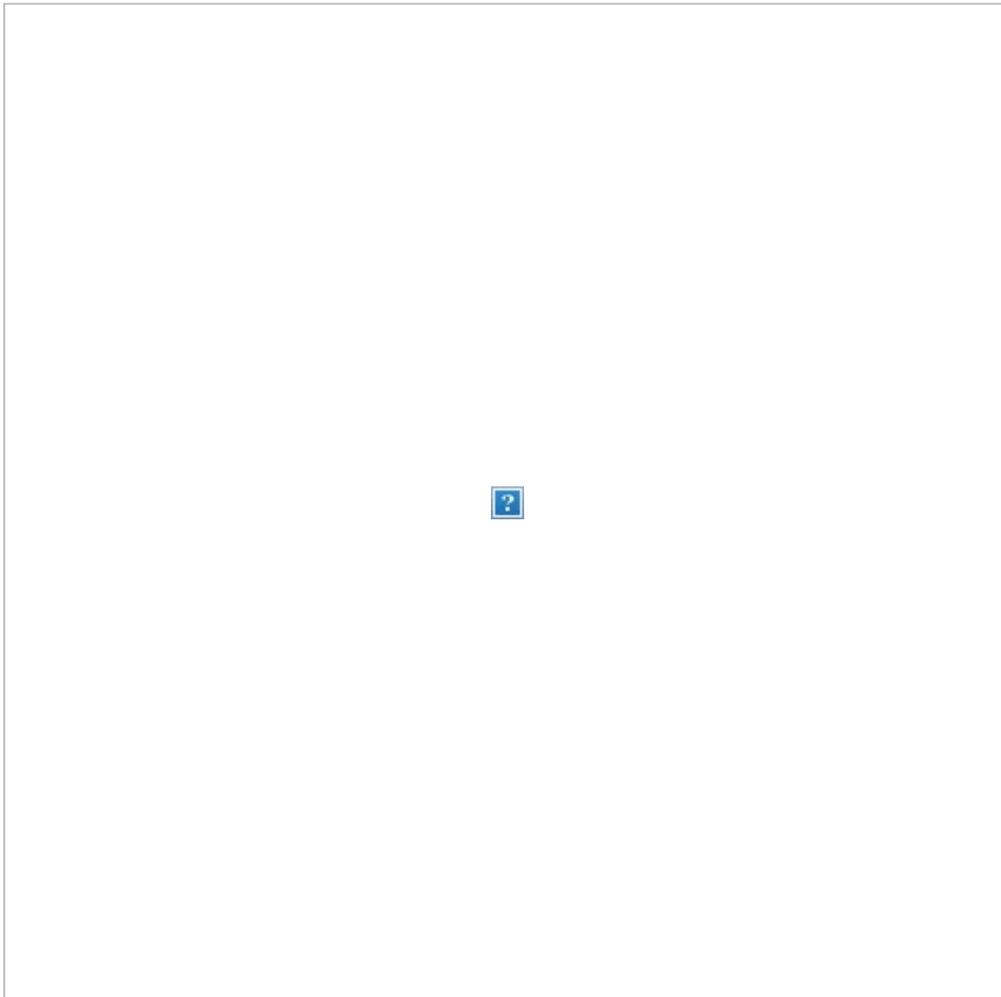
Could you gain an advantage in trade competition through this submission? No

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:** [seitale](#)  
**To:** [Unitary Plan](#)  
**Subject:** Submission on Private Plan Change 111 – Hobsonville Grove Development  
**Date:** Thursday, 10 April 2025 4:33:22 pm  
**Attachments:** [TDG Collector Road Placement Analysis.pdf](#)  
[Submission on Private Plan Change 111.pdf](#)  
[pc111-form-5-filled.pdf](#)

---

To the Planning Team,

Please find attached our submission on Private Plan Change 111 (Hobsonville Grove), including the completed Form 5 and supporting documentation.

We are forwarding this directly to ensure it is received and properly recorded.

The submission includes material relevant to the proposed collector road alignment near 17 Trig Road, as referenced in the plan change documents.

We would appreciate confirmation of receipt at your earliest convenience.

Kind regards,  
Joe Liu  
(On behalf of Ms. Hsiu Ho Lin)  
17 Trig Road, Whenuapai

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

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

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

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

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

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

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



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

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

For office use only
Submission No:
Receipt Date:

### Submitter details

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

Mr/Mrs/Miss/Ms(Full Name)

Joe Liu (on behalf of Ms. Hsiu Ho Lin)

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

#### Address for service of Submitter

20 Oliver Road, Eastern Beach, Auckland 2012

Telephone:

21849886

Email:

seitale@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 111 (Private)

Plan Change/Variation Name

Hobsonville Grove

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

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

Plan provision(s)

Alignment of the proposed collector road as shown in Appendix 4 (Urban Design Assessment, Page 19).

Or

Property Address

17 Trig Road, Whenuapai

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 alignment bisects our property at 17 Trig Road, which is entirely unacceptable.
- ~~It severely affects the integrity, utility, and value of the land and infringes on property rights and amenity.~~
- The proximity to the Trig Road motorway off-ramp and Whenuapai School raises safety concerns.
- ~~The alignment conflicts with planning best practices and integrated transport principles.~~
- A more appropriate and professionally recommended alternative alignment was identified in the 2017 TDG Transport Assessment, which avoids our land and maintains full compliance with planning and road classification policies.
- ~~We have been cooperative through previous public developments - Whenuapai School Senior Campus; further impact on our land is unfair and unjustified.~~

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.

| 4.1

- Realign the proposed collector road to follow the alternative route as identified in Appendix 5, Page 40 (Integrated Transport Assessment) and the TDG Transport Assessment Report (May 2017).
- Ensure that any road infrastructure near 17 Trig Road avoids bisecting or encroaching upon the property.

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)

09/04/2025  
Date

**Notes to person making submission:**

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

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

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

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

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

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

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

## Submission on Private Plan Change 111 – Hobsonville Grove Development

### Submitter:

Joe Liu (on behalf of Ms. Hsiu Ho Lin, landowner)  
17 Trig Road  
Whenuapai, Auckland

---

I am writing on behalf of my mother, Ms. Hsiu Ho Lin, in strong opposition to elements of Proposed Private Plan Change 111 (PC111) – Hobsonville Grove.

As a matter of principle, we are not opposed to the overall development project. However, we are unequivocally opposed to the proposed alignment of the collector road and categorically reject its implementation in its current form, as it would bisect our property at 17 Trig Road—an outcome that is entirely unacceptable. We must state unequivocally that we will not, under any circumstances—now or in the future—accept any outcome that utilizes the inappropriate road alignment currently depicted in Appendix 4.

Unless this issue is addressed and the alignment is amended to adopt a more appropriate route that avoids causing detrimental effects to our property, we cannot and will not support this project moving forward.

We also wish to highlight that throughout the entire process of the Whenuapai School Senior Campus construction, we have made significant efforts to accommodate, assist, and endure the disruptions associated with that development. It would be profoundly unfair to now expect our family to endure further disadvantage, particularly in the form of a road corridor that compromises the very integrity of our land.

Upon review of the documentation provided on Auckland Council's website, particularly Page 19 of PC111 Appendix 4: Urban Design Assessment (refer Image A1), we have identified this alignment as posing:

1. Substantial adverse effects on the integrity, utility, amenity, and long-term value of our land
2. A serious erosion of property rights and quiet enjoyment
3. Traffic safety concerns, particularly due to the road's proximity to the Trig Road motorway off-ramp and Whenuapai School Senior Campus
4. A lack of alignment with planning best practices and integrated transport principles

We remain particularly concerned about the implications of internal road layouts within Austino's site, as these will directly influence the direction and continuity of future roading connections, including the collector road.

---

### Supporting Documentation

We also attach a comprehensive Transport Assessment Report prepared by TDG (now Stantec) in 2017, commissioned independently by Ms. Hsiu Ho Lin. This report evaluated the originally proposed collector road and recommended an alternative alignment that avoids bisecting 17 Trig Road.

The alignment recommended by TDG is consistent with the layout shown in Appendix 5, Page 40 of PC111 (refer Image A2), confirming that our concerns and proposed solution are long-standing, professionally validated, and fully compliant with relevant planning objectives and road classification principles.

---

### Our Position

We strongly object to the alignment currently shown in Figure 24 (Page 19 of PC111 Appendix 4) and categorically request that it does not proceed in any form that bisects or encroaches upon 17 Trig Road.

This proposed road layout is:

- Inconsistent with strategic planning intent
  - Logistically problematic from a traffic engineering and safety perspective
  - Unnecessarily harmful to an existing private landowner, particularly given our previous cooperation during public development
- 

### Preferred Alternative

We urge Auckland Council and the applicant to adopt the more rational and less intrusive alignment depicted on Page 40 of PC111 Appendix 5 (refer Image A2). This alternative:

- Avoids direct interference with our property
  - Achieves superior connectivity and safety outcomes
  - Is broadly aligned with the indicative road network referenced in recent planning correspondence from Harrison Grierson
  - Reflects the findings and recommendation of the independent 2017 TDG Transport Assessment Report
- 

### Requested Outcomes

1. That the proposed collector road be realigned to avoid significant adverse impacts on 17 Trig Road, as illustrated in Image A2 (Appendix 5, Page 40 – Integrated Transport Assessment).
2. That the design and implementation of any roading infrastructure in the vicinity of 17 Trig Road be revised to ensure minimal adverse impact on the property, including its

4.2

integrity, current use, amenity, and long-term planning opportunities.

Given the material impact to our land, we respectfully request written clarification on the final proposed road alignment as it affects 17 Trig Road significantly.

Should this matter remain unresolved, we reserve our right to be heard at the hearing and to pursue all statutory remedies available.

---

**Yours sincerely,**

Joe Liu

(On behalf of Ms. Hsiu Ho Lin)

17 Trig Road, Whenuapai

---

**Attachments:**

- Image A1: Current alignment (Appendix 4, Page 19 – Urban Design Assessment)
- Image A2: Preferred alignment (Appendix 5, Page 40 – Integrated Transport Assessment)
- Image A3: Indicative road network (Harrison Grierson correspondence)
- Attachment A4: TDG Transport Assessment Report – “Alternative Collector Route for Whenuapai 3 Precinct – Stage 1A” (May 2017)

# Appendices

Image A1: (Page 19 of PC111 Appendix 4: Urban Design Assessment)

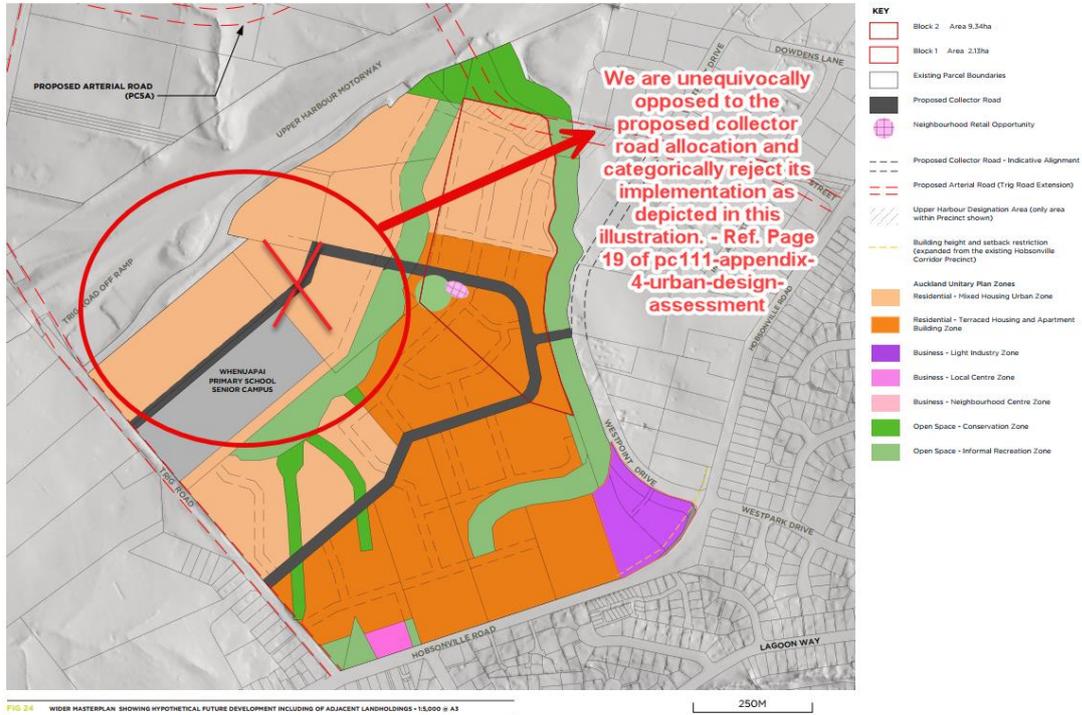


Image A2: (Page 40 of PC 111 – Appendix 5 – Integrated Transport Assessment)

**6.5 Future Connections and Opportunities**

Both Block 1 and Block 2 are adjacent to vacant lots that are zoned Future Urban (FUZ). Although the exact location of connections cannot be determined, this section aims to show how the eastern parcels of land can be linked into the road network.

For Block 2, it is envisaged that a collector route will be constructed to connect with Trig Road when the FUZ land is urbanised. Road alignment will be determined either when the land is rezoned, and / or when the land is developed in accordance with the land use zoning.

An indicative road alignment through Block 2 is shown in the Wider Masterplan in Figure 24. This includes the indicative location of where the collector road will cross into FUZ zoned land.

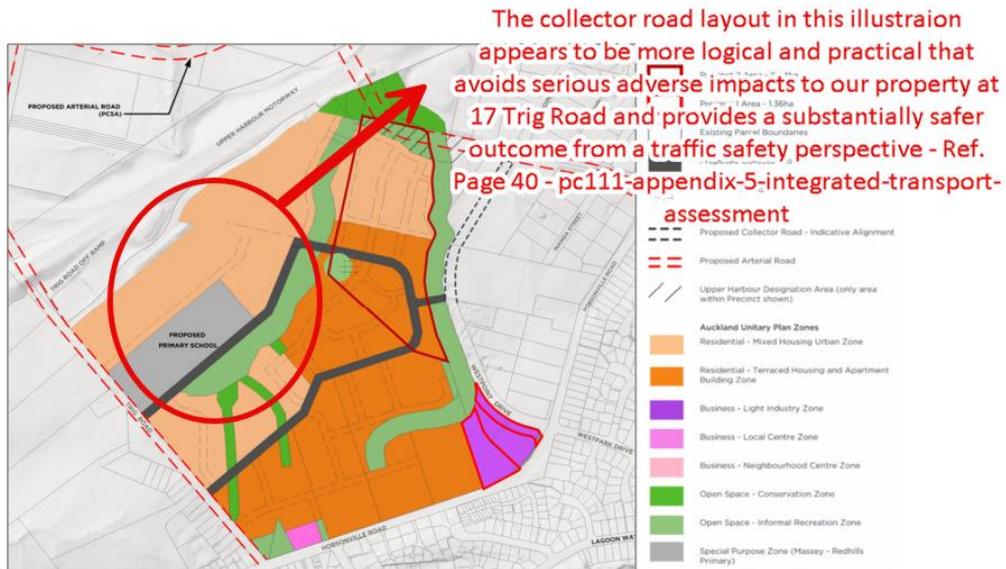


FIGURE 24: WIDER MASTERPLAN

Image A3:



Ngā mihi

Clare



**CLARE COVINGTON**

**Technical Lead - Planning**

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PO Box 5760, Victoria St West  
Auckland 1142

**M** +64 21 288 8795 **D** +64 9 917 5045 **P** +64 9 917 5000

**HARRISON  
GRIERSON.  
COM**



**Attachment A4: TDG Transport Assessment Report (please refer to the accompanying document for further information).**



**Hsiu Ho Lin**

17 Trig Road, Whenuapai

---

**Transport Assessment – Alternative  
Collector Route for Whenuapai 3  
Precinct – Stage 1A**

---

May 2017

**Hsiu Ho Lin**

17 Trig Road, Whenuapai

---

**Transport Assessment – Alternative  
Collector Route for Whenuapai 3 Precinct –  
Stage 1A**

**Quality Assurance Statement**

---

Prepared by:

**Jan Franta**

Principal Transportation Engineer



Reviewed by:

**Daryl Hughes**

Technical Director



Approved for Issue by:

**Daryl Hughes**

Technical Director



Status: Final Report

Date: 12 May 2017



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New Zealand

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[www.tdg.co.nz](http://www.tdg.co.nz)

## Table of Contents

1.	Introduction .....	1
2.	Sources of Information .....	2
2.1	Planning Policy Background.....	2
2.2	Further Sources of Information .....	4
3.	Proposed Indicative Collector Road.....	6
3.1	Alignment Proposed in Draft Whenuapai Plan Change.....	6
3.2	Traffic Function.....	6
4.	Alternative Indicative Collector Road .....	8
4.1	Proposed Alternative ICR Alignment .....	8
4.2	Compliance with Policy.....	8
4.3	Other Traffic Benefits .....	9
5.	Summary & Conclusions .....	11
5.1	Summary.....	11
5.2	Conclusions.....	12

## 1. Introduction

TDG has been appointed by Hsiu Ho Lin, to appraise the proposed Draft Whenuapai Plan Change (**DWPC**, published on the ShapeAuckland's website<sup>1</sup>), with respect to the impact of proposed 'Indicative Collector Road' (**ICR**) linking Hobsonville Road with Trig Road on 17 Trig Road and the wider Stage 1A area of the DWPC.

The ICR as currently proposed in the DWPC bisects the client's land and would therefore, if implemented as planned, have a number of adverse effects, including:

- Severance – by cutting the land into two disjointed land parcels;
- Detriment to amenity – by bringing traffic to the immediate vicinity of the existing residential property; and
- Noise – for the same reason as above, but also taking into account the acoustic properties of the existing property are not comparable with new built.

This report summarises the findings of the impact assessment.

---

<sup>1</sup> <http://shapeauckland.co.nz/consultations/the-future-of-whenuapai>

## 2. Sources of Information

### 2.1 Planning Policy Background

#### 2.1.1 Whenuapai Structure Plan (2016)

Whenuapai Structure Plan (WSP) has been adopted in September 2016 and outlines the development strategy for the Whenuapai area for the next 30 years.

##### 2.1.1.1 Transport

With respect to transport, WSP proposals include only proposed arterial roads and do not show the routing of roads of lower categories, as is apparent from the excerpt from the Structure Plan Map in **Figure 1**. The WPS is supported by an Integrated Transport Assessment (see section 2.2.1).

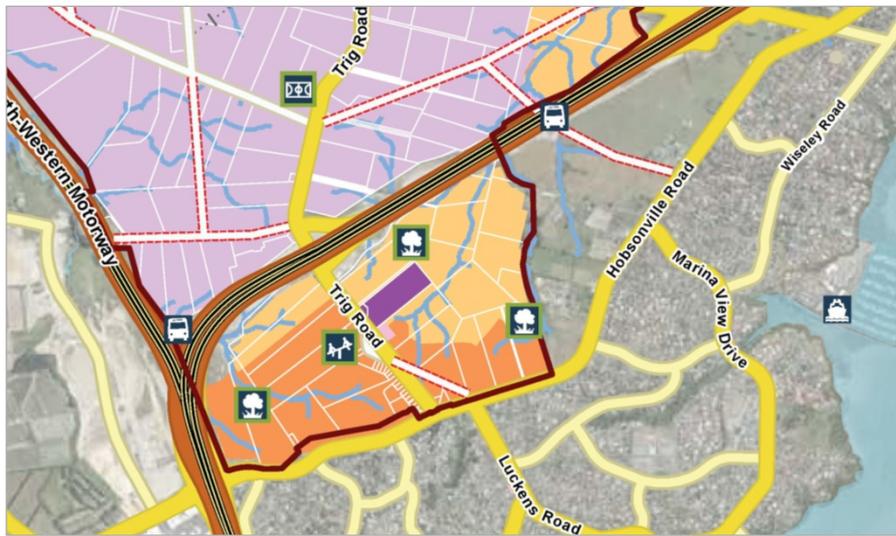


Figure 1: Structure Plan Map (Excerpt)

#### 2.1.2 Draft Whenuapai Plan Change (2017)

The DWPC has been prepared in reaction to a number of comments to the adopted WSP. It only considers Stages 1A to 1E of the Structure Plan, but is developed in more detail, for example including proposed collector road alignments or the extent of areas dedicated for open spaces (as opposed to just markers). The notified documents include:

- Documents:
  - Draft Whenuapai 3 Precinct Provisions;
  - From structure plan to draft Whenuapai plan change - The differences explained; and
  - Draft Whenuapai process map.
- Plans
  - Draft Whenuapai Zoning Map;
  - Draft Whenuapai Precinct 3 Plan 1; and

- Draft Whenuapai Precinct 3 Plan 2

### 2.1.2.1 Objectives

The following relevant objectives are enshrined in the 'Draft Whenuapai 3 Precinct Provisions' document:

#### **Indicative Roads and Open Spaces**

(6) Subdivision and development occurs in an integrated and co-ordinated way that implements the Whenuapai 3 precinct plan and provides for connections to future development on adjoining land and the wider transport network.

#### **Policies**

The 'Draft Whenuapai 3 Precinct Provisions' document includes the following policies relating to the design of road network:

#### **Indicative Roads and Parks**

(14) Require subdivision and development within the precinct to provide for a transport network that is designed and constructed in accordance with the requirements of any relevant code of practice or engineering standards to achieve an appropriate balance between movement, safety, connectivity and a sense of place.

(16) Require the provision of roads as shown on Whenuapai 3 Precinct Plan 2 through subdivision and development with amendments to the location and alignment only provided for collector roads where the road will still provide the equivalent function to that which is shown on the Whenuapai 3 Precinct Plan 2.

## 2.1.3 Auckland Transport Code of Practice (2013)

Section 4 of the Auckland Transport Code of Practice (**ATCOP**) specifies the road classification used within Auckland. Roads are split into two main categories:

- **Arterial** (including Motorways, Strategic Routes and Primary & Secondary Arterials); and
- **Non-arterial** (including Collector Roads, Local Streets, Lanes & Service Lanes and Shared Spaces).

**Table 3** of ATCOP lists basic parameters for individual types of categories. A summary of selected parameters for some arterial and non-arterial roads is provided below.

Parameter	Primary Arterial	Secondary Arterial	Collector Road	Local Road
<b>Through traffic function</b>	Intended to carry predominantly through traffic (but many also serve adjacent activities)	Provide movement within the district between key nodes	Collect traffic from local streets in order to connect with arterials	A street whose primary role is to serve access to adjacent property.
<b>Network Connectivity function</b>	Connect principal sectors of the region (not catered for by strategic routes)	Connect major nodes within an area. Serve adjacent key activities	Collect and distribute traffic from local roads to arterials within an area (and vice versa). Serve adjacent key activities	Collect and distribute traffic to/from local properties within an area
<b>Traffic volumes</b>	Traffic volumes may be up to and in excess of 40,000 vehicles per day	Traffic flows generally up to 25,000 vehicles per day	Traffic flows typically up to 10,000 vehicles per day	Traffic flows are generally up to 5,000 vehicles per day

Table 1: Road Classification Table (Excerpt)

## 2.2 Further Sources of Information

### 2.2.1 Whenuapai Structure Plan – Integrated TA (2016)

Whenuapai Structure Plan is supported by an Integrated Transport Assessment (ITA) (by Flow Transportation Specialists, dated June 2016). The ITA includes details of zone capacity in the modelled area (zones Green 1 and Green 2), which enables an estimate traffic volumes catered for by the ICR.

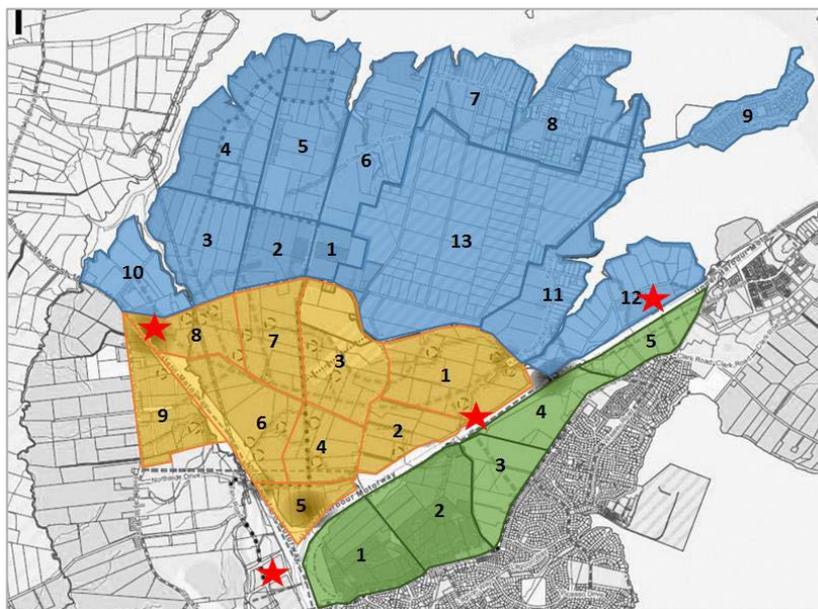


Figure 2: Zoning of SATURN Model

Zone	Dwellings	School Roll	Estimated AADT
Green 1	530		4,240
Green 2	870	800	8,500

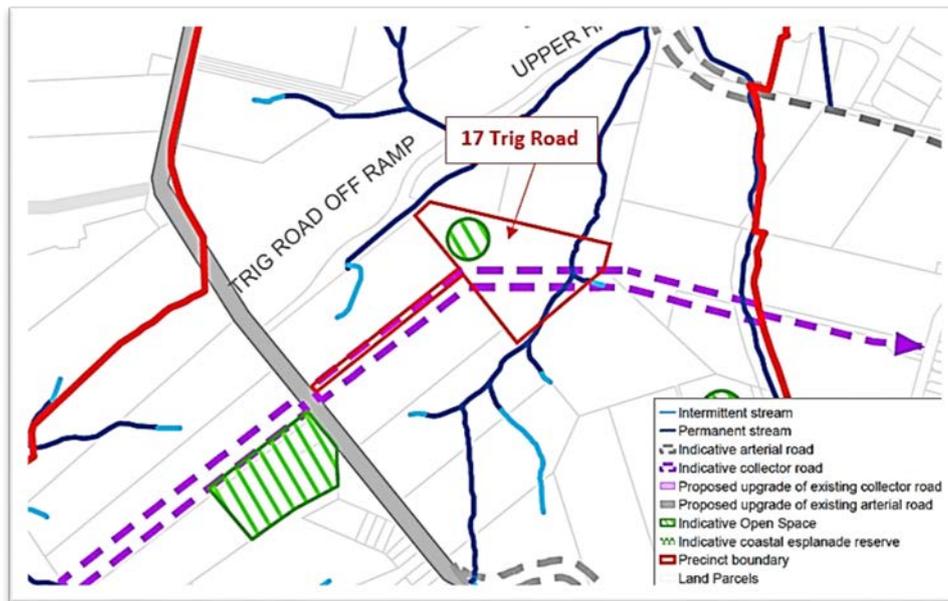
**Table 2: Zone Housing Capacity**

Traffic modelling was carried out using a SATURN model; it has been however, noted that the modelled highway network does not entirely correspond to the proposals put forward in the Whenuapai Structure Plan and the DWPC.

### 3. Proposed Indicative Collector Road

#### 3.1 Alignment Proposed in Draft Whenuapai Plan Change

Plans entitled 'Draft Whenuapai 3 Precinct Plan 1' and 'Draft Whenuapai 3 Precinct Plan 2' show the alignment of the Indicative Collector Road. A section of the plan including the ICR under consideration is presented in **Figure 3**.



**Figure 3: Proposed Indicative Collector Road Alignment** (excerpt from Draft Whenuapai 3 Precinct Plan 1)

The ICR starts in the west on the boundary of 4-6 Hobsonville Road, extending in the north-eastern direction inside and along the southern boundary of 42 Trig Road and forms a (signalised) intersection at Trig Road. The Indicative Collector Road then continues on the same heading south of plot 19 Trig Road until it reaches plot 17 Trig Road. At this point the ICR turns eastbound, bisecting plot 17. Past plot 17 the ICR changes heading to east and extends along the southern boundary of Plots 90 and 92 Hobsonville Road until it reaches Hobsonville Road.

#### 3.2 Traffic Function

The western section of the ICR is effectively a cul-de-sac collecting traffic from future developments to the north-west of Trig Road and Hobsonville Road (estimated 530 dwellings, or 4,240 daily trips). N.B. the estimated trip generation is less than 5,000 vehicles AADT, therefore a 'Local Street' character may be appropriate for this section of the ICR.

The eastern section of the ICR should serve as collector roads for developments to the north-east Trig Road and Hobsonville Road (870 dwellings and an 800-pupil school, an estimated 8,500 trips per day). However, the ICR also provides a convenient link between Hobsonville Road and Trig Road, bypassing the proposed signalised intersection of these roads and providing a shorter route to/from SH16 intersection.

It is thus likely that the ICR as proposed has the potential to attract some through traffic between two arterial roads, which is contrary to Road Classification as specified in the Auckland Transport Code of Practice: according to this document a collector road shall 'Collect traffic from local streets in order to connect with arterials' and 'Collect and distribute traffic from local roads to arterials within an area (and vice versa)'. With 8,500 daily trips attributable to the adjacent developments, only 1,500 extra transit movements per day would bring this route above the 10,000-vpd threshold from collector to arterial.

The proposed intersection of ICR with Trig Road is placed less than 200 metres from the SH16 ramp (which currently works as give-way priority controlled but the ITA includes proposals for its signalisation). Tailbacks forming during peak hours may exceed the short stacking distance and interfere with the operation of the upstream intersection; this could in turn attract more vehicles trying to avoid queues on Trig Road to the ICR.

The volume of traffic likely to use the ICR as a through route is unknown as the diagrams presented in the 'Whenuapai Structure Plan Integrated Transport Assessment Report' report show zero traffic for the broadly corresponding section of the modelled highway network - see **Figure 4**. This appears to be an error, as we note significantly higher volumes of traffic on the parallel section of Hobsonville Road that disperse just before and after the said section, suggesting demand for this route exists.



**Figure 4: Whenuapai Structure Plan SATURN Traffic Model Output<sup>2</sup>**

<sup>2</sup> Source: Whenuapai Structure Plan Integrated Transport Assessment Report June 2016

## 4. Alternative Indicative Collector Road

### 4.1 Proposed Alternative ICR Alignment

An alternative ICR alignment proposed by TDG following consultation with the client is presented in **Figure 5**.



**Figure 5: Proposed Alternative ICR Alignment**

In this proposal, the western section of the Alternative ICR has been shifted by approximately 125 metres to the south. It starts on the boundary of 4-6 Hobsonville Road and extends in the north-eastern direction along the southern boundary of land 38 Trig Road towards Trig Road, where it forms a (signalised) intersection. This alignment slightly affects the northern end of Ryans Road, which could be severed or integrated into the future intersection design.

The ICR then extends north-eastbound beyond Trig Road along the northern boundary of 9 Trig Road, and the southern boundary of 17 Trig Road. The ICR then turns east-south-east and rejoins the originally proposed ICR alignment towards Hobsonville Road.

### 4.2 Compliance with Policy

#### 4.2.1 DWPC Objective (6)

*Subdivision and development occurs in an integrated and co-ordinated way that implements the Whenuapai 3 precinct plan and provides for connections to future development on adjoining land and the wider transport network.*

The alternative proposal complies with Objective (6) of the DWPC better than the original proposal by not unnecessarily subdividing land parcels, making their future conveyance and development easier.

#### 4.2.2 DWPC Policy (14)

*Require subdivision and development within the precinct to provide for a transport network that is designed and constructed in accordance with the requirements of any relevant code of practice or engineering standards to achieve an appropriate balance between movement, safety, connectivity and a sense of place.*

The alternative proposal is compliant with Policy 14 of DWPC. The geometry of the proposed alignment is compliant with relevant design standards and will facilitate a layout meeting all vertical, horizontal, and visibility requirements.

#### 4.2.3 DWPC Policy (16)

*Require the provision of roads as shown on Whenuapai 3 Precinct Plan 2 through subdivision and development with amendments to the location and alignment only provided for collector roads where the road will still provide the equivalent function to that which is shown on the Whenuapai 3 Precinct Plan 2.*

The alternative proposal is compliant with Policy 16 of DWPC. The change in the routing is only marginal hence the traffic function (of a collector road) will not be compromised, namely:

- The western portion of ICR collects traffic from development to the north-west of Trig Road and Hobsonville Road;
- The eastern portion of ICR serves as the collector road for developments to the north-east of Trig Road and Hobsonville Road; and
- The ICR connects Hobsonville Road with Trig Road.

Furthermore, the proposed alternative routing of the ICR delivers additional benefits in terms of traffic and transport detailed in the next section.

### 4.3 Other Traffic Benefits

The alternative proposal has a number of benefits over the ICR alignment presented in DWPC.

#### 4.3.1 Improved Intersection Location

The ICR alignment as proposed in DWPC results in the future intersection with Trig Road being located on a crest of a hill. This is generally considered unsuitable as drivers do not have sufficient time to appreciate the layout ahead due to reduced visibility, as shown in **Figure 6**.

The proposed alignment places the future intersection into a sag, which is an ideal location for an intersection allowing arriving drivers to see the layout from above and get a good overview of the layout and traffic conditions. This positively contributes to road safety.



**Figure 6: Location of Intersections with Trig Road**

#### 4.3.2 Greater and More Uniform Intersection Spacing

The DWPC proposal places the new intersection just 200 meters from the SH16 intersection, with several negative consequences as discussed in section 3.2. The alternative proposal puts the new access some 325 metres from SH16 and 450 metres from Hobsonville Road. The benefits of this arrangement are as follows:

- Greater stacking distance for queuing vehicles, reducing the likelihood of tailback reaching the adjacent intersections; and
- Better location with relation to developments to the north-west and north-east of Trig Road and Hobsonville Road. The areas of land to the north and south of the ICR are similarly sized, resulting in more uniform distribution of traffic from side roads. The accessibility of future developments in the proximity of the Trig Road / Hobsonville Road intersection is also improved by avoiding the need for a link directly to the arterial road.

#### 4.3.3 Reduced Incentive to Be Used by Through Traffic

The alternative layout is likely to be slightly less attractive for through traffic as the intersection with Trig Road is located further away from SH16 and the overall distance longer, therefore the time saving is less in comparison with the DWPC arrangement.

#### 4.3.4 Lesser Impact on Existing Structures

The alternative proposal avoids existing houses and farm structures on plots 42 and 19, whilst affecting no additional structures.

## 5. Summary & Conclusions

### 5.1 Summary

TDG was appointed by Hsiu Ho Lin, to appraise the proposed Draft Whenuapai Plan Change, namely the impact of proposed 'Indicative Collector Road' linking Hobsonville Road with Trig Road as it has a number of adverse effects on the client's property at 17 Trig Road.

The following documents have been consulted as part of this exercise:

- Whenuapai Structure Plan (2016)
- Draft Whenuapai Plan Change (2017)
- Auckland Transport Code of Practice (2013)
- Whenuapai Structure Plan – Integrated TA (2016)

#### 5.1.1 DWPC IRC Alignment

The Indicative Collector Road as proposed in DWPC extends parallel to SH16 approximately 200m south of its centreline until it reaches plot 17 Trig Road, bisecting it. The IRC changes its heading to east-south-east until it reaches Hobsonville Road.

The ICR shall serve as a collector road for developments to the north-west and north-east of Trig Road and Hobsonville Road; however, it also creates a through route between Hobsonville Road and Trig Road. In addition, the close spacing of the proposed intersection on Trig Road and the SH16 intersection may result in tailback affecting the adjacent intersections.

#### 5.1.2 Proposed Alternative IRC Alignment

The western section of the Alternative ICR has been shifted by approximately 125 metres to the south, following existing land boundaries so as not to intersect any major plots of land. The eastern section alignment has been retained.

The proposed alternative IRC is fully compliant with DWPC policies in that it:

- Land parcels are not unnecessarily subdivided;
- The alignment facilitates a future design fully compliant with relevant standards;
- The change has only a marginal impact on open space areas that can be easily mitigated against; and
- The alternative alignment provides the same function as the original proposal.

In addition to meeting all policy requirements, the alternative layout delivers additional benefits:

- Better intersection location improving road safety;
- Greater and more uniform intersection spacing, (i) reducing the likelihood of queue overspill between adjacent intersections, and (ii) conducive to better connectivity for adjacent developments;

- Less likely to be used as a through route due to reduced time saving compared to the DWPC proposal; and
- Lesser impact on existing structures.

## 5.2 Conclusions

It has been demonstrated that the proposed alternative IRC delivers a number of benefits over the layout promoted in DWPC, whilst being fully compliant with all relevant policies. It is thus the opinion of TDG that the Draft Whenuapai Plan Change shall be amended to reflect the findings of this report and alignment of the IRC changed as per the recommendations of this report.

TDG

**From:** [UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 111 - Willem van der Steen  
**Date:** Thursday, 24 April 2025 4:00:17 pm

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Willem van der Steen

Organisation name:

Agent's full name:

Email address: willemvdsteen@gmail.com

Contact phone number: 0279 373 622

Postal address:  
157B Hobsonville Road  
West Harbour  
Auckland 0618

#### **Submission details**

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

Plan change number: Plan Change 111

Plan change name: PC 111 (Private): Hobsonville Grove

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

Rule or rules:  
Proposed change PC111 - changes to zoning

Property address: Hobsonville Grove -Hobsonville Road 84 & 100

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 no need for rezoning - the existing vacant zone plots can be used for the intended purposes by the interested parties.

Existing infrastructure cannot cope with the recent new builds, and adding more is irresponsible.

Deliver the promised upgrades to the infrastructure, including connecting the Upper Harbour motorway exitroundabout to West Point Drive as per plan.

Remove trucks going to the industrial estate from going over Hobsonville Road.

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

Submission date: 24 April 2025

**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**

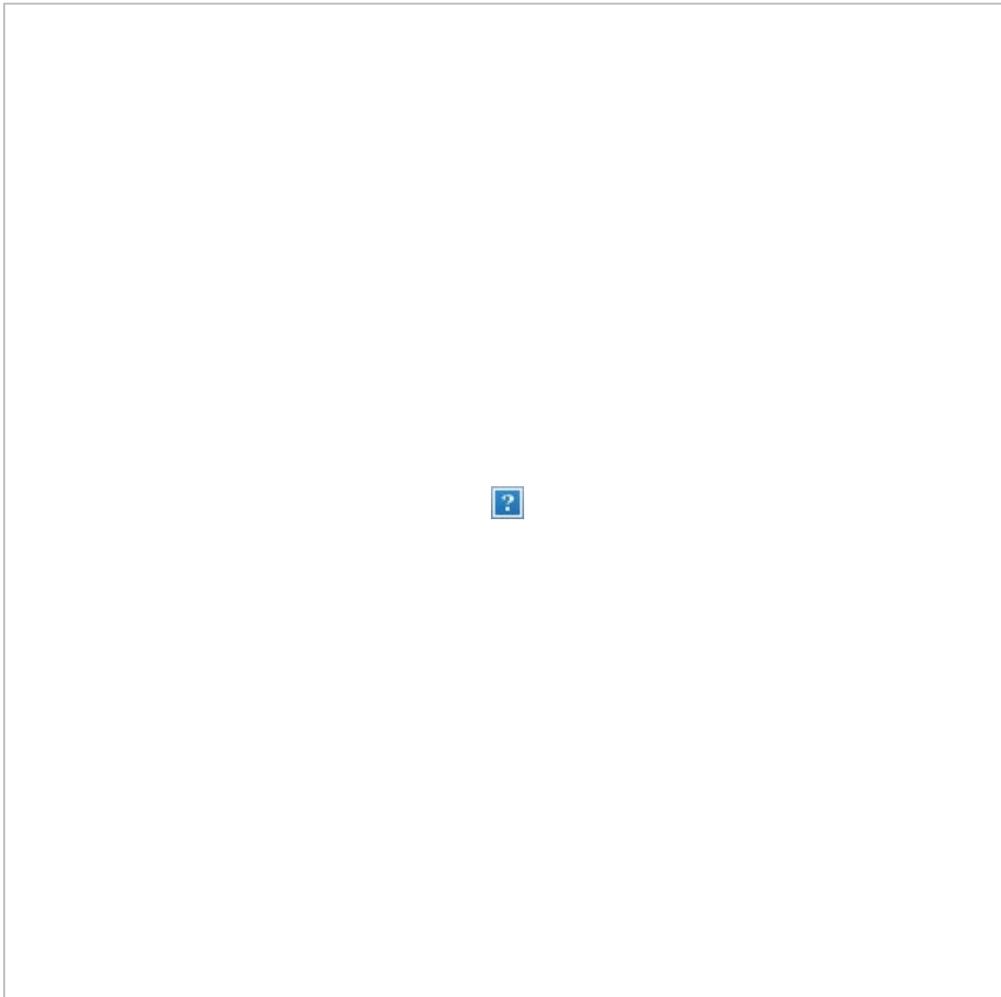
Could you gain an advantage in trade competition through this submission? No

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:** [UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 111 - Ministry of Education  
**Date:** Monday, 28 April 2025 12:01:33 pm  
**Attachments:** [Ministry of Education Submission - Auckland Council PC 111.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Ministry of Education

Organisation name: Ministry of Education

Agent's full name: Eden Rima

Email address: Eden.Rima@beca.com

Contact phone number: 0930090000

Postal address:  
PO Box 6345  
Wellesley  
Auckland 1141

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 111

Plan change name: PC 111 (Private): Hobsonville Grove

**My submission relates to**

Rule or rules:

Property address: Refer to submission attached.

Map or maps: Refer to submission attached.

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:  
Refer to submission attached.

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

Details of amendments: Refer to submission attached.

Submission date: 28 April 2025

Supporting documents  
Ministry of Education Submission - Auckland Council PC 111.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**

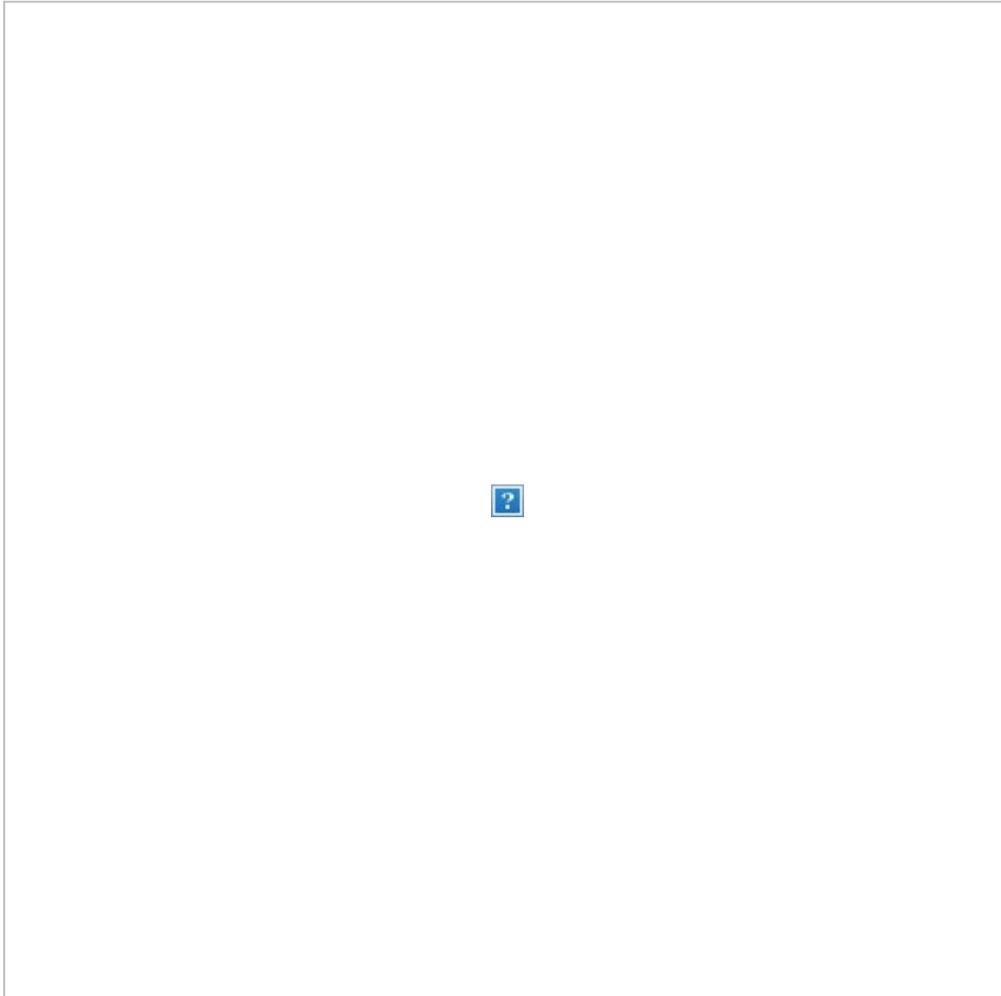
Could you gain an advantage in trade competition through this submission? No

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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**FORM 5**

**Submission on a publicly notified proposal for policy statement or plan, change or variation  
under Clause 6 of Schedule 1, Resource Management Act 1991**

To: Auckland Council

**Name of submitter: Te Tāhuhu o te Mātauranga | Ministry of Education**

Address for service: C/- Beca Ltd  
PO Box 6345  
Wellesley  
Auckland 1141

Attention: Eden Rima

Phone: +64 9 300 9000

Email: Eden.Rima@beca.com

**This is a submission on the Plan Change 111 (Private) – Hobsonville Grove, Hobsonville**

**The specific parts of the proposal that the Ministry of Education’s submission relates to are:**

The Ministry are interested in the proposed rezoning due to potential effects on network capacity. While the applicant has not undertaken any consultation with the Ministry for this specific Proposed Plan Change, we acknowledge Austino New Zealand Limited (herein referred to as the Applicant) undertook considerable engagement with the Ministry on the previous Fast Track consenting proposal to rezone this site.

**Background**

Te Tāhuhu o te Mātauranga | Ministry of Education (‘the Ministry’) is the Government’s lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government’s goals for education. The Ministry assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.

The Ministry has responsibility for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing. The Ministry is therefore a considerable stakeholder in terms of activities that may impact existing and future educational facilities and assets within the Auckland region.

The Ministry has engaged with developers across the country, including the Auckland region, on plan changes. During consultation, specific objectives and policies that better enable the provision of future educational facilities (should there be a need) have often been agreed upon and there is an opportunity on PC111 for the Applicant and the Ministry to work together to achieve favourable outcomes for the Hobsonville community and surrounding school catchments.

**The Ministry of Education’s submission is:**

Plan Change 111 (PC 111) is seeking to rezone approximately 10.7 hectares of land in Hobsonville from Future Urban, Business - Light Industry and Open Space – Informal Recreation zones to a mix of Business – Light Industry, and Residential – Terrace Housing and Apartment Buildings (THAB) and Mixed Housing Urban (MHU) zones.

PC111 is anticipated to enable 335 residential dwellings, 40% within the MHU zones and 60% within the THAB zone, thereby increasing the demand on the local school network in Hobsonville and the wider surrounding area.

The nearest school to the plan change area (PCA) is Whenuapai School Senior Campus, located 221m south west of the plan change area (PCA) and Hobsonville School, located 442m north east of the PCA. Additionally, Marina View School is located 618m south east of the PCA, as shown in Figure 1 below.

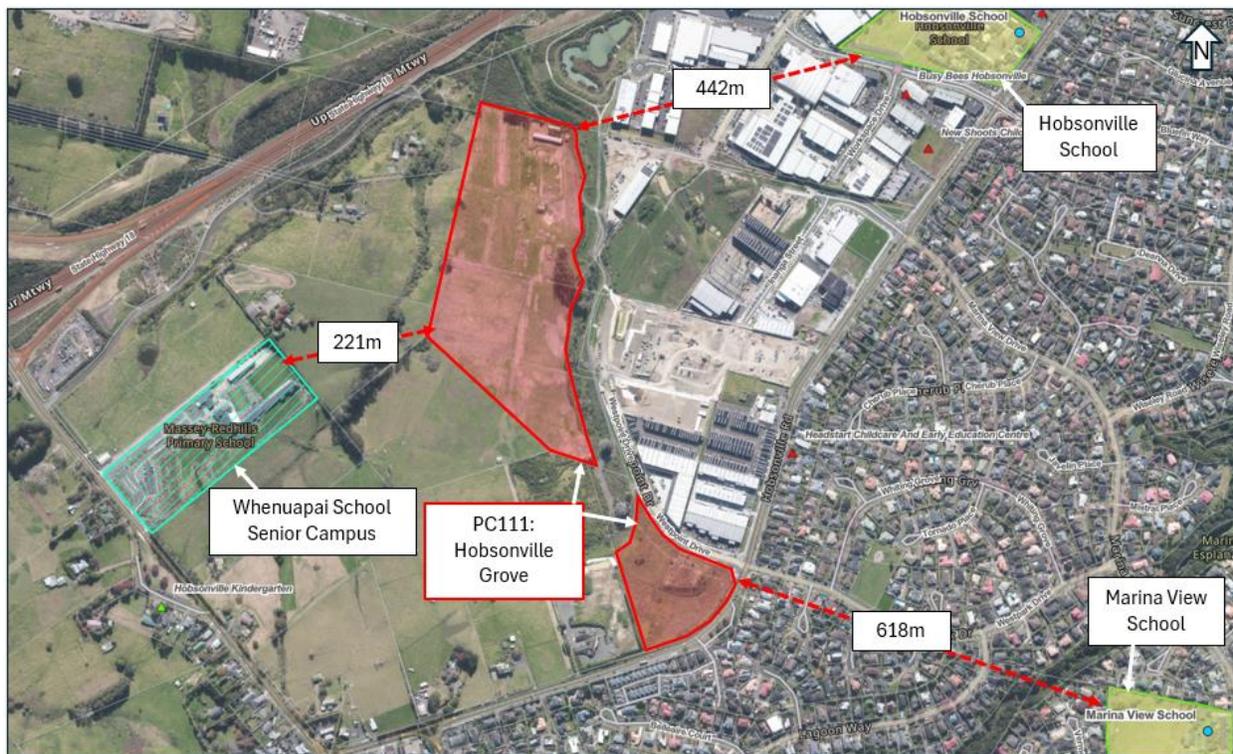


Figure 1: Schools in the vicinity of PCA

The surrounding area is also subject to further intensification and zoned for Future Urban Zone and MHU zone, therefore PC111 is likely to contribute to cumulative effects associated with intensification as well.

Cumulative effects associated with intensification extend beyond the increasing density and also encompass the effects on the horizontal infrastructure network as a result of increased demand for potable water, wastewater (WW) and stormwater. For context, Whenuapai School was designed to operate within the reasonably foreseeable urban environment, however intensification in the surrounding area has resulted in additional, and in some cases unforecasted, demand on the current reticulated network, resulting in an underperforming WW network. As additional intensification is sought within the surrounding area, appropriate consideration should be given to the needs of existing educational facilities reliant on the current reticulated network,

Appropriate provisions to enable educational facilities, where there is an operational need, will contribute to a well-functioning urban environment and provide an important community service to the residents of the PCA and surrounding area. The Ministry's position is that education facilities should be enabled throughout residential areas where student populations reside and where there is a potential need (such as intensification) for schools to be enabled and subsequently located.

The Ministry requests that the applicant continues to engage with the Ministry and sufficient provision within the relevant objectives and policies made to enable the establishment of educational facilities to accommodate additional school age children within the PCA.

It is acknowledged Austino New Zealand Limited (the Applicant) have included provisions for education opportunities within the proposed Hobsonville Grove Precinct (provided in Appendix 2a). The Ministry further requests the retention of this provision and an additional provision which enables education facilities.

### **Decision sought**

The Ministry is **neutral** on the private plan change if Council accepts the following relief and any consequential amendments required to give effect to the matters raised in this submission. Specifically:

1. The Precinct Provisions in Appendix 2A are amended to provide enabling provisions for education facilities as per the attached.

**6.1**

**The Ministry wishes to be heard in support of its submission.**

*Eden Rima*

---

**Eden Rima**  
**Planner – Beca Ltd**  
**(Consultant to the Ministry of Education)**

**Date:** 28<sup>th</sup> March 2025

## Attachment 1

- Retention have been shown as red (**retention**); and
- Additions have been shown as an underline (**addition**).

### 11.2. Objectives [dp]

- (1) 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.
- (2) A relevant residential zone provides for a variety of housing types and sizes that respond to:
  - (a) housing needs and demand; and
  - (b) the neighbourhood's planned urban built character, including three-storey buildings.
- (3) The Hobsonville Grove Precinct is developed for high and medium density housing typologies and small-scale retail opportunities.
- (4) Subdivision, use, and development achieves a well-connected environment for living and working, with convenient connections to parks, walkways, transport infrastructure and **education opportunities**.
- (5) The Hobsonville Grove Precinct is a walkable neighbourhood, with local amenities and a street-based environment that contributes to pedestrian amenity, safety, and convenience.
- (6) Subdivision and development is coordinated with and does not occur in advance of the of infrastructure including transport infrastructure, wastewater, water supply and stormwater services.

6.2

All relevant overlay, Auckland-wide and zone objectives apply in this precinct in addition to those specified above.

### 1.3. Policies [dp]

- (1) Enable a variety of housing types with a mix of densities within the zone, including three-storey attached and detached dwellings, and low-rise apartments.
- (2) Apply the MDRS across all relevant residential zones in the precinct except in circumstances where a qualifying matter is relevant (including matters of significance such as historic heritage and the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wahi tapu, and other taonga).
- (3) Encourage development to achieve attractive and safe streets and public open spaces, including by providing for passive surveillance.
- (4) Enable housing to be designed to meet the day-to-day needs of residents.
- (5) Provide for developments not meeting permitted activity status, while encouraging high-quality developments.
- (6) Require development to achieve a built form that contributes to high-quality built environment outcomes by:
  - a) maintaining privacy, outlook, daylight and sunlight access to provide for the health and safety of residents on-site;



- b) providing for residents' safety and privacy while enabling passive surveillance on the street;
  - c) minimising visual dominance effects to adjoining sites;
  - d) maintaining a level of privacy, and sunlight and daylight access for adjoining sites;
  - e) minimising visual dominance effects of carparking and garage doors to streets and private accessways;
  - f) minimising adverse effects on the natural environment, including restricting maximum impervious area on a site to reduce the amount of stormwater runoff generated by a development and ensure that adverse effects on water quality, quantity and amenity values are avoided or mitigated;
  - g) requiring development to reduce the urban heat island effects of development and respond to climate change, by providing deep soil areas that enable the growth of canopy trees;
  - h) designing practical, sufficient space for residential waste management; and
  - i) designing practical, sufficient space for internal storage and living areas.
- (7) Subdivision and development are undertaken in general accordance with the precinct plan.
- (8) Provide for a range of lot sizes and housing typologies that support lifestyle and housing choice at high and medium of densities.
- (9) Require publicly reticulated wastewater and water supply network to be available, and if necessary upgraded, to service any subdivision or development within the precinct. | 6.3
- (10) Avoid subdivision, use and development prior to the availability of reticulated water and wastewater and transport infrastructure to service development in the Hobsonville Grove Precinct.
- (11) Require any subdivision and development within the precinct to incorporate linkages to adjacent land, including active mode connections to Westpoint Drive and Spedding Road, and public open space.
- (12) Require that subdivision and land use activities establish a transport network that provides for the safe and efficient movement of motor vehicles, pedestrians and cyclists.
- (13) Recognise that the precinct is part of a newly developing residential area, and that there is a potential need for educational facilities to establish within the Precinct. | 6.4



**Te Tāhuhu o  
te Mātauranga**  
Ministry of Education

**From:** [UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 111 - Kyle Tseng  
**Date:** Tuesday, 29 April 2025 11:46:14 am

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Kyle Tseng  
Organisation name:  
Agent's full name:  
Email address: chunkaitseng@gmail.com  
Contact phone number:  
Postal address:

#### **Submission details**

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

Plan change number: Plan Change 111  
Plan change name: PC 111 (Private): Hobsonville Grove

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

Rule or rules:  
Entire Plan Change  
Property address: Entire Plan Change  
Map or maps: Entire Plan Change  
Other provisions:  
Entire Plan Change

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:  
Entire Plan Change will provide the necessary housing in the area and prosper the growth of the area.

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

Details of amendments:

Submission date: 29 April 2025

#### **Attend a hearing**

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

**Declaration**

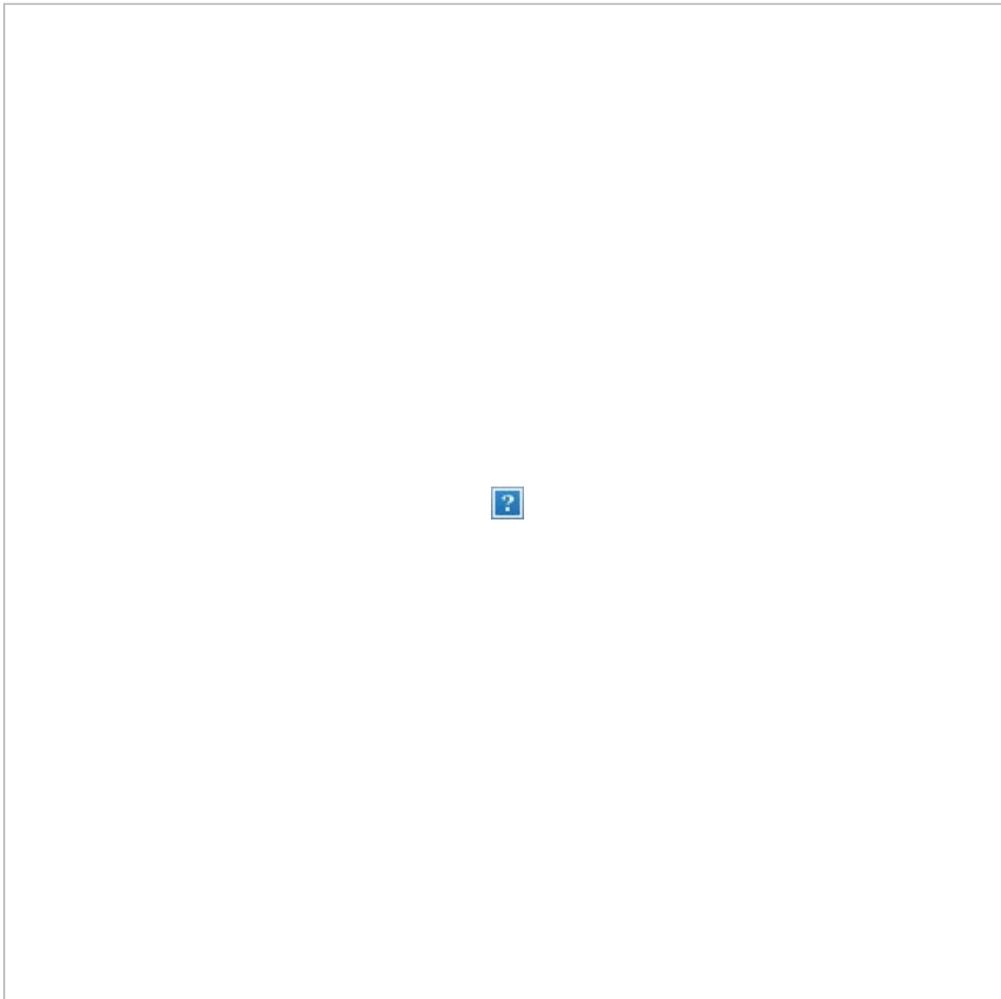
Could you gain an advantage in trade competition through this submission? No

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:** [Clare Wall Shaw](#)  
**To:** [Unitary Plan](#)  
**Subject:** Auckland Council submission on Plan Change 109  
**Date:** Tuesday, 29 April 2025 2:51:22 pm  
**Attachments:** [AC submission PC111 Final SIGNED.pdf](#)

---

Kia ora,

Please find attached a submission from Auckland Council on Plan Change 111:  
Hobsonville Grove.

Ngā mihi,  
Clare

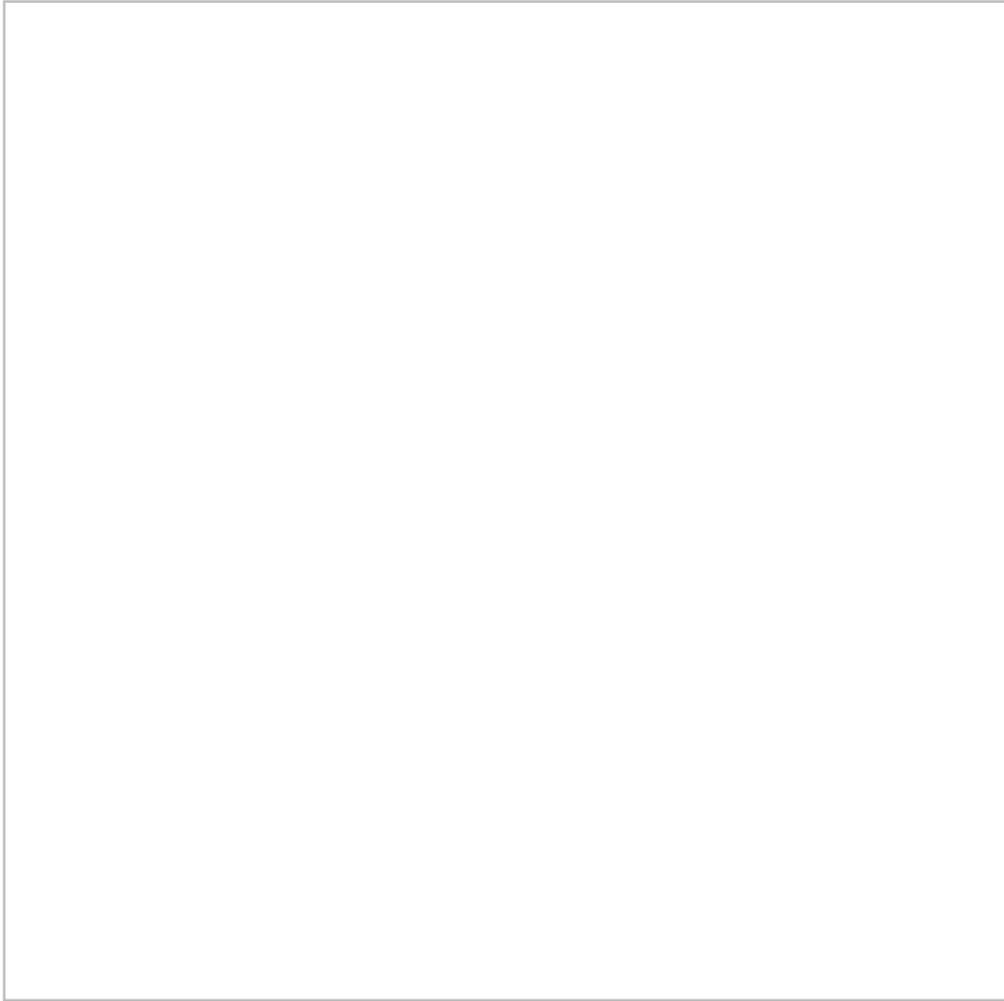
**Clare Wall Shaw | Team Leader - Planning**  
**Central South Unit | Te Puku o Te Tonga**  
**Planning and Resource Consents Department**

Waea pūkoro | Phone 021 582 875

Te Kaunihera o Tāmaki Makaurau | Auckland Council

Level 16, Te Wharau o Tāmaki Auckland House, 135 Albert Street, Auckland

[aucklandcouncil.govt.nz](http://aucklandcouncil.govt.nz)



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**IN THE MATTER** of the Resource Management Act 1991 (**RMA**)

**AND**

**IN THE MATTER** of a submission under clause 6 of the First Schedule to the RMA on Plan Change 111 – 84 & 100 Hobsonville Road, Hobsonville

**SUBMISSION ON NOTIFIED PROPOSAL FOR PRIVATE PLAN CHANGE 111 TO THE AUCKLAND UNITARY PLAN (OPERATIVE IN PART)**

To: Auckland Council

**Name of Submitter:** Auckland Council

Contact: Celia Davison

Address for service: Auckland Council  
135 Albert Street  
Private Bag 92300  
Auckland 1142

**INTRODUCTION**

1. This is a submission on Private Plan Change 111 at 84 & 100 Hobsonville Road, Hobsonville (**PC 111**) to the Auckland Unitary Plan (Operative in Part) (**AUP**) by Austino New Zealand Limited (**the Requestor**).
2. PC 111 proposes to rezone approximately 10.3 hectares of land from Future Urban Zone (**FUZ**) to Residential - Terrace Housing and Apartment Buildings Zone (**THAB**), Residential - Mixed Housing Urban Zone (**MHU**) and to introduce the Hobsonville Grove Precinct.
3. Approximately 3,851m<sup>2</sup> of 84 Hobsonville Road is owned by Auckland Council and zoned for open space purposes to provide an esplanade link to Rawiri Stream. This land was approved for disposal by the council's Finance and Performance Committee on 19 May 2022 (subject to statutory requirements) and is sought to be rezoned from Open Space – Informal Recreation to Business Light Industry Zone (**LIZ**) as part of PC 111. This land would then be managed by the existing I603 Hobsonville Corridor Precinct.

4. PC 111 also seeks to apply the Stormwater Management Area – FLOW-1 (**'SMAF-1'**) control on the planning maps. This would apply across the entire plan change area.
5. Auckland Council could not gain an advantage in trade competition through this submission.
6. This submission by Auckland Council in its capacity as submitter (**'ACS'**) relates to PC 111 in its entirety and all provisions of PC 111 including:
  - a. The Hobsonville Grove Precinct
  - b. The AUP maps

## **SUBMISSION**

7. Future urban areas, such as the PC 111 land, play a critical role in Auckland's growth. Auckland Council ('the Council') supports the future urbanisation of land subject to the Whenuapai Structure Plan as a mechanism to provide for growth in northwest Auckland. The purpose of the request is broadly recognised as providing for an efficient use of the FUZ and open space zoned land to provide for a range of business, industrial and residential activities to meet demand.
8. However, there are a number of aspects to PC 111 that are of concern to ACS to the extent that ACS opposes the plan change in its entirety and seeks that if approved, the matters raised in this submission are addressed.
9. Based on ACS's review of the plan change information, ACS broad concerns with PC 111 are as follows:
  - a. It does not give effect to the Part 2 of the RMA and in particular the sustainable management of natural and physical resources.
  - b. It does not give effect to the National Policy Statement on Urban Development 2020 (updated May 2022) (**'NPS-UD'**) expectations of a well-functioning urban environment
  - c. It does not give effect to the National Policy Statement on Freshwater Management 2020 (amended October 2024) priorities for the health and wellbeing of water bodies and freshwater ecosystems and the ability of people and communities to provide for their social, economic and cultural well-being, now and in the future.
  - d. It does not give effect to key objectives and policies of Chapters B2 Urban Growth and Form, B3 Infrastructure, Transport and Energy of the Regional Policy Statement (**'RPS'**) of the AUP
  - e. The departure from the density of development identified in the Whenuapai Structure Plan 2016 (**'WSP'**) is inappropriate<sup>1</sup>

---

<sup>1</sup> The WSP is under review to meet the council's current policies and strategies.

- f. The use of precinct provisions for the THAB zone to provide for a 'quasi' Business - Neighbourhood Centre Zone.
  - g. The inadequate mitigation of adverse effects in relation to:
    - acoustic management of traffic noise associated with the planned arterial road – Spedding Road
    - flooding including downstream effects on other properties, infrastructure and the Trig and Rawiri Streams
    - poor connectivity to the surrounding area
  - h. The need to strengthen the precinct's provisions to ensure subdivision and development is coordinated and integrated with the required infrastructure
  - i. The clarity and effectiveness of the provisions needs improvement
10. The above matters are discussed in more detail below and in Schedule 1 to this submission.

### **Intensification**

11. The WSP sets out a framework to transform Whenuapai into a sustainable urban community. It identifies the plan change area as suitable for 'medium density residential' with land fronting onto Hobsonville Road as being 'high density residential'. PC 111 land is within Stage 1A of the WSP, with development signalled for between 2018-2026.
12. The proposed density requested by PC 111 reflects two key departures from the WSP:
- a) Land within Sub-precincts A and B are proposed to include a mix of high and medium density residential zones, namely THAB and MHU zones, rather than only medium density residential.
  - b) A neighbourhood centre is proposed to be included within the THAB zone. This was not anticipated in the WSP.
13. ACS does not support the proposed THAB zoning or for this zone to be used for a neighbourhood centre as it does not give effect to the NPS-UD Objective 1 (well-functioning urban environments) and RPS objectives and policies B2.2.1(1A), which is drawn from Objective 1.
14. RPS Objective B2.2.1(1) requires a quality compact form that enables several outcomes to be achieved including a higher quality urban environment, good accessibility for all people, greater social and cultural vitality, and reduced adverse environmental effects.
15. RPS Policies B2.2.2(5), B2.2.2(6), B2.4.1(2), B2.4.2(2) and B2.4.2(3) focus on a hierarchy of development with higher intensification around the higher order centres, with local and neighbourhood centres serving as focal points for their local communities.

16. Policies B2.4.2(2) and B2.4.2(3) are directly relevant to this plan change as they guide where higher and medium residential densities should be located.

**B2.4.2(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, which contribute to a well-functioning urban environment.*

**B2.4.2(3)** *Provide for medium residential intensities in area that are within moderate walking distance to centres, public transport, social facilities and open space.*

17. For centres Objective B2.5.1(2) primarily focuses commercial growth and activities with the hierarchy of centre and identified growth areas.

18. It is also noted that the AUP Chapter A1.6.4 Zones describes that zones are used to manage the way in which areas of land are to be used, developed or protected. The spatial application of zones generally identifies where similar uses and activities are anticipated. Given this ACS considers the proposed provision of a neighbourhood centre within a THAB zone to be inconsistent with A.16.4

### **Infrastructure prerequisites**

19. The NPS-UD and RPS Chapters B2 and B3 contain objectives and policies that place strong emphasis on the importance of ensuring the integration of infrastructure, with land use / urbanisation. Section 75(3) of the RMA requires the plan change to “give effect to” these higher order provisions. This is a strong directive requiring the relevant objectives and policies to be implemented. Examples of these provisions include:

- Objective 6(a) of the NPS-UD which requires local authority decisions on urban development that affect urban environments to be “*Integrated with infrastructure planning and funding decisions*”. Objective 6(c) also requires local authority decisions to be responsive especially where significant development capacity would be realised
- The range of RPS provisions in chapters B2 and B3 that address the need for the integration of infrastructure provisions, planning and funding with land use, and the timely, efficient, and adequate provision of infrastructure, including B2.2.1(1); and (d); B2.2.2 (7); B3.2.1.(5) B3.3.1(1)(b) and B3.3.2(5).

20. Policy B2.2.2(7) is directly relevant to the plan change as it applies to FUZ land.

**B2.2.2(7)** *Enable rezoning of land within the Rural Urban Boundary or other land zoned future urban to accommodate urban growth in ways that do all of the following*

*(a) support a quality compact urban form;*

*(b) provide for a range of housing types and employment choices for the area;*

*(c) integrate with the provision of infrastructure;*

*(caa) provide good accessibility, including by way of efficient and effective public or active transport;*

*(ca) incorporate resilience to the effects of climate change*

*(d) follow the structure plan guidelines as set out in Appendix 1: and*

*(e) support and limit as much as possible adverse impacts on, the competitive operation of land and development markets.*

21. In B2.9 Explanation and Principal Reasons for Adoption of the objectives and policies, other council strategic plans such as the Auckland Plan are cited as needing to be considered in conjunction with the RPS.
22. Auckland Council adopted the Auckland Future Development Strategy 2023-2053 (FDS) in November 2023. The FDS meets the intent behind the NPS-UD and focuses on the long-term future of Tāmaki Makaurau. A key component of the FDS is to integrate long-term land use and infrastructure planning while meeting future climate, environmental, population, housing and employment needs.
23. The FDS introduces infrastructure prerequisites, linked to the development readiness of areas. This is to ensure that bulk infrastructure for development is well-coordinated and can provide a safe, sustainable environment on which communities can be based. The FDS identifies the timing for the live zoning of plan change area as being before 2035+. The FDS recognises that “some business can take advantage of existing capacity” for out of sequence development., The infrastructure prerequisites<sup>2</sup> identified for the Whenuapai East area to support full build out are:
  - a. the Brigham Creek Road upgrade
  - b. State Highway 16 (SH16) to State Highway 18 (SH18) connections
  - c. the Hobsonville Road upgrade
  - d. the Upper Harbour (SH18) Rapid Transit network improvements
  - e. the Whenuapai Wastewater Package 2 (Southern portion only) project
  - f. the Trig Road Water Reservoir project
  - g. the North Harbour No.2 Watermain Project
24. ACS understands that Auckland Transport and Watercare consider that the development that would be enabled by the request does not rely on the FDS prerequisites. It can be supported by existing transport, and wastewater networks. However, there may be some constraints with water supply and there is a lack of certainty regarding the delivery of stormwater management infrastructure.
25. The primary concern of ACS is to ensure the plan change adequately provides for the strategic integration of transport, wastewater, water supply and stormwater infrastructure, otherwise it would be contrary to the NPS-UD, NPS-FM, RPS and FDS. Accordingly, ACS seeks to strengthen the precinct infrastructure provisions as detailed in Schedule 1.

#### **Adverse environmental effects**

26. ACS considers that while PC 111 provides additional development capacity, potentially providing for around 335 dwellings, it does not adequately address how people and communities will provide for their health and well-being, now and into the future.
27. ACS considers the lack of an acoustic assessment and any mitigation measures to address adverse effects on people’s health and wellbeing in the vicinity of the future

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<sup>2</sup> Auckland Future Development Strategy 2023-2053, Appendix 6 Future urban infrastructure prerequisites, p38

Spedding Road corridor creates an inadequate basis on which to make strategic decisions or inform decision making in accordance with Objectives 1, 6 and 7 of the NPS-UD. Similarly, further information is also required to determine the flood risk to properties and infrastructure, outside of the plan change area, such as Watercare's Trig Road pump station and the shaft of the Northern Interceptor, and New Zealand Transport Authority's ('NZTA') culverts under the Upper Harbour Motorway. Appropriate precinct provisions are required to avoid or mitigate any adverse effects.

28. ACS is also concerned that there is no certainty that the proposed residentially zoned land will be connected and integrated with any future road and active mode networks located off Trig Road or the planned arterial road on Spedding Road. This part of the plan change area is currently land locked and relies on future connections to the designated Spedding Road corridor to the north, and a proposed bridge (vehicle and active transport) across Rawiri Stream to connect to Westpoint Drive and onto Hobsonville Road.
29. However, the recently confirmed Spedding Road designation by AT (#1484) has a lapse period of 15 years, making a worst-case scenario of 2040 before it could be funded and constructed, assuming a lapse-date extension is not later required.
30. ACS understands there are practical concerns with the development of the proposed road bridge and intersection to Westpoint Drive, particularly in terms of achieving appropriate gradients or requiring significant and complex geotechnical structures and /or retaining walls. The proposed precinct also does not provide any active mode connections to the surrounding areas to the east, or to the adjacent green pathway along Rawiri Stream. It is important that PC 111 precinct provisions provide for future active mode connections to adjacent sites to improve land use transport integration.
31. ACS recognises the FUZ signals significant changes to this part of Whenuapai which the WSP identifies as being suitable for medium density housing. Although as noted above, the WSP is under review. However, ACS is concerned that the adverse effects of subdivision and development, including acoustic, flooding and accessibility effects have not been adequately mitigated and the precinct provisions require strengthening to guide future resource consent applications.

## DECISION SOUGHT

32. At its meeting on 20 February 2025<sup>3</sup>, the council's Policy and Planning Committee resolved (further to resolution number PEPCC/2025/7) to delegate authority to the Chair and Deputy Chair of that Committee and a member of the Houkura - Independent Māori Statutory Board to approve a council submission:
  - c) *... seeking to have the private plan change request declined unless Council's concerns around the following matters are appropriately addressed:*

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<sup>3</sup> Refer Minutes of the Policy and Planning Committee

- i. development is not enabled until there has been provision of infrastructure (e.g. through strengthening the objectives, policies and precinct provisions included in the private plan change) to address stormwater and flooding issues, transport issues and alignment with the Whenuapai Structure Plan 2016*
- ii. amendments are made to the private plan change provisions to ensure that people are not exposed to unacceptable levels of noise from the anticipated arterial road(s)*
- iii. public open space issues, including addressing the proposed loss of open space at 84 Hobsonville Road and the lack of provisions in the precinct to deliver open space that are fit for purpose*
- iv. the location of the Neighbourhood Centre should be relocated as it does not front an arterial route and the location is inconsistent with the Whenuapai Structure Plan*
- v. amendments are made to the private plan change to ensure that there is an appropriate separation and interface between land to be rezoned Business - Light Industry zone and land anticipated to be zoned for residential purposes to the west of 84 Hobsonville Road.*

33. Consistent with the above resolution, ACS's position is that, unless the issues raised in this submission are properly addressed, it seeks the following relief:

a. The primary relief sought by ACS is for the Panel to decline PPC111 in its entirety; or

8.1

b. Without limiting its primary relief, in the event that PPC111 is granted in part or in full, ACS seeks:

- Amendments to the precinct provisions as outlined in this submission and in Schedule 1; and
- Such further, other, or consequential relief, including in relation to PPC111's explanatory text, objectives, policies, activity table, standards, matters of discretion, assessment criteria, special information requirements, and maps/plans that reflects or responds to the reasons for this submission.

8.2

34. ACS is willing and able to work through the matters raised in this submission with the applicant.

#### **APPEARANCES AT THE HEARING**

35. ACS wishes to be heard in support of its submission.

36. If others make a similar submission, ACS will consider presenting a joint case with them at the hearing.

**DATED** 29 April 2025

On behalf of Auckland Council as submitter:



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Councillor Richard Hills, Chairperson of the Policy and Planning Committee



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Councillor Angela Dalton, Deputy Chairperson of the Policy and Planning Committee



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Member Edward Ashby, Houkura - Independent Māori Statutory Board

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Schedule 1

Item	Issue/ Provision	Support/ Oppose	Reasons for submission	Decision requested
1.	Overall	Oppose	<p>ACS seeks the plan change to rezone approximately 10.7 hectares of land at 84 and 100 Hobsonville Road, - Hobsonville from Future Urban and Open Space -Informal Recreation to Residential -Terrace Housing and Apartment Buildings, Residential - Mixed Housing Urban and Business - Light Industrial zones and the development of a new precinct and the extension of the operative Hobsonville Corridor precinct be declined in its entirety.</p>	<p>Decline the plan change OR</p> <p>Without limiting its primary relief, if PC 111 is granted consent in part or in full, ACS seeks amendments to the precinct provisions as outlined in this schedule be resolved to ACS's satisfaction.</p>
2.	Zoning	Oppose	<p>ACS opposes the zoning of sub-precinct B as THAB zone and seeks the area be zoned as MHU.</p> <p>The application of the THAB zone in this location does not give effect to the objectives of the NPS-UD and the RPS. Nor does it meet the intended use of the land for medium density housing as set out in the WSP.</p> <p>It also does not give effect to the purpose of the THAB zone. It is not located around a metropolitan, town or local centres and where the public</p>	<p>Delete the proposed THAB zone from the AUP zoning maps and replace with the MHU zone.</p> <p>Any consequential amendments to the Hobsonville Grove precinct provisions and plans, including the deletion of sub precincts.</p>

8.3

			<p>transport network supports the highest levels of intensification.</p> <p>As consequence the precinct provisions and plans will also require amendments to remove reference to THAB zone and related provisions.</p>	
3.	Provision of small-scale commercial activities	Oppose	<p>ACS opposes the provision of an internalised small scale commercial area /retail opportunity. This ‘retail opportunity’ or centre’ was not anticipated by the WSP and may detract from the potential neighbourhood centre identified in the WSP for Trig Road next to the primary school.</p> <p>While the THAB zone provides for limited commercial activities such as dairies and cafes up to 100m<sup>2</sup> gross floor area per site, the scale of ‘retail opportunity’ proposed is well beyond what is anticipated in a residential zone.</p> <p>Under the AUP the best option to pursue a retail centre, such as proposed in PC 111 is through a resource consent which can fully assess the environmental effects of the proposal. To be clear, ACS would not support the zoning of a Business – Neighbourhood Centre Zone in this location.</p>	<p>Delete from I1.10.2 Hobsonville Precinct Plan 2 reference to the ‘Indicative Neighbourhood Retail Opportunity’ and the consequential deletion of provisions relating to retail opportunities from all other relevant precinct provisions.</p>

8.4

			ACS finds the justification by the requestor for a retail opportunity to be limited.	
4.	Adverse effects – noise	Oppose	<p>ACS believes it is well accepted in New Zealand and internationally that noise from high volume roads has the potential to generate adverse effects on receiving environments. This includes the loss of amenity and poor health outcomes.</p> <p>ACS observes that NZTA’s approach to operational noise mitigation on state highways and arterials places the responsibility for noise management on both land developers and councils to ensure that activities sensitive to noise from existing or planned arterial roads are acoustically treated to reduce noise.</p> <p>PC 111’s precinct provisions fail to integrate the planned roading environment with the urban environment sought by PC 111.</p> <p>ACS also draws attention to the inclusion of noise mitigation measures in the precinct provisions of recent plan changes including I451 Drury East, I452 Waihoehoe, I557 Wellsford North and I617 Whenuapai 3. This is in response to current best practice.</p>	Provide an acoustic assessment to describe the noise effects on noise sensitive activities within the vicinity of the existing Upper Harbour Highway and the planned Spedding Road corridor will experience and any proposed amendments to the precinct provisions to mitigate potential adverse effects.

8.5

5.	Stormwater provisions	Oppose	<p>The proposed stormwater objective is not given effect to in the precinct policies, standards and assessment criteria.</p> <p>No provision is made for the stormwater management proposed in Stormwater Management Plan to be carried out. AUP provisions are regionwide, whereas the proposed SMP provides details and for matters specific to the plan change area that are not captured in the AUP.</p> <p>This will ensure stormwater management mitigations are required and delivered at the time of resource consent</p>	<p>Add specific stormwater objectives and policies to ensure desired outcomes and actions are implemented.</p> <p>Add a stormwater infrastructure standard which must stipulate the stormwater management requirements specific to the plan change area.</p>	8.6
6.	Adverse effects – stormwater	Oppose	<p>ACS considers there is insufficient information, and no provision made for the staging of development and the associated delivery of stormwater infrastructure and services, to ensure that as each stage of development proceeds/completes stormwater will be managed appropriately and stand alone, should any delay between stages occur or fail to proceed in entirety as otherwise envisaged at the time of plan change.</p>	<p>Inclusion of sufficient high-level information and the development of precinct provisions to ensure delivery of the staging of development and implementation of proposed stormwater infrastructure and services. The precinct provisions must identify dependencies and necessary sequencing so that works completed as each stage is completed can stand alone, providing adequate stormwater management should further stages be delayed or fail to proceed.</p>	
7.	Stormwater flow/flooding	Support	<p>ACS has concerns regarding stormwater flow/flooding effects arising from the development of the plan change area including;</p>	<p>Additional information and mitigation is sought and additional precinct provisions should be provided to ensure the effects of development enabled by the plan</p>	8.8

			<ul style="list-style-type: none"> <li>existing infrastructure including culverts under State Highway 18/Upper Harbour Motorway, and Watercare assets located at 27 Trig Road and 161 Brigham Creek Road</li> <li>private property downstream of the plan change area</li> <li>Trig Stream and Rawiri Stream, resulting from changes to in stream flows attributable to the development.</li> </ul>	change will not result in any increase in flooding and no new risks are created.	<b>8.8 cont.</b>
8.	Mana whenua	Support in part	Mana whenua values and traditions should be reflected in the new development with mana whenua participation.	Include precinct provisions, such as in the precinct description and assessment criteria, that require mana whenua culture and traditions to be explicitly integrated into the new development.	<b>8.9</b>
9.	Incorporation of Medium Density Residential Standards	Support in part	<p>Section 77G of the RMA requires that MDRS are incorporated into any relevant urban residential zone unless qualifying matters, as set out in s77I, allow development that is less enabling than the MDRS</p> <p>Amendments are sought to the Hobsonville Grove Precinct to fully incorporate the Medium Density Residential Standards (MDRS) into the MHU zone</p> <p>For example, the activity table does not include MDRS standards relating to accessory buildings, internal and extensions and alterations to buildings and additions to an existing dwelling. These types of activities will be required</p>	Amend the precinct provisions to be consistent with the protocols the council wishes to adopt to incorporate MDRS.	<b>8.10</b>

			<p>as the Hobsonville Grove community grows and changes over time.</p> <p>The language and formatting used is inconsistent with the MDRS protocols provided by the council. ACS seeks the requestor observes these protocols to ensure consistency across the AUP, making the management of the AUP more efficient.</p>	
10.	Precinct description	Oppose in part	<p>The purpose of the precinct needs to give effect to the well-functioning urban environments objectives of the NPS-UD and the RPS. ACS considers its proposed amendments more succinctly outline the purpose of the precinct.</p>	<p>Amend I1.1 Precinct description as follows:</p> <p>The purpose of the Hobsonville Grove Precinct is to provide for the planned expansion of Whenuapai <u>and to develop a liveable, compact and accessible community with high quality residential development.</u> <del>and to</del> <u>It will</u> also incorporate the Medium Density Residential Standards contained in Schedule 3A of the Resource Management Act 1991.</p> <p>The Precinct will enable a range of housing typologies to be provided. in a location <del>that is accessible within a</del> <u>moderate walking distance</u> to amenities, public transport, and employment and education opportunities. ...</p>

8.11

11.	Precinct description	Oppose in part	<p>The precinct description needs to clearly outline the restrictions to be placed on subdivision and development until such time as operational transport, bulk water supply and wastewater infrastructure is in place to service the development. This is particularly important as the Whenuapai East area is not identified by the FDS as ready for development until 2035+.</p> <p>ACS seeks to ensure the timely integration of subdivision and development with the provisions of all required infrastructure.</p>	<p><u>Amend I1.1 Precinct description as follows:</u></p> <p>...</p> <p><u>Subdivision and development is restricted until the land within the Hobsonville Grove Precinct is able to be connected to operational bulk water supply and wastewater infrastructure with sufficient capacity to service development of the precinct, and new transport infrastructure connections to Westpoint Drive are operational.</u></p>
12.	Precinct description	Oppose in part	<p>The precinct description does not refer to the proposed Stormwater Management Plan and the precinct description only references the AUP and Stormwater Management Area Flow controls.</p> <p>Reference should be made to an approved Stormwater Management Plan (if the requestor wishes to rely on the content of the SMP for the authorisation of discharges and diversions from the plan change area and seek adoption under the HW&amp;FR Regionwide Network Discharge Consent).</p>	<p>Amend I1.1 Precinct description to more fully describe the precinct’s approach to manage stormwater and flood risk including that stormwater management will be undertaken in accordance with ‘an approved Stormwater Management Plan’.</p>

8.12

8.13

			As noted above, ACS seeks to ensure the timely integration of subdivision and development with the provision the required infrastructure.	
13.	Objective I1.2(3)	Oppose in part	The proposed amendment brings the objective into line with the precinct themes of high-quality compact urban environments and accessibility.	Amend Objective I1.2(3) as follows:  The Hobsonville Grove Precinct is developed <u>in a comprehensive and integrated way to facilitate for high- and high-quality medium density housing, typologies and small-scale retail opportunities.</u>
14.	New transport objective	Support	ACS considers this new objective is necessary to ensure the policy cascade from objectives to policies, standards and assessment matters/criteria is in place.	Add a new Objective I1.2(3A) as follows:  <u>Subdivision and development provide for the safe and efficient operation of the current and future transport network for all modes.</u>
15.	Objective I1.2(4)	Oppose	The proposed amendments bring the objective into line with the theme of 'integration' which is essential to achieve an alignment of infrastructure and land use activities.	Delete Objective I1.2(4)  <del>Subdivision, use, and development achieves a well-connected environment for living and working, with convenient connections to parks, walkways, transport infrastructure and education opportunities.</del>  Provide a new objective I1.2(4A) as follows;  <u>Transport infrastructure that is required to service subdivision and development within the precinct:</u> <u>(a) Provides for safe and integrated walking and cycling connections within the precinct and to existing and future green networks adjoining the precinct.</u> <u>(b) Supports the planned upgrades to Spedding Road arterial corridor.</u> <u>(c) Mitigates transport effects on the surrounding road network; and</u>

8.14

8.15

8.16

				<p><u>(d) Provides connectivity to future subdivision and development of adjacent sites.</u></p> <p><u>(e) Provides connectivity across Rawiri Stream to Westpoint Drive.</u></p>	8.16 cont.
16.	Objective I1.2.(6)	Oppose in part	ACS considers this amendment provides greater certainty that operational infrastructure is required as the precinct is developed.	<p>Amend objective I1.2(6) as follows:</p> <p>Subdivision and development is coordinated with and does not occur in advance of the availability of <u>operational</u> infrastructure including transport infrastructure, <u>bulk</u> wastewater, water supply and stormwater services.</p>	8.17
17.	Objective I1.2(5)	Oppose in part	The proposed amendment gives clarity to the type of contribution a street-based environment is expected to deliver.	<p>Amend Objective I1.2(5) as follows;</p> <p>The Hobsonville Grove Precinct is a walkable neighbourhood, with local amenities and a street-based environment that contributes <u>positively</u> to pedestrian amenity, safety, and convenience.</p>	8.18
18.	Amend policy I1.3(7)	Oppose in part	ACS considers that Policy I1.3(7) should be moved to the beginning of the policy section in line with the council's preferred formatting guidelines for precincts. It also requires a more precise reference to the precinct plan.	<p>Amend Policy I1.3(7) as follows;</p> <p><del>(71A) Subdivision and development are undertaken</del> <u>Hobsonville Grove Precinct is developed</u> in general accordance with the <u>I1.10.2</u> Hobsonville Grove Precinct <u>Plan 2</u>.</p>	8.19
19.	Policy I1.3(10)	Oppose in part	ACS generally supports this policy but seeks changes to ensure the policy is consistent with other similar precinct policies in the wider Whenuapai area. Transport policies are developed separately as they need to align with the relevant transport standards.	<p>Amend Policy I1.3(10) as follows;</p> <p>Avoid subdivision, use and development prior to the availability of <del>reticulated</del> <u>operational bulk water supply</u>, <del>and</del> wastewater and <del>transport</del> stormwater infrastructure to service development in the Hobsonville Grove Precinct.</p>	8.20

<p>20.</p>	<p>Policy I1.3.(11)</p>	<p>Oppose in part</p>	<p>ACS considers the transport policies require strengthening to provide clear and unambiguous guidance for future subdivision and development by incorporating references to the relevant standards.</p> <p>ACS considers it important that any future road connecting to Trig Road provides for active modes of transport, to provide safe access to the school, potential Trig Road neighbourhood centre and other amenities that may develop over time.</p> <p>The directions of connections should be shown on the precinct plan. This will in ACS's opinion give effect to transport integration with the surrounding area.</p>	<p>Delete Policy I1.3(11)</p> <p><del>Require any subdivision and development within the precinct to incorporate linkages to adjacent land, including active mode connections to Westpoint Drive and Spedding Road, and public open space.</del></p> <p>Replace with three new policies:</p> <p>Add a new Policy I1.3(8A) as follows:</p> <p><u>Require subdivision and development to provide the transport infrastructure identified on I1.10.2 Precinct Plan 2 and in accordance with Table I1.10.3.</u></p> <p>Add a new policy I1.3(8B) as follows:</p> <p><u>Ensure that subdivision and development provide for safe and efficient future road and active mode connections to adjoining sites and to Spedding Road corridor as shown in Hobsonville Grove I1.10.1 Precinct Plan 2.</u></p> <p>Add a new policy I1.3.(8C) as follows:</p> <p><u>Avoid subdivision and development occurring in advance of the availability of operational transport infrastructure connecting the precinct's internal road network to Westpoint Drive, as identified on Hobsonville Grove I1.10.2 Precinct Plan 2 and in Table I10.3</u></p>
<p>21.</p>	<p>Policy I1.3(17)</p>	<p>Oppose in part</p>	<p>ACS considers this policy needs to clearly describe how it is intended to</p>	<p>Amend Policy I1.3(17) as follows:</p>

8.21

8.22

			provide for open space within the precinct.	<del>Provide</del> <u>Enable the provision of public open space at the time of subdivision that is accessible, predominantly edged by roads and served by walkways and cycleways and meets the needs of the community, if that is required to realise Council open space strategies for Whenuapai and the Precinct.</u>
22.	I1.4 Activity table	Support	<p>ACS notes that the activity table does not reference activities in the relevant zone. This omission needs to be corrected.</p> <p>The activity status for this particular activity would be left blank. This requires a consequential amendment in the introductory text to I1.4.1 to explain the meaning of a blank entry.</p>	<p>Amend the introduction to I1.4 as follows:</p> <p>All relevant .... Activity Table I14.1 <u>below.</u></p> <p><u>A blank in the activity table status column means the activity status in the relevant overlay, Auckland-wide or zone provision applies.</u></p> <p>Add a new activity to I1.4 Activity table as follows:</p> <p><u>(AA1) Activities listed as permitted, restricted discretionary or discretionary activities in Table H5.4.1 Activity Table in the Residential – Mixed Housing Urban Zone.</u></p>
23.	I1.4 Activity table (A1)	Support in part	ACS supports the non-complying activity status of subdivision, use and development where compliance with I.6.1.1 (Water supply and wastewater infrastructure). This conforms with the AUP’s classification of activity status as set out in chapter A1.7 concerning the circumstances when non-complying activity status is justified.	<p>Retain the non-complying activity status of (A1)</p> <p>Amend Table II1.4.1 Activity table (A1) as follows:</p> <p><b>Table II1.4.1 Activity table</b></p> <p><del>Activities-Use and development</del> <u>that does not comply with Standards I1.6.1.1 (Water supply and wastewater infrastructure).</u></p> <p>NC</p>

8.22  
cont.

8.23

8.24

			ACS considers that amendments are required to row (A1) to ensure the consistent use of activity descriptions across the AUP. A minor correction is made to the table heading.	
24.	I1.4.1 Activity table (A2)	Oppose	<p>Activity 2 is not consistent with integrating subdivision and development with effective, efficient and safe transport. The preference for subdivision and /or development that does not comply with Standard 11.6.1.2 is to have non-complying activity status. Assessment as a non-complying activity is justified, having regard to the following considerations:</p> <ul style="list-style-type: none"> <li>- A1.7.5 of the AUP(OP) concerning the circumstances when non-complying activity status is justified;</li> <li>- It is not anticipated that any subdivision and development can or should occur without the required supporting transport infrastructure connections to Westpoint Drive being constructed and operational;</li> <li>- Subdivision and development occurring without the required transport infrastructure would have significant adverse traffic effects on the transport network, and would not assist in achieving a well-functioning urban environment; and</li> <li>- Non-complying activity status (supported by a robust objective and policy framework as discussed above, appropriately reflects the need for</li> </ul>	<p>Amend Table I1.4.1 Activity table (A2) as follows:</p> <p><del>Activities</del> Use and development that does not comply with Standards I1.6.1.2 (Transportation connections)</p> <p><del>RD</del> <u>NC</u></p>

8.25

			greater scrutiny of any departure application, and the need for detailed evidence to justify any departure.		
25.	I1.4.1 Activity table (A13A)	Support	For completeness the activity table should include a cross reference to the subdivision listed in Chapter E38 Subdivision	Add a new subdivision activity to I1.4.1 Activity table as follows;  <u>(A13A) Subdivisions listed in Chapter E38 Subdivision</u>	8.26
26.	I1.4.1 Activity table (A13)	Oppose in part	Minor amendment to include reference to the relevant subdivision standards	Amend I1.4.1 Activity table (A13) as follows: Subdivision of land in accordance with an approved land use consent for the purpose of the construction, or use of dwellings as permitted or restricted discretionary activities in the precinct <u>and meeting Standard I1.7.1.1 Standards for controlled subdivision activities.</u>	8.27
27.	I1.4.1 Activity table (A17)	Oppose	ACS seeks to simplify the activity description and to require a non-complying activity status for subdivision that does not meet Standards I1. 6.12 (Transportation connections).  This then aligns the subdivision activity status with the non-complying activity status also sought by ACS for use and development that does not comply with Standard I1.6.1.2.	Amend I1.4.1 Activity table (A17) as follows:  <del>Subdivision of vacant lots, subdivision around four or more legally established or consented dwellings, or subdivision that creates land to vest in Auckland Council that does not comply with Standard I1.6.1.2 (Transportation connections).</del>  RD <u>NC</u>	8.28
28.	I1.4.1 Activity table (A18)	Oppose in part	ACS seeks to simplify the activity description.  ACS also seeks a more onerous activity status for subdivision that does not comply with the standards I1.6.1.1 (Water Supply and wastewater	Amend I1.4.1 Activity table (A18) as follows:  <del>Subdivision of vacant lots, subdivision around four or more legally established or consented dwellings, or subdivision that creates land to vest in Auckland Council that does not comply with Standard I1.6.1.1 (Water supply and wastewater infrastructure).</del>	8.29

			<p>infrastructure) and I1.6.1.2 (Transportation Connections).</p> <p>This would align with ACS preference for non-complying activity status for use and development where these critical infrastructure standards are not meet. Refer to item 24 above for the reasoning for this position.</p>	NC	8.29 cont.
29.	I1.6.1.1 – Water supply and wastewater infrastructure	Oppose in Part	<p>Reliance on a third party to confirm compliance with this standard is not acceptable. The requestor should liaise with Watercare as to appropriate alternative measures that would apply if bulk water supply and wastewater infrastructure with sufficient capacity is not available to support development within the precinct.</p>	<p>Delete I1.6.1.1(1)(b) and replace with an appropriate alternative method should bulk water supply and wastewater infrastructure with sufficient capacity not be available to support development within the precinct.</p>	8.30
30.	Standard I1.6.1.2 Transportation connections	Oppose in part	<p>ACS considers this standard needs to incorporate requirements to construct the bridge from the plan change area to Westpoint Drive. This is to ensure an integrated and connected transport network is delivered. Amendments to the standard would give effect to the transport objectives and policies.</p>	<p>Amend Standard I1.6.1.2 Transportation connections to include implementation of the bridge across Rawiri Stream to Westpoint Drive as a requirement of subdivision and development.</p>	8.31
31.	Standard I1.6.1.2(2)	Oppose in part	<p>ACS considers this part of the standard should be a separate standard. ACS considers this would provide more flexibility in road design with non-compliance from the new standard having a restricted discretionary or discretionary activity status.</p>	<p>Amend Standard I1.6.1.2 Transportation connections to delete clause (2) and then adding a new separate standard to address road function and design. Consequential to this amendment, amend I1.4.1 Activity Table include this activity as well as the provision of appropriate matters of assessment and assessment criteria provided.</p>	8.32

32.	IX.7 Assessment - controlled activities	Support	This section is somewhat confused as it includes MDRS standards for controlled subdivision activities, which should be included in section I1.6 Standards.	Move MDRS standards I1.7.1.1 Standards for controlled activities, to section I1.6.1 Standards and renumber accordingly.	8.33
33.	IX.7 Assessment controlled activities - Matters of control	Support	Section I1.7 Assessment – controlled activities is missing the sub-section ‘Matters of Control’. This is an essential component to the structure and organisation of the AUP. This section must be included in the proposed precinct provisions to then enable the development of the relevant assessment criteria.	<p>Add a new section ‘Matters of control, as follows:</p> <p><b><u>I1.7.1A Matters of control</u></b></p> <p><u>The Council will reserve its control to the following matters when assessing a controlled activity resource consent application, in addition to the matters specified for the relevant controlled activities in the zone, Auckland-wide, or overlay provisions:</u></p> <p><u>(1) All controlled subdivision activities in Table I1.4.1</u></p> <p>(a) <u>compliance with an approved resource consent or consistency with a concurrent land use consent application or certificate of compliance;</u></p> <p>(b) <u>compliance with the relevant overlay, Auckland-wide, precinct and zone rules;</u></p> <p>(c) <u>the effects of infrastructure provision.</u></p>	8.34
34.	I1.8. Assessment criteria for controlled activities	Oppose in part		<p>Amend I1.8 Assessment criteria for controlled activities as follows:</p> <p><b><u>I1.8 Assessment criteria for controlled activities</u></b></p> <p><del>(1)</del> <u>The Council will consider the relevant assessment criteria below for controlled activities from the list below, in addition to the assessment criteria specified for the relevant controlled activities in the zone, Auckland-wide or overlay provisions:</u></p>	8.35

				<p><u>(1A) Subdivision</u></p> <p>(a) Compliance with an existing approved resource ...</p> <p>(c) whether there is appropriate.... to (23)</p>	8.35 cont.
35.	I1.9.1 Matters of discretion	Oppose in part	Minor change to introduce consistency with the AUP style guide	<p>Amend I1.9.1 Matters of discretion as follows: .</p> <p><b>I1.9.1 Matters of discretion</b></p> <p><del>For development and subdivision that is a restricted discretionary activity in the Hobsonville Grove Precinct</del> The council will restrict its discretion to the following matters ...</p>	8.36
36.	I1.9.1 Matters of discretion and I1.9.2 Assessment criteria	Oppose in part	<p>ACS notes that there is no provision in the assessment provisions for subdivision activities (A15). Amendments are required to correct this omission.</p> <p>ACS also note the Standard reference number will need updating once these provisions are moved to I1.6. XX Standards.</p>	Amend I1.9.1 Matters of discretion and I1.9.2 Assessment criteria to provide for restricted discretionary subdivision that does not meet IX.7.1.1 Standards for controlled subdivision activities.	8.37
37.	I1.10.1 Precinct Plan 1	Oppose	Precinct Plan 1 is made redundant by the requested removal of the sub precincts from the Hobsonville Grove Precinct	Delete I1.10.1 Precinct Plan 1. - Sub-precincts	8.38
38.	I1.10.2 Precinct Plan 2	Oppose in part	ACS seeks amendments to Precinct Plan 2 as a consequence of the various recommendations made in this submission.	<ul style="list-style-type: none"> <li>Amend the heading of I1.10.2 Precinct Plan 2 as follows</li> </ul> <p>I1.10.2 Precinct Plan 2 — <del>Indicative road connections, neighbourhood park, and retail opportunity overlay.</del></p>	8.39

			<p>ACS considers the roading network within the precinct appears to be disjointed and incomplete. A more efficient and integrated internal road network is sought.</p> <p>ACS is concerned that the precinct plan includes information relating to another precinct, namely I603 Hobsonville Corridor Precinct. This approach will be confusing for readers of the AUP and is not supported by ACS. Individual precincts in the AUP are location specific and must not include relevant provisions relating to other precincts.</p>	<ul style="list-style-type: none"> <li>• Amend Precinct Plan 2, including the key, as follows:             <ul style="list-style-type: none"> <li>○ Remove symbols and references to Hobsonville Grove sub-precincts A and B and Hobsonville Grove sub-precinct C</li> <li>○ Show the indicative roads as lines with arrows pointing to their direction over adjacent properties</li> <li>○ Show a collector road that indicates an efficient route to the school on Trig Road</li> <li>○ Show how the collector roads will integrate with each other</li> <li>○ Show an indicative collector road that connects to the future Spedding Road corridor</li> <li>○ Delete symbols and references to 'Indicative Potential Connection Point'</li> <li>○ Delete symbols and references to 'Indicative Neighbourhood Retail Opportunity'</li> <li>⊖ Delete symbols and references to 'Hobsonville Road Building Height Restrictions'</li> <li>○ Amend reference to the local park 'Indicative <u>open space</u> Local Park'</li> <li>○ Identify walkways and cycleways including connections to Rawiri Stream green pathway</li> <li>○ Show a north pointing compass</li> <li>○ Delete all references to the Hobsonville Corridor and identification of its precinct boundary</li> </ul> </li> </ul>
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8.39  
cont.

39.	Amend I603 Hobsonville Corridor Precinct	Support	ACS seeks that I603 Hobsonville Corridor Precinct be amended to incorporate any necessary changes arising from the inclusion of 84 Hobsonville Road into that precinct.	Amend I603 Hobsonville Corridor Precinct to incorporate 84 Hobsonville Road including changes to the precinct maps and provisions as necessary. ACS recommends the requestor discuss this amendment with Auckland Council.	8.40
40.	Editorial	Support	Minor editorial correction to ensure editorial consistency across the AUP.	Use the AUP numbering protocols and style guidelines to correct editorial issues with the precinct provisions	8.41

**From:** [Amber Taylor](#)  
**To:** [Unitary Plan](#)  
**Subject:** Submission on Plan Change 111 (Private)  
**Date:** Tuesday, 29 April 2025 4:44:15 pm  
**Attachments:** [image001.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[Watercare Private Plan Change 111 Submission.pdf](#)

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Afternoon,

Please find Watercare's submission to PPC111 attached.

Ngā mihi,

**Amber Taylor**

Development Planning Team Lead | Major Developments  
Kaihautū Mataamua Whakamahere Whanaketanga | Ngā Hanganga Matua

**Watercare Services Limited**

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Mon Tue Wed Thu Fri



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Attention: Planning Technician

[unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

**TO:** Auckland Council

**SUBMISSION ON:** Proposed Private Plan Change 111: Hobsonville Grove

**FROM:** Watercare Services Limited

**ADDRESS FOR SERVICE:** [planchanges@water.co.nz](mailto:planchanges@water.co.nz)

**DATE:** 29 April 2025

**Watercare could not gain an advantage in trade competition through this submission.**

## 1. WATERCARE'S PURPOSE

- 1.1. Watercare Services Limited (**Watercare**) is New Zealand's largest provider of water and wastewater services. Watercare is a council-controlled organisation under the Local Government Act 2002 (**LGA**) and is wholly owned by the Auckland Council (**Council**).
- 1.2. As Auckland's water and wastewater services provider, Watercare has a significant role in helping Council achieve its vision for the Auckland Region.
- 1.3. Watercare's purpose, embodied in the Maori whakatauki (proverb) below, reflects the connection between our services and the wellbeing of our community and the local environment:

*Ki te ora te wai, ka ora te whenua, ka ora te tangata.*

*When the water is healthy, the land and the people are healthy.*

- 1.4. Watercare is required to manage its operations efficiently with a view to keeping overall costs of water supply and wastewater services to its customers (collectively) at minimum levels, consistent with the effective conduct of its undertakings and the maintenance of the long-term integrity of its assets.

- 1.5. Watercare is subject to economic regulation under the Watercare Charter (**Charter**). The Charter imposes minimum service quality standards, financial performance objectives and an interim price-quality path. Regulatory oversight is held by the Commerce Commission as the appointed Crown Monitor. Subject to the Charter, Watercare must also give effect to relevant aspects of the Council's Long-Term Plan, and act consistently with other plans and strategies of the Council, including the Auckland Unitary Plan (Operative in Part) (**AUP**), the Auckland Plan 2050 and the Auckland Future Development Strategy 2023-2053 (**FDS**).<sup>1</sup>

## 2. SUBMISSION

- 2.1. This is a submission on a private plan change requested by Austino New Zealand Limited (**Applicant**) to the AUP that was publicly notified on 27 March 2025 (**PPC 111**).
- 2.2. The land subject to PPC 111 (**PPC 111 Area**) comprises two geographically separate 'blocks' of land in Hobsonville. These are:
- a) 84 Hobsonville Road (**Block 1**); and
  - b) 100 Hobsonville Road (**Block 2**).
- 2.3. Block 1 and Block 2 are located upstream of:
- a) the land owned by Watercare at 27 Trig Road, which is the proposed site for the future Northern Interceptor Shaft (**Northern Interceptor Shaft Site**);
  - b) the existing Wastewater Pump Station 68 at 161 Brigham Creek Road (**WWPS 68**); and
  - c) the existing Wastewater Pump Station 70 at 2A Buckley Avenue (**WWPS 70**).
- 2.4. PPC 111 seeks to:
- a) Rezone 1.36ha of land in Block 1 from Future Urban and Open Space - Informal Recreation to Business – Light Industrial Zone.
  - b) Rezone 9.34ha of land in Block 2 from Future Urban to Residential – Mixed Housing Urban (**MHU**) and Residential – Terraced Housing and Apartment Building (**THAB**) zone.
  - c) Apply the AUP Stormwater Management and Flow 1 Overlay (SMAF1) provisions to Blocks 1 and 2.
  - d) Extend the existing AUP "*Hobsonville Corridor sub-precinct C I603*" and related provisions (in particular I603.6.8 standards for new buildings on sites fronting Hobsonville Road) to Block 1 to the intent that the standard will take precedence

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<sup>1</sup> Local Government (Auckland Council) Act 2009, s58.

over the zone rules.

- e) Include a new precinct for Block 2 (the “Hobsonville Grove Precinct”), to include rules relating to the indicative location of collector roads and provide for limited scale retail within a small centre.
- 2.5. For the reasons set out in this submission, Watercare **opposes** PPC 111. PPC 111 represents premature and out-of-sequence development that would compromise Watercare's ability to provide water and wastewater services to existing customers and planned growth in already live-zoned areas. The proposed development significantly precedes planned bulk water infrastructure delivery timeframes. Additionally, the proposal fails to adequately address potential adverse flooding effects on Watercare's critical infrastructure, specifically WWPS 68 and the Northern Interceptor Shaft Site.
- 2.6. In making its submission, Watercare has considered the relevant provisions of the Auckland Plan 2050, the Long-term Plan 2024-2034 (10-year Budget), Watercare's Statement of Intent 2024-2027, the Future Development Strategy (FDS), the Water Supply and Wastewater Network Bylaw 2015, the Water and Wastewater Code of Practice for Land Development and Subdivision, the Watercare Business Plan 2025-2034 (10-Year Business Plan), and the Watercare Asset Management Plan FY25-34. Watercare has also considered the relevant RMA documents including the AUP and the National Policy Statement on Urban Development 2020 (**NPS-UD**).
- 2.7. It is noted that any infrastructure delivery dates provided in this submission below are forecast dates only and are subject to change.

**Specific parts of PPC 111 this submission relates to**

- 2.8. Watercare's submission relates to PPC 111 in its entirety.
- 2.9. Without limiting the generality of paragraph 2.8 above, Watercare has a particular interest in:
- a) the actual and potential effects of PPC 111, if approved, on Watercare's existing and planned water and wastewater networks and the service Watercare provides;
  - b) the proposed precinct provisions insofar as they relate to flooding / stormwater, water supply and wastewater servicing (and the absence of such provisions in the case of Block 1);
  - c) the proposed stormwater management approach;
  - d) assessment of flooding effects;
  - e) proposed mitigation measures; and
  - f) protection of critical infrastructure.

**Specific reasons for submission**

2.10. Without limiting the generality of the matters raised above, Watercare makes the following further / specific submissions.

**Sequencing of development**

2.11. Watercare’s bulk infrastructure programme is planned, funded and sequenced in line with the Auckland Plan 2050, the Auckland Council Development Strategy (this is currently the FDS, which replaced the Future Urban Land Supply Strategy 2017 in December 2023), the Auckland Council Growth Scenario (**AGS**), and the AUP.

2.12. The PPC 111 area is located within the Whenuapai East future urban area. The FDS states that the timing for the delivery of the bulk infrastructure for the Whenuapai East future urban area is not before 2035+.<sup>2</sup>

2.13. Appendix 6 of the FDS identifies the infrastructure prerequisites that enable the development of the future urban areas. This Appendix states:<sup>3</sup>

... The timing of the live-zoning future urban areas spans over 30 years from 2023 – 2050+ and is necessary in acknowledging the council’s limitations in funding infrastructure to support growth. Distributing the live zoning of future urban areas over this timeframe enables proactive planning in an orderly and cost-efficient way, ensuring the areas are supported by the required bulk infrastructure and able to deliver the quality urban outcomes anticipated in this FDS.

2.14. Relevant to wastewater and water infrastructure, the Whenuapai Wastewater Package 2 (Southern portion only), the Trig Road Water Reservoir, and the North Harbour 2 Watermain Project are listed in Appendix 6 of the FDS as being infrastructure prerequisites for the Whenuapai East future urban area:<sup>4</sup>

Whenuapai East	<b>Not before 2035+</b>	Brigham Creek Road upgrade SH16 to SH18 Connections Hobsonville Road Upgrade Upper Harbour (SH18) Rapid Transit Whenuapai Wastewater Package 2 (Southern portion only) Trig Road Water Reservoir, North Harbour No.2 Watermain Project
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2.15. Based on Watercare’s current infrastructure assessment (superseding Watercare’s memorandum dated 31 January 2025), the following is required to service the PPC 111 Area:

<sup>2</sup> The Auckland Future Development Strategy 2023-2053, Appendix 7: Future urban area summary – Whenuapai and Red Hills, at page 49.

<sup>3</sup> The Auckland Future Development Strategy 2023-2053, Appendix 6: Future urban infrastructure prerequisites, at page 35.

<sup>4</sup> The Auckland Future Development Strategy 2023-2053, Appendix 6: Future urban infrastructure prerequisites, at page 39.

- a) **Bulk wastewater servicing:** Bulk wastewater servicing for PPC 111 relies on the existing local gravity line draining to WWPS 68. Currently, WWPS 68 has constrained capacity due to downstream limitations at WWPS 70. The capacity constraints at WWPS 68 will only be alleviated following the diversion of WWPS 70 flows into the Northern Interceptor as part of the planned Rosedale Northern Interceptor Integration project, which will address capacity constraints at WWPS 70 and therefore enable WWPS 68 to accommodate additional flow. This project is currently under construction with commissioning expected by **late 2026**. The Applicant's Civil Infrastructure Report for Block 2 notes that the Northern Interceptor needs to be completed for confirmation of wastewater servicing. Until this diversion is complete, WWPS 68 does not have the available capacity to service any additional demands that would be generated by development in the PPC 111 Area.
- b) **Bulk water supply servicing:** The PPC 111 Area cannot be supported with water until the North Harbour 2 Watermain (**NH2W**) is complete. The existing North Harbour 1 Watermain is already under significant pressure serving West Auckland, the Upper North Shore, and the Hibiscus Coast, with water pressure affected during peak periods. While the Trig Road Water Reservoir will help balance peak demands, it is the NH2W that is the primary infrastructure requirement to support growth. While NH2W is currently forecast for completion **in 2034**, there are risks associated with its delivery timeline, and this could extend **beyond 2035**.

- 2.16. The bulk infrastructure upgrades described above would be necessary prerequisites for any development enabled by PPC 111, if it is approved. However, the current timeline indicates bulk wastewater infrastructure will not be available until 2026/27 at the earliest, and bulk water supply infrastructure not until 2034 at the earliest (and potentially 2035+).
- 2.17. Watercare opposes PPC 111 as it is materially out-of-sequence with the timing for development set out in the FDS, and therefore out-of-sequence with when Watercare is planning to provide bulk infrastructure for this area. Taking into account the typical 10-year planning horizon for RMA plans,<sup>5</sup> Watercare notes that this development proposal comes a decade before essential water supply infrastructure would be available (at the earliest).
- 2.18. Connecting the PPC 111 Area out of sequence with the timing planned under the FDS and AGS will jeopardise Watercare's ability to service planned growth in the wider areas supported by the NH2W. Where out-of-sequence plan changes are approved and land is live-zoned earlier than anticipated under the FDS and the AGS, the actual growth rate may become steeper than the AGS projection, causing the capacity of Watercare's infrastructure to be taken up faster than the programmed or future upgrades can be delivered. This directly impacts Watercare's ability to service existing customers and planned growth in already live-zoned areas.
- 2.19. Watercare does not support out-of-sequence development that might put pressure on Watercare to reprioritise or reallocate funding in the Watercare Asset Management Plan.

<sup>5</sup> See e.g. section 79 of the RMA.

If this were to occur, other projects – such as infrastructure for other growth areas, or renewals and upgrades required to ensure level of service and/or improved environmental outcomes – may need to be deprioritised.

- 2.20. Where funding reallocation is not possible and connections are granted, existing and planned infrastructure capacity may be taken up faster than planned, resulting in constraints to growth in live zoned areas (i.e. areas with operative urban zoning). In addition, approval of out-of-sequence growth results in considerable additional operational costs being brought forward. This cost would be borne by all Aucklanders who are connected to Watercare’s water and wastewater networks.
- 2.21. While PPC 111 proposes a suite of water and wastewater-related precinct provisions in recognition of the water and wastewater constraints applying to the development of Block 2, those provisions are insufficient to address Watercare’s concerns, and do not address its concerns in relation to Block 1.

### ***Structure Planning***

- 2.22. The 2016 Whenuapai Structure Plan was developed to show the arrangement of various land uses and infrastructure, and how the area connects to adjacent urban areas and wider infrastructure networks. The Whenuapai Structure Plan is intended to guide future development by coordinating and defining the land use patterns and the location, distribution and integration of this infrastructure. The Structure Plan was intended to form the basis of changes to the AUP through a plan change process. Council is currently updating the 2016 Whenuapai Structure Plan and public consultation is not anticipated to occur until August / September 2025.
- 2.23. The Structure Plan indicates 100 Hobsonville Road as being zoned for Medium Density residential development (not as THAB), while 84 Hobsonville Road falls just outside of the Structure Plan boundary to the east of 100 Hobsonville Road.

### ***Yield***

- 2.24. PPC 111 proposes between 165 and 335 new dwellings, depending on the yield scenario applied. Importantly, the higher end of the proposed yield range significantly exceeds density assumptions currently adopted in Auckland Council’s AGS. If densities similar to those at the higher end of the proposed range are replicated across the wider catchment, existing and planned water supply and wastewater infrastructure (through to full build out of the FDS) could become constrained, hindering full servicing of the catchment and potentially necessitating unplanned, costly infrastructure upgrades or expansions.

### ***Infrastructure integration***

- 2.25. The NPS-UD and AUP Regional Policy Statement (**RPS**) both emphasise the importance of integrating urban development with infrastructure planning and funding decisions. Objective 6 of the NPS-UD specifically requires that decisions on urban

development integrate with infrastructure planning and funding decision. The AUP Objective B3.2.1(5) requires that infrastructure and land use planning are integrated to service growth efficiently. PPC 111, being out-of-sequence with planned infrastructure delivery timelines and by proposing densities that exceed current AGS assumptions and therefore have not been planned for, does not give effect to these policy directives. Without clear alignment and appropriate sequencing, PPC 111 risks undermining the effectiveness, resilience, and efficiency of existing and planned public water and wastewater infrastructure investments.

### ***Local networks***

- 2.26. Watercare records that, if PPC 111 is approved and made operative, the local water supply and wastewater network upgrades required to support the plan change would be assessed at the time of resource consent application and engineering plan approval. These local network upgrades are the responsibility of the developer to deliver at their cost.

### ***Cumulative infrastructure impacts***

- 2.27. Watercare is particularly concerned about the cumulative infrastructure impacts arising from multiple out-of-sequence private plan changes within the wider wastewater catchments and water supply zones, notably PPC 100 (Riverhead), PPC 109 (98-100 & 102 Totara Road, Whenuapai), PPC 107 (Whenuapai Business Park), PPC 86 (41-43 Brigham Creek Road, Whenuapai) and the current PPC 111 proposal. In this context, Watercare also notes the potential for further out-of-sequence private plan changes in the area to be notified in the near future.
- 2.28. If this type and scale of out of sequence development is approved and connections are granted to the public water supply and wastewater networks, reallocation of funding would be required to provide the required new and/or upgraded bulk water supply and/or wastewater services, which would impact the delivery of other planned infrastructure.
- 2.29. Where funding reallocation is not possible, which is most likely the scenario given Watercare's obligations to the Council to deliver infrastructure in line with the FDS and obligations under economic regulation, and connections are granted, existing and planned infrastructure capacity would be taken up faster than planned, resulting in constraints to growth in live-zoned areas (i.e. areas with operative urban zoning).
- 2.30. In addition to the multiple out-of-sequence private plan changes, Watercare is already concerned with the extent of live-zoned land existing within the wider wastewater catchments and water supply zones. This live-zoned land has substantial development capacity enabled by the AUP that is well beyond the existing capacity of the bulk water supply and wastewater networks. Watercare considers it would be appropriate for Council to assess and quantify the existing development capacity of live-zoned land within the relevant wastewater catchments and water supply zones to better inform consideration of PPC 111.

### ***Flooding / stormwater management***

- 2.31. PPC 111 proposes to apply the AUP Stormwater Management and Flow 1 Overlay (SMAF1) provisions to Blocks 1 and 2. There are no additional stormwater controls proposed.
- 2.32. The downstream environment includes Rawiri Stream and Trig Stream which converge to form the Waiarohia Stream. The site for the proposed Northern Interceptor Shaft at 27 Trig Road is immediately adjacent to Trig Stream. WWPS 68 is located adjacent to the Waiarohia Stream at 161 Brigham Creek Road. These sites, which are shown on the aerial image below (reproduced from the Applicant's SMP), have been identified as being at risk of increased flooding due to the proposed PPC 111 development:<sup>6</sup>

*Figure 1 Downstream flood risk and Watercare infrastructure*



**FIGURE 23. PROPERTIES IDENTIFIED AS BEING AT RISK OF FLOODING.**

### Effects on WWPS 68

- 2.33. The proposed development is assessed in the Applicant's Stormwater Management Plan (**SMP**) as increasing the flooding risk at WWPS 68 by an estimated 10mm<sup>7</sup>. Given that WWPS 68 is critical wastewater infrastructure, the adverse effects (including cumulative effects) are considered to be potentially significant and must be fully mitigated to ensure no increased flood risk would arise from PPC 111, if it is approved.
- 2.34. Prior to notification of PPC 111, Healthy Waters expressed concerns – which Watercare shares – about the SMP, the precinct provisions and downstream flooding effects<sup>8</sup>.

<sup>6</sup> PC 111 – Appendix 9a – Stormwater Management Plan – Figure 23 available at:

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc111-appendix-9a-stormwater-management-plan-SMP.pdf>

<sup>7</sup> Table 7, Austino Blocks 1 and 2 Investigations – 84, 88, 90 and 100 Hobsonville Road Stormwater Management Plan by Harrison Grierson November 2024 (Document number R002-A2212330-SMP-RJK): 34.

<sup>8</sup> Te Komiti mō te Kaupapa Here me te Whakamahere / Policy and Planning Committee OPEN AGENDA at paragraph 80(c) Item 10

Watercare is particularly concerned about the potential downstream flooding impacts on its existing and future assets and the lack of mitigation.

- 2.35. The Applicant's SMP is supported by a modelling report prepared in 2012, which substantially predates current guidance for assessing rainfall runoff and climate change scenarios. Due to its outdated assumptions, this modelling:
- a) May understate potential flood level increases;
  - b) Uses land use scenarios that may not reflect the impervious surfaces planned by PPC 111;
  - c) Has not properly assessed the risks to Watercare's existing and planned infrastructure; and
  - d) Has failed to propose methods to avoid, remedy or mitigate adverse effects on WWPS 68 and the planned Northern Interceptor Shaft at 27 Trig Road from the development that would be enabled by PPC 111.
- 2.36. Watercare does not agree with the Applicant's current assessment that any adverse flooding / inundation effects from PPC 111 development on WWPS 68 will be less than minor.
- 2.37. Recent events, particularly the January 2023 floods which damaged the Wairau Valley pump station, have demonstrated that allowing development to increase flood risk and inundation risk to pump station buildings is unacceptable because:
- a) Pump station electronics are highly vulnerable to flood damage;
  - b) Once water enters electrical systems, the pump station becomes inoperable;
  - c) Pump failure can lead to wastewater overflow, with serious environmental and public health consequences;
  - d) Recovery from flood damage can take days, during which time raw sewage may flow to waterways;
  - e) The costs of repair and environmental cleanup are substantial;
  - f) Even modest flooding can prevent effective operation. For example:
    - i. Staff may not be able to safely access the pump station for operation and maintenance; and

on 44 available at:

[https://urldefense.com/v3/https://infocouncil.aucklandcouncil.govt.nz/Open/2025/02/20250220\\_PEPCC\\_AGN\\_11325.PDF\\_!!JcuPmubLuqHOewrctw!EyV0vN68qWs1Pi7ZlyKcad7jNqMJnldZGbZsTIDA0zyJgfvxwJA73j5SKht7WEe\\_L3qskkW1bt5MMcirsMRzhGvBr\\_HTVsTT68vGLk1XS4\\$](https://urldefense.com/v3/https://infocouncil.aucklandcouncil.govt.nz/Open/2025/02/20250220_PEPCC_AGN_11325.PDF_!!JcuPmubLuqHOewrctw!EyV0vN68qWs1Pi7ZlyKcad7jNqMJnldZGbZsTIDA0zyJgfvxwJA73j5SKht7WEe_L3qskkW1bt5MMcirsMRzhGvBr_HTVsTT68vGLk1XS4$)

ii. Emergency response becomes difficult when access routes are submerged.

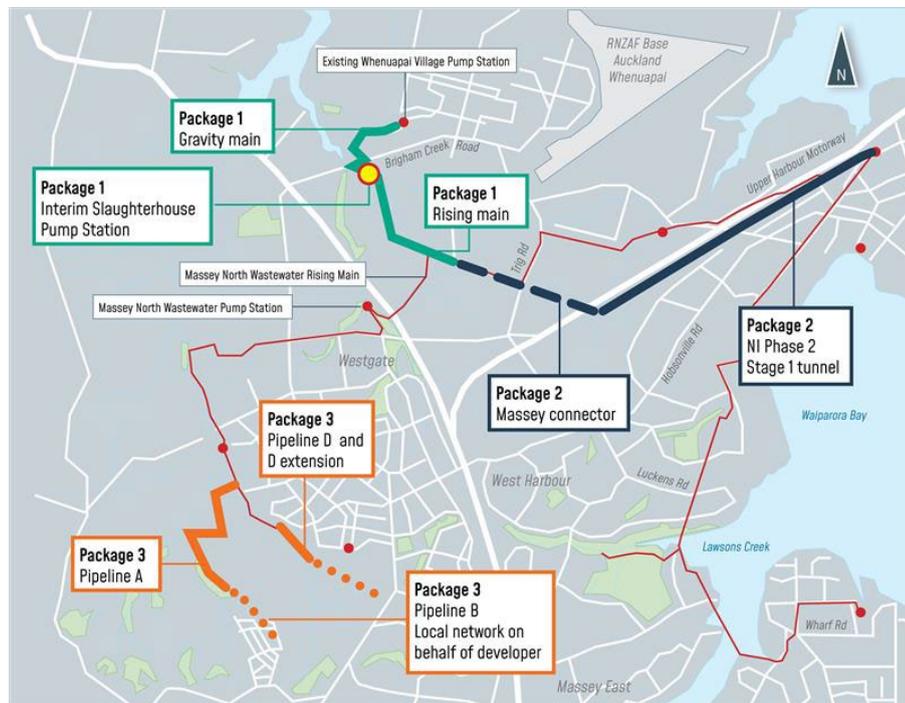
2.38. The Applicant has not proposed any mitigation measures to prevent additional flooding of WWPS 68, which is inadequate given the matters traversed above.

Effects on the Northern Interceptor Shaft Site

2.39. To service future growth in the Whenuapai and Redhills area, Watercare has developed Whenuapai Wastewater Package 2 which includes the new Northern Interceptor Shaft. The Northern Interceptor Shaft will convey flows from developing areas to the existing Rosedale WWTP, and enable the connection of existing and proposed sewer lines, as well as diverting flows towards Rosedale WWTP. Watercare is due to start construction of the Whenuapai Wastewater Package 2. The tendering process is not complete yet, but the designs are. At this stage, it is anticipated that these works will be completed by 2028/2029.

2.40. The image below shows the alignment of the Northern Interceptor Tunnel and the location at which it will connect to the Massey connector. The planned location and alignment for the Northern Interceptor Tunnel means there is a functional and operational need for the Northern Interceptor Shaft to be constructed and operated at the Northern Interceptor Shaft Site owned by Watercare at 27 Trig Road.

Figure 2 Planned Watercare Infrastructure



2.41. The Applicant’s modelling predicts a 70mm flood depth increase at 27 Trig Road. The image below, taken from the proposed SMP provided by the Applicant, illustrates the extent of the inundation that will occur at 27 Trig Road if the flood depth increases by

0.07m.<sup>9</sup> Flood levels at the site affecting planned infrastructure will increase with each development in the stormwater catchment.

Figure 3 Applicant's modelling of extent of inundation at 27 Trig Road



FIGURE 24. FLOOD DEPTH DIFFERENCE AT 27 TRIG ROAD IN THE 1% AEP 3.8° (CC).

- 2.42. The Applicant's SMP may understate the potential flood level increases and requires updating. Effects on infrastructure need to be specifically assessed with current climate change and rainfall predictions.
- 2.43. Auckland Council's GIS (GeoMaps) shows a modelled stream on the eastern side of the site with two overland flow paths between the stream and the eastern site boundary. There is a flood plain associated with the stream, indicating approximately 2/3 of the site is affected by flooding. Any rise in the existing natural flood levels at the Northern Interceptor Shaft Site is a concern for Watercare's construction delivery and operations teams. Increased flood levels need to be assessed and mitigated accordingly. Stormwater ingress creates an increased risk of sewage overflows, particularly where stormwater ingress increases flows to the downstream pump station and associated treatment plants.
- 2.44. The Applicant has not proposed any mitigation measures / methods to avoid flooding of the Northern Interceptor Shaft Site, which is inadequate given:
- a) The matters traversed above; and
  - b) The large impervious areas proposed under the Light Industry zoning in Precinct 1 and the residential zonings in Precinct 2 will result in large increases in surface runoff, likely exacerbating flood risks in an area where 27 Trig Road is already vulnerable to flooding and increases in flood depth as a result of the PPC 111 development may adversely impact planned infrastructure.

<sup>9</sup> PC 111 – Appendix 9a – Stormwater Management Plan – Figure 24 available at:

<https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc111-appendix-9a-stormwater-management-plan-SMP.pdf>

- 2.45. The Applicant's assessment is that the effects on the Northern Interceptor Shaft Site are less than minor as there are no buildings on this site. Watercare does not agree with the Applicant's assessment, and notes that no assessment has been completed on the effects of flooding on the planned Northern Interceptor shaft.
- 2.46. Watercare considers that potentially material adverse effects will arise. The Northern Interceptor Project is a critical part of the planned overall bulk infrastructure network. Over the next 10 years, wastewater flows from a population in the order of 160,000 people are planned to be diverted from the Mangere WWTP via the Northern Interceptor to utilise available capacity at the Rosedale WWTP. Watercare needs to retain the ability to use 27 Trig Road for its intended purpose to enable the Northern Interceptor to be delivered and to become operational as planned. Any flooding at the Northern Interceptor Shaft Site may materially adversely affect the construction and operation of the Northern Interceptor Shaft and the overall bulk infrastructure network.

#### Inconsistency with AUP provisions

- 2.47. PPC 111 fails to give effect to key higher-order provisions of the AUP, including (for example and without limitation):
- a) Objective B10.2.1(3): *"New subdivision, use and development avoid the creation of new risks to people, property and infrastructure."*

#### **Comment:**

- PPC 111 will potentially create new flood risks to critical infrastructure – WWPS 68 and the planned Northern Interceptor Shaft – contrary to this objective.
  - PPC 111 will have potentially significant adverse effects on critical wastewater infrastructure through increased flood risks. The proposed development may constrain the operation of WWPS 68 by increasing flood risks and potentially compromising the WWPS's ability to function during flood events and hindering access for maintenance and emergency response. It may also constrain the construction and operation of the Northern Interceptor Shaft, which is required to serve as a crucial point for connecting wastewater infrastructure.
- b) Policy B10.2.2(3): *"Ensure the potential effects of climate change are taken into account when undertaking natural hazard risk assessments."*

#### **Comment:**

- The Applicant's flood assessment fails to properly account for climate change, contrary to this policy.
- c) Policy B10.2.2(6): *"Adopt a precautionary approach to natural hazard risk assessment and management in circumstances where: (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, and also sea level rise over at least 100 years; or (b) the level of information on the probability and/or impacts of the hazard is limited."*

**Comment:**

- Given the uncertainties and inconsistencies identified above in relation to the flood assessment work, a precautionary approach is required by this policy.
- d) Policy B10.2.2(12): *"Minimise the risks from natural hazards to new infrastructure which functions as a lifeline utility by: (a) assessing the risks from a range of natural hazard events including low probability but high potential impact events ..."*

**Comment:**

- The Northern Interceptor is planned new infrastructure. Therefore, the risks from natural hazards on the Northern Interceptor must be minimised.
- e) Objective E26.2.1(1) – *The benefits of infrastructure are recognised.*

Objective E26.2.1(2) – *The value of investment in infrastructure is recognised.*

Objective E26.2.1(3) – *Safe, efficient and secure infrastructure is enabled, to service the needs of existing and authorised proposed subdivision, use and development.*

Policy E26.2.2(2) – *Provide for the development, operation, maintenance, repair, upgrade and removal of infrastructure throughout Auckland by recognising:*

- (a) functional and operational needs;*
- (b) location, route and design needs and constraints;*
- (c) the complexity and interconnectedness of infrastructure services;*
- (d) the benefits of infrastructure to communities within Auckland and beyond;*
- (e) the need to quickly restore disrupted services;*
- (f) its role in servicing existing, consented and planned development.*

Policy E26.2.2(3) – *Avoid where practicable, or otherwise remedy or mitigate adverse effects on infrastructure from subdivision, use and development, including reverse sensitivity effects, which may compromise the operation and capacity of existing, consented and planned infrastructure.*

**Comment:**

- The value of investment in both the existing WWPS 68 and the planned Northern Interceptor Shaft at their respective locations needs to be recognised.

These are critical components of Auckland's wastewater infrastructure network, with WWPS 68 currently providing essential wastewater services and the Northern Interceptor Shaft planned as a key connection point in the regional wastewater system.

- Both infrastructure assets need to be appropriately protected from incompatible subdivision, use and development and protected from the adverse effects of development that would be enabled by PPC 111.

#### Cumulative flooding effects

- 2.48. Watercare is particularly concerned about the cumulative flooding effects arising from multiple private plan changes and developments within the wider stormwater catchment. While each plan change applicant may assess that their contribution to increased flooding is 'no more than minor', the modelled flood levels arising from Maximum Probable Development risk severely compromising the operation of existing and planned infrastructure. Therefore, each plan change applicant must assess their contribution to increased flooding and provide appropriate mitigation. Watercare notes that this mitigation may not be implemented within the plan change area, and that it may be possible that multiple developers contribute to a solution.
- 2.49. The combined scale of development enabled by these proposals significantly increases impervious surfaces, leading to cumulative stormwater runoff and flooding impacts on critical infrastructure.
- 2.50. These cumulative effects, especially when factoring in anticipated climate change impacts, present greater risks, including compromised operation of wastewater facilities, impeded emergency access, environmental harm from wastewater overflows, and increased infrastructure maintenance and repair costs. Accordingly, cumulative stormwater and flooding impacts from PPC 111 must be assessed comprehensively and robustly mitigated, if PPC 111 is approved, to ensure the sustainable management of Auckland's critical infrastructure.

#### Conclusion on flooding / stormwater management

- 2.51. In summary:
- a) The Applicant's stormwater modelling was undertaken over a decade ago and requires updating to reflect more recent land use changes, climate change predictions and new understandings of risk and risk management approaches resulting from recent flooding events in New Zealand.
  - b) Any increase in the existing natural flood levels at the Northern Interceptor Shaft Site and/or WWPS 68 is a concern for Watercare's construction, delivery and operations.
  - c) The combined impact of multiple developments in the catchment amplifies these

concerns, as each development contributes incrementally to the overall flood risk, potentially compromising the function of critical infrastructure that serves the wider Auckland region.

- d) PPC 111 fails to give effect to key provisions of the AUP, as outlined above.
- e) If PPC 111 were to be approved despite these significant concerns, the Applicant would need to implement comprehensive stormwater management measures to ensure no increase in flood levels beyond existing conditions. The current proposal lacks any such mitigation measures for protecting either WWPS 68 or the Northern Interceptor Shaft Site, rendering it inadequate to protect this critical infrastructure upon which the wider Auckland region depends.

### 3. DECISIONS SOUGHT

- 3.1. For the reasons stated in this submission, Watercare seeks that PPC 111 be declined in its entirety. The proposal is fundamentally premature, with essential water infrastructure not available for approximately a decade (potentially 2035+), and beyond the typical 10-year planning horizon for RMA plans. The area cannot be serviced with bulk water supply for the foreseeable future, creating unacceptable risks to service provision for both existing customers and growth in already live-zoned areas. Furthermore, the proposal fails to adequately assess and mitigate flooding impacts on critical downstream infrastructure that services the wider Auckland region.
- 3.2. This timing issue cannot be resolved through amendments to precinct provisions. If PPC 111 is approved – even with significantly strengthened precinct provisions applying to the entire PPC 111 area – unmeetable expectations will be raised giving rise to the kinds of risks described by the Environment Court in *Foreworld v Napier City Council*<sup>10</sup> (e.g. the risk that Council / Watercare is put under pressure to spend money committed elsewhere prematurely).
- 3.3. Watercare notes that, notwithstanding the fundamental timing issues that necessitate decline, the current precinct provisions are also deficient across all provision categories, including precinct description, objectives, policies, activity table rules, standards, matters of discretion, assessment criteria, special information requirements, and precinct plans. These deficiencies include, but are not limited to:
  - a) Complete absence of provisions addressing water and wastewater constraints for Block 1;
  - b) Insufficient objectives, policies and rules / controls to address infrastructure capacity impacts;
  - c) Inadequate provisions addressing flooding impacts on critical downstream infrastructure;

9.1

<sup>10</sup> *Foreworld v Napier City Council*, W8/2005, at pages 6-7.

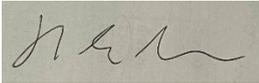
- d) Lack of comprehensive stormwater management requirements to ensure hydraulic neutrality;
- e) Inadequate recognition of climate change effects in flooding assessments.

3.4. While these deficiencies further support Watercare's position that PPC 111 should be declined, Watercare considers that the fundamental timing and sequencing issues mean PPC 111 is inappropriate regardless of any potential amendments to these provisions.

**4. APPEARANCE AT HEARING**

4.1. Watercare wishes to be heard in support of its submission.

29 April 2025



Helen Shaw  
**Head of Strategy and Consenting**  
**Watercare Services Limited**

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**From:** [Davies, Rebecca](#)  
**To:** [Unitary Plan](#)  
**Subject:** NZDF submission on PC 111 - Hobsonville Grove [unclassified]  
**Date:** Tuesday, 29 April 2025 5:12:12 pm  
**Attachments:** [240428 NZDF Submission.pdf](#)

---

Good afternoon,

Please see attached submission by the NZ Defence Force on Proposed Plan Change 111 (Private): Hobsonville Grove.

Ngā mihi,

**Rebecca Davies**

Principal Statutory Planner, Defence Estate and Infrastructure  
Te Ope Kātua o Aotearoa | New Zealand Defence Force

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**A FORCE FOR  
NEW ZEALAND**

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## Submission on Proposed Plan Change 111 (Private): Hobsonville Grove

*Clause 6 of First Schedule, Resource Management Act 1991*

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### General submission points

1. This is a submission by the New Zealand Defence Force ("NZDF") on Proposed Plan Change 111 (Private): Hobsonville Grove ("PC 111").
2. NZDF operates the Royal New Zealand Air Force (RNZAF) Base Auckland at Whenuapai, located to the northwest of the PC 111 area. RNZAF Base Auckland is a significant Defence facility, of strategic importance regionally, nationally and internationally. Ensuring that this facility can continue to operate to meet Defence purposes under section 5 of the Defence Act 1990 is critical. Defence purposes include the defence of New Zealand, the provision of assistance to the civil power either in New Zealand or elsewhere in times of emergency, and the provision of public service when required. RNZAF Base Auckland is essential to achieving these purposes.
3. The objectives and policies in the Auckland Unitary Plan Regional Policy Statement (RPS) provide a strong policy direction for the protection of infrastructure. Policy B3.2.2(4) seeks to "avoid", where practicable adverse effects on infrastructure in the first instance, or otherwise remedy or mitigate. Policy B3.2.2(5) seeks to "ensure" development "does not constrain" the operation and upgrading of existing infrastructure. PC 111 therefore needs to give effect to these objectives and policies by ensuring appropriate provisions are included in the AUP.

4. NZDF wishes to ensure that the proposed development (including construction activity) is undertaken in a way that does not adversely affect NZDF's ability to safely carry out military and aircraft operations from RNZAF Base Auckland. NZDF's main concerns regarding PC 111 include:
  - a. Obstacle/structure heights;
  - b. Bird strike risk; and
  - c. Lighting and glare (reflectivity).

**Obstacle/Structure Heights: Designation 4311 (Whenuapai Airfield Approach and Departure Path Protection)**

5. The location of the area subject to PC 111 ("PC 111 area") is within Minister of Defence Designation 4311 "Whenuapai Airfield Approach and Departure Path Protection" (Designation 4311) which applies to the airspace in the vicinity of RNZAF Base Auckland. The purpose of the designation is "Defence purposes (as defined by section 5 of the Defence Act 1990) – protection of approach and departure paths".
6. Designation 4311 requires that no obstacle shall penetrate the approach and departure path obstacle limitation surfaces (OLS) (as shown on the planning maps and described in the designation) without the prior approval in writing of NZDF. NZDF will not approve any permanent breaches of the OLS.
7. NZDF understands that PC 111 anticipates a maximum total building height of up to 12m (including roof structures).
8. The separation distance between ground level and the OLS ranges between approximately 16 - 54m above mean sea level across proposed Block 2 (Precinct 2) and 4 – 26m across Block 1 (Precinct 1). This is indicative only and needs to be formally surveyed. The Assessment of Environmental Effects does not include a contour map to confirm the separation distance between ground level and the OLS, however, this needs to be provided in order to determine the feasibility of proposed zoning and the ability to construct structures to the heights sought through PC 111 ( including the viability of Terraced Housing and Apartment Building zoning in the location proposed, and the proposed heights of structures in Block 1 (Precinct 1)).
9. In addition to permanent structure heights, there is the potential for cranes, or other construction equipment to be an issue in terms of conflict with height restrictions established by the OLS during construction. NZDF wishes to highlight that any proposed intrusion into the OLS, including temporary intrusions required for construction equipment including cranes, will require prior written approval from NZDF in accordance with the requirements of Designation 4311. Parties proposing a temporary intrusion into the OLS must also notify the Civil Aviation Authority (CAA) under Part 77 CAA Rules (Objects and Activities Affecting Navigable Airspace).
10. Unapproved crane use within the OLS is a major safety risk, and has a significant impact on flight operations, which can cause the unplanned closure of the RNZAF Base Auckland runway, which constrains the overall use of RNZAF Base Auckland. Whilst Designation 4311 should prevent this occurring, there have been many instances where NZDF has not been notified prior to the operation of cranes or erection of other temporary structures within the OLS. Incorporating provisions into the Precinct is therefore necessary to avoid risk to flight safety and operations, and will increase visibility and awareness of the OLS.
11. NZDF seeks amendments to PC 111 to specifically reference the OLS and

requirements under Designation 4311. Specific relief sought is set out in the attached table.

### **Bird Strike Risk**

12. Bird strike is a significant safety risk for aircraft operating from RNZAF Base Auckland. Urban areas can attract certain adaptable bird species, which pose hazards to aircraft safety. Effective management strategies are therefore crucial. Off-Base land use activities can attract birds and wildlife, and undermine wildlife and bird hazard management activities undertaken on-Base. NZDF is concerned about increased bird strike risk and hazard to aircraft operations resulting from habitat changes in the vicinity of RNZAF Base Auckland, and seeks measures to avoid bird strike risk through engagement in resource consent and Plan Change applications.
13. Current bird species of concern include black-backed and red-billed gulls, starlings, spur-winged plovers, Canada geese, mallard ducks, paradise shelducks, rock pigeons, and harrier hawks.
14. Civil Aviation Rule 139.71 (Wildlife Hazard Management) addresses the control of bird hazards, and is supported by Civil Aviation Advisory Circular (AC) 139-16 Wildlife Hazard Management at Aerodromes. AC 139-16 covers implications of land use activities near aerodromes and identifies that particularly severe problems arise when birds make regular flights across an aerodrome (e.g. when they fly between roosts and feeding areas).
15. Risks arise from (but are not limited to) wetland areas, and open water elements (including rain gardens, stormwater treatment, sediment retention ponds, swales, amenity ponds and plantings).
16. NZDF requests provisions to avoid bird strike risk including in relation to stormwater treatment (such as ponds and swales), and sediment retention ponds to be designed to avoid attracting birds, including no new areas of open/standing water within the PC 111 area.

10.2

### **Lighting and glare (reflectivity)**

17. Lighting at night can create a safety risk for aircraft if it mimics runway lighting or causes distraction to pilots. In addition, reflective building materials can reflect sunlight and create glare, impairing the vision of pilots by causing a sunstrike effect.
18. NZDF requests specific provisions relating to lighting, glare and reflectivity in order to avoid safety risks to aircraft.

10.3

### **Relief sought**

19. The matters above identify NZDF's broad submission points on PC 111. In addition, and to further assist (but not limit the points above), specific provisions NZDF wishes to see amended in PC 111 are set out in the attached table. NZDF seeks relief that addresses the points above, as well as in the attached table, including any such further alternative or consequential relief as may be necessary to fully give effect to this submission. NZDF is open to further discussion with the applicant on the matters raised in this submission.

10.1

NZDF **could not** gain an advantage in trade competition through this submission.

NZDF **wishes to be heard** in support of this submission.

If others make a similar submission, **NZDF will consider** presenting a joint case with them at the hearing.

A handwritten signature in black ink, appearing to read 'M. Davis'.

29/04/2025

Date

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Person authorised to sign  
on behalf of New Zealand Defence Force

The following table sets out relief sought by NZDF in relation to specific amendments to the provisions of PC 111 (shown in underline and ~~strikethrough~~) and further reasons for NZDF's support or opposition to these provisions, in addition to those set out in the body of this submission (above).

Point	Provision	Support/ Oppose	Reasons	Relief Sought* *While this column identifies specific relief sought, additional or consequential amendments, or wording to similar effect, may be required in order to address the points raised by NZDF in the broad submission above or the specific points below.
1.	I1.1 Precinct Description	Oppose in Part	<p>The proposed Precinct is subject to Designation 4311. Designation 4311 requires that no obstacle (permanent or temporary) shall penetrate obstacle limitation surfaces (OLS) without prior written approval from NZDF.</p> <p>PC 111 is required to give effect to the RPS objectives and policies by ensuring appropriate provisions are included in the AUP to protect this existing infrastructure.</p> <p>For clarity, NZDF considers that the existence of the designation and its requirements should be referenced in the Precinct chapter, including in the description.</p>	<p>Amend the Precinct chapter to reference Designation 4311 requirements.</p> <p>Amend I1.1 Precinct description to add a sentence referencing Designation 4311 (additions underlined):</p> <p>...</p> <p><u>Development in the precinct is subject to height restrictions identified in Designation 4311.</u>  <u>Permanent structures must not infringe the Obstacle Limitation Surfaces (OLS) identified in Designation 4311. The use of temporary structures and construction equipment, is also subject to height restrictions under Designation 4311. Prior written approval from the New Zealand Defence Force is required for proposed infringement of any such height restrictions.</u></p>
2.	II1.4.1 Activity Table	Oppose in part	<p>The proposed Precinct is subject to Designation 4311. Designation 4311 requires that no obstacle (permanent or temporary) shall penetrate the approach and departure path obstacle limitation surfaces (OLS).</p>	<p>Amend II1.4.1 Activity table to add a sentence referencing Designation 4311 (additions underlined):</p> <p><u>Note 3</u></p>

10.4

10.5

Point	Provision	Support/ Oppose	Reasons	Relief Sought* *While this column identifies specific relief sought, additional or consequential amendments, or wording to similar effect, may be required in order to address the points raised by NZDF in the broad submission above or the specific points below.
			<p>PC 111 is required to give effect to the RPS objectives and policies by ensuring appropriate provisions are included in the AUP to protect this existing infrastructure.</p> <p>For clarity, NZDF considers that the existence of the designation and its requirements should be referenced above the Activity table.</p>	<p><u>Development in the precinct is subject to height restrictions identified in Designation 4311. Permanent structures must not infringe the Obstacle Limitation Surfaces (OLS) identified in Designation 4311. The use of temporary structures and construction equipment, is also subject to height restrictions under Designation 4311. Prior written approval from the New Zealand Defence Force is required for proposed infringement of any such height restrictions.</u></p>

10.5  
cont.