

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

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



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Miss Tara Indira Deobhauka

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

Address for service of Submitter

27 Domett Ave.

Telephone: 021 225 4848 Fax/Email: taradeobhauka@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 21

Plan Change/Variation Name 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

The specific provisions that my submission relates to are:

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

Plan provision(s) All of them

Or

Property Address

Or

Map

Or

Other (specify)

Submission

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

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes No

Submission no 117

The reasons for my views are: Hazardous to the environment, will no doubt cause damage to the surrounding houses and affect wildlife. local residents will be affected by the increased noise, causing large disruption. School children will also be affected greatly due to the numerous amount of schools located around the ~~area~~ (continue on a separate sheet if necessary) area.

I seek the following decision by Council:

- Accept the proposed plan change / variation
- Accept the proposed plan change / variation with amendments as outlined below
- Decline the proposed plan change / variation
- If the proposed plan change / variation is not declined, then amend it as outlined below.

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at a hearing

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

17 / 04 / 19
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 no 117

ATTACHMENT – Reasons for Submission

1. **I/we oppose** Proposed Plan Change 21 (PC 21-private) for the following reasons:
 - (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
 - (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
 - (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
 - (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
 - (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
 - (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
 - (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

Submission no 117

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 117

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).

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.

How to Submit

1. Use the attached Auckland Council form and post to

Auckland Council, Unitary plan, Private Bag 92300, Auckland 1142 ;
Attention Planning Technician

2. In person using attached Auckland Council form to Auckland libraries or offices

3. Online

Search 'Auckland Council Plan change PC 21'. The link will come up.

4. By e mailing attached Auckland Council form to

unitaryplan@aucklandcouncil.govt.nz

SUBMIT BEFORE 5PM 18TH APRIL

18 APR 2019

Submission no 118

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Carlton Brown
Date: Thursday, 18 April 2019 11:45:42 AM

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Carlton Brown

Organisation name:

Agent's full name:

Email address: carltonbro@gmail.com

Contact phone number: 0275363275

Postal address:
1 Shipherds Close
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
PC 21"

Property address: 3 Brightside Road, 149,151,153 Gillies Avenue, Epsom"

Map or maps:

Other provisions:
The entire Plan Change"

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

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

The reason for my or our views are:
See attachments

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

Submission date: 18 April 2019

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?

Submission no 118

Yes

Declaration

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

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

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

Yes

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

Submission no 118

ATTACHMENT -- Reasons for Submission

1. **I/we oppose** Proposed Plan Change 21 (PC 21-private) for the following reasons:
 - (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
 - (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
 - (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
 - (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
 - (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
 - (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
 - (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and

Submission no 118

purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 118

I have lived at 1 Shipherds close for over nine years.

The main reason I chose this area is because it is a really quite and safe neighborhood.

My home is built from plaster and according to reports will suffer damage from the continuous work being done over the next couple of years.

The increased traffic from construction vehicles and random strangers wandering the neighborhood will see an increase in home burglaries and a loss of that feeling Of safety.

This Epsom area is unique and has a special feel which will be ruined by such a development. Why would a city destroy an area like this with such a development.

A building 25 meters high in this neighborhood is visual graffiti and belongs in a commercial setting.

So it is difficult to comprehend how anyone, anywhere could assume that this type of building would be appropriate for this area.

We would lose the peace and quite enjoyment we now take for granted please do not allow this.



Submission no 119

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Auckland Grammar School Board of Trustees
Date: Tuesday, 16 April 2019 10:46:00 AM

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Auckland Grammar School Board of Trustees

Organisation name:

Agent's full name:

Email address: p.gargiulo@ags.school.nz

Contact phone number: 09 6235630

Postal address:

Private Bag 99930 Newmarket Auckland 1149

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:

The entire Plan change

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

Heath and Safety implications for the students of Auckland Grammar School

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

Submission date: 16 April 2019

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

Submission no 119

Declaration

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

Are you directly affected by an effect of 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.

ATTACHMENT -- Reasons for Submission

1. **I/we oppose** Proposed Plan Change 21 (PC 21-private) for the following reasons:
 - (a) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
 - (b) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
 - (c) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 120

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Alister Ross Prew
Date: Wednesday, 17 April 2019 4:00:18 PM
Attachments: [personal reasons \(2\).pdf](#)
[personal reasons \(1\).pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Alister Ross Prew

Organisation name:

Agent's full name:

Email address: alisterprew@hotmail.co.nz

Contact phone number: 02040767622

Postal address:
63 Epsom Ave
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
the entire plan change

Property address: 3 Brightside Road and 149, 151 and 153 Gillies Ave, Epsom

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:
see attachments

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

Submission date: 17 April 2019

Supporting documents
personal reasons (2).pdf
personal reasons (1).pdf

Attend a hearing

Submission no 120

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

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

Declaration

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

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

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

Yes

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

Submission no 120

1. In addition, I also have these concerns :

- (i) Our family has lived in the Mt Eden/Epsom since 1973, and in our present house since 1984 (35 years).
- (ii) What I really like about the area is that it is central and retains the character of the original Mt Eden settlement. It has a reasonable amount of older housing stock and has a fair number of mature trees.
- (iii) I am very concerned that commercial interests can intrude on a well-established residential area.
- (iv) I do not like the fact that the rules are so maleable that developers and any one else who wants a change thinks the prospects of being successful make it worth their while applying for changes and putting neighbours and residents to the expense of resisting such changes. In my own case we spent more than \$12,000 on a planner and architect, and had the services of a QC without cost, in relation to an application lodged by our neighbour. We got very minor changes to the neighbour's design and were not happy with having to spend the money or having so little to show for it.
- (v) I do not understand how anything that is up to 25 metres tall can be considered “appropriate” within a residential area with no more than 8 metre tall dwellings. This has to be considered an unacceptable visual intrusion that will be highly visible from many directions, and in-turn inflict privacy issues across a large outlook area.

Submission no 120

ATTACHMENT -- Reasons for Submission

1. **I/we oppose** Proposed Plan Change 21 (PC 21-private) for the following reasons:
 - (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
 - (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
 - (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
 - (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
 - (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
 - (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
 - (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and

Submission no 120

purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 121

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Brent Dale Druskovich
Date: Wednesday, 17 April 2019 10:00:30 PM
Attachments: [Technical submission_20190417191825.617.pdf](#)
[Personal Thoughts submission.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Brent Dale Druskovich

Organisation name:

Agent's full name:

Email address: brentdruskovich@gmail.com

Contact phone number: 096389421

Postal address:
10a Domett Avenue
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:
The entire plan change

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

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

The reason for my or our views are:
Expressed on the supporting documents, they are based upon my experiences as a local resident

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

Submission date: 17 April 2019

Supporting documents
Technical submission_20190417191825.617.pdf
Personal Thoughts submission.pdf

Attend a hearing

Submission no 121

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

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

Declaration

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

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

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

Yes

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

Submission no 121

ATTACHMENT -- Reasons for Submission

1. **I/we oppose** Proposed Plan Change 21 (PC 21-private) for the following reasons:
 - (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
 - (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
 - (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
 - (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
 - (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
 - (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
 - (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and

Submission no 121

purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 121

1. In addition, I also have these concerns :

- (i) I have lived in Epsom from 1977 to 1997, and again from 2005 till the present, in total some 34 years. Even in the intervening years when I didn't live here I was a regular visitor to my parents and friends who continued to live in the suburb.
- (ii) After living away from Epsom I returned for a number of reasons, these include in no particular order, the heritage architecture combined with the mature trees, the schooling, the small scale commercial atmosphere – i.e. nothing more than a few scattered traditional shopping centres, i.e. not a proliferation of large office blocks and other commercial enterprises – I do acknowledge the existing hospitals, of which the current Brightside one is the largest, the others are smaller and fit better in scale with the surrounding residential properties.
- (iii) I am concerned about the idea that a major commercial enterprise can come into a well-established residential area that is clearly identified for residential activities only, and has current planning rules to protect the heritage properties within the neighbourhood.
- (iv) In particular I worry about the already difficult parking in our immediate neighbourhood. Most weekdays it is impossible to get parking on our road during working hours, this new proposal with a limited number of carparks would add more pressure to an already crowded parking environment, as a minimum if this is to be passed they need to provide adequate onsite parking.
- (v) I believe the added pressures are also likely to add to the traffic congestion on Gillies Ave which allows some parking outside the “rush hours”, during rush hours there are clearways. Currently a limited number of vehicles use this parking and it does result in various manoeuvring and lane changes, especially where southbound traffic is turning right into Brightside from Gillies Ave. There is a common occurrence for people turning left out of Kipling Ave to make a quick right into Brightside Road to avoid the lights at Owens Road to then proceed either to Mount Eden Village along Owens Road or to head along Mountain Road.
- (vi) With vehicles parked outside the clearway hours on Gillies Ave on the western side, which will be a result of the under-catered for parking allowance, the lanes at the Owens Road intersection north bound will become more congested. This will result in longer queues of traffic and make it significantly more difficult for local traffic to turn right out of Kipling Ave, Domett Ave and potentially Bracken Ave as well as.
- (vii) It will also make it more difficult for people to park when visiting the other local hospitals, medical clinics and the child care centre on Gillies Avenue.
- (viii) I am also worried that if this proposal can take place here, then it can take place anywhere around Auckland residential zones. Zoning and planning has its place to ensure that the community retains the values they have bought into or chosen to live within.
- (ix) Eden-Epsom has a unique environment which to me is about the residential properties, small scale businesses, local shops and schools. There is no place in this environment for a major commercial intrusion whether it be this one or any other.

Submission no 121

- (x) The prospect of a 24/7 hospital operation of the scale that could be built under the proposal is completely contrary to any concept about quality residential amenity. This is because the traffic issues I have identified will also exist during the weekends, something that as a resident it is appreciated we get a reprieve from during the weekends and that friends and family can find parking to visit us.
- (xi) I am further concerned about the long time period of the works that is required and in particular the time to establish a very substantial basement to proposed new structures. "Quarrying", which is what excavation is over 2 – 3 years duration, within a residential area will create a large number of truck movements through an already congested traffic situation, especially if truck movements are allowed prior to 9am when the local schools get in and after 3pm when a multitude of students, their parents and associated school buses pass through this area. Construction above ground will follow this and will again affect the traffic.
- (xii) It would be sensible to limit any truck movements (both arriving and leaving site) to between the hours in the above mentioned point, so that there isn't further congestion at these hours nor a danger to the large number of school aged pedestrians.
- (xiii) Because of the long period required to construct it the aforementioned parking and traffic congestion issues will be further amplified with construction workers seeking offstreet parking for the length of the day.
- (xiv) Professionally I work as a consultant archaeologist, and although I have no reason to suspect that there are archaeological issues with this proposal I am very concerned about the prospect of further loss of the heritage fabric in this neighbourhood. Three heritage homes were lost 20 years ago when the first Southern Cross hospital was built. Now another 3 could be lost. Two of which in my opinion are far better than average, complete with their heritage settings (the gardens and large trees). I have chosen to live in this suburb because of the heritage buildings and the beauty that they bring to it including their gardens and trees. This should not be allowed in an area that enjoys a reputation built around this very character.
- (xv) Auckland has a housing shortage. Inner city suburbs like Epsom are not exempt from this. The proposal is removing housing, including a large boarding house which provides for a wide range of people. This will result in the removal of some of the "variety" in the residential makeup of Epsom.
- (xvi) I do not understand how anything that is up to 25metres tall can be considered "appropriate" within a residential area with no more than 8 metre tall dwellings. Furthermore the large building proposed will be a visual blight and an overbearing dominant scar on the visual landscape.
- (xvii) This has to be considered an unacceptable visual intrusion that will be highly visible from many directions.

Submission no 122

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Charles Russell Stewart
Date: Monday, 15 April 2019 12:45:23 PM
Attachments: [Epsom Submission CS_20190415122821.386.pdf](#)
[technical-submission-ideas \(4\)_20190415122837.105.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Charles Russell Stewart

Organisation name:

Agent's full name: John Stewart

Email address: cr_stewart@hotmail.com

Contact phone number: 0223428060

Postal address:
20C Kipling Ave
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
The proposal in its entirety.

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:
I would like it declined in full. Please refer to my attachments.

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

Submission date: 15 April 2019

Supporting documents
Epsom Submission CS_20190415122821.386.pdf
technical-submission-ideas (4)_20190415122837.105.pdf

Attend a hearing

Submission no 122

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

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

Declaration

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

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

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

Yes

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

Submission no 122

ATTACHMENT -- Reasons for Submission

1. **I/we oppose** Proposed Plan Change 21 (PC 21-private) for the following reasons:
 - (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
 - (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
 - (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
 - (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
 - (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
 - (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
 - (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and

Submission no 122

purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 122

I have lived in the Epsom area over 20 years. What I like about the area is the close community feel of the neighbourhood.

I am concerned by the concept of a large scale commercial development that is being proposed for the residential area.

It will have a significant impact on the residential zone in the Epsom area and add further congestion to the suburb.

Eden Epsom is a very unique and special environment which is about space and the natural environment. It is not a place for large scale commercial buildings to be built in residential zones.

The impact on traffic is an obvious concern to all the residents living in the zone and will significantly add to the pressure on the surrounding roads.

The proposal for a large 24/7 hospital operation will be at odds with the residential zoning under the unitary plan.

The proposal will also impact on potential housing for the area. There is already large schools in the area and as such the need for housing is necessary to provide for families to live in.

The height of the proposed development concerns me also. At 25m tall this will not be in line with the area where dwellings are only allowed to be up to 8m tall with most housing well below that. It will have an impact on the visual site lines of many properties in the surrounds. It will look very unsightly in the low profile housing which would surround it and thus look visually out of place. The reason is that it will add buildings that will not be in keeping with the look of the streets that surround it.

Having read the consultants reports in support of the planned change application, I disagree and take serious issue with the many statements that suggest the hospital development will be of little significance to the residential nature of this part of Epsom.

In my view, this development would be totally contrary to the permitted zoning under the Unitary Plan and to allow it would be to undermine the principles embodied in the Plan for a dedicated residential area of Auckland.

Finally, I would question what alternative sites have been considered by SCHL for the development of further hospital facilities. The Unitary Plan provides for hospital zoning in various parts of Auckland and I would have thought that SCHL would have investigated alternative permitted sites before attempting to proceed with a planned change in a long established residential area.

Submission no 123

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Chi Wong
Date: Sunday, 14 April 2019 7:30:11 PM
Attachments: [PersonalStatement_ChiWong.pdf](#)
[TechnicalStatement_ChiWong.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Chi Wong

Organisation name:

Agent's full name:

Email address: thomas321@gmail.com

Contact phone number: 0223401023

Postal address:
5/2 Brightside Road
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:
The entire Plan Change

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

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

The reason for my or our views are:
See attachments

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

Submission date: 14 April 2019

Supporting documents
[PersonalStatement_ChiWong.pdf](#)
[TechnicalStatement_ChiWong.pdf](#)

Attend a hearing

Submission no 123

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

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

Declaration

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

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

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

Yes

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

Submission no 123

ATTACHMENT -- Reasons for Submission

1. I oppose Proposed Plan Change 21 (PC 21-private) for the following reasons:

- (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
- (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
- (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
- (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
- (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
- (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
- (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

Submission no 123

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 123

1. In addition, I also have these concerns :

- (i) I have lived in this area for 4 years. What I really like about the area is that it is a very private and quiet residential area. I am very concerned about the idea that a major commercial enterprise can come into such a well-established residential area that is clearly identified for residential activities only. I am worried that if this proposal can take place here, then it can take place anywhere around Auckland residential zones. This makes Auckland no different than many other big cities, just a mess with no real concern for “liveable communities” based around quality residential environments.
- (ii) Increasing traffic is a serious concern for me because Gillies Avenue, Owens road and even Brightside Road are already very busy. Having a big number of cars getting in and out of the planned hospital extension will be a traffic nightmare.
- (iii) My house has concrete components to it, and a pool, and rock walls. This is all potentially at risk of damage from continuous excavation/blasting for a prolonged period of time to establish a very substantial basement to proposed new structures.
- (iv) I do not understand how anything that is up to 25metres tall can be considered “appropriate” within a residential area with no more than 8 meters tall dwellings. This has to be considered an unacceptable visual intrusion that will be highly visible from many directions, and in-turn inflict privacy issues across a large outlook area. Effectively this will establish a large commercial island within a large low-profile residential area.

Submission no 124

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Christine Elizabeth Fletcher
Date: Thursday, 18 April 2019 10:45:48 AM

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Christine Elizabeth Fletcher

Organisation name:

Agent's full name:

Email address: fletch.family@xtra.co.nz

Contact phone number: 0272760013

Postal address:

7 Bourne Street

Mt Eden

Auckland 1024

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:

PC21

Property address: 3 Brightside Rd, 149, 151, 153 Gillies Ave Epsom

Map or maps:

Other provisions:

The proposed Plan Change in its entirety.

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

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

The reason for my or our views are:

I have lived in the area for over 40 years and know that the scale of the proposed change would cause massive disruption and degradation to our community. I understand the construction would require a prolonged period of time compounding the existing disruption already taking place with long overdue infrastructure developments. The proposal will require years of rock blasting and pose considerable safety risks for the thousands of school age children that traverse the area on a daily basis. The extensive consultation and consideration of the Auckland Unitary Plan left this area with residential zoning with good reason. It is inexplicable to me that Southern Cross did not use that process and opportunity to raise their requirements for further medical facilities. I fear the precedent setting nature of this and strongly object to the loss of heritage and important landscape and vegetation amenity. This is a very brief summary of my concerns. I have had limited time to prepare a detailed response to the technical issues of concern, but wish to be heard with my submission

Submission no 124

when I could expand on the issues with greater detail.

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

Submission date: 18 April 2019

Attend a hearing

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

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

No

Declaration

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

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

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

Yes

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

Submission no 125

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Claire Siddens
Date: Monday, 15 April 2019 1:30:46 PM
Attachments: [Mt Eden Village Inc PC 21 April 2019.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Claire Siddens

Organisation name: Mt Eden Village Inc

Agent's full name:

Email address: admin@mounteden.co.nz

Contact phone number: 021 652246

Postal address:
33a Ellerton Rd
Mt Eden
Auckland 1024

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
Plan Change 21 (Private) 3 Brightside Road, 149, 151, 153 Gillies Avenue Epsom.

Property address: 3 Brightside Road, 149, 151, 153 Gillies Avenue Epsom.

Map or maps:

Other provisions:
The entire plan change

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

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

The reason for my or our views are:
See attached document

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

Submission date: 15 April 2019

Supporting documents
[Mt Eden Village Inc PC 21 April 2019.pdf](#)

Attend a hearing

Submission no 125

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.

11 April 2019

Auckland Council
Private Bag 92300
Victoria St West
Auckland 1142



1

Copy to:
Southern Cross Hospitals Limited
C/o Courtney Bennet
Level 10, AMP Centre
29 Customs St West,
Auckland

We are making a submission on the following application:

Site address: **3 Brightside Road, 149, 151, 153 Gillies Avenue, Epsom**
Plan change/variation PC 21

Our contact details:

Name: Claire Siddens
Contact number: 021 652 246
Email address: admin@mounteden.co.nz
Postal address: C/o 33A Ellerton Rd, Mt Eden, Auckland 1024
Organisations name: Mt Eden Village Inc
Name of person applying for the consent – Southern Cross Hospitals Limited.
Application number: LUC60322580
Plan Change 21 (Private): 3 Brightside Road, 149, 151, 153 Gillies Avenue, Epsom

This submission relates to the following:

A private plan change request to the Auckland Unitary Plan (Operative in Part) from Southern Cross Hospitals Ltd.

1. A plan change to rezone land at 3 Brightside Road from Mixed Housing Suburban to Special Purpose – Healthcare Facility and Hospital Zone
2. Amend the zone of three sites at 149, 151, 153 Gillies Avenue, Epsom from Residential Single House Zone to Special Purpose – Healthcare Facility and Hospital Zone
3. Removal of the Special Character Area Overlay from the three sites at 149, 151, 153 Gillies Avenue; and
4. The inclusion of parking variation control applicable for this hospital requiring a minimum parking requirement of 1 space per 64m² gfa.

This submission:

Mount Eden Village Inc

Submission no 125

Mt Eden Village Inc. is an association registered under the Incorporated Societies office and represents 132 business and property owners. The association operates a Business Improvement District (BID) programme in association with Auckland Council. This BID Programme is designed to support business communities to undertake marketing and promotional activities, provide support to business owners, engage and attract customers to the area and lobby and advocate on behalf of the local business and property owners. Mt Eden Village Inc has been part of the Auckland Council BID programme since 2000.

Mt Eden Village Inc requests Auckland Council to decline this application in total.

Concerns:

In addition, we have the following concerns:

1. The change in zone to allow a major commercial enterprise in what is an established residential area.
2. The proposal will set a precedent for an increase in commercial development within the vicinity and elsewhere within other residential areas.
3. The proposal undervalues the Unitary Plan and the consultation process that was part of its development and adoption.
4. The Eden-Epsom area is a unique environment and its community values its local heritage, buildings, trees, green spaces and community. This development has no place within a residential area and should be placed in a more suitable location supported by being within a designated public transport routes.
5. The impact of additional traffic on local residential streets will cause congestion and impend on the flow of traffic through local streets already congested.
6. The operation of a 24/7 hospital of this scale that could be built under the proposal is completely contrary to the Special Character Area Overlay, removing more heritage homes over time.
7. Consideration must be given to any impact from future changes and development of the Epsom Campus located at 74 Epsom Avenue, Epsom on the local roads, traffic and parking.

Conclusion:

Mt Eden Village Inc requests Auckland Council to decline this application in total.

Public hearing:

Mt Eden Village Inc request to speak at the public hearing.

Kind regards



Steve Roper
Mt Eden Village Inc. Chair

Submission no 126

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 18 April 2019 8:46 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - David Jones

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: David Jones

Organisation name:

Agent's full name:

Email address: doj@halaw.co.nz

Contact phone number:

Postal address:
3 Poronui Street
Mt Eden
Auckland 1024

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:

Property address: 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

Map or maps:

Other provisions:

1. the modification is contrary to the existing plan. 2.

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

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

The reason for my or our views are:

1. The application is at odds with and contrary to the existing Unitary plan in a substantial way. 2. The application is for a use of properties in a manner not permitted by the plan. 3. The proposed structure is grossly disproportionate in size to the surroundings in which it is proposed to be located 4. The area in which the proposed buildings is intended to sit is an historic residential area. A hospital of this size will ruin that character and wipe way the historical legacy of the area. 5. The existing hospital has been entitled to carry out its activities due to largely existing use rights rooted in the 19th century facility which was confined to a part of the existing site used by the hospital and which originally was a facility in a building of a residential nature consistent with the majority of houses which remain in the area. There is

Submission no 126

no basis for increasing the coverage of the hospital by taking residential dwelling on which there are no existing use rights.

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

Submission date: 18 April 2019

Attend a hearing

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

Declaration

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

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

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

Yes

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

Submission no 127

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Emma Susan Carr-Smith
Date: Tuesday, 16 April 2019 9:15:43 PM
Attachments: [technical-submission-advice.pdf](#)
[Submission.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Emma Susan Carr-Smith

Organisation name:

Agent's full name:

Email address: timandemma@xtra.co.nz

Contact phone number: 021353834

Postal address:
157 Gillies Ave
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:

Property address: 3 Brightside Road, 149, 151, 153 Gillies Avenue, Epsom

Map or maps:

Other provisions:
The entire Plan change

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

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

The reason for my or our views are:
See attachments

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

Submission date: 16 April 2019

Supporting documents
technical-submission-advice.pdf
Submission.pdf

Attend a hearing

Submission no 127

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

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

Declaration

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

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

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

Yes

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

Submission no 127

ATTACHMENT -- Reasons for Submission

1. **I/we oppose** Proposed Plan Change 21 (PC 21-private) for the following reasons:
 - (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
 - (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
 - (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
 - (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
 - (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
 - (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
 - (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and

Submission no 127

purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 127

We have lived in our house for the past 5 years and it is our intention to continue to live here many more years. We love the history of the Epsom area, the beautiful tree lined streets, rock walls, and villas.

To contemplate a hospital being allowed to operate 24/7 at the size Southern Cross is proposing is ludicrous. Gillies Ave and the surrounding streets are congested enough without introducing many years of invasive building work associated with the proposed development plus the then ongoing increased traffic from a business that size.

Our children attend Epsom Girls Grammar-I can only imagine the chaos and disruption for the 2,000 odd students and parents the years of development will cause.

We are especially concerned with our privacy being affected by a 25 metre high building across the road from us.

Also of major concern is the affect the blasting will have on our house, pool and surrounding rock walls.

We have seen proposed plans and cannot believe that such a monstrosity could be considered- surely reason will prevail. I do not believe this is the only option available to Southern Cross.

Submission no 128

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Eun Rae Cho
Date: Tuesday, 16 April 2019 10:00:54 PM
Attachments: [Private Statment_Eun Rae CHO.pdf](#)
[Technical submission_Eun Rae Cho.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Eun Rae Cho

Organisation name:

Agent's full name:

Email address: pinebay@xtra.co.nz

Contact phone number: 021677883

Postal address:
168 Gillies Avenue
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
The proposal in its entirety

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:
I would like it declined in FULL. Please refer to my attachments

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

Submission date: 16 April 2019

Supporting documents
[Private Statment_Eun Rae CHO.pdf](#)
[Technical submission_Eun Rae Cho.pdf](#)

Attend a hearing

Submission no 128

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

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

Declaration

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

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

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

Yes

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

Submission no 128

I would like the proposed development on 3 Brightside Road/ 149, 151 and 153 Gillies Avenue, Epsom to be declined by the Auckland City Council.

I have been living in current house for more than 19 years and intend to maintain this property within this residential Epsom area as a family home for our children.

My house is composed of plaster components and the property surrounded by rock walls. Thus the foundation of our property is at risk of potential damage from continuous excavation/blasting which is required to establish a firm base of the proposed new establishment. Importantly, damage of the rock wall caused during construction and development of Southern Cross Hospital will inevitably put pedestrians and vehicles passing on Gillies Avenue at significant risk.

In addition, Gillies Avenue is one of the busiest road in Auckland and I believe that the proposed development will further worsen the traffic. It will impose considerable disturbance for residents, students and parents that readily use Gillies Avenue for commuting purposes.

While the process of developing better healthcare facility may be acceptable if it is intended for **public** healthcare, I cannot find this proposition acceptable given the addressed reasons particularly in such a well-established residential area.

Regards,

Eun Rae CHO

pinebay@xtra.co.nz

09-623-2012

168 Gillies Avenue, Epsom, Auckland 1023

Submission no 128

1. I oppose Proposed Plan Change 21 (PC 21-private) for the following reasons:

- (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
- (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
- (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
- (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
- (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
- (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
- (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.
- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.

Submission no 128

- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 129

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Fisi Amies
Date: Thursday, 18 April 2019 2:15:46 PM

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Fisi Amies

Organisation name:

Agent's full name:

Email address: Fisi.amies@gmail.com

Contact phone number: 095371597

Postal address:

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
PC 21

Property address: 3 Brightside Road, 149,151 and 153 Gillies Ave

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

I strongly oppose to the destroying of houses and communities in clear breach of the Unitary Plan. Another private hospital is not needed. We have too many in our area. Residential houses are needed. The Unitary Plan was created to give a voice to the community and a plan for the future of Auckland. It was clearly decided that this is a residential area. Southern Cross had the means and ability to oppose this and they chose not too. They can not suddenly decide for weak commercial reasons that they want to build a large hospital down the road from Mercy hospital across the Manukau Road from Ascot hospital just to compete. If this is allowed then why have a Unitary Plan ? Why not allow anything to be build anywhere ? Why not build a Countdown supermarket here or a Service Station in the domain. The Almighty wealth of the Insurance Business can not be allow to override the wish of the community nor Rules we all live by and agreed to live by with the Unitary Plan. Shame on you Southern Cross

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

Submission no 129

Submission date: 18 April 2019

Attend a hearing

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

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

Declaration

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

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

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

Yes

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

Submission no 130

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Frances Loo
Date: Thursday, 18 April 2019 1:16:07 PM
Attachments: [190418-TechnicalSubmission.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Frances Loo

Organisation name:

Agent's full name:

Email address: info@chapter.co.nz

Contact phone number: 021635027

Postal address:
442 Mt Eden Rd
Mt Eden
Auckland 1036

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:

A private plan change request to the Auckland Unitary Plan (Operative in Part) from Southern Cross Hospitals Ltd.

Property address: 3 Brightside Road, 149, 151, 153 Gillies Avenue, Epsom

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

I have lived in Mt Eden and Epsom at various addresses nearby since 1970 and I have attended the local schools (Auckland Normal Intermediate and Epsom Girls Grammar). I also participated in the consultation phase of the Auckland Unitary Plan - by attending public meetings and providing written feedback. According to the Auckland Council, "Under the Auckland Unitary Plan, zones manage how different areas are used, developed or protected. All land in Auckland, including land in coastal marine areas, has a zone. In general, the way that land is zoned reflects how it is used and what sort of activities happen there. Zoning can also identify how the way land is used is expected to change in the future". Zones are extremely important and people should be able to rely on zones for their planning and savings and investment purposes. For most people, the purchase of their long-term residential home will be the single largest financial decision they will make in their

Submission no 130

lifetime – and it will represent the largest component of their savings. The impact on neighbours of a decision to dramatically change a zone (from Mixed Housing Suburban and Single House to Special Purpose – Healthcare Facility and Hospital Zone) should not be underestimated; and a decision like that should only be made if all alternative options have been exhausted. As I understand it, however, Southern Cross Hospitals has not looked at any alternative sites for their hospital development. I found this to be astonishing (any normal business of reasonable size should have a plan B and even plan C), elitist (why does their development have to be in a 'leafy suburb'), and quite impractical from Auckland's planning perspective. Given the country's position on a fault line (earthquake risk) and suggestions that renewed volcanic activity could occur in Auckland (volcanic eruption risk), Auckland Council would be negligent if it allowed Southern Cross to pursue building additional hospital facilities in such close proximity to existing ones. Auckland City and its population would benefit from a better geographical spread of such facilities. While some might argue that the specialists and surgeons would face increased travelling time if the hospitals were more spread out, I disagree. Being able to build a hospital of scale in the correct zone with great facilities and great carparking (any they could invest in landscaping to provide any "leafy" look required) would mean that more consecutive appointments could potentially be scheduled onsite. I strongly support the progress and development of Auckland City but I also consider it vital to preserve the heritage and character of the older suburbs (since, once these are lost, they cannot be replaced). With that in mind, the rezoning and potential scale of the redevelopment proposed by Southern Cross Hospitals simply cannot be justified. Instead, it would be fantastic for Auckland to have a new hospital with great facilities and great carparking (unlike the horrendous rabbit warrens at Auckland Hospital, Greenlane Hospital and Mercy Hospital) rather than trying to shoehorn an out-of-scale utilitarian-looking development into the site at Brightside Road and Gillies Avenue with all of the attendant activities of excavation and blasting and issues of safety, pedestrian and road traffic disruption, noise and dust. I am also extremely concerned about the potential precedent that Auckland Council accepting this proposed zone plan change would set. Zones are there to protect the environment, heritage, culture, conservation and people. The question would become –why bother having zones at all?

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

Submission date: 18 April 2019

Supporting documents
190418-TechnicalSubmission.pdf

Attend a hearing

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

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

Declaration

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

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

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

No

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

Submission no 130

ATTACHMENT – Technical Reasons for Submission

I oppose Proposed Plan Change 21 (PC 21-private) for the following reasons:

- (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
- (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
- (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
- (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
- (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
- (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
- (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary

Submission no 130

to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 131

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Gemma Louise Tolich Allen
Date: Wednesday, 17 April 2019 11:00:49 AM

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Gemma Louise Tolich Allen

Organisation name:

Agent's full name:

Email address: gemma@hydrobio.co.nz

Contact phone number: 0210526973

Postal address:
32A Owens Rd
Epsom
Auckland 1023
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:

The entire Plan Change

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

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

The reason for my or our views are:

Please see PDF file attached to this email

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

Submission date: 17 April 2019

Attend a hearing

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

Submission no 131

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

Yes

Declaration

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

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

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

Yes

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

Submission no 132

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Georgina Emma Johnston
Date: Tuesday, 16 April 2019 10:00:48 PM
Attachments: [technical-submission-advice_20190416213801.026.pdf](#)
[Personal submission Georgina.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Georgina Emma Johnston

Organisation name:

Agent's full name:

Email address: timandemma@xtra.co.nz

Contact phone number: 0276593346

Postal address:
157 Gillies Ave
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:

Property address: 3 Brightside Road, 149, 151, 153 Gillies Avenue, Epsom

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:
See attached

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

Submission date: 16 April 2019

Supporting documents
[technical-submission-advice_20190416213801.026.pdf](#)
[Personal submission Georgina.pdf](#)

Attend a hearing

Submission no 132

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

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

Declaration

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

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

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

Yes

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

Submission no 132

ATTACHMENT -- Reasons for Submission

1. **I/we oppose** Proposed Plan Change 21 (PC 21-private) for the following reasons:
 - (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
 - (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
 - (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
 - (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
 - (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
 - (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
 - (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and

Submission no 132

purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 132

There will be rock breaking noise for 2 years

Gillies Ave and Brightside is already really busy, it will be so busy if they are doing building work for the next few years

It will tower over everything and ruin the view

Why cant they put it in other places than housing areas

Submission no 133

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 18 April 2019 4:31 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Glennis Loo
Attachments: 190418-TechnicalSubmission_20190418162339.980.pdf

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Glennis Loo

Organisation name:

Agent's full name:

Email address: glennisloo@gmail.com

Contact phone number: 0274770248

Postal address:
436 Mt Eden Rd
Mt Eden
Auckland 1024

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:

A private plan change request to the Auckland Unitary Plan (Operative in Part) from Southern Cross Hospitals Ltd.

Property address: 3 Brightside Road, 149, 151, 153 Gillies Avenue, Epsom

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:

My family has lived nearby (at 120 Mountain Rd) for more than 40 years up until my father's passing in 2016 and we still live quite close (in Mt Eden village). I really appreciate the heritage and character values to be found in the area - which is an established high quality residential neighbourhood and community - distinguished by its low-rise buildings, trees and green spaces. The removal of the special character area overlay, the loss of another 3 heritage homes and the commercial intensification of the site proposed by Southern Cross Hospitals is not appropriate for the addresses proposed. A hospital built under the proposed zoning would dwarf the neighbouring residential buildings, would not be

Submission no 133

in character, and the excavation/blasting activity would negatively affect the neighbourhood for its duration. My family and I know some of the Brightside Rd residents and we are aware that earlier excavation/blasting activity in Brightside Rd in the late 1990s resulted in complaints from the neighbours about the blasting noise, dust and property damage (i.e., cracks) and, as we understand it, the complaints were not documented fully and accurately, nor were they dealt with professionally. The excavation activity that would be involved this time would be substantially greater and hence would have an even greater impact and, unfortunately, based on how contractors performed last time, there can be little confidence that the adverse affects would be minimised. This is against a backdrop of considerable growth in pedestrian and road traffic in the subsequent 20 years. In a nutshell, rather than apply for a zone change (and there are no overwhelming benefits to having a larger hospital at that site that would offset the negative impact such a development would have), Southern Cross Hospitals would be better served looking for a more suitable site that is zoned to provide the scale that it desires. Auckland Council must also be extremely careful about setting a dangerous precedent if it agrees to Southern Cross Hospital's application.

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

Submission date: 18 April 2019

Supporting documents

190418-TechnicalSubmission_20190418162339.980.pdf

Attend a hearing

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

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

Declaration

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

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

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

No

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

Submission no 133

ATTACHMENT – Technical Reasons for Submission

I oppose Proposed Plan Change 21 (PC 21-private) for the following reasons:

- (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
- (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
- (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
- (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
- (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
- (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
- (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary

Submission no 133

to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 134

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 18 April 2019 1:15 AM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Hamish McLaren Wanhill
Attachments: PC21 private - Technical Submission - Hamish Wanhill.pdf; PC21 private - Personal Reasons Submission - Hamish Wanhill.pdf

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Hamish McLaren Wanhill

Organisation name:

Agent's full name:

Email address: hamish@liberation.co.nz

Contact phone number: 021 973 228

Postal address:
79A Owens Road
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
The Entire Plan Change

Property address: 3 Brightside Road, 149,151,153 Gillies Avenue, Epsom

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:
See attachments

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

Submission no 134

Submission date: 18 April 2019

Supporting documents

PC21 private - Technical Submission - Hamish Wanhill.pdf

PC21 private - Personal Reasons Submission - Hamish Wanhill.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.

Submission no 134

ATTACHMENT 1 – Technical Reasons for Submission, Hamish Wanhill

1. I oppose Proposed Plan Change 21 (PC 21-private) for the following reasons:

- (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
- (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
- (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
- (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
- (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
- (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
- (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and

Submission no 134

purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 134

ATTACHMENT 2 – Personal Reasons for Submission, Hamish Wanhill

1. In addition, I also have these concerns:

- a) My family and I have lived in this area for a over 18 years. We chose to buy into the Mt Eden and Epsom areas when we were expecting our first child because of the local schools and a strong sense of community from residents in Mt Eden and Epsom areas. The area appealed to my wife and I because of the special heritage character of the homes and obvious respect for maintaining them by their owners and a pride this residential area. My house, at 79A Owens Road, Epsom, sits where Epsom and Mt Eden meet, approximate 150 metres from Brightside Road. I am very active in this area, supporting small local businesses, local schools, socialising and am out walking these streets every day with my dog. Both houses I have owned in the Mt Eden and now North Epsom area have been character early 1900s Villas. Both houses have been fully and respectfully renovated, under my ownership, in keeping with the area's unique heritage character. Southern Cross Hospitals Limited proposed removal of character homes around Brightside and Gilles Ave, to build a large non-residential commercial building of up to 25 metres and the removal of the existing homes is completely at odds with why I live in and love this area.
- b) I am extremely concerned that a commercial company (Southern Cross Hospitals Limited) has demonstrated clear contempt for the Auckland Unitary Plan, which currently clearly states that their planned area for rezoning (the properties on the corner of Brightside Road and Gillies Ave) has been designated as a residential zone with special character overlay. Further more, Southern Cross chose to not participate in any discussions and feedback on the Auckland Unitary Plan, despite having acquired the Brightside Road and Gillies Ave properties with a plan to expand their Brightside Hospital footprint. Rather, Southern Cross opted to refrained from engaging in the Unitary Plan discussion and development process. More concerning is *should* Southern Cross Hospital Limited be successful in having the properties rezoned as 'Special Purpose – Healthcare Facility and Hospital Zone', there is nothing Auckland Council can do to stop them from building a huge eyesore of a building, up to 25 metre, and not the sanitised and highly subjective 16 metre "artist's impression" that Southern Cross Hospitals Limited submitted in their Private Plan Change Request and associated supporting documentation. Southern Cross Hospitals Limited are a business. They will want to maximise use of the site. Fundamentally, this means the likelihood of a much taller commercial structure, which is completely at odds with the character nature of the immediate and surrounding residential zoned areas.
- c) The Auckland Unitary Plan development process presented a great opportunity for ALL Auckland public and businesses to have their say and be heard on issues such as residential housing and commercial zoning, etc. Should Southern Cross Hospital Limited's plan change request and rezoning be approved, so soon after the long-coming Unitary Plan was ratified, it would send a very clear message to the public of Auckland that the Unitary Plan is not valued by Auckland Council and that the wants of **private** business are more important than those of the 1.5 million people who live in Auckland. *i.e. The wants (not needs) of a few out-weight the wants and needs of the many.* I am

Submission no 134

deeply concerned that if this proposal change is approved, then no Auckland residential zones are safe from large commercial development. Regardless of Unitary Plan agreed zoning.

- d) Southern Cross Hospitals Limited have demonstrated that they do not care what the residents of Epsom and Mt Eden think or want for our residential suburbs. They have not engaged the Epsom and Mt Eden community and stakeholders. Rather they discretely acquired a large block of land and the houses that border the existing Brightside Hospital with the express purpose of expansion, without even looking for other more appropriate non-residential sites across Auckland. They have chosen a covert approach, not one of transparency and engagement with the community of residents who live in Eden-Epsom. Southern Cross should have sought input from residents and stakeholders. But they chose not to. Rather they chose a path that serves only the needs of Southern Cross Hospitals Limited only and not the community who live in the residential zone. As a **private hospital** group, Southern Cross' plan to expand the existing Brightside site serves no benefit to those who live in the area. Rather it presents a long list of inconveniences and concerns, both short term (construction phase) and long term, including but not exclusive to excavation and blasting, noise pollution and physical safety concerns, thousands of truck movements, associated traffic issues on and around Gillies Ave, Brightside, Owens Road and Mountain Road, parking issues during and after construction. Southern Cross are seeking to provide an absurdly small number of carparks onsite resulting in overflow parking to neighbouring streets, increased traffic flow in the immediate vicinity and surrounding streets from staff, patients, their friends and families and services vans and trucks.

Submission no 135

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Tuesday, 16 April 2019 9:01 AM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Hugh Blackley
Attachments: PC 21 Brightside Ave Submission .pdf

Categories:

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Hugh Blackley

Organisation name:

Agent's full name:

Email address: hughblackley@xtra.co.nz

Contact phone number: 095222980

Postal address:

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
PC 21

Property address: 3 Brightside Ave

Map or maps:

Other provisions:

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

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

The reason for my or our views are:
I oppose the submission: PDF attached

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

Submission date: 16 April 2019

Submission no 135

Supporting documents
PC 21 Brightside Ave Submission .pdf

Attend a hearing

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

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

Declaration

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

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

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

Yes

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

Submission no 135

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Tuesday, 16 April 2019 8:31 AM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Hugh Blackley

Categories:

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Hugh Blackley

Organisation name:

Agent's full name:

Email address: hughblackley@xtra.co.nz

Contact phone number: 09 5222980

Postal address:
37 Owens Road
Mt Eden
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
PC 21

Property address: 3 Brightside Road 149,151 and 153 Gillies Ave

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:

Submission on notified proposal for plan change – PC21 3 Brightside Road plus 149, 151 and 153 Gilles Ave, Epsom
I oppose the plan and its entirety for the following reasons. The proposed plan change makes a mockery of the Auckland Regional Policy Statement for maintaining residential areas, those of historic and heritage nature and special character. It also makes a mockery of the Unitary Plan as Southern Cross Hospitals has been well aware prior to the Unitary Plan of their intentions, as have many medical doctors who use their facilities. The medical facilities are

Submission no 135

simply not needed in this area of central Auckland and there is already spare medical space including surgical operating space available at the Mercy Hospital site in Mountain Road and the Ascot Hospital site at Greenlane, and the pre-existing owned Southern Cross hospitals in Gillies, Brightside Road and most importantly St Mark's Road. There is also availability of operating space at Ormiston Hospital and most importantly on the large expanding side at Southern Cross North Harbour and in Shakespeare Road. Two large facilities in easy motorway access to Epsom/Mt Eden and central Auckland. These are in medical and commercial sites. The Southern Cross Shakespeare Road site is about to start at the end of this year, and this will mean that day surgeries currently carried out at Southern Cross North Harbour will shift to that site and that will effectively open a huge amount of operating space at Southern Cross North Harbour, which many people and Auckland already travel to without any issue. Also on the Southern Cross North Harbour site in Wairau Road, there are plans for a further 12 bed surgical unit, a radiation oncology unit and further medical suites. This will result in an over-supply in this region when also combined with their Shakespeare Road day surgery site, due to open at the end of this year. Already one whole floor of their Southern Cross North Harbour medical unit has been assigned poorly utilized gymnasium which is astounding for highly extensive medical designed buildings to be leased as a gymnasium, which indicates the underutilizations of their buildings currently in Auckland. This will likely be the result of the Brightside expansion in that there is NOT the need for medical space.....it will sit empty until Southern Cross can force/ coerce doctors and staff away from Mercy and Ascot sites and leave these vacant. There is not a need nor business case for more private hospital beds in central Auckland. The current sites are under-utilized and public hospitals are actively expanding . Southern Cross Hospitals also have a large site at St Mark's Road which is in a commercial area of tall buildings, high-density and very close to the medical rooms of many medical practitioners along Remuera Road. This is a more suitable site if they feel they have to waste their stakeholders insurance monies instead of lower premiums. This site is also extremely close to the motorway on-ramp and does not propose a traffic problem as expansion of the Brightside site will. The St Mark's Road site can go to multi-story, is in a commercial zone and also suitable hospital zone and medical zone and does not involve destroying historic residential homes and destroying a residential community, nor does it involve a Unitary Plan change. There is no need for further private hospitals in central Auckland and especially in this zone. This is a commercial venture and an unnecessary need as many specialists and surgeons will advise. Southern Cross hospitals and their owner Southern Cross Insurance, merely want to place a large hospital on the doorstep of their only competitor in town, Mercy Ascot. I have absolutely NO affiliations with Mercy or Mercy Ascot. It is not appropriate to take away historic residential houses which are in high need and replace them with a private hospital that is not needed by the local residents, nor the residents of Auckland, when there are plenty of other private hospital facilities available in close distance and close travel. This is not an Emergency hospital nor a Public hospital that might be argued as being needed, this is a private business venture. There is a large public hospital at Auckland City Hospital down the road, and Auckland City Hospital has extensive plans to create a large elective hospital on the already owned very large Greenlane Hospital site and are in the middle of planning several operating theatres over the next two years to be built. This has been approved on a Government level and funding given and so elective surgery can be carried out on this site. This will become a major Greenlane Elective hospital site. Larger than all other elective hospitals. It already has the large outpatient hospital at Greenlane and the old National Women's hospital, all of which eventually will become a large elective hospital. Plans are already underway for this with further government funding. This means that there be an oversupply of both private and public elective operating theatres and beds in the central Auckland region, which is not expanding like North Auckland and South Auckland. These Greenlane plans are well underway for developing this site and it will mean there will be an enormous shift of publicly funded elective surgeries (which currently Southern Cross and Mercy Ascot do some of) back into the large elective hospital on the Greenlane site, so any economic plan to carry on doing publicly funded elected surgeries will die as Auckland City Hospital Board has extensive plans with funding to do their own surgeries. This has already happened at Middlemore and Northshore hospitals. Stand-alone elective units have already been built at the North Shore public hospital site by Waitemata District Health Board and at the SuperClinic site by Counties Manukau District Health Board. The net effect of building these publicly funded elective units was a massive drop in private elective surgical use because of a massive reduction in waiting lists and a massive reduction in publicly funded private surgeries. The private hospitals became under-utilized. This fight for the elective insurance dollar continues as those with private insurance reduce (well documented), the elderly give up health insurance because of cost (partly due to the folly of using insurance premium to build under utilized hospitals) and public health has better funding and does more elective surgeries (confirmed stat over the last 8 years). The net effect is a race to the bottom as Southern Cross hospitals desperately tries to compete with Mercy Ascot for the health \$\$\$\$\$. This is not a sustainable business plan and loss of residential houses and land will be the next effect. The development of the Greenlane Hospital elective surgical unit in the next few years, which is already planning, will substantially reduce the need for elective surgeries, both public and private, in the central Auckland area. There are also plans for funding additional public hospitals on the North Shore and in South Auckland and Middlemore is undergoing an extensive rebuild, which will also decrease the need for private hospitals. How many elective hospitals does central Auckland need ? Do we not need houses and also land for houses ? As I stated above have no affiliation with Mercy Ascot nor Southern Cross. For the last 20 years I have worked at all of these hospital including Auckland City Hospital, Northshore Hospital, Middlemore Hospital Ascot, Mercy, Brightside, North Harbour and St Marks and I have first had experience and a great understanding of the needs and dynamics of the private and public hospital. I am also well aware of the underutilization of the currently existing private hospitals in Auckland despite the protestations and expansion plans of Southern Cross Hospitals (which is often uneconomic and unfettered), but they do have a large amount of money to spend without accountability, unlike some of the other hospitals including public hospitals in Auckland. The hospital that is planned

Submission no 135

will result in demolition of sorely needed residential housing in prime residential zone. It will have huge adverse effects on the neighbouring properties. One only needs to look at the Southern Cross North Harbour site in Wairau Road, which is in an semi-commercial area, and how Southern Cross Hospital is under a massive expansion programme on that site with absolutely no regard for the surrounding residents nor do their buildings hospitals and large advertorial signs that have any compatibility with the surrounding architecture or residential areas. They have massive staff and patient parking issues despite under utilization. They have traffic issues. I am well aware of the traffic that a private hospital creates as I am part of that problem, as my wife is. Doctors cars, patients cars and delivery vehicles arrive constantly throughout the day and night 24/7, but particularly during the high volume traffic periods of early in the morning and in the evening. For the Brightside Gillies Ave site this will during school drop off times for both Auckland Grammar School and Epsom Girls Grammar school and during the high peak traffic times already very heavy along Gillies and Brightside Ave and Owens and Mountain Rd. As a Trauma surgeon at Auckland City Hospital this development it is just an accident waiting to happen by creating a very large hospital in this school residential zone, which as explained above is totally unneeded. Traffic along Gillies Ave, Brightside, Mountain Road and Owens Road is already chaos at these times and almost gridlocked, particularly getting access onto the motorway and off the motorway and building a hospital here will only create worsening gridlock. I am well aware that Southern Cross will pay their own transport advisors to say this will not be an issue, but they do not live in this zone and frankly they are being paid to mislead the Auckland Planning Committee. From a personal point of view, I have gone to school in this area. I chose to return to live in this area. The home I live in has historic covenants. It also has covenants on the trees which have been put in place by Auckland Council. I obey these covenants and I have restored the house. The house is over 150 years old and when doing renovations to the house I was required to obey the Council Regulations and the Unitary Plan. The previous owners of this house lived there for 18 years; the owners before that 35 years; the owners before that 30 years. The same applies to all the houses surrounding our house. They are all long-standing residential houses and people choose to live in this area because of the historical nature, because of the closeness of Mt Eden and the Mt Eden community and because of the good schools in the area and the fact that our children can walk to school. Living in this zone comes at an increased expense because of the school zones, but also because of the heritage of many of the houses which means that we cannot go and willy nilly bowl or even re-build these houses without extensive approval from the Auckland City Council. People choose to live in Epsom, Mt Eden and the surrounding areas because of these heritage houses, because of the community not because they want to live close to a private hospital or an industrial complex. There are plenty of areas for these types of buildings in commercial zones, and this was the reason for the Unitary Plan. As stated above there is no need for this hospital to increase in size and to raze further houses to have this hospital expand. Southern Cross has plenty of other sites available namely St Marks Rd and currently their hospitals are underutilized, and there are plans for further building of hospitals in the Auckland zone in commercial areas which will further reduce the demand for these private hospitals. Our house is a historic house with slate roof and basalt stone walls in the ground and a swimming pool, which is brand new and I will be expecting any damage done to the house, the pool and the surrounding area to be covered by the Council insurance plan. I have taken the liberty of checking with my home insurance company and they have advised me they would not be responsible damage done by a neighbouring building event It would be covered either by the Auckland City Council liability or Southern Cross Hospitals The same applies to blasting, stone debris and disruption to schools, schoolchildren travel, which I have thoroughly reviewed at various meetings and note this project, the amount of rock blasted out, the damage to surrounding houses will be extensive, particularly based on what occurred in 1999. It is of interest that when I went to renovate the swimming pool, I was clearly told that excavation or blasting of the volcanic basalt would not be approved by my building consent because I was in a residential area and it did not abide with the Council nor Unitary Plan. I have seen what Southern Cross has done on the Southern Cross North Harbour Wairau Road site and they have progressively quietly brought the surrounding houses and then built out on top of these sites so they tower over the surrounding residents and hospital workers can see their bedrooms, their living rooms and their family rooms. The net effect is to destroy the residential area and with have been visiting this Southern Cross North Harbour site 30 years now, at Wairau Road I have seen that whole residential area destroyed by Southern Cross Hospitals. This is certainly the method that Southern Cross Hospitals use (despite being a charity based organisation), and they do not create communities but destroy communities. This cannot be allowed to happen for the sake of future generations in Auckland who certainly do not need an unnecessary private hospital that has no commercial viability apart from trying to annoy their competitor and take away private medical business which is scarce. There is an oversupply of private hospital beds and theatres in this city. This is a pure venture of greed and folly by a charity based organisation that currently appears to have an excess of money, which indeed it should be paying back to its shareholders and the elderly people that support Southern Cross Insurance. Thank you for allowing this submission. Please decline this folly for the ratepayers and residents of Auckland. Hugh Blackley

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

Submission date: 16 April 2019

Attend a hearing

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

Submission no 135

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

Declaration

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

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

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

Yes

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

Submission no 135

Submission on notified proposal for plan change – PC21 3 Brightside Road plus 149, 151 and 153 Gilles Ave, Epsom

I oppose the plan and its entirety for the following reasons.

The proposed plan change makes a mockery of the Auckland Regional Policy Statement for maintaining residential areas, those of historic and heritage nature and special character. It also makes a mockery of the Unitary Plan as Southern Cross Hospitals has been well aware prior to the Unitary Plan of their intentions, as have many medical doctors who use their facilities.

The medical facilities are simply not needed in this area of central Auckland and there is already spare medical space including surgical operating space available at the Mercy Hospital site in Mountain Road and the Ascot Hospital site at Greenlane, and the pre-existing owned Southern Cross hospitals in Gillies, Brightside Road and most importantly St Mark's Road. There is also availability of operating space at Ormiston Hospital and most importantly on the large expanding site at Southern Cross North Harbour and in Shakespeare Road. Two large facilities in easy motorway access to Epsom/Mt Eden and central Auckland. These are in medical and commercial sites. The Southern Cross Shakespeare Road site is about to start at the end of this year, and this will mean that day surgeries currently carried out at Southern Cross North Harbour will shift to that site and that will effectively open a huge amount of operating space at Southern Cross North Harbour, which many people and Auckland already travel to without any issue.

Also on the Southern Cross North Harbour site in Wairau Road, there are plans for a further 12 bed surgical unit, a radiation oncology unit and further medical suites. This will result in an over-supply in this region when also combined with their Shakespeare Road day surgery site, due to open at the end of this year.

Already one whole floor of their Southern Cross North Harbour medical unit has been assigned poorly utilized gymnasium which is astounding for highly extensive medical designed buildings to be leased as a gymnasium, which indicates the underutilizations of their buildings currently in Auckland. This will likely be the result of the Brightside expansion in that there is NOT the need for medical space.....it will sit empty until Southern Cross can force/ coerce doctors and staff away from Mercy and Ascot sites and leave these vacant. There is not a need nor business case for more private hospital beds in

Submission no 135

central Auckland. The current sites are under-utilized and public hospitals are actively expanding .

Southern Cross Hospitals also have a large site at St Mark's Road which is in a commercial area of tall buildings, high-density and very close to the medical rooms of many medical practitioners along Remuera Road. This is a more suitable site if they feel they have to waste their stakeholders insurance monies instead of lower premiums.

This site is also extremely close to the motorway on-ramp and does not propose a traffic problem as expansion of the Brightside site will. The St Mark's Road site can go to multi-story, is in a commercial zone and also suitable hospital zone and medical zone and does not involve destroying historic residential homes and destroying a residential community, nor does it involve a Unitary Plan change.

There is no need for further private hospitals in central Auckland and especially in this zone. This is a commercial venture and an unnecessary need as many specialists and surgeons will advise. Southern Cross hospitals and their owner Southern Cross Insurance, merely want to place a large hospital on the doorstep of their only competitor in town, Mercy Ascot. I have absolutely NO affiliations with Mercy or Mercy Ascot.

It is not appropriate to take away historic residential houses which are in high need and replace them with a private hospital that is not needed by the local residents, nor the residents of Auckland, when there are plenty of other private hospital facilities available in close distance and close travel.

This is not an Emergency hospital nor a Public hospital that might be argued as being needed, this is a private business venture. There is a large public hospital at Auckland City Hospital down the road, and Auckland City Hospital has extensive plans to create a large elective hospital on the already owned very large Greenlane Hospital site and are in the middle of planning several operating theatres over the next two years to be built. This has been approved on a Government level and funding given and so elective surgery can be carried out on this site. This will become a major Greenlane Elective hospital site. Larger than all other elective hospitals.

It already has the large outpatient hospital at Greenlane and the old National Women's hospital, all of which eventually will become a large elective hospital. Plans are already underway for this with further government funding. This means that there be an oversupply of both private and public

Submission no 135

elective operating theatres and beds in the central Auckland region, which is not expanding like North Auckland and South Auckland. These Greenlane plans are well underway for developing this site and it will mean there will be an enormous shift of publicly funded elective surgeries (which currently Southern Cross and Mercy Ascot do some of) back into the large elective hospital on the Greenlane site, so any economic plan to carry on doing publicly funded elected surgeries will die as Auckland City Hospital Board has extensive plans with funding to do their own surgeries. This has already happened at Middlemore and Northshore hospitals.

Stand-alone elective units have already been built at the North Shore public hospital site by Waitemata District Health Board and at the SuperClinic site by Counties Manukau District Health Board.

The net effect of building these publicly funded elective units was a massive drop in private elective surgical use because of a massive reduction in waiting lists and a massive reduction in publicly funded private surgeries. The private hospitals became under-utilized. This fight for the elective insurance dollar continues as those with private insurance reduce (well documented), the elderly give up health insurance because of cost (partly due to the folly of using insurance premium to build under utilized hospitals) and public health has better funding and does more elective surgeries (confirmed stat over the last 8 years). The net effect is a race to the bottom as Southern Cross hospitals desperately tries to compete with Mercy Ascot for the health \$\$\$\$.

This is not a sustainable business plan and loss of residential houses and land will be the next effect.

The development of the Greenlane Hospital elective surgical unit in the next few years, which is already planning, will substantially reduce the need for elective surgeries, both public and private, in the central Auckland area. There are also plans for funding additional public hospitals on the North Shore and in South Auckland and Middlemore is undergoing an extensive rebuild, which will also decrease the need for private hospitals.

How many elective hospitals does central Auckland need ?

Do we not need houses and also land for houses ?

As I stated above have no affiliation with Mercy Ascot nor Southern Cross.

For the last 20 years I have worked at all of these hospital including Auckland City Hospital, Northshore Hospital, Middlemore Hospital Ascot, Mercy, Brightside, North Harbour and St Marks and I have first had experience and a great understanding of the needs and dynamics of the private and public hospital. I am also well aware of the underutilization of the currently existing

Submission no 135

private hospitals in Auckland despite the protestations and expansion plans of Southern Cross Hospitals (which is often uneconomic and unfettered), but they do have a large amount of money to spend without accountability, unlike some of the other hospitals including public hospitals in Auckland.

The hospital that is planned will result in demolition of sorely needed residential housing in prime residential zone. It will have huge adverse effects on the neighbouring properties. One only needs to look at the Southern Cross North Harbour site in Wairau Road, which is in an semi-commercial area, and how Southern Cross Hospital is under a massive expansion programme on that site with absolutely no regard for the surrounding residents nor do their buildings hospitals and large advertorial signs that have any compatibility with the surrounding architecture or residential areas. They have massive staff and patient parking issues despite under utilization. They have traffic issues.

I am well aware of the traffic that a private hospital creates as I am part of that problem, as my wife is. Doctors cars, patients cars and delivery vehicles arrive constantly throughout the day and night 24/7, but particularly during the high volume traffic periods of early in the morning and in the evening. For the Brightside Gillies Ave site this will during school drop off times for both Auckland Grammar School and Epsom Girls Grammar school and during the high peak traffic times already very heavy along Gillies and Brightside Ave and Owens and Mountain Rd.

As a Trauma surgeon at Auckland City Hospital this development it is just an accident waiting to happen by creating a very large hospital in this school residential zone, which as explained above is totally unneeded. Traffic along Gillies Ave, Brightside, Mountain Road and Owens Road is already chaos at these times and almost gridlocked, particularly getting access onto the motorway and off the motorway and building a hospital here will only create worsening gridlock. I am well aware that Southern Cross will pay their own transport advisors to say this will not be an issue, but they do not live in this zone and frankly they are being paid to mislead the Auckland Planning Committee.

From a personal point of view, I have gone to school in this area. I chose to return to live in this area. The home I live in has historic covenants. It also has covenants on the trees which have been put in place by Auckland Council. I obey these covenants and I have restored the house. The house is over 150 years old and when doing renovations to the house I was required to obey the Council Regulations and the Unitary Plan. The previous owners of this house lived there for 18 years; the owners before that 35 years; the

Submission no 135

owners before that 30 years. The same applies to all the houses surrounding our house. They are all long-standing residential houses and people choose to live in this area because of the historical nature, because of the closeness of Mt Eden and the Mt Eden community and because of the good schools in the area and the fact that our children can walk to school. Living in this zone comes at an increased expense because of the school zones, but also because of the heritage of many of the houses which means that we cannot go and willy nilly bowl or even re-build these houses without extensive approval from the Auckland City Council. People choose to live in Epsom, Mt Eden and the surrounding areas because of these heritage houses, because of the community not because they want to live close to a private hospital or an industrial complex. There are plenty of areas for these types of buildings in commercial zones, and this was the reason for the Unitary Plan.

As stated above there is no need for this hospital to increase in size and to raze further houses to have this hospital expand. Southern Cross has plenty of other sites available namely St Marks Rd and currently their hospitals are underutilized, and there are plans for further building of hospitals in the Auckland zone in commercial areas which will further reduce the demand for these private hospitals.

Our house is a historic house with slate roof and basalt stone walls in the ground and a swimming pool, which is brand new and I will be expecting any damage done to the house, the pool and the surrounding area to be covered by the Council insurance plan.

I have taken the liberty of checking with my home insurance company and they have advised me they would not be responsible damage done by a neighbouring building event

It would be covered either by the Auckland City Council liability or Southern Cross Hospitals The same applies to blasting, stone debris and disruption to schools, schoolchildren travel, which I have thoroughly reviewed at various meetings and note this project, the amount of rock blasted out, the damage to surrounding houses will be extensive, particularly based on what occurred in 1999. It is of interest that when I went to renovate the swimming pool, I was clearly told that excavation or blasting of the volcanic basalt would not be approved by my building consent because I was in a residential area and it did not abide with the Council nor Unitary Plan.

I have seen what Southern Cross has done on the Southern Cross North Harbour Wairau Road site and they have progressively quietly brought the surrounding houses and then built out on top of these sites so they tower over the surrounding residents and hospital workers can see their bedrooms, their living rooms and their family rooms.

Submission no 135

The net effect is to destroy the residential area and with have been visiting this Southern Cross North Harbour site 30 years now, at Wairau Road I have seen that whole residential area destroyed by Southern Cross Hospitals.

This is certainly the method that Southern Cross Hospitals use (despite being a charity based organisation), and they do not create communities but destroy communities. This cannot be allowed to happen for the sake of future generations in Auckland who certainly do not need an unnecessary private hospital that has no commercial viability apart from trying to annoy their competitor and take away private medical business which is scarce. There is an oversupply of private hospital beds and theatres in this city.

This is a pure venture of greed and folly by a charity based organisation that currently appears to have an excess of money, which indeed it should be paying back to its shareholders and the elderly people that support Southern Cross Insurance.

Thank you for allowing this submission. Please decline this folly for the ratepayers and residents of Auckland.

Hugh Blackley

Submission no 136

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 15 April 2019 5:45 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Hyeon Tae Cho
Attachments: Personal Statement-converted.pdf; Personal Statement-converted_20190415173902.468.pdf

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Hyeon Tae Cho

Organisation name:

Agent's full name:

Email address: kenta.cho@auckland.ac.nz

Contact phone number: 0212984275

Postal address:
168 Gillies Avenue
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
The proposal in its entirety

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:
I would like it declined in full. PLEASE REFER TO MY ATTACHMENTS

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

Submission date: 15 April 2019

Submission no 136

Supporting documents

Personal Statement-converted.pdf

Personal Statement-converted_20190415173902.468.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.

Submission no 136

Hyeon Tae (Kenta) Cho
Email: Kenta.cho@auckland.ac.nz

I oppose the private plan change PC21, the development on 3 Brightside Road / 149, 151 and 153 Gillies Avenue, in FULL.

My reasons are as follows:

The Epsom/Mt. Eden residential area is home to 4 major public schools, ranging from primary (Kohia Terrace), middle (Auckland Normal Intermediate) and high schools (Auckland Boys' Grammar and Epsom Girls Grammer), with hundreds, if not thousands, of students and parents that readily utilise Gillies Avenue for transit. While it is clear the process of development and construction will impose considerable effects on one of the most congested roads in Auckland, it provides potential disruption within various institutions, which in addition to undermining the safety of children and pedestrians, can cause significant disturbance to daily life. Critically, this can occur via continuous excavation/blasting which we have previously experienced during the current Southern Cross establishment approximately 20 years ago. Moreover, this will impose major disruption of residential homes extending beyond potential property damage and cause significant mental and psychological stress by aberrant noise and blasting, particularly but not limited to home-stay parents and young children/infants that reside on Brightside and along Gillies Avenue.

While the expansion of hospital operation, as mentioned in the executive summary provided by SFH consultants, is indeed required to match Auckland's 'growing and ageing population', this proposition fails to recognise Auckland's significant housing shortage. Inner city suburbs like Mt Eden / Epsom are not exempt from this. While attempting to resolve one issue, another of comparable social and economic burden must be dealt accordingly, without neglecting the other. Removing 3 heritage homes, in addition to the 3 previously lost, and numerous large boarding houses that provide for a large number of people depicts an emerging problem. With a unitary plan that allow a platform for further development, such as PC21, within residential areas in Auckland loss of houses will inevitability accumulate and exacerbate the housing crisis. In fact, the existing hospital in Epsom could be relocated elsewhere for further development and concurrently allow necessary housing within a preferred inner-city residential area with adequate public transport and other social services.

As a medical researcher, I recognise the growing need for improved healthcare facilities. However, I wish to address that private hospital may not necessarily provide significant or 'effective' contribution towards the Epsom/Mt Eden community compared to other regions. For example, Mercy Ascot and many other private health institutions are already well-established around the Epsom/Mt Eden region and although this residential area may contribute at least in part to the growing population, new residential establishments are developed in a more vigorous manner in relatively outer Auckland regions. Hence, a private hospital may more 'effectively' contribute to 'local, district and regional communities' in such developing areas to match the influx of residents to provide better health care in addition to public health services. Additionally, the establishment in developing regions likely encourage distribution of demand more evenly throughout Auckland.

Submission no 136

Hyeon Tae (Kenta) Cho
Email: Kenta.cho@auckland.ac.nz

Given these reasons, I would like to conclude that the Southern Cross's central aim for further establishment in Epsom/Mt Eden, namely to 'significantly contribute' and 'enabling...social, economic wellbeing and health', is paradoxically threatening our community's wellbeing and health.

Kind regards,

Hyeon Tae (Kenta) Cho

Email: Kenta.cho@auckland.ac.nz

Phone: +64-212984275

Address: 168 Gillies Avenue, Epsom, Auckland, 1023

Submission no 136

Hyeon Tae (Kenta) Cho
Email: Kenta.cho@auckland.ac.nz

I oppose the private plan change PC21, the development on 3 Brightside Road / 149, 151 and 153 Gillies Avenue, in FULL.

My reasons are as follows:

The Epsom/Mt. Eden residential area is home to 4 major public schools, ranging from primary (Kohia Terrace), middle (Auckland Normal Intermediate) and high schools (Auckland Boys' Grammar and Epsom Girls Grammer), with hundreds, if not thousands, of students and parents that readily utilise Gillies Avenue for transit. While it is clear the process of development and construction will impose considerable effects on one of the most congested roads in Auckland, it provides potential disruption within various institutions, which in addition to undermining the safety of children and pedestrians, can cause significant disturbance to daily life. Critically, this can occur via continuous excavation/blasting which we have previously experienced during the current Southern Cross establishment approximately 20 years ago. Moreover, this will impose major disruption of residential homes extending beyond potential property damage and cause significant mental and psychological stress by aberrant noise and blasting, particularly but not limited to home-stay parents and young children/infants that reside on Brightside and along Gillies Avenue.

While the expansion of hospital operation, as mentioned in the executive summary provided by SFH consultants, is indeed required to match Auckland's 'growing and ageing population', this proposition fails to recognise Auckland's significant housing shortage. Inner city suburbs like Mt Eden / Epsom are not exempt from this. While attempting to resolve one issue, another of comparable social and economic burden must be dealt accordingly, without neglecting the other. Removing 3 heritage homes, in addition to the 3 previously lost, and numerous large boarding houses that provide for a large number of people depicts an emerging problem. With a unitary plan that allow a platform for further development, such as PC21, within residential areas in Auckland loss of houses will inevitability accumulate and exacerbate the housing crisis. In fact, the existing hospital in Epsom could be relocated elsewhere for further development and concurrently allow necessary housing within a preferred inner-city residential area with adequate public transport and other social services.

As a medical researcher, I recognise the growing need for improved healthcare facilities. However, I wish to address that private hospital may not necessarily provide significant or 'effective' contribution towards the Epsom/Mt Eden community compared to other regions. For example, Mercy Ascot and many other private health institutions are already well-established around the Epsom/Mt Eden region and although this residential area may contribute at least in part to the growing population, new residential establishments are developed in a more vigorous manner in relatively outer Auckland regions. Hence, a private hospital may more 'effectively' contribute to 'local, district and regional communities' in such developing areas to match the influx of residents to provide better health care in addition to public health services. Additionally, the establishment in developing regions likely encourage distribution of demand more evenly throughout Auckland.

Submission no 136

Hyeon Tae (Kenta) Cho
Email: Kenta.cho@auckland.ac.nz

Given these reasons, I would like to conclude that the Southern Cross's central aim for further establishment in Epsom/Mt Eden, namely to 'significantly contribute' and 'enabling...social, economic wellbeing and health', is paradoxically threatening our community's wellbeing and health.

Kind regards,

Hyeon Tae (Kenta) Cho

Email: Kenta.cho@auckland.ac.nz

Phone: +64-212984275

Address: 168 Gillies Avenue, Epsom, Auckland, 1023

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

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



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

JAMES GARY CURRIE

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

Address for service of Submitter

149 Gillies Ave, Epsom

Telephone:

021 081 96185

Fax/Email:

currie_jim2010@hotmail.com

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 21

Plan Change/Variation Name

3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

The specific provisions that my submission relates to are:

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

Plan provision(s)

Or

Property Address

Or

Map

Or

Other (specify)

The whole proposed plan change

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

Submission no 137

The reasons for my views are:

I live at 149 Gillic, and have for three years there is a housing crisis in Auckland, and rental accommodation I can afford is impossible to find. The rent here is reasonable, but after having considered (continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

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

other renting options, have discovered the choices are very limited, it not impossible for me to even consider.

*Continued on next Page

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

Jim Currie

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

Date

18/04/2019

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.

: Next page

Reasons for my view

apart from my own concerns about being able to find affordable housing, most of the other tenants of the Boarding House, of which there are about 30, are, I believe, in the same precarious position. ~~Many~~ Some have no jobs, some are migrants, particularly Filipinos, who are struggling to make ends meet. It goes without saying that to rent in Auckland is beyond the means of many people ~~like them~~, and I find it almost absurd that when there is such a housing crisis in existence, that a large company like Southern Cross would choose to set up a large hospital in a zone ^{already} zoned for residential purposes, when it has other options.

and I believe it had the chance to oppose the zoning as it stands ~~at~~ when before the UP was put in place.

So, apart from the personal circumstance of myself and other tenants living here, if Southern Cross' planned amendment were to go ahead, it really would seem like the City is completely giving ~~into~~ ^{into} big business, and ignoring the heart of the city, its residents, and their practical, as opposed to commercial, needs ~~ambitions~~. Thanks

Submission no 137

ATTACHMENT – Reasons for Submission

1. **I/we oppose** Proposed Plan Change 21 (PC 21-private) for the following reasons:

- (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
- (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
- (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
- (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
- (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
- (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
- (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

Submission no 137

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 138

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 15 April 2019 8:30 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Hyun Ryang Cho
Attachments: Technical submission_20190415202231.394.pdf; Reasoning for opposing the Private Plan Change PC21 (1).pdf

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Hyun Ryang Cho

Organisation name:

Agent's full name:

Email address: hcho529@aucklanduni.ac.nz

Contact phone number: 0211130012

Postal address:
168 Gillies Avenue
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
The proposal in its entirety

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:
I would like it declined in full Please refer to my attachment

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

Submission no 138

Submission date: 15 April 2019

Supporting documents

Technical submission_20190415202231.394.pdf

Reasoning for opposing the Private Plan Change PC21 (1).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.

Submission no 138

HYUN RYANG CHO (hcho529@aucklanduni.ac.nz)

168 Gillies Avenue, Epsom, Auckland

ATTACHMENT -- Reasons for Submission

1. **I/we oppose** Proposed Plan Change 21 (PC 21-private) for the following reasons:
 - (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
 - (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
 - (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
 - (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
 - (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
 - (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
 - (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and

Submission no 138

HYUN RYANG CHO (hcho529@aucklanduni.ac.nz)

168 Gillies Avenue, Epsom, Auckland

purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 138

HYUN RYANG CHO (hcho529@aucklanduni.ac.nz)

168 Gillies Avenue, Epsom, Auckland

Reasoning for opposing the Private Plan Change PC21, on the development on 3 Brightside Road, 149,151 and 153 Gillies Avenue are as follows:

Gillies Avenue is an important road for the commuters heading into the city centre along with Manukau Rd, Mt Eden Rd and Dominion Rd, as it connects directly onto the Southern Motorway, towards the city centre. All the roads mentioned are very congested during morning rush hours and afternoon rush hours, and Gillies Avenue being a home for hundreds of residents but also a home to multiple schools, with over thousands of students this road can be very congested. A potential development on Gillies Avenue will no doubt cause severe disruptions to those who live around Gillies Avenue and all the students of the schools but also every commuter that will utilise Gillies Avenue, including everybody using private vehicles to commute but those who use the bus to commute. This area is prone to being congested, and these future developments on Gillies Avenue will absolutely have a direct affect on everybody utilising Gillies Avenue.

Continuous blasting & excavation for the substantial basement being planned, will be of very large concern, especially for residents living in a relatively close proximity of the development site, because it will be very likely for this to cause damage to those homes & structural damage to properties such as rock walls and pools, but also affect the safety of those nearby, including school students who use Gillies Avenue to commute to and from school.

Auckland having a housing crisis that has not yet been solved, with a very vast number of Auckland's population having to travel over an hour to commute to work yet allowing developments and commercialisation on this mainly residential area should not even be considered. This area has been mainly a residential area, and so it should be for times to come. Allowing this to happen will result in the loss of livelihood of those living here, but again as mentioned above, those who use this road as a means of getting to work. Because Eden-Epsom area has a high density of schools, from primary to high schools, this area is a very important area for families especially those with children wanting to or are attending schools now, and so it should be kept this way, to keep the heritage and well-being of Gillies Avenue and its near surroundings.

Submission no 139

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Wednesday, 17 April 2019 3:15 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Jennifer Anne Spillane
Attachments: ZoneChange_Technical.pdf; Spillane_Plan Change 21 opposition.pdf

Categories:

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Jennifer Anne Spillane

Organisation name:

Agent's full name:

Email address: spillanej01@gmail.com

Contact phone number: 0276036990

Postal address:
79 Epsom Avenue
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
We oppose the plan change request in its entirety

Property address:

Map or maps:

Other provisions:
See attached

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

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

The reason for my or our views are:
we oppose the plan change in its entirety see attached

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

Submission no 139

Submission date: 17 April 2019

Supporting documents

ZoneChange_Technical.pdf

Spillane_Plan Change 21 opposition.pdf

Attend a hearing

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

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

Declaration

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

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

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

Yes

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

Submission no 139

1. In addition, I/we also have these concerns:

- (i) The Mt Eden/Epsom area is a special combination of residential dwellings (including a large number of heritage dwellings) and a few carefully considered “light touch” commercial buildings that blend well with the residential. I understand it is proposed that the Southern Cross hospital development be able to be built up to 25 metres. That will materially detrimentally affect the overall character of the area and is not appropriate in a residential zone. Our concern is not only in relation to the impact of this proposed development but also for the precedent that this will create for other developments in character areas in Auckland.
- (ii) The importance of Auckland’s character heritage residential areas is recognised in the Unitary Plan, which has been the subject of much consultation. It is vitally important that that is not now undermined by a rule change for an inappropriate development that will not only create a visual intrusion, but will also change the overall character of the area.
- (iii) I am deeply concerned about the impact of the construction project itself, in the area. In addition to the impact on neighbouring houses of the 2-3 years of volcanic rock breaking, my concern is also for the impact on traffic in the area, with a significant increase in construction trucks in an area with a high density of schools and school children cycling and walking to school.

Submission no 139

1. I, Proposed Plan Change 21 (PC 21-private) for the following reasons:

- (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
- (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
- (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
- (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
- (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
- (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
- (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

Submission no 139

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
- i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 140

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 18 April 2019 4:01 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - jennifer lorraine scott

Categories:

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: jennifer lorraine scott

Organisation name:

Agent's full name:

Email address: bnjscott@xtra.co.nz

Contact phone number: 09 5200618

Postal address:
49 mt st john ave
epsom
auckland 1051

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:

Property address: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

Map or maps: optional

Other provisions:

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

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

The reason for my or our views are:

this development is in the wrong place. It is far too large to be sited in a primarily residential area with an already heavy traffic load on an arterial road. There is a much more appropriate area for it to go at the former training college site which is close by, far larger- so there is space if a future need for expansion is needed- which is likely, and it is already a non residential area. this application should be declined and Southern cross advised to use the site as mentioned

Submission no 140

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

Submission date: 18 April 2019

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.

Submission no 141

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Saturday, 13 April 2019 5:46 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Jennifer Stewart
Attachments: Eden Epsom Submission_20190413172840.313.pdf; technical-submission-ideas (4)_20190413172903.672.pdf

Categories:

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Jennifer Stewart

Organisation name:

Agent's full name: John Stewart

Email address: jennystewart20@gmail.com

Contact phone number: 0210786244

Postal address:
4/9 Marama Ave
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
The proposal in its entirety

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:
I would like it declined in full. Please refer to my attachment.

Submission no 141

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

Submission date: 13 April 2019

Supporting documents

Eden Epsom Submission_20190413172840.313.pdf

technical-submission-ideas (4)_20190413172903.672.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.

Submission no 141

ATTACHMENT -- Reasons for Submission

1. **I/we oppose** Proposed Plan Change 21 (PC 21-private) for the following reasons:
 - (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
 - (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
 - (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
 - (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
 - (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
 - (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
 - (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and

Submission no 141

purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 141

I have lived in this area for 28 years. I oppose this application to extend this hospital.

Firstly, it is of particular concern that the Unitary Plan, which takes into account the heritage nature of this residential suburb, could be altered to allow for the erection of a major commercial building of up to 25 metres in height and a proportionate bulk.

Secondly, this commercial enterprise would be running a 24 hour-a-day seven day a week operation, which is completely contrary to quality living in this well-established residential area.

Thirdly, I am very concerned that three heritage homes in this suburb, which is renowned for its character and gardens, would be lost. To suggest that vegetation and rock walls could in some way ameliorate this, is disingenuous and self-serving.

Fourthly, I have a major concern about the impact on traffic. During the construction of the building and its underground carpark the heavy vehicles both delivering materials and removing excavation spoil will create huge traffic issues. In the long term, the operation of the hospital will necessitate major increase in traffic. This will include patients and their families, doctors and the full range of health professionals and hospital workers. The traffic movements will be very significant at critical times at the beginning and end of the working day, further creating major transport issues.

In conclusion, in my opinion the change to the Unitary Plan sought by SCHL is inappropriate and beyond the scope of acceptable planning principles.

Submission no 142

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Wednesday, 17 April 2019 1:45 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - John Damian Allen
Attachments: Submission JD Allen.pdf

Categories:

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: John Damian Allen

Organisation name:

Agent's full name:

Email address: ja@sdg.net.nz

Contact phone number: 021630145

Postal address:
32A Owens Rd
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:
The entire Plan Change

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

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

The reason for my or our views are:
please see PDF File attached

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

Submission no 142

Submission date: 17 April 2019

Supporting documents
Submission JD Allen.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.

Submission no 142

SUMBISSION BY JOHN ALLEN IN OPPOSITION TO A REQUEST FOR A PRIVATE PLAN CHANGE BY SOUTHERN CROSS HOSPITALS LTD IN RELATION TO PLAN CHANGE 21 (PRIVATE).

- 1) I oppose the Private Plan Change (21) for 3 Brightside Road and 149, 151, 153 Gillies Ave sought by Southern Cross Hospitals.

Submission no 142

2) Personal information relevant to this opposing submission:

- I am a consulting civil and structural engineer with the degree of Master of Engineering (1st Class) from the University of Auckland.
- My work on new theories for the limit analysis of plate structures and their mathematical proofs has been published in Philosophical Transactions of the Royal Society, London.
- As structural consultant to Hong Kong and Shanghai Hotels I provided all design and construction review for the towers, sea walls and landscape structures of The Peninsula, Bangkok.
- For the past three years I have been engaged on research work with the University of Auckland on the response of building structures to earthquake motion and large blast impulse at distance.
- I independently hold three patent designs for earthquake resistant structures.
- I designed the building structures and landscaping of 32A Owens Rd, and have lived there since 1995.

Submission no 142

- 3) The development proposed by Southern Cross Hospitals Ltd includes a large scale commercial building to be constructed over three residentially zoned sites, two of which have heritage overlay, and all of which are surrounded by residential properties.
- 4) Southern Cross Hospitals is a limited liability non-profit company who nullify their profits and hence any tax obligations through continued investment in their own healthcare sector. This investment includes their own property development ventures.
- 5) The building block as proposed by Southern Cross, is to a height of 16m above ground/street level, and overlies a proposed basement which would require excavation through solid, continuous basalt rock to a depth of 7m. The compressive strength of this bonded basalt is at least twice that of high strength concrete. Both building and basement would run along most of its eastern street boundary on Gillies Ave.
- 6) Along its western boundary, the building as proposed to a height of at least 16m above existing ground level, would lie only 6m distant from the open living space of its nearest residential property, being our residence at 32A Owens Rd. Its proposed basement would involve excavation through the solid basalt to within 5m distance of our boundary.
- 7) For scale perspective Epsom Girls Grammar School lies to the north of the proposed development. Three of its buildings are located on Gillies Ave; the most prominent being the Raye Freedman Arts Centre which is the most northerly building. At its Northern extreme, the tip of its cantilevered roof is at 10m above ground/street level. The building's height at its opposite southern end is 7.5m. The average height of the building is approximately 9m above ground level, and at this height the building is both very prominent and imposing within its landscape. The building proposed by Southern Cross is a 16m high block, being almost twice the height of the Raye Freedman Arts Centre and approximately twice the maximum height permitted for the residentially zoned sites that Southern Cross propose to build over. Figures 15 & 16 in the appended set of figures show, to scale, both the proposed building and the Raye Freedman Arts Centre.
- 8) To the west of the proposed development, buildings at the lower commercial end of Owens Rd, where Owens Rd intersects with Manukau Rd, are typically two and three story office blocks averaging 7m-8m height with a maximum height of 10m for a three story block. Neither these buildings nor any of the buildings at Epsom Girls Grammar School which all overly basalt rock have basement excavations. Buildings of the bulk and height proposed by Southern Cross are found only further north along Manukau Rd in the Newmarket commercial zone.
- 9) The building proposed by Southern Cross is grossly incompatible with both the historical and present character and zoning (recently reinforced and reiterated in the unitary plan) of this neighborhood.

Submission no 142

- 10) To put the proposed development by Southern Cross into a time perspective, similar drawings of the proposed development, but with a reduced width were presented by Southern Cross in a minuted meeting, to Auckland Council 24 July 2014. This meeting was held only two days after the closing date for public submissions on the then proposed Auckland Unitary Plan (AUP). At this meeting Southern Cross disclosed that they had options to purchase the three residentially zoned sites of 149-153 Gillies Ave. Auckland Council advised Southern Cross at this meeting that their proposal was simply not appropriate for this residential zone.
- 11) The AUP subsequently, that is, at a period after this meeting, reinforced the residential zoning of the three sites (149 to 153 Gillies Ave) by designating all of them as single dwelling residential, and further protecting two of the three with heritage overlay.
- 12) Despite this, and despite having had five years to locate more appropriate sites, Southern Cross have purchased the properties on 149 to 153 Gillies Ave and have persisted with their proposal.
- 13) When asked in a meeting with residents whether Southern Cross had considered other sites for their proposed development, Courtney Bennett, the Chief of Property and Development for Southern Cross Hospitals, responded that they had not, and that the idea was novel.
- 14) Southern Cross have now pushed onto a more extreme approach by applying to have the three residential sites, all of which are similarly surrounded by residentially zoned properties, to be rezoned as a Special Purpose Healthcare Facility and Hospital Zone (HFHZ).
- 15) This would enable Southern Cross, a commercial enterprise, to build 25m high multi story blocks in the middle of a residentially zoned neighbourhood with no need for any consideration of, or consultation with, residents.
- 16) The proposed development adds to Southern Cross' existing facility, to create a large commercial estate. The impact of this proposed 24 hour / 7 day working estate on the immediate and surrounding residential area would be both considerable and negative in all respects.
- 17) In 1993 my wife and I commissioned residential architects Cook Hitchcock and Sargisson to design our home at 32A Owens Rd, which we moved into in 1995. The building's materials are all high quality; being solid masonry, cedar joinery, copper spouting, cedar shingles, marble paving. The design is sympathetic with neighboring residences and comprises three buildings with a total floor area of 350m² with ground floors which integrate with and flow onto three courtyards and a swimming pool area. External walls of the ground floor are substantially glazed and transparent. This is evident in the appended set of photographs of 32A Owens Rd.
- 18) The personal effect on ourselves and the effect on our property from Southern Cross' proposed development would include:

Submission no 142

- The overbearing and permanent presence of a 16m high commercial building located only 6m distance from our connected and open living spaces
 - Severe depreciation of our property's ambience and market value
 - Severe impact on our enjoyment of our property's special indoor/outdoor living aspects, which were central to the property's design
 - Complete loss of our eastern sky scape
 - Complete loss of our morning sun
 - Extensive morning shading and cooling to our outdoor living spaces
 - Severe loss of our privacy and our perceived privacy
 - Inevitable damage to our masonry house structure and concrete pool, from vibrations during proposed excavation through solid basalt to within 3m of our boundary
 - Severe visual impact from the proposed 16m building, to all areas of the property, indoor and outdoor
- 19) The extreme impact of the proposed development on the interior and exterior living spaces of 32A Owens Rd is illustrated in the appended figures and photographs. The figures read in conjunction with the photographs, though extreme, are by no means exhaustive. That is, they can convey only a part of the impact. Each figure is briefly explained. The interior and exterior spaces of 32A Owens Rd are labelled on the figures as:
- KD: Kitchen/Dining (GF)
 - L1: Main Living Room (GF)
 - D: Dining Room (GF)
 - L2: Second Living Room (GF)
 - EG: Entry Gates
 - FD: Front Door
 - G: Garage
 - P: Pool Area
 - RG: Rear Garden
 - RC: Rear Courtyard
 - CC: Central Courtyard
 - O: Office (FF)
 - B1-B4: Bedrooms (FF)
 - G: Gallery (FF)
 - SW: Stair Well
- 20) Effectively every interior and exterior living space of 32A Owens Rd is overlooked, looked into, or looked through from a sweeping range of angles and locations on the first or second floors of the building and link bridge of the proposed development. Reciprocally, the interior and exterior spaces of 32A Owens Rd which could be looked into, would look out in their eastern and

Submission no 142

southern directions to views of nothing but the proposed building and its three story link bridge.

32A Owens Rd would be continuously surrounded and overlooked along its entire eastern and southern boundaries by the proposed development. The development as proposed would result in the complete loss of privacy and ambience currently existing at 32A Owens Rd, the loss of its eastern and southern views, severe shading, and the permanent and inescapable overbearing presence of a large functioning commercial building, grossly out of place with its environment and setting.

21A) Figures

Figure 1: shows the north elevation of 32A Owens Rd inclusive of pool area, relative to the north elevation of the proposed development. The shaded area to the rear of the house is the three story link bridge of the proposed development

Figure 2: shows the plan of the three residential buildings of 32A Owens Rd inclusive of pool area and courtyards, relative to the overlooking first floor plan inclusive of link bridge of the proposed development. Some of the possible view directions from the first floor of the proposed development into the labeled interior and exterior living spaces of 32A Owens Rd are shown.

Figure 3: similar to Figure 2, but here 32A Owens Rd is shown relative to the overlooking second floor plan inclusive of the second floor of the link bridge of the proposed development. Again a limited number of possible view directions from the second floor of the proposed development into the labelled interior and exterior living spaces of 32A Owens Rd are shown.

Figure 4: shows a transverse cross section (referenced as section 1 of Figures 2 and 3) of 32A Owens Rd along with the proposed development. Lines of sight, direct or oblique, from the development into the labelled interior and exterior spaces of 32A Owens Rd are shown.

Figure 5: shows a transverse cross section (referenced as section 2 on figures 2 and 3) of 32A Owens Rd, with lines of sight from the proposed development into further interior and exterior spaces 32A Owens Rd.

Figure 6: shows a longitudinal cross section (referenced as section 3 on Figures 2 and 3) of 32A Owens Rd, with lines of sight from the first and second levels of the link bridge of the proposed development into and through the interior spaces and into the exterior spaces of 32A Owens Rd.

Figure 7: shows a longitudinal cross section (referenced as section 4 on Figures 2 and 3) of the wall enclosed pool area and rear garden space of 32A Owens Rd, with lines of site from the

Submission no 142

first and second levels of the link bridge of the proposed development into the pool and garden area of 32A Owens Rd.

Figure 8: shows a longitudinal section and elevation of 32A Owens Rd taken through its central courtyard area. This shows the relative position and relative scale of 32A Owens Rd to the west or facing elevation of the proposed development. It also shows the view towards the building from the center of 32A Owens Rd and illustrates the building's grossly overbearing presence.

Figure 9: similar to Figure 8, shows a longitudinal section and elevation of 32A Owens Rd taken through its central courtyard. The relative position and scale of 32A Owens Rd can here be compared with a longitudinal cross section through the proposed development which includes the proposed depth and extent of excavation through continuous bonded basalt rock as proposed in the development.

Figure 10: similar to Figure 1 shows the north elevation of 32A Owens Rd along with the north elevation of the proposed development. The existing phoenix palm tree of 149 Gillies Ave, in its current position, has been superimposed onto the Figure. This drawing, inclusive of the superimposed existing phoenix palm, along with Figures 11-14 can be read in conjunction with the appended photographs, inclusive of the tree, to quickly gain a tangible reference of the scale of the proposed development.

Figures 11-14: show elevations and a cross section of the proposed development. The existing palm tree of 149 Gillies Ave has again been superimposed onto these drawings at its current position and vertical extent (height).

Figures 15, 16: show an elevation and longitudinal section of the proposed development relative to the Raye Freedman Arts Centre. Both buildings are at the same scale.

Figure 17: shows 32A Owens Rd relative to the proposed development. The three buildings of 32A Owens Rd, its courtyard, and swimming pool are shown in this figure. As can be seen, 32A Owens Rd is engulfed by the proposed development.

21B) **Photographs**

Photographs 1A, 1B: views towards the south, of the northern elevation of 32A Owens Rd. It shows the kitchen/dining room to the left, the central courtyard, living room to the right and bedroom 1 over it.

Submission no 142

- Photographs 2A, 2B: views towards the west showing again the central courtyard, garage building and office over it.
- Photographs 3A, 3B: views towards the north showing the second living room and entry gates.
- Photographs 4A, 4B: views towards the east showing the kitchen/dining room and pool/courtyard area beyond.
- Photograph 5: a view from the first floor bedroom 1 towards the east. It looks into the kitchen/dining room and over its roof to the neighbouring sites on Gillies Ave. Included in the photograph is the existing palm tree of 149 Gillies Ave. Figure 11 superimposes, to scale, this palm tree onto the eastern view of the proposed development. The proposed development is of the same height as the palm tree, but runs for 70m along the entire eastern skyline.
- Photograph 6: a view taken from the first floor office again looking into the kitchen/dining room and over its roof to the neighboring sites on Gillies Ave. Again, Figure 11 shows the proposed development view in this direction relative to the palm tree in this photograph.
- Photograph 7: shows a view from the living room to the east.
- Photograph 8: shows a view from the central courtyard to the east. Figure 8 shows the kitchen/dining room in this photograph relative to the proposed development beyond it.
- Photograph 9: shows a view from the entry gates of 32A Owens Rd towards the Gillies Ave sites inclusive of the kitchen/dining room and phoenix palm beyond.
- Photograph 10: shows a view from the kitchen/dining room of 32A Owens Rd toward the eastern neighbouring Gillies Ave sites. Included in this photograph is the pool area of 32A Owens Rd, the wall between 32A Owens Rd and the Gillies Ave properties, and significantly the palm tree of 149 Gillies Ave which is of the same height as the proposed development.
- Photograph 11: shows a view from the pool area of 32A Owens Rd, again to the east and inclusive of the phoenix palm.
- Photograph 12: shows a view taken from the same position as Photograph 11 but towards the south east. This is the oblique direction along which the proposed development would run. Figures 1 and 7 show the three story link bridge of the proposed development which would overlook this area.

Submission no 142

- Photograph 13: shows a view from the laundry or back door of 32A Owens Rd towards the eastern direction of the proposed development. Included in this photograph is the rear garden, boundary walls, and phoenix palm of 149 Gillies Ave which again, being of the same height as the proposed 70m long building serves as a relevant scale reference.
- Photograph 14: shows a view taken from the stairwell of 32A Owens Rd towards the south. Figure 6 shows the proposed three story link bridge relative to the stairwell.
- Photograph 15: shows a view towards the south taken from bedrooms 3 and 4 of 32A Owens Rd. Again, Figure 6 shows the proposed three story link bridge relative to these bedrooms.
- Photograph 16: shows a view to the south of the pool and rear garden area. The proposed building, 16m high, 70m long would run to the left, and the three story link bridge would be directly to the south, both surrounding and overlooking this area from all heights and angles.
- Photograph 17: shows a view towards the north of the pool area. Included in this photo is, to the north of the trees, the balcony of the private neighbouring residence.
- Photographs 18-23: show various views of the interior and exterior spaces of the property, all of which would be overlooked from both the east and south of this proposed development.
- 22) Southern Cross Hospitals Ltd has engaged various consultants to support their application to first re zone the three single dwelling residentially zoned properties of 149 to 151 Gillies Ave and their mixed housing suburban zoned property at 3 Brightside Rd, and second, build a large commercial building of at least 16m height with three story link bridge.
- 23) In their general assessment of neighbourhood character, Motu Design refer to the form and mass of the Raye Freedman Arts Centre at Epsom Girls Grammar School to be "out of odds" with the surrounding context, but indicative of variability along Gillies Ave.
- 24) This building lies to the very north of Gillies Ave and on the edge of the Newmarket commercial zone.
- 25) They incorrectly state that the building is around 6m high and hence of the same height as many houses or small medical facilities along Gillies Ave and to the south of the Raye Freedman Centre.
- 26) As I have stated above the Raye Freedman Art Centre varies from 10m height at its most northerly part to 7.5m height at its most southerly, that is, an

Submission no 142

average of around 9m height (I have this information because I was the structural consultant on the Raye Freedman Arts Centre).

- 27) This height is why the Raye Freedman Arts Centre looks 'out of odds' with the surrounding context even with its surrounding context being the edge of the Newmarket commercial zone.
- 28) There are no buildings of the height or form (block) of the Raye Freedman Arts Centre (and adjoining classroom and technology block) to the south of it along Gillies Ave.
- 29) However, as shown in Figures 15 and 16, the building block proposed by Southern Cross on 149-153 Gillies Ave would dwarf the Raye Freedman Arts Centre.
- 30) In their specific assessment of residential properties, Motu Design (5.7, p29) again incorrectly, state that immediate neighbours to the proposed development are located only along the northern "side" of the proposed development and, (if this was correct), this would mean that the proposed development would be located to the south of all residential neighbours, and hence shading to properties would not be considered a problem.
- 31) The statement that adjoining properties lie only to the northern side of the proposed development is not correct.
- 32) In the same section 5.7 (p32) Motu Design contradict themselves, where they state that 32A Owens Rd has its southern boundary facing the existing hospital site and its eastern boundary facing the proposed hospital expansion site.
- 33) This statement is correct. The entire southern and eastern boundaries of 32A Owens Rd run along the internal L-shaped boundary of the proposed development. That is, 32A Owens Rd lies to both the north and west of the proposal.
- 34) The 70m long, 16m high building as proposed, lies to the east of 32A Owens Rd. Its presence would visually dominate, overlook, and block all morning sun and have severe shading and cooling effects on 32A Owens Rd.
- 35) Further, Motu Design focus on a small, high cathedral window located on the east side of 32A Owens Rd. This is shown on our attached Photograph 16. The photograph used in Motu Design's report has been uploaded from a now obsolete google photo.
- 36) Motu Design use this window to establish that only the eastern pool area of 32A Owens Rd, running immediately adjacent to 149 Gillies Ave, will be affected by this proposal.
- 37) They (Motu Design) further state that not only will a good standard of residential amenity be maintained towards 32A Owens Rd but that the proposed development "is likely to benefit this property."

Submission no 142

- 38) To swallow this counter-reality nonsense, the reader would need to have no grasp of the situation.
- 39) LA4 Landscape Architects, as engaged by Southern Cross Hospitals Ltd, consider the effects of the proposed development on the existing environment in their visual effects assessment.
- 40) In their section 5.10 they consider a visual catchment and viewing audience. Here they define the visual catchment as the physical area that would be exposed to visual changes associated with "a permitted development".
- 41) Significantly they state that with frontages along two roads, the development has high visual exposure to those travelling along Gillies Ave, Brightside Rd, and Shepherds Ave. That is, high visual exposure to passing pedestrians and motorists.
- 42) "Beyond here" (that is in other localities and directions) LA4 then consider 11 locations (viewpoints) looking towards the proposed development. These locations selected to capture and "fairly" represent the range of public view towards the proposed site.
- 43) Again in their words, "the analysis from the viewpoints is representative of the potential views from the most effected surrounding properties and roads".
- 44) 32A Owens Rd, the most immediate neighbour to the development proposed by Southern Cross Hospitals Limited, is not included in the viewpoint assessment and is not referred to in any of the text in the LA4 report.
- 45) However, the 16m high, 70m long building proposed by Southern Cross is located only 6m off the eastern boundary of 32A Owens Rd and runs along its entire eastern boundary.
- 46) 32A Owens Rd immediately bounds the proposed development along its (32A Owens Rd) entire southern and eastern boundaries.
- 47) 32A Owens Rd is engulfed (surrounded and overlooked) by the proposed 70m long, 16m high building proposed along its entire eastern boundary and the three story, 32m long, link bridge running parallel with its entire southern boundary.
- 48) This is well illustrated in LA4's own bulk diagrams, which have here been enlarged (so that they can be read without assistance) on Figure 17.
- 49) The LA4 report concludes that visual effects from the proposed development will be "*minor*" in the context of the existing landscape and visual environment.
- 50) In section 5.20 of their report, LA4 list a seven point scale taken from the NZILA Best Practice Guide.
- 51) The word minor is used only in the "low effect" category, defined here as meaning that "awareness of the proposal would not have a marked effect on the overall quality of the scene or create any significant adverse effects."

Submission no 142

- 52) This clearly does not apply to 32A Owens Rd, where the effect of the proposed development on it would be an "extreme effect", again defined in the LA4 report as:

Extreme Effect

The proposal is completely at odds with the surrounding area and dominates the scene to an extreme degree.

The proposal very significantly affects and entirely changes the character of the surrounding area. The proposal causes extreme adverse effects that cannot be avoided, remedied or mitigated.

(p. 13)

- 53) Again, this fact is clearly illustrated by the attached figures and photographs of 32A Owens Rd and the proposed development.
- 54) SFH Consultants (Stephen Havill, planner) as engaged by Southern Cross Hospitals to support their application, draws on the reports by Motu Design and LA4 Landscape Architect and adds to them.
- 55) Again 32A Owens Rd, the hospital site's nearest and potentially most effected neighbour is not referred to in the text of the SFH report.
- 56) As with the Motu Design report, the SFH report, repeats, incorrectly, that neighbouring properties lie only to the north of the proposed development and hence will not be affected.
- 57) Extracts of statements made in the SFH report on the effect of the proposed development on neighbouring properties include:

Height

SCHL have been cognisant of the resultant potential effects on residential character and amenity, and these reasons underpin their decisions to purchase the Gillies Avenue properties, firstly 151 and 153, and then subsequently 149 as well. The location of the subject sites relative to adjoining residential properties and the transport network limit the potential for effects, because the adjoining properties are to the north, and the public roads and SCHL properties are to the east, south and west. *The increased height is significantly screened from the wider surrounding area by the large mature vegetation onsite and in the surrounding properties and streets.*

(p. 49)

Height in Relation to Boundary ("HIRB")

The Urban Design and Visual Effects Reports agree that the HIRB controls will manage the scale of built form in relation to external boundaries *ensuring taller areas of built form are located further away from boundaries and retain a reasonable level of sunlight and daylight access to adjacent sites.*

(p. 49)

Submission no 142

Shading

We consider that the access to sunlight and daylight for adjacent properties is maintained to a reasonable extent and the shading of the street is generally masked by vegetation and trees. The Urban Design and Visual Effects Assessment Reports agree. *We therefore consider the potential shading effects will be minor.*

(p. 51)

Visual Privacy

The visual privacy effects from development enabled by the zone change will be from windows at upper levels of a building that is taller than that permitted within the current zone. The potential effects of visual privacy are mitigated by the location and design of windows, the retention of tall trees which provide visual screening and obscuring of direct views, and the increased yard setback from boundaries. Moreover, the users of the hospital are unlikely to use windows or balconies in the similar way that residents or hotel users would. Additionally, the internal arrangement of the hospital can be such that the upper level is a surgical level, where occupants (staff and patients) are not capable of looking down onto adjacent properties in a way or to an extent that would compromise visual privacy. The visual privacy effects are unlikely to be as great as that associated with a two-storey building or the boarding houses. *We are therefore of the opinion that the potential effects of visual privacy will be minor.*

(p. 51)

Dominance

The visual dominance effects are larger than what would occur generally within the single house or mixed housing suburban zone. This is a result of the larger bulkier buildings enabled by the HFH zone. However, we consider the dominance effects are mitigated by the increased setbacks from the boundaries, compliance with HIRB controls to residential boundaries, the separation provided by SFH Consultants AEE – Brightside & Gillies Jan 2019 52 both Gillies Avenue and Brightside Roads, and the articulation, modulation, materials and high-quality design of the hospital building itself. These factors would act to break up the building bulk, reduce its blankness, *we consider this would mitigate the potential visual dominance effects to an extent that is minor.*

(p. 51, 52)

Visual Landscape Effects

Development permitted under the H25 provisions would be visible from various locations in the surrounding urban environment due to the height, form and scale greater than currently existing within the site. Development within the site would however have

Submission no 142

minimal adverse landscape and visual effects and could be readily accommodated in this location.

In my opinion the standards, provisions and assessment criteria within the H25 SPHZ will *protect the surrounding residential area and minimise potential adverse effects of overshadowing, visual dominance and loss of visual privacy on adjacent properties while maintaining a high standard of amenity.*

I conclude that the visual effects will be minor in the context of the existing landscape and visual environment for the reasons identified. The visual amenity and quality of the environment surrounding the site will not be SFH Consultants AEE – Brightside & Gillies Jan 2019 57 adversely affected by development permitted by the H25 provisions” (p. 56, 57)

Urban Design

In addition, the additional controls from the protected trees and volcanic viewshafts, as well as the site shape, orientation and character of the site enables development to occur in a manner and form SFH Consultants AEE – Brightside & Gillies Jan 2019 59 *that will integrate into the residential environment.* (p. 58, 59)

Conclusion

Overall, it is our opinion that the proposed zone change will result in an increase in the scale and intensity of development enabled at the subject site and this will generate increased adverse character and amenity related effects for the public realm and adjacent properties. *However, these effects have been demonstrated within the range of expert reports to be of a minor extent and appropriate having regard to the particular locational context.* (p. 61)

- 58) All of the three reports referred to above, and commissioned by Southern Cross Hospitals Ltd, state that the effects of the proposed development on neighbouring properties would be *minor*.
- 59) Clearly these reports are not including in their assessments, the hospital’s most immediate neighbour, 32A Owens Rd.
- 60) The effect of the development proposed by Southern Cross Hospitals Limited on its most immediate and adjoining neighbour, 32A Owens Rd, would be extreme, and would directly destroy the living environment of 32A Owens Rd.

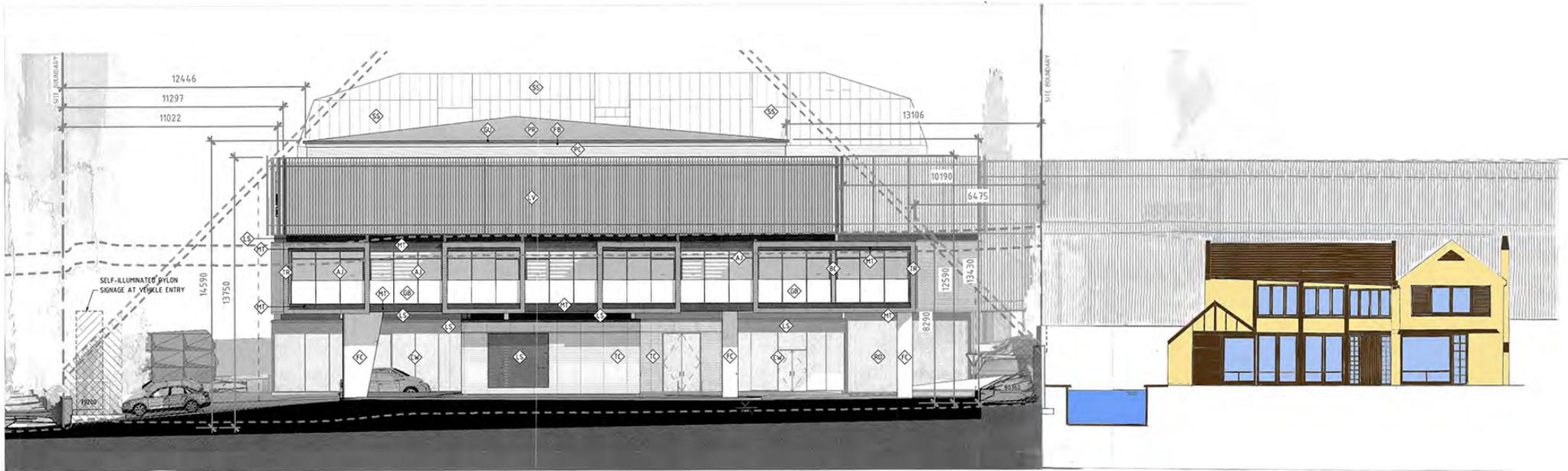


FIGURE 1

Submission no 142



FIGURE 2

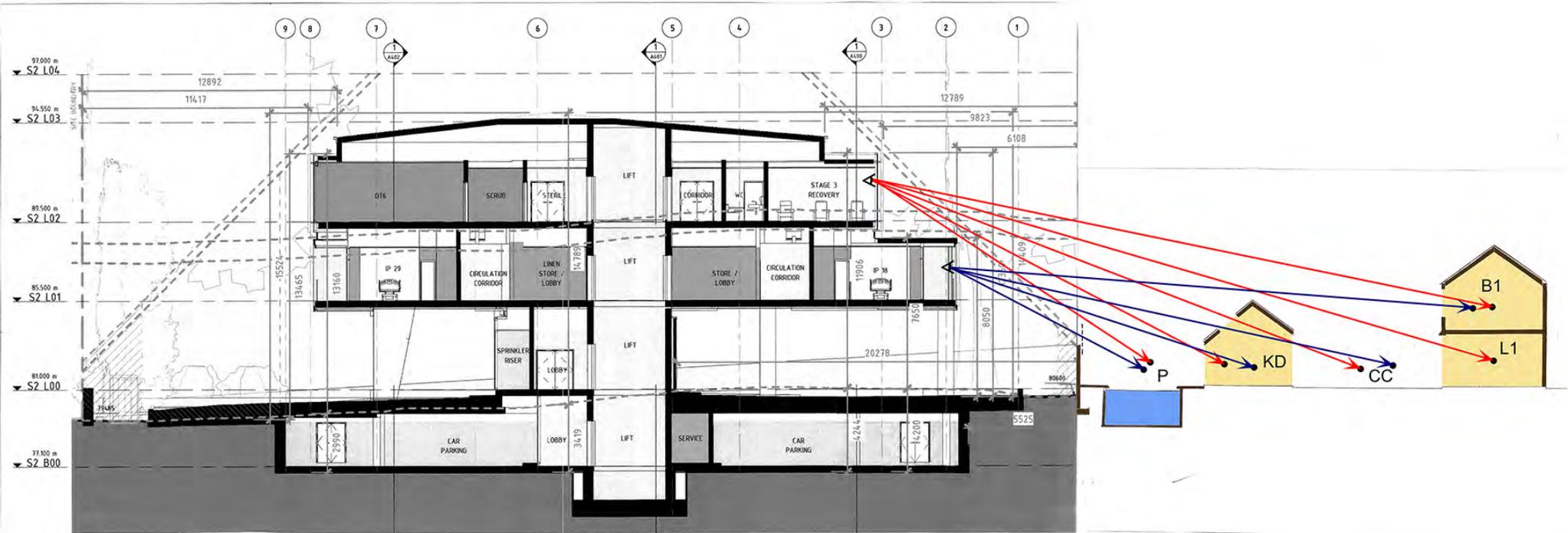


FIGURE 4

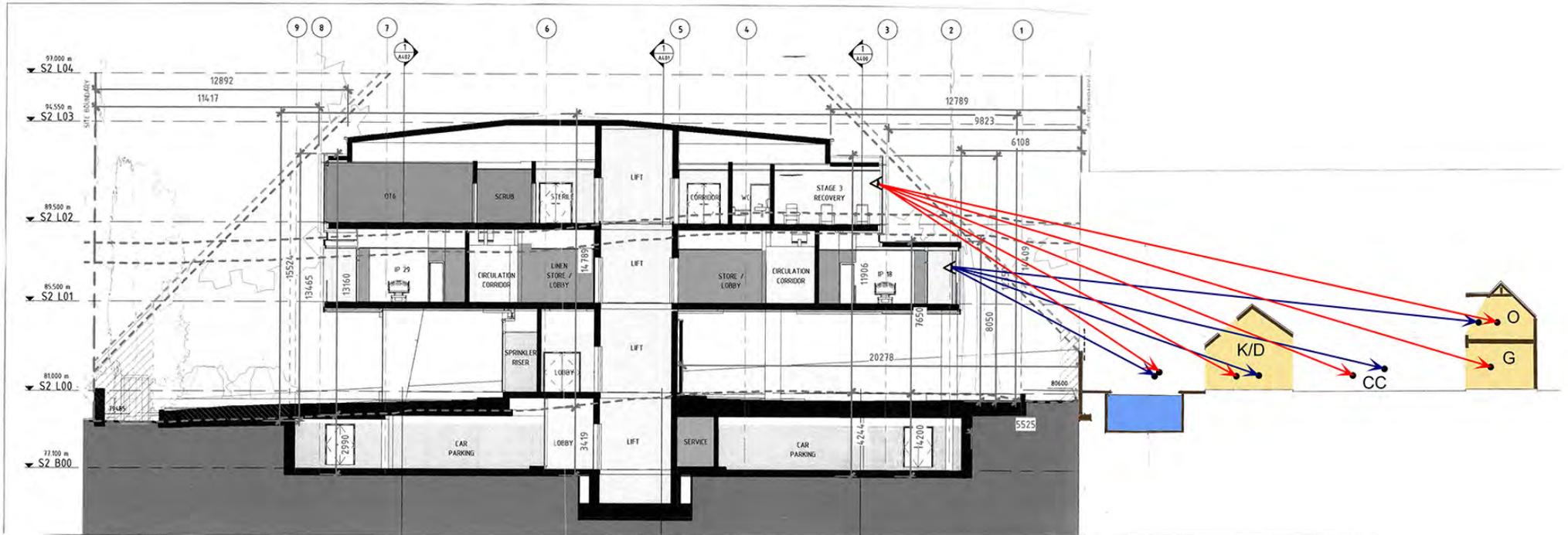


FIGURE 5

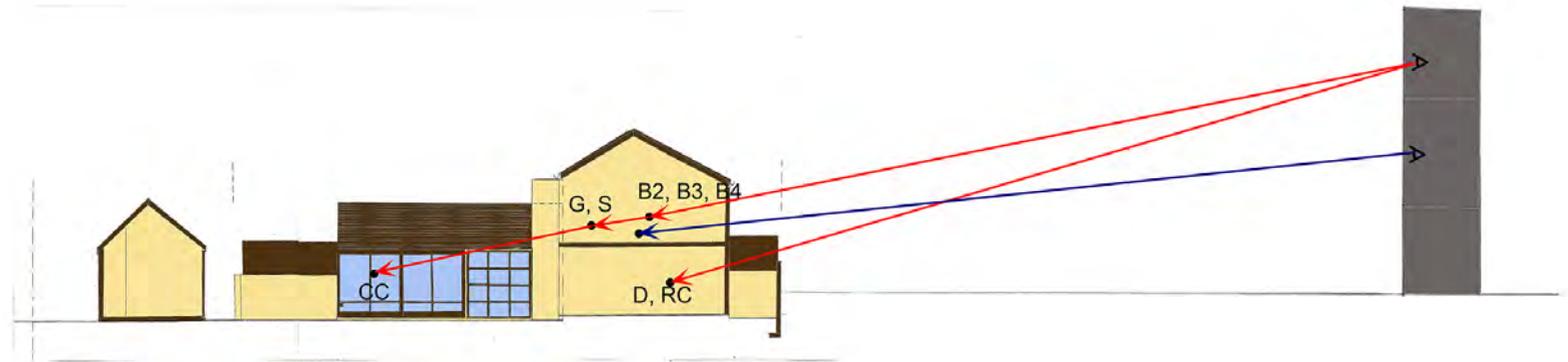


FIGURE 6

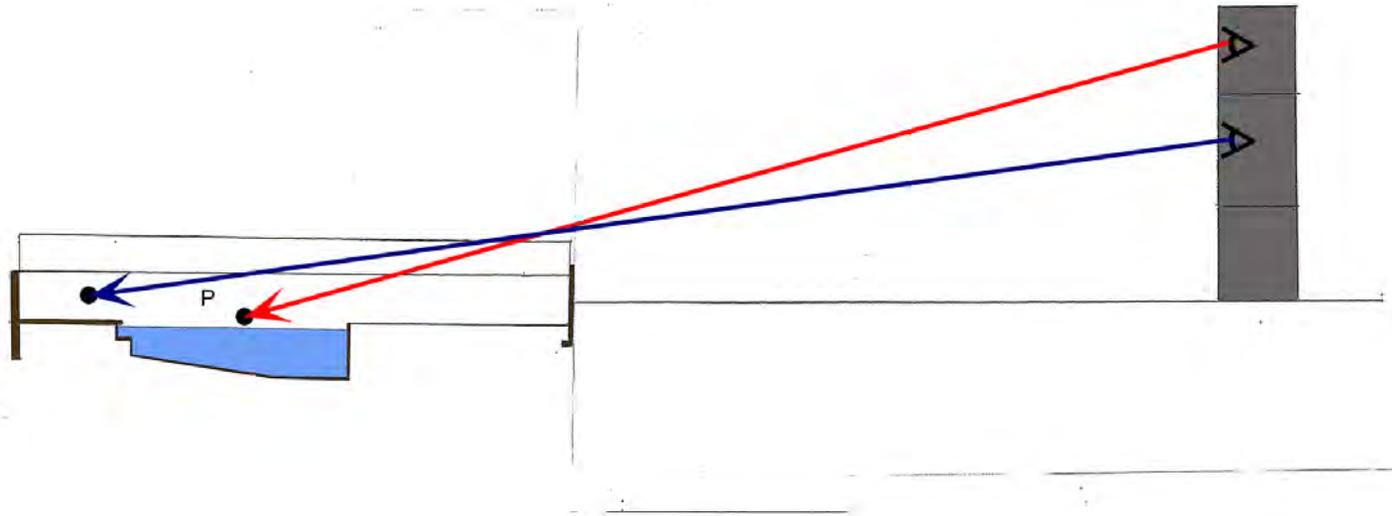


FIGURE 7

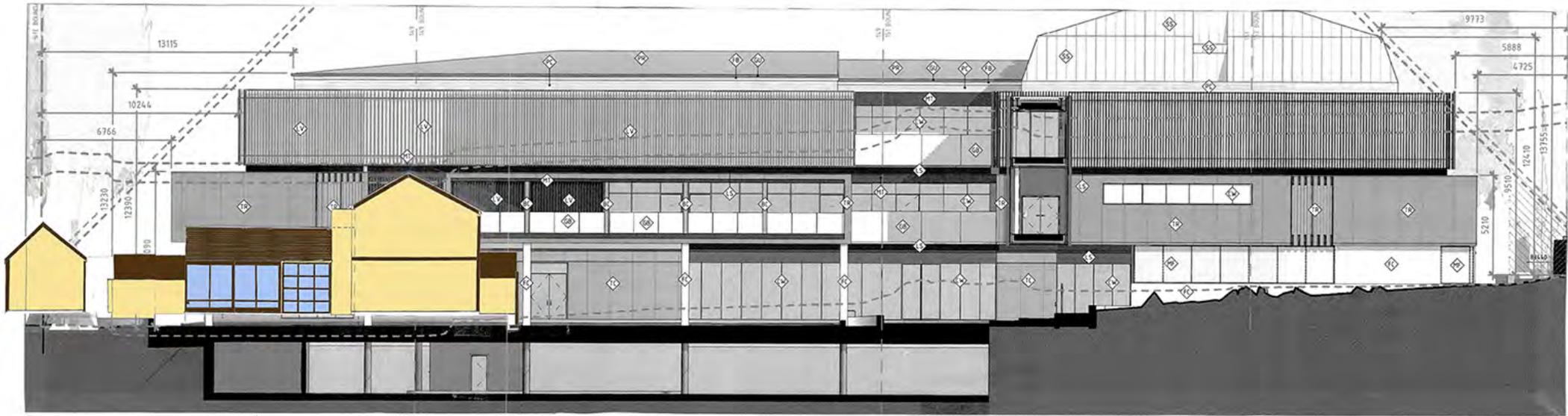


FIGURE 8

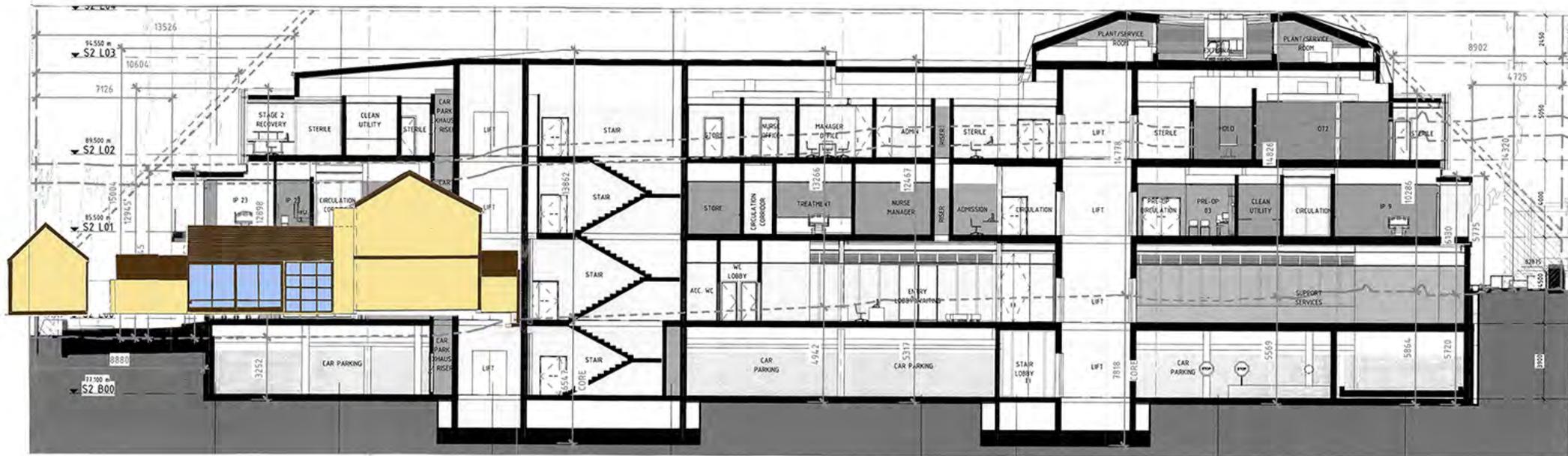


FIGURE 9





FIGURE 10

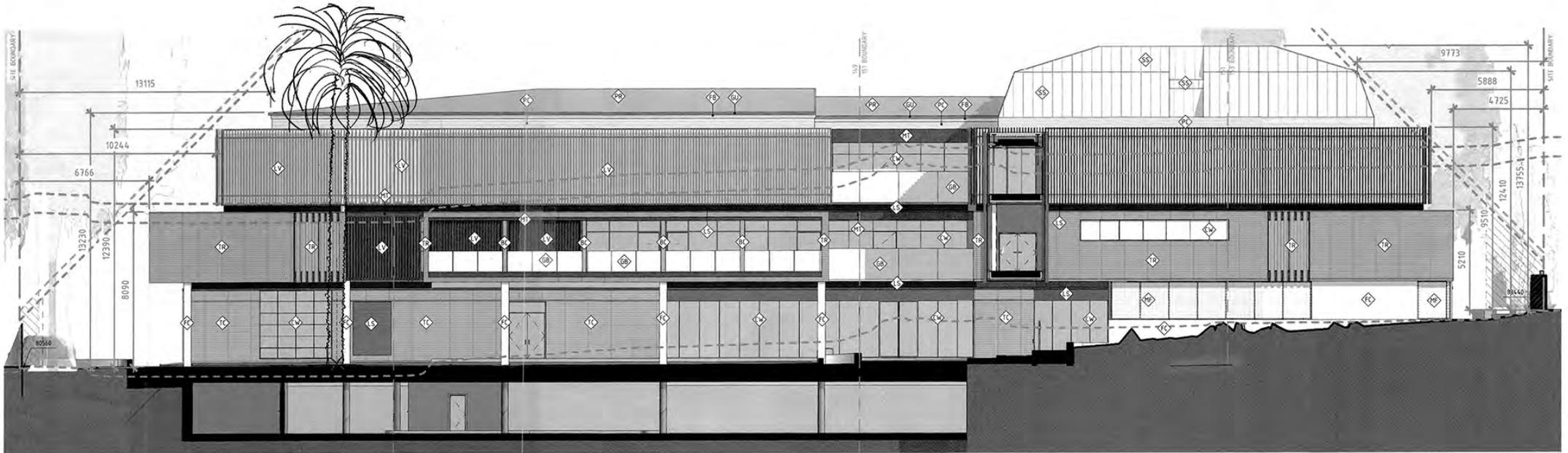


FIGURE 11

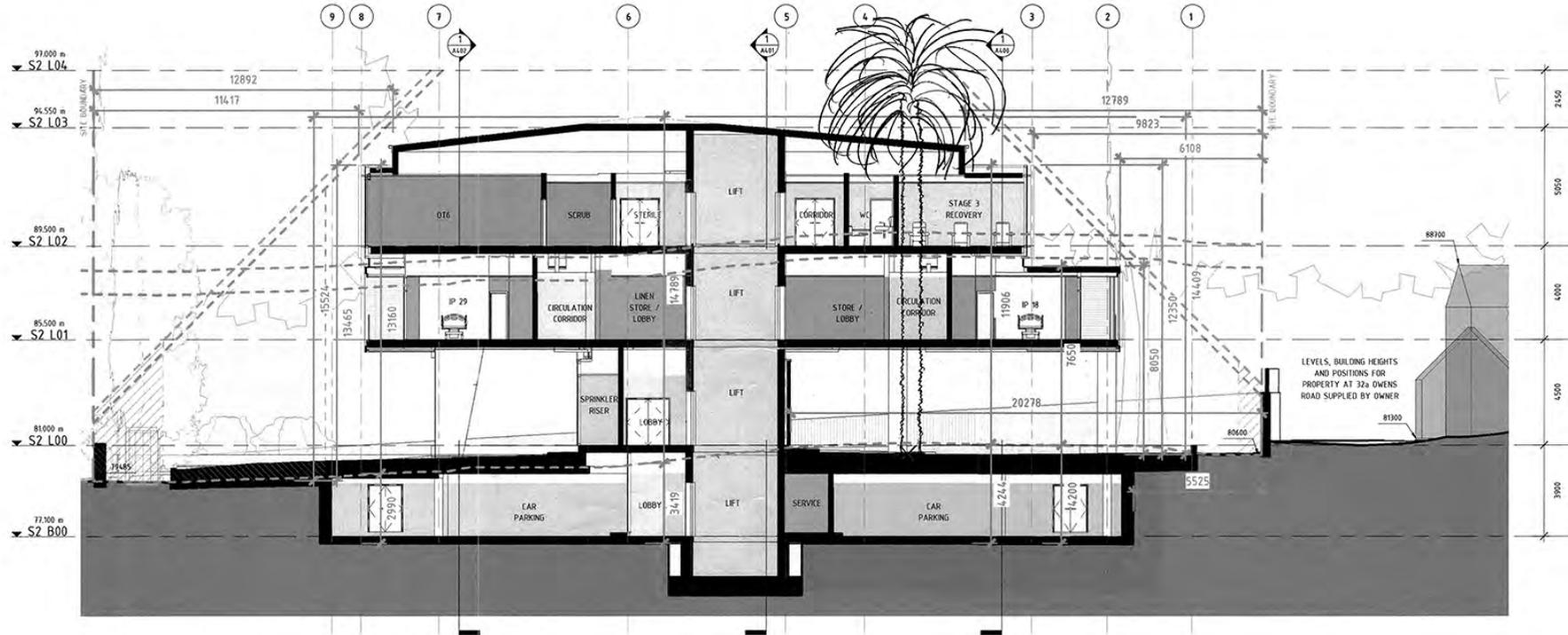


FIGURE 12

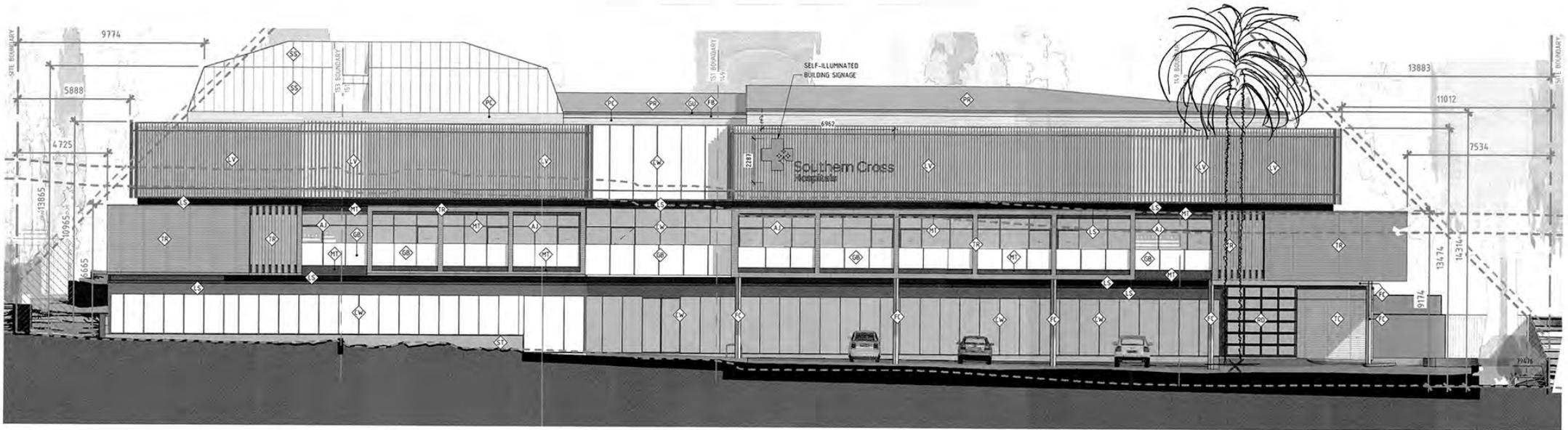


FIGURE 13

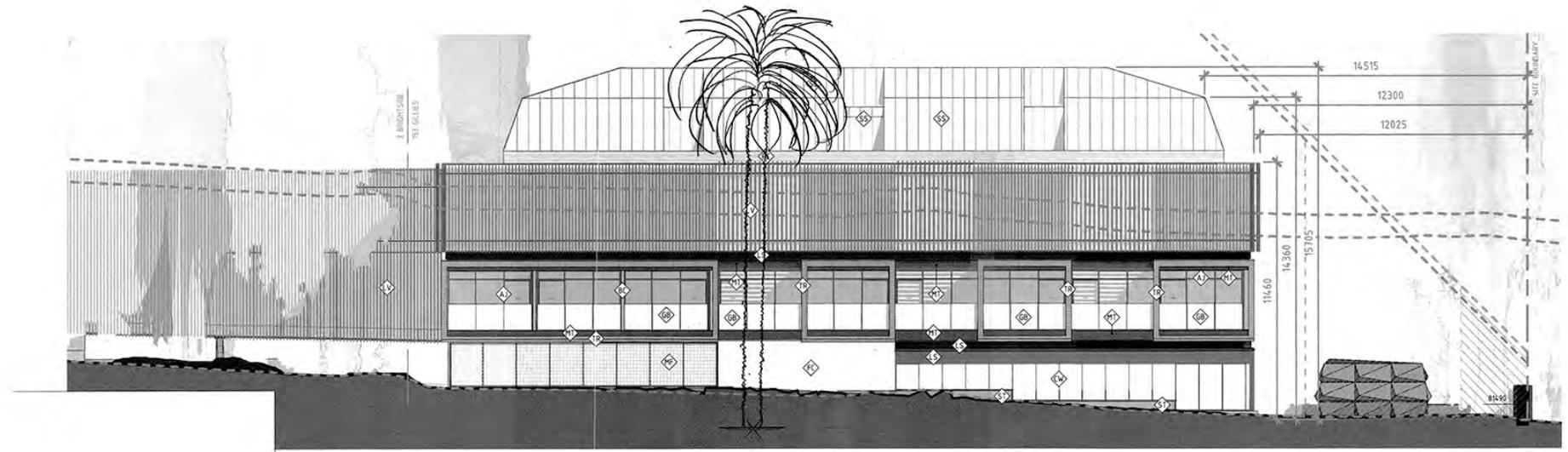


FIGURE 14



2 EXTERNAL ELEVATION - EAST
ATD 1:30

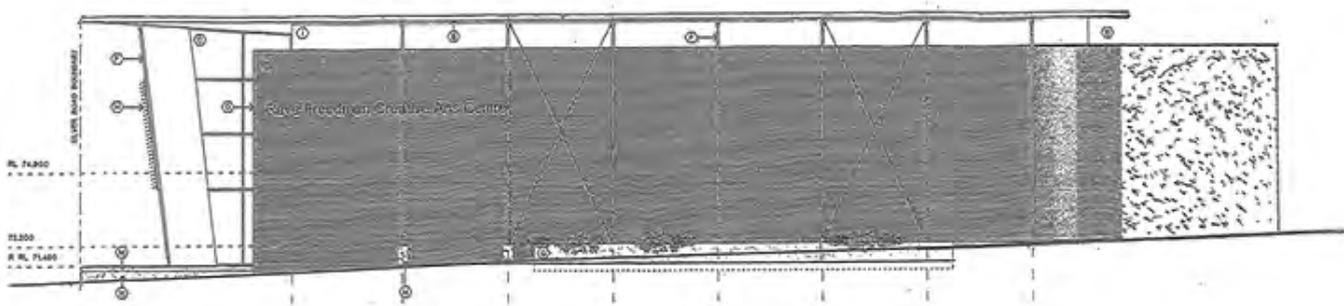


FIGURE 15

Submission no 142

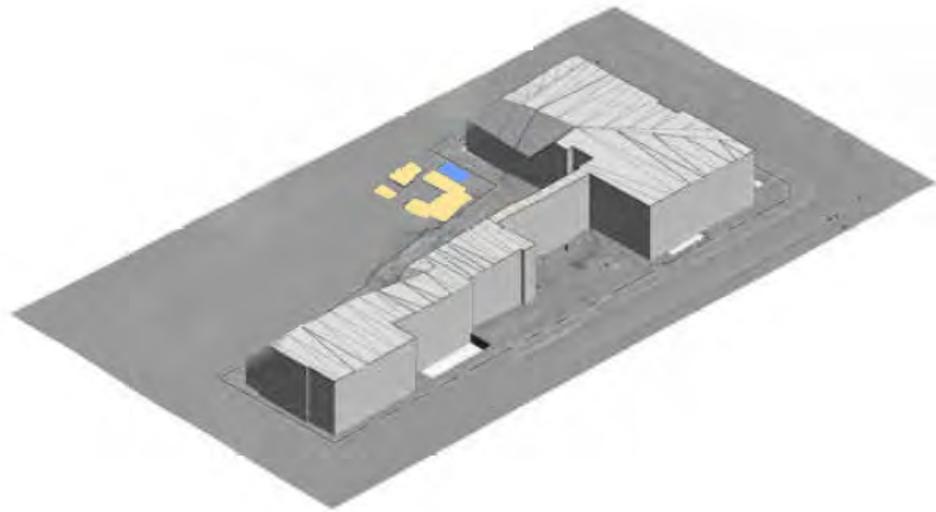
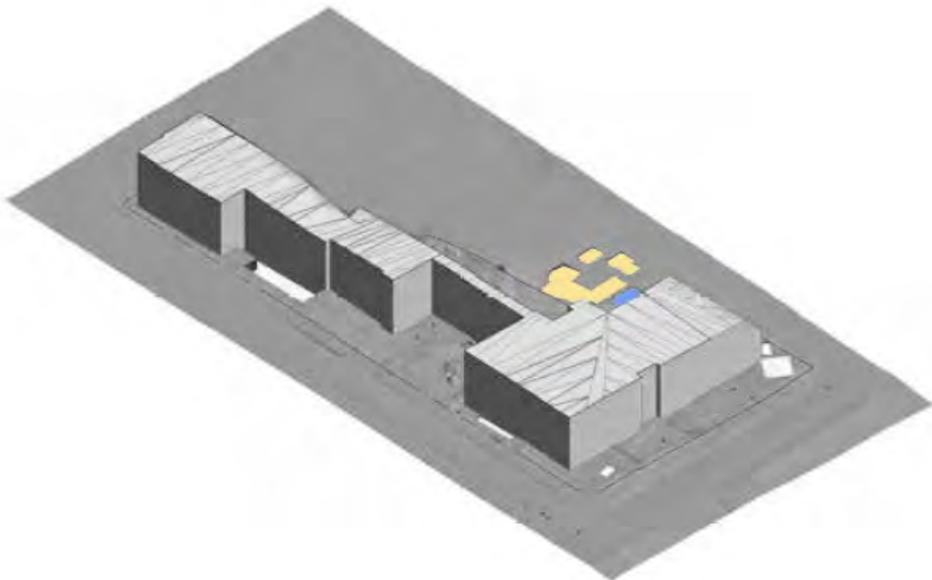
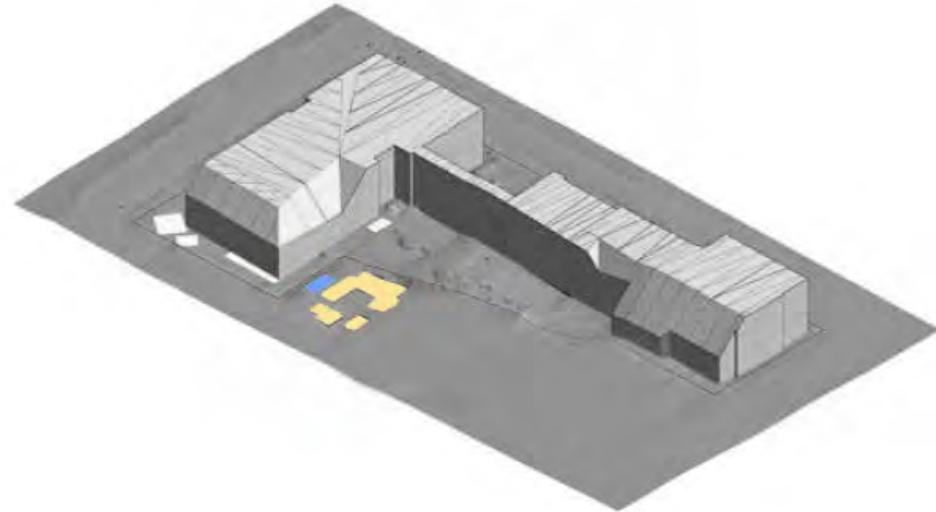
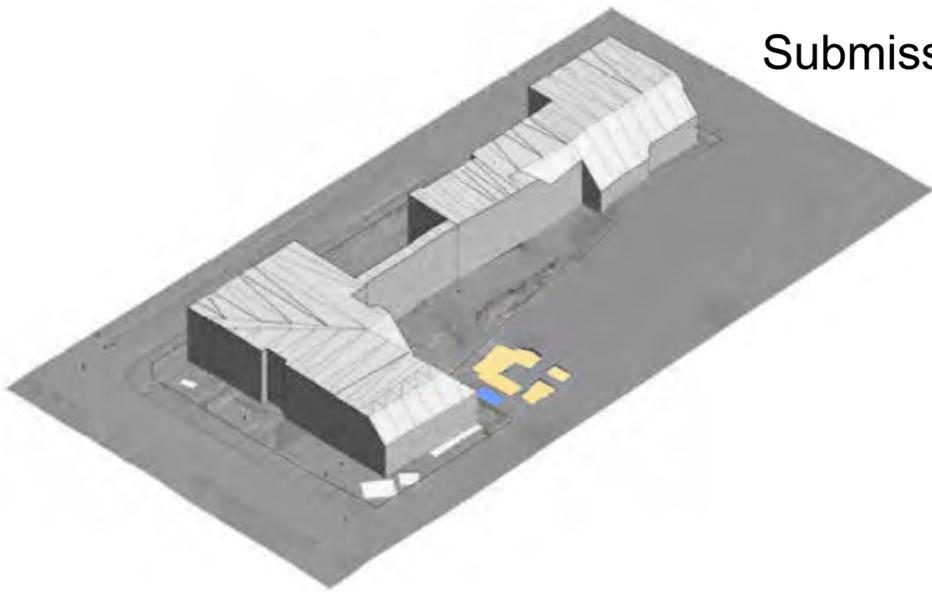


FIGURE 17

Submission no 142



PHOTOGRAPH 1A



PHOTOGRAPH 1B

Submission no 142



PHOTOGRAPH 2A



PHOTOGRAPH 2B



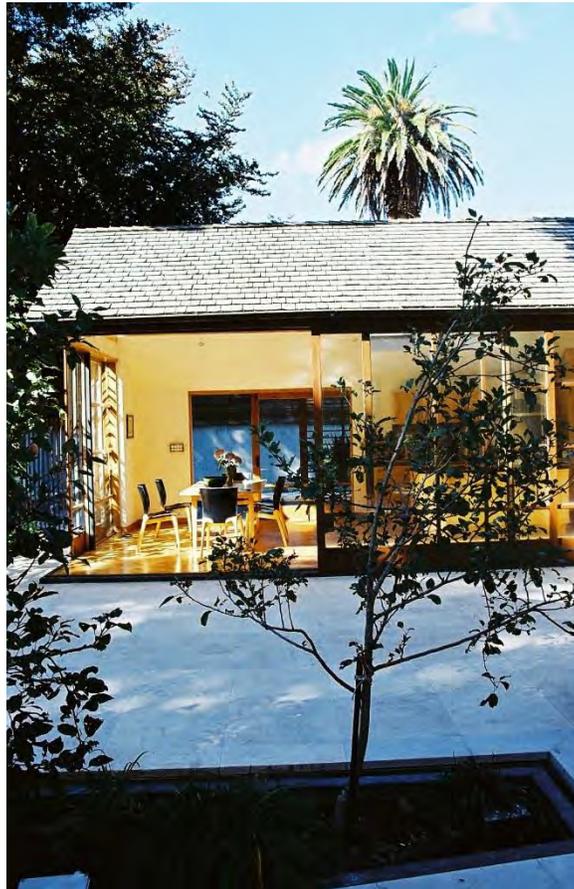
PHOTOGRAPH 3A



PHOTOGRAPH 3B



PHOTOGRAPH 4A



PHOTOGRAPH 4B

Submission no 142



PHOTOGRAPH 5



PHOTOGRAPH 6



PHOTOGRAPH 7



PHOTOGRAPH 8



PHOTOGRAPH 9



PHOTOGRAPH 10

Submission no 142



PHOTOGRAPH 11



PHOTOGRAPH 12

Submission no 142



PHOTOGRAPH 13



PHOTOGRAPH 14



PHOTOGRAPH 15



PHOTOGRAPH 16



PHOTOGRAPH 17



PHOTOGRAPH 18



PHOTOGRAPH 19



PHOTOGRAPH 20



PHOTOGRAPH 21



PHOTOGRAPH 22



PHOTOGRAPH 23

Submission no 143

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 18 April 2019 12:16 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Karen Ann Tuxford
Attachments: ZoneChange_Technical_20190418120221.239.pdf; KarenTuxford_planchange21_opposition .pdf

Categories:

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Karen Ann Tuxford

Organisation name:

Agent's full name:

Email address: hastiephysio@hotmail.com

Contact phone number: 021360216

Postal address:
33 Windmill Road
Mt Eden
Auckland 1024

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:

I oppose the plan change in its entirety

Property address:

Map or maps:

Other provisions:
see attached

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

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

The reason for my or our views are:
we oppose the plan change 21 in its entirety

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

Submission no 143

Submission date: 18 April 2019

Supporting documents

ZoneChange_Technical_20190418120221.239.pdf

KarenTuxford_planchange21_opposition .pdf

Attend a hearing

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

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

Declaration

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

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

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

Yes

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

Submission no 143

1. I, Proposed Plan Change 21 (PC 21-private) for the following reasons:

- (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
- (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
- (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
- (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
- (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
- (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
- (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

Submission no 143

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
- i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 143

My name is Karen Tuxford and in addition to the technical issues detailed I have the following concerns with the proposed plan change. My family and I live at 33 Windmill Road, Mt Eden; we have lived in the Mt Eden/Epsom area for over 11 years. Our children have attended the local schools, Kohia Terrace, Auckland Normal Intermediate and our daughter is now at Epsom Girls Grammar with our son starting Auckland Boys Grammar in 2020.

To challenge of the 'new' unitary plan, that has been implemented so recently after considerable consultation is wrong on the part of SCHL. I question the integrity of the plan if it can be altered for commercial gain. The changes proposed, asking to change the zoning from Residential with Historical significance to the introduction of 'Business' zoned type buildings, is entirely unsuitable in a residential area

The integrity of this plan is at risk. The potential changes could then apply to any area in our Mt Eden/Epsom community, undermining the historical character of many other streets in the adjacent areas. A change in the plan would ultimately open the door to other industrial/commercial businesses being able to locate themselves in residential zones at will. The historical significance of the Epsom/Mt Eden area is crucial to maintain. There are many highly sought after, beautiful homes with deep history in Mt Eden/Epsom. This is one of the reasons we sought to buy here 11 yrs ago. If we had wanted to live in an area with high density housing combined with industrial buildings, we would have chosen a different area.

Removing several of the homes from Gilles Ave, to make way for a commercial enterprise, is contrary to the vision of maintaining the character of the area. As local residents we want to uphold the nature and architectural significance of our neighbourhoods.

This proposed hospital expansion is not for the better-ment of the community as a whole. SCHL is only concerned with the competitive and lucrative market of the Private health system. We have Auckland Hospital for emergency services 2km away and multiple private sector options within a 5km radius. Southern Cross's competitive relationship with MercyAscot should not negatively impact an entire community.

The increase in traffic would have a terrible impact in and around the area where our children walk to and from school daily and where I drive frequently; it is a feeder road to multiple services within our community such as dance studios, table tennis, squash Gillies Avenue is an arterial route for motorway access and is used to reach many surrounding suburbs. It is

Submission no 143

already very heavily congested and this would be made far worse if a hospital were to be erected on Gillies Avenue/Brightside Road. It would make the intersection of Gillies and Owen unsafe both during the construction and after for the thousands of pedestrians, bike and scooter riders and general traffic associated with the many schools in the area.

Nor is there any reason why a structure of up to 25 metres in height should be allowed in this leafy residential area. This disruption that this would cause to local residents is enormous and inappropriate.

There must be more suitable sites than the one that is being proposed? Why is Southern Cross not looking to build on a site that is already appropriately zoned and does not have so many negative factors associated with it, for example basalt rock blasting, traffic congestion, destruction of heritage homes, disruption of a residential area? There is no reason why Southern Cross Hospital should be allowed to have the unitary plan overturned for commercial gain when there are more suitable options. The local residents (who chose to live and contribute to the community spirit we so enjoy) respect the decisions set down in the plan and honour the heritage character homes and streets.

Submission no 144

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Saturday, 13 April 2019 12:16 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Keradith Rene Thomas
Attachments: ZoneChange_TechnicalKeriThomas.pdf; PlanChange21 opposition_KeriThomas.pdf

Categories:

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Keradith Rene Thomas

Organisation name:

Agent's full name:

Email address: richard2keri@yahoo.co.nz

Contact phone number: 027 399 5144

Postal address:
13 Fairview Road
Mt Eden
Auckland 1024

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:

I oppose the plan change in its entirety

Property address:

Map or maps:

Other provisions:

I oppose the plan change in its entirety See attached documents

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

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

The reason for my or our views are:

I oppose the plan change in its entirety See attached documents

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

Submission no 144

Submission date: 13 April 2019

Supporting documents

ZoneChange_TechnicalKeriThomas.pdf

PlanChange21 opposition_KeriThomas.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.

Submission no 144

I am Keradith (Keri) Thomas and I oppose the proposed plan change 21 for many reasons, detailed below are my concerns.

My family and I live at 13 Fairview Road; we have lived in the Mt Eden/Epsom area since our return from overseas 5 years ago. We chose this leafy residential area because we love the character homes and the community feel.

We have just completed a renovation on our character bungalow and were required to work within the rules and regulations set down by the Auckland City Council and the Auckland Unitary Plan. I fail to see how the AUP can be altered to change an entire zone for a commercial business and yet residents, that have chosen to buy properties and live in the area zoned as 'residential' are to adversely affected without consideration.

If the plan change was accepted and the hospital expansion was allowed the increase in traffic would be really bad for our area. This is a very serious issue for me as I have three children. My two daughters currently walk in and around the Owens Road/Gillies Avenue area to get to and from school and our son will join them next year when he starts at Auckland Boys Grammar. I genuinely fear for their safety both during the build and after the proposed expansion as this area is already very heavily congested. Children do not always make smart choices regards when to cross a road or sneak in between slowing cars etc. and the increased risk of accidents is very worrying. Many many children either walk or bike or are driven to the multiple schools in this area and the impact would be untenable for families let alone those trying to access the Gillies Road on-ramp to the motorway which is already a problem at many different times during the day.

Submission no 144

Mt Eden/ Epsom is a unique heritage environment with many beautiful homes and they should be honoured and protected not destroyed for commercial gain. This concept of protecting heritage homes was agreed when the AUP set the zone aside as residential and there is no reason for this to be over turned. No structure up to 25 metres tall can be considered appropriate within this area. There is no place in our community for a major commercial intrusion.

Submission no 144

1. I, Keradith (Keri) Thomas oppose the Proposed Plan Change 21 (PC 21-private) for the following reasons:

- (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
- (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
- (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
- (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
- (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
- (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
- (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

Submission no 144

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
- i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 145

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Sunday, 14 April 2019 5:45 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Lani Keane
Attachments: Personal Statement of opposition to PC21 - Lani Keane.pdf; Technical Statement of opposition to PC21 - Lani Keane.pdf

Categories:

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Lani Keane

Organisation name:

Agent's full name: Sean Keane

Email address: lanikeane@hotmail.com

Contact phone number: 0211913963

Postal address:
134 Mountain Road
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
The entire Plan Change

Property address: 3 Brightside Road, 149,151,153 Gillies Avenue, Epsom

Map or maps:

Other provisions:
The entire Plan Change

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

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

The reason for my or our views are:
I wish to decline it in its entirety as indicated. Please see attachments

Submission no 145

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

Submission date: 14 April 2019

Supporting documents

Personal Statement of opposition to PC21 - Lani Keane.pdf

Technical Statement of opposition to PC21 - Lani Keane.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.

Submission no 145

Technical statement of opposition to PC21 from Lani Keane, 134 Mountain Road, Epsom, Auckland

1. I oppose Proposed Plan Change 21 (PC 21-private) for the following reasons:

- (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
- (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
- (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
- (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
- (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
- (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
- (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and

Submission no 145

purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 145

Personal statement of opposition to PC21 from Lani Keane, 134 Mountain Road, Epsom, Auckland

I have a number of personal concerns about what is being proposed in PC21

1. We moved to Mountain Road in July of last year, bringing our 3 children into the city from our previous home in Coatesville. We did so after reviewing the councils Unitary Plan and being satisfied that we were moving from the country to a leafy, green, residential suburb in the city. We planned the move that we would be here for the next 25 years, before then shifting into some form of aged-care facility. We would not have made the move if we had known that an enormous and disruptive new medical facility was about to be built here.
2. We chose to live in Epsom precisely because it is a leafy, green and well-established inner-city village. It's a place where people walk, where you don't feel like you are in a city of 1mn+ people, and where the character and history of the city is very apparent. Approving application PC21 will significantly change all of those elements about the area, and will encourage the industrialisation of some of our oldest and most liveable areas of Auckland. There are plenty of other places where such a facility could and should be built.
3. I am hugely annoyed that the developer would submit this application so soon after we all spent months reading, arguing, attending meetings and discussing the recently agreed Unitary Plan. If they wanted to make such a significant change to the Epsom area plan then the time to do that was during the review. It wasn't that long ago! Their application now forces me, my family, my neighbours and my community to have to again take time to fill in these forms and oppose something that should never have been put forward in the first place. The whole community discussed the Unitary Plan. The whole community settled on the Unitary Plan. What would be the council message about the worth of that plan if it was simply changed now in response to a corporate request.
4. The Unitary Plan clearly identifies Epsom a well-established residential area of Auckland. It is generally regarded by most Aucklanders as being one of the more liveable and desirable parts of the city, and it is an essential part of our history. An enormous commercial enterprise has no place in such a community. It's completely out of character, along with being completely outside of the Unitary Plan.
5. We moved into Mountain Road so that our two teenage daughters could easily walk to the local school. Along with hundreds of other children they do this every morning and evening, walking along Owens Road and into Mountain Road. The footpaths are full of kids from Epsom Girls, Diocesan, Auckland Grammar and St Peters. The roads also see kids riding bicycles and scooters. The cars that travel at that time are mostly full of parents dropping off and picking up their children. This enormous (and out of Plan) development will create major logistical headaches both during the construction phase, and even after completion.

The safety risk of one of these children being struck by a large industrial machine or truck during the long building period is incredibly high. Kids don't always follow road signs, and they don't always do the logical thing. Given the nature, physical position and absolute size of this

Submission no 145

development there is no way that you can guarantee the safety of our children if this project is approved.

6. The plan will see 3 large heritage homes being demolished along Gillies Avenue. This is in addition to the 3 lovely old houses that Southern Cross demolished 20 years ago when they first got permission for their current hospital facility. We all know that if this development goes ahead then it is inevitable that Southern Cross will seek to further expand in coming years and more houses will be lost. Regardless of what the developers eventually do it's also highly likely that if this plan goes ahead other homes nearby will be sold or moved as living near to a very large 24/7 hospital facility will make the area unliveable. This is completely wrong in an area with a reputation for beautiful old residential houses. It's also completely outside of the Unitary Plan.
7. The submission indicates that there is likely to be extensive blasting and quarrying required to excavate the site and to establish adequate foundations for the new structure. When we moved home one of my concerns about the city was noise and disruption as I am studying for a postgraduate qualification. Most of my study is done at home. We chose Mountain Road precisely because it is in a well-established residential area which is not full of 24 hour commercial activities. I would not have made this choice if I had known what Southern Cross had planned, and I am annoyed that they didn't present their ideas during the Unitary Plan process and discussion.
8. The submission indicates that there is likely to be extensive blasting and quarrying required to excavate the site and to establish adequate foundations. I am strongly opposed to this as I read from prior experience in the area that blasting inevitably leads to dust, damage and general inconvenience to nearby properties. Our house is more than 100 years old and it will likely respond poorly to nearby blasting. The windows and walls are thin and the insulation is minimal. We will hear the blasting and it will be disruptive. The vibration and quarrying may do damage to the structure of our home. I do not trust the developer to make these issues good, and I have no confidence that they will abide by any covenants or restrictions that may be imposed if the Council approves this development.
9. The demolition of residential houses to build a commercial operation in the heart of a residential area appears to be out of touch with government policy on housing. Aren't we in the middle of a housing crisis and isn't the government trying to build 10,000 new homes for New Zealanders every year? Knocking down quality heritage homes to build a commercial structure in the middle of the city makes little sense in the current climate, and especially so given that the Unitary Plan has clearly designated areas to encourage such developments outlined in the plan itself.
10. The submission indicates that there is likely to be extensive blasting and quarrying required to excavate the site and to establish adequate foundations. I am strongly opposed to this as my wife has a serious medical condition that is likely to be aggravated by loud blasting, and by the inevitable increase in dust and particulates in the air.
11. The submission indicates that there is likely to be extensive blasting and quarrying required to excavate the site and to establish adequate foundations. I am strongly opposed to this as my

Submission no 145

children study at home and they all have important exams coming up in the next few years. One of the reasons we chose to live in Mountain Road was that the area was residential, and that the children would be able to study without disturbance.

12. The submission indicates that there is likely to be extensive blasting and quarrying required to excavate the site and to establish adequate foundations. I am strongly opposed to this as there is no way that this can be done without establishing a significant safety perimeter around the blasting and quarrying site. Inevitably this will cause major disruption to the local area traffic flows, and particularly to Gillies Avenue and Owens Road. This will back up onto the motorway, to Manukau Road, to Newmarket and to Mt Eden Village. This area is already one of the heaviest thoroughfares in this part of Auckland given the large number of schools in the area. We already experience extensive traffic delays and long wait times. Closing the main road will undoubtedly amplify and aggravate the already extensive congestion during the period of construction. It will also subsequently add large volumes of vehicles to a part of the city that should not be targeted for additional traffic.
13. I am alarmed at the prospect of a hospital of this scale operating 24/7 in a residential area. This is at odds with everything about the local area, and it is alien to the any concept of a quality residential amenity. This is a corporate venture of significant scale, and its place is not in the middle of one of Auckland's prime green residential areas.
14. The title of this month's National Geographic magazine is "Cities". The entire issue is focused on how to make urban areas more liveable, how to make communities thrive and how to make cities more "human." The Editor writes "Waking up every morning and knowing that the city is a little bit better than it was yesterday – that's very nice when you have children." I'm alarmed at the Southern Cross proposal and I certainly don't think it will make Epsom better tomorrow than it is today, and I don't think it will make it better for my children. The plan will only make it better for Southern Cross.
15. Finally, I simply cannot understand how the developer considers that a structure that could be up to 25m tall could – in any way, shape or form – be considered "appropriate" within a residential area that mostly has buildings that are no more than 8m tall. The proposed structure will be a massive visual impairment (aka "eyesore") and will undoubtedly be visible from many areas of the local community.

Approval of such a structure would be outside of what we all agreed in the Unitary Plan, and it would create a very significant, highly disruptive commercial structure that would sit within what is a low-profile, long established RESIDENTIAL area. This proposal from the developers is completely inappropriate.

Submission no 146

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 18 April 2019 2:01 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Lindsay Amies

Categories:

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Lindsay Amies

Organisation name:

Agent's full name:

Email address: lindsayamies@hotmail.com

Contact phone number: 09 5371597

Postal address:

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
PC21

Property address: 3 Brightside Road, 149,151 and 153 Gillies Ave

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

This is a disgrace for my health insurance company which is a Registered Charity to demolish historic and much needed residential houses and in doing so destroy a residential community to build a unneeded massive hospital. they have many other areas deemed appropriate by the Unitary Plan. I can travel to any hospital that I need to and indeed I do. I travel across the city to see my surgeon and it is less than once a year. To destroy a local community so i travel only 5 minutes instead of 15 minutes is criminal. I will certainly not be going to Brightside, if this goes ahead and I will look at changing to NIB health insurance because at least they value my premiums instead of wasting them

Submission no 146

on destroying houses and communities. We need houses and communities not more Private Hospitals I will be a very angry resident ratepayer if this goes ahead Thank you

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

Submission date: 18 April 2019

Attend a hearing

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

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

Declaration

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

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

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

Yes

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

Submission no 147

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Tuesday, 16 April 2019 9:31 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Lucy Kate Johnston
Attachments: technical-submission-advice_20190416211443.789.pdf; Personal Comments Lucy.pdf

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Lucy Kate Johnston

Organisation name:

Agent's full name:

Email address: timandemma@xtra.co.nz

Contact phone number: 021353834

Postal address:
157 Gillies Ave
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:

Property address: 3 Brightside Road, 149, 151, 153 Gillies Avenue, Epsom

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:
See attached

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

Submission date: 16 April 2019

Submission no 147

Supporting documents

technical-submission-advice_20190416211443.789.pdf

Personal Comments Lucy.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.

Submission no 147

As a student at Epsom Girls Grammar and someone who lives very close I am worried about the affect the size and height and general disruption the proposed plan would have on us.

I worry about the building height creating shade on our house and also worry about our privacy if we are outside on our lawn or in our pool.

I also am worried about how the building will look against a backdrop of Mt Eden and also next to the surrounding residential houses.

The blasting needed for the carpark excavation will be so loud and disruptive to our learning at school and also for us living very close by.

Gillies Ave is already a very busy road without the added problems of removing waste from the building site.

Submission no 147

ATTACHMENT -- Reasons for Submission

1. **I/we oppose** Proposed Plan Change 21 (PC 21-private) for the following reasons:
 - (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
 - (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
 - (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
 - (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
 - (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
 - (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
 - (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and

Submission no 147

purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 148

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Tuesday, 16 April 2019 8:16 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Lynne Towers

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Lynne Towers

Organisation name:

Agent's full name:

Email address: lynnetowers1@gmail.com

Contact phone number:

Postal address:
167 Gillies Ave
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
Plan change 21

Property address: 3 Brightside Road, 149,151 and 153 Gillies Ave Epsom

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:

Massive disruption to neighborhood with noise during construction , huge increase and disruption in traffic with construction trucks and on going increase in traffic along arterial route if hospital built . Loss of large native trees and associated bird life that is so important to the area and the country as a whole.

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

Submission date: 16 April 2019

Submission no 148

Attend a hearing

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

Declaration

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

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

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

Yes

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

Submission no 149

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Wednesday, 17 April 2019 12:00 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Mary-Jane Johnson
Attachments: PC 21 Submission_201904171115836.016.pdf

Categories:

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Mary-Jane Johnson

Organisation name:

Agent's full name:

Email address: mjjohnson550@gmail.com

Contact phone number: 021 669 060

Postal address:
55 Owens Rd
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
THE PROPOSED PLAN CHANGE IN ITS ENTIRETY

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:
I OPPOSE THE PRIVATE PLAN IN FULL

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

Submission no 149

Submission date: 17 April 2019

Supporting documents

PC 21 Submission_20190417115836.016.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.

Submission no 149

Mary-Jane Johnson : mjohnson550@gmail.com : Mobile 021 669 060

PERSONAL STATEMENT OF OPPOSITION TO PLAN CHANGE 21

I OPPOSE THE PRIVATE PLAN CHANGE IN FULL

I have lived at my present property for over 20 years. I feel privileged to live in such a beautiful inner city suburb of Auckland surrounded by heritage homes and streets of leafy green trees. It is very family orientated area with good schools, interesting areas to walk, a nearby village to socialise, close to good transport and minutes from the CBD.

After many years of discussion and planning and community submissions the new Auckland Unitary Plan designated my street as Single House Zoning. I was relieved at this decision as to me it meant that the residential area in which I lived and loved would remain mainly unchanged in the forthcoming years. That however has now possibly changed.

My property is located directly opposite the intersection of Brightside and Owens Roads and so the application by Southern Cross Hospitals Limited to expand the hospital in Brightside Rd will effect me and my family.

The application PC 21 proposes to amend the zone at 3 Brightside Rd from Mixed Housing Suburban to Special Purpose – Healthcare Facility and Hospital Zone which means that more than just a hospital building could eventually end up on this site.

I am concerned that the PC 21 incorporates 3 special character residential dwellings at 149,151 and 153 Gillies Ave. These sites are presently Residential Single House Zone but are also to be amended to Special Purpose -Healthcare Facility and Hospital Zone. These dwellings and probable vegetation are to be demolished to allow for the proposed hospital expansion. It will also mean that people from the boarding house will need to find alternative accommodation in a city already struggling with a housing shortage. Already 3 houses were demolished when the present hospital was rebuilt 20 years ago. The loss of these homes is inconsistent with the Special Character overlay provisions of the AUP District plan. I am concerned that if the hospital plan goes ahead that more homes will be lost if further expansion of the hospital is required in future years.

Submission no 149

Mary-Jane Johnson : mjohnson550@gmail.com : Mobile 021 669 060

I am very concerned that the application PC 21 will allow for extensive blasting and other earthworks required for the deep foundations and underground carpark. I have already endured this process when the present hospital was rebuilt and I do not wish to endure this process again. The blasting will be for a much longer time, possibly 2 to 3 years and with building work allowed 6 days a week from 7.30 to 6pm in residential areas this will be a very stressful time for local residents. Many residents work from home or are there during the day and I am concerned that our mental wellbeing will suffer. I am also concerned as to the effects the blasting will have on neighbouring houses some of which are immediately behind the hospital site. I am also concerned of the effect the blasting will have on the older homes and stone walls in the immediate area.

I have concerns about the prospect of parking in the immediate area both during the building process and after the hospital completion for staff and visitors. I already have a problem daily with vehicles parked by my property which makes visibility of oncoming traffic virtually impossible to see.

The application PC 21 proposes to have a reduction from the required parking for a private hospital which will have adverse effects on the properties and streets immediately by the hospital site which makes this site unsuitable for the proposed extension.

I have concerns about the effect such a building project would have on traffic in the area. With the constant blasting of rocks from the site the number of large vehicles required to remove these will add to congestion on Mountain Rd, Owens Rd and Gillies Ave. During peak hours and especially at school closing time traffic flow in this area is at a maximum. Traffic along these roads already face delays getting on and off the motorway and should this development go ahead possible road closures which are most likely will only further aggravate the situation.

Increased traffic volume during this development will cause an increased safety risk for the hundreds of school children that walk along Mountain and Owens Rd each day to and from the 4 secondary schools in the immediate area. Visibility is not always good at the intersection of Mountain and Owens Rd due to the heavy volume of traffic and large heavy vehicles associated with the development will pose an extra safety risk.

Submission no 149

Mary-Jane Johnson : mjohnson550@gmail.com : Mobile 021 669 060

The PC 21 application allows for a 24/7 hospital operation. This will be a complete intrusion of privacy of residents who live directly behind the hospital site or immediately across the road. It will take away the pleasure of living in their own homes.

The PC 21 application allows for a building of 15 metres and possibly up to 25 in a residential area where homes are no more than 8 metres . I do not understand how this application was even accepted by Auckland Council as a building of this size has no place in a residential area of heritage homes or in fact any residential area of Auckland City. The building will be visible from all directions as it will tower above everything else as trees that are so much a part of Epsom will do nothing to hide a building of this magnitude.

I totally oppose the application from Southern Cross Hospitals Limited to expand the hospital on the present site in Brightside Rd. This is a heritage residential area and a commercial building of this magnitude has no place in our community. We should be preserving the older areas and history of Auckland for future generations to come.

I do agree that there is perhaps a need for more private hospitals in Central Auckland but a heritage residential area like Epsom is certainly not the place for this proposal. A commercial area would be much more suited to for this build.

I hope that Auckland Council declines application PC 21 and let Epsom remain as laid out in the present Unitary Plan.

Submission no 150

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Tuesday, 16 April 2019 2:16 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Mike and Jenny Merrington
Attachments: Southern Cross Hospital personal-submission-_20190416141107.876.pdf

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Mike and Jenny Merrington

Organisation name:

Agent's full name:

Email address: jenmerrington@gmail.com

Contact phone number: 027 5504134

Postal address:

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:

The entire plan change

Property address: 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

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:

See attached

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

Submission date: 16 April 2019

Submission no 150

Supporting documents

Southern Cross Hospital personal-submission-_20190416141107.876.pdf

Attend a hearing

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

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

Declaration

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

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

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

No

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

Submission no 150

In addition, we also have these concerns :

We are very concerned about the idea that a major commercial enterprise can come into a **well-established residential area that is clearly identified for residential activities only** and that the **Unitary Plan would be completely overridden**. Years and enormous cost were spent getting submissions and completing a blueprint for the future. How could this be completely overturned by a commercial enterprise, leaving no confidence in council process. We are worried that if this proposal can take place here, then it can take place anywhere around Auckland residential zones.

We are concerned that **the hospital is not being proposed in an area already designated for such use** and where there would be considerably less disruption particularly during the building process

We are concerned that a **25 metre building** could be allowed in a quiet suburban neighbourhood

Submission no 151

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 15 April 2019 6:15 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Min Kang Park
Attachments: Personal Statement_Min Kang Park.pdf; Technical submission.pdf

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Min Kang Park

Organisation name:

Agent's full name:

Email address: toshiedon@gmail.com

Contact phone number: 021446315

Postal address:
168 Gillies Avenue
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
The proposal in its entirety

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:
I would like it declined in FULL. Please refer to my attachments.

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

Submission date: 15 April 2019

Submission no 151

Supporting documents
Personal Statement_Min Kang Park.pdf
Technical submission.pdf

Attend a hearing

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

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

Declaration

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

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

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

Yes

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

Submission no 151

Min Kang Park
Email: toshiedon@gmail.com
Phone: +64-21446315
Address: 168 Gillies Avenue, Epsom, Auckland, 1023

Reasons for Submission

1. I oppose the Proposed Plan Change 21 (PC 21-private) for the following reasons:

- (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
- (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
- (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
- (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
- (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
- (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.

Submission no 151

Min Kang Park

Email: toshiedon@gmail.com

Phone: +64-21446315

Address: 168 Gillies Avenue, Epsom, Auckland, 1023

- (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.
- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular:
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 151

Min Kang Park
Email: toshiedon@gmail.com

I oppose the private plan change PC21, the development of 3 Brightside Road / 149, 151 and 153 Gillies Avenue, Epsom in **FULL**.

My reasons are:

This project does not respect neighbouring residents, children and students, as well as the environment the one of most historic streets of Auckland.

I have been living at our property, 168 Gillies Avenue, Epsom for 19 years since 2001, settling down with my husband and three sons, who were educated at local primary and intermediate, Kohia Terrace Primary and Auckland Normal Intermediate, respectively. I have very much enjoyed living here with my family under the unique landscape and wish to stay as long as possible, provided the surroundings do not change significantly into a commercialised area.

However, my plans are under threat from the development of construction of an institution of this scale which will inevitably affect the surrounding environment, landscape, daily life of residents and transit to work / schools. These issue will no doubt rise from continuous excavation/blasting in addition to excessive noise for a prolonged period of time. Neighbours and I are all very concerned about the future of our street and the potential for future projects that may commence as a result of this venture.

I feel this project does not contribute to social and economic wellbeing on our local community, and only endangers one of the most historic streets of Auckland.

Kind regards,

Min Kang Park

Email: toshiedon@gmail.com

Phone: +64-21446315

Address: 168 Gillies Avenue, Epsom, Auckland, 1023

Submission no 152

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 15 April 2019 10:15 AM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Prudence Jane Cotter

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Prudence Jane Cotter

Organisation name:

Agent's full name:

Email address:

Contact phone number: 021 2739519

Postal address:
44B St Georges Bay rd
Parnell
Auckland 1052

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
PC21

Property address: 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

Map or maps:

Other provisions:

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

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

The reason for my or our views are:
See Attached

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

Submission date: 15 April 2019

Submission no 152

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.

Submission no 153

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 15 April 2019 10:30 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Pui Yi Linda Leung
Attachments: PersonalStatement_LindaLeung.pdf; TechnicalStatement_LindaLeung.pdf

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Pui Yi Linda Leung

Organisation name:

Agent's full name:

Email address: lindaee@gmail.com

Contact phone number: 0221228209

Postal address:
5/2 Brightside Road
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:
The entire Plan Change

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

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

The reason for my or our views are:
See attachments

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

Submission date: 15 April 2019

Submission no 153

Supporting documents

PersonalStatement_LindaLeung.pdf

TechnicalStatement_LindaLeung.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.

Submission no 153

ATTACHMENT -- Reasons for Submission

1. I oppose Proposed Plan Change 21 (PC 21-private) for the following reasons:

- (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
- (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
- (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
- (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
- (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
- (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
- (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

Submission no 153

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 153

In addition, I also have these concerns:

1. We have been in this area for 4 years. We really like this location here because of its quietness & convenience & easy access to anywhere. However, with the huge “commercial” project coming up in this “residential” area, it will surely destroy all those qualities mentioned. Blastings and excavations will probably last for years. I can hardly imagine how much noise would be generated from the construction site and how badly would the air be polluted in the surrounding areas. These would very likely create enormous stress and health issues to the residents in the nearby areas. I, myself, have been suffering from migraine for over 30 years. I know how worst it could possibly be with such condition. I foresee it would be of immense suffering & torture for myself when having migraine, with all those blastings/excavations & constructions going on, especially if last for years. This is intolerable
2. The junctions of Owens/Gillies/ Brightside/Mountain Road are already very busy during school/ office hours, in particular. There would absolutely be huge blockages to the the traffic with big trucks & construction vehicles moving in & out of the site. How would Southern Cross and the Council manage these chaos done to the residents? There are many kids walking to EGGS/ AGS/ Kohia ..etc thru those pathways . These huge moving vehicles would be putting them in a pretty dangerous position. How would SC & Council protect these kids from accidents throughout those years?
3. It seems that at the end SC will be enjoying all the profits gained from this huge development years later. Council would be very happy because they have assisted an “enterprise” to achieve a “big job”. However, the residents at Epsom would gain absolutely NOTHING !! We will only get troubles, tortures, sufferings, ... etc. My question is, DOES THE COUNCIL REALLY CARE FOR THE RESIDENTS OF EPSOM? I personally don't think it is an appropriate act to allow large commercial intrusion to this residential environment.

Submission no 154

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Wednesday, 17 April 2019 8:15 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Richard Dallas Dominic Quatermass
Attachments: Brightside.pdf

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Richard Dallas Dominic Quatermass

Organisation name:

Agent's full name: Richard Quatermass

Email address: quatermass@xtra.co.nz

Contact phone number: 0273106724

Postal address:
6/34 Owens Road
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
The entire plan change

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

It is not acceptable for the Unitary Plan, so soon after its implementation, to be changed solely for the benefit of a profit-making business. Their customers, most of whom pay for private health insurance, are perfectly capable of travelling to areas such as Kingsland where this activity is permitted. Four years ago we bought a small unit in a leafy heritage area, not in a commercial zone. We are confident that you will reject this application, allowing the peace of the neighbourhood to be undisturbed by explosions during the construction phase and vastly increased traffic both then and in the future. The sheer bulk of possible future developments under this application and its concomitant

Submission no 154

discretionary activities is, of course, totally out of scale with the neighbourhood. These industrial-sized buildings would be visible to us on two sides, changing forever our outlook and our sense of well-being. The health insurance industry in general, and Southern Cross in particular, is wealthy enough to build a new hospital anywhere in Auckland but this does not mean that they should be allowed to do what they want when they want - in this application, destroying a designated heritage area and riding roughshod over the needs and views of their neighbours. In this case Might is clearly not Right. I ask you to reject this application in its entirety. See also my attachment

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

Submission date: 17 April 2019

Supporting documents
Brightside.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.

Submission no 154

ATTACHMENT -- Reasons for Submission

1. **I/we oppose** Proposed Plan Change 21 (PC 21-private) for the following reasons:

- (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
- (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
- (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
- (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
- (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.

Submission no 154

- (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.

- (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.

- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.

- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.

Submission no 154

- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.

- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 155

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Saturday, 13 April 2019 12:46 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Richard Edward Thomas
Attachments: ZoneChange_TechnicalRichardThomas.pdf; Richard Thomas_oppositon to planchange21.pdf

Categories:

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Richard Edward Thomas

Organisation name:

Agent's full name:

Email address: richard2keri@yahoo.co.nz

Contact phone number: 027 532 3400

Postal address:
13 Fairveiw Road
Mt Eden
Auckland 1024

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:

I oppose the plan change 21 in its entirety

Property address:

Map or maps:

Other provisions:

I oppose the plan change in its entirety

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:
see attachments

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

Submission no 155

Submission date: 13 April 2019

Supporting documents

ZoneChange_TechnicalRichardThomas.pdf

Richard Thomas_oppositon to planchange21.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.

Submission no 155

Richard Thomas

I have been a resident in Mt Eden with my family for the last 5+ years since our return to New Zealand. We love the family orientated feeling of Mt Eden/Epsom the village, the mountain and the diverse nature of the character homes. The area enjoys a wonderful community spirit due to the residential zone and I am very concerned that this would be negatively impacted should the proposed plan change be accepted.

I am outraged that the Auckland Council is considering a zone change for a commercial organisation. The zones of the Auckland Unitary Plan were discussed and agreed and should not be able to be altered for individual/commercial gain. This proposal does not benefit our community, which is already very adequately serviced regards hospitals. There is not a need for an expanded Southern Cross Hospital in the Mt Eden/Epsom area. However there are definitely needs for such a facility in other areas of Auckland that are already zoned appropriately and much more suitable.

The other major concern I have is the total unsuitability of the site itself. The required basalt rock blasting is reason enough to reject this plan change request as the impact on the community and the environment would be considerable. Added to that are the logistics of building a 25 metre high eyesore in an already heavily congested area. The disruption of construction including trucks, equipment, building material deliveries and the like would grind traffic to a halt. Gillies Avenue is a busy arterial route feeding the motorway and main roads, this would affect commuters and workers well beyond the proposed site itself and further affect the 'liveability' of Auckland.

The site is unsuitable for all the reasons detailed above but also it would be a major problem moving forward should the build take place. SCHL has already asked for concessions to the council regulations regards adequate parking spaces for a hospital. The

Submission no 155

area is already oversubscribed regards off street parking and this would only worsen with an expanded hospital. Why build a hospital and fail to provide safe and adequate parking for patients, staff and visitors when a suitable area will not have any of these limitations?

The question has to be asked why do SCHL want to build on the proposed site when there are so many reasons it does not make sense? I do hope the council takes all these issues into consideration.

Submission no 155

1. I, Richard Thomas oppose the Proposed Plan Change 21 (PC 21-private) for the following reasons:

- (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
- (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
- (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
- (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
- (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
- (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
- (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

Submission no 155

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
- i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 156

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 18 April 2019 12:15 AM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Sanjay Ravi Dutt
Attachments: Technical submission ideas .pdf

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Sanjay Ravi Dutt

Organisation name:

Agent's full name:

Email address: scoobjay@gmail.com

Contact phone number: 021314030

Postal address:
20 Epsom Ave
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
Plan change 21

Property address: 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

Map or maps: The entire plan change

Other provisions:

I believe this plan for expansion will have multiple adverse affects on the surrounding residents and community. This is a quiet residential area away from the large buildings and businesses already located in nearby suburbs. The development would introduce a large commercial site in the middle of an area enjoyed by families, and take away from the overall character and peacefulness in the surrounding streets. The traffic on Gilles ave is already at capacity around peak times of the day, being such an important main road in both directions. There is a real concern about the significant increase in traffic that would occur with this expansion, not to mention the potential safety risks to the hundreds of school children walking along this route twice a day. It's also a concern that this private enterprise is attempting to push this proposal through, and have the zoning changed because their activity does not match the consented zone. There are other areas nearby that would be better suited to commercial activity of this size, as they already have zoning consent (e.g. Newmarket). Commercial enterprises should not have the ability to force their will onto private citizens, just for their own financial gain. In practical terms the impact of the actual construction will cause chaos in the area (heavy machinery and vehicles, excessive noise and dust). Even greater concern is the part of the proposal involves the use of dynamite to create the underground carpark. The use of dynamite in past projects has

Submission no 156

caused real damage to the foundations of the surrounding houses - most of which are historic villas that could not be expected to handle the shockwaves and vibrations. There is inadequate justification or re-assurance for this to go ahead, and the burden of legal recourse should any homeowners be affected is not feasible or fair. I've lived at the Epsom Ave address nearby since 1998, and was once one of those school kids walking along Gilles ave everyday - I know the area very well. This proposal increases the size of a 24/7 private hospital - the affected residents and community may not even benefit from this proposal, but they will certainly experience the negative impacts on their day-to-day life here.

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

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

The reason for my or our views are:

This proposal is an unwelcome intrusion on our community, and does not belong in the area. I reject it for the reasons listed above, and in the technical submission attached.

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

Submission date: 18 April 2019

Supporting documents

Technical submission ideas .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.

Submission no 156

ATTACHMENT -- Reasons for Submission

1. I/we oppose Proposed Plan Change 21 (PC 21-private) for the following reasons:

- (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
- (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
- (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
- (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
- (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
- (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
- (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.
- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the

Submission no 156

purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.

- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.

- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iiii. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.

- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.

- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 157

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Sunday, 14 April 2019 5:30 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Sean Keane
Attachments: Personal Statement of opposition to PC21 - Sean Keane.pdf; Technical Statement of opposition to PC21 - Sean Keane.pdf

Categories:

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Sean Keane

Organisation name:

Agent's full name: Sean Keane

Email address: mtecho@hotmail.com

Contact phone number: 0211913963

Postal address:
134 Mountain Road
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
The entire Plan Change

Property address: 3 Brightside Road, 149,151,153 Gillies Avenue, Epsom

Map or maps:

Other provisions:
The entire Plan Change

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

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

The reason for my or our views are:
I wish to decline it in its entirety as indicated above. See attachments.

Submission no 157

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

Submission date: 14 April 2019

Supporting documents

Personal Statement of opposition to PC21 - Sean Keane.pdf

Technical Statement of opposition to PC21 - Sean Keane.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.

Submission no 157

Technical statement of opposition to PC21 from Sean Keane, 134 Mountain Road, Epsom, Auckland

1. I oppose Proposed Plan Change 21 (PC 21-private) for the following reasons:

- (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
- (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
- (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
- (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
- (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
- (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
- (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and

Submission no 157

purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 157

Personal statement of opposition to PC21 from Sean Keane, 134 Mountain Road, Epsom, Auckland

I have a number of personal concerns about what is being proposed in PC21

1. We moved to Mountain Road in July of last year, bringing our 3 children into the city from our previous home in Coatesville. We did so after reviewing the councils Unitary Plan and being satisfied that we were moving from the country to a leafy, green, residential suburb in the city. We planned the move that we would be here for the next 25 years, before then shifting into some form of aged-care facility. We would not have made the move if we had known that an enormous and disruptive new medical facility was about to be built here.
2. We chose to live in Epsom precisely because it is a leafy, green and well-established inner-city village. It's a place where people walk, where you don't feel like you are in a city of 1mn+ people, and where the character and history of the city is very apparent. Approving application PC21 will significantly change all of those elements about the area, and will encourage the industrialisation of some of our oldest and most liveable areas of Auckland. There are plenty of other places where such a facility could and should be built.
3. I am hugely annoyed that the developer would submit this application so soon after we all spent months reading, arguing, attending meetings and discussing the recently agreed Unitary Plan. If they wanted to make such a significant change to the Epsom area plan then the time to do that was during the review. It wasn't that long ago! Their application now forces me, my family, my neighbours and my community to have to again take time to fill in these forms and oppose something that should never have been put forward in the first place. The whole community discussed the Unitary Plan. The whole community settled on the Unitary Plan. What would be the council message about the worth of that plan if it was simply changed now in response to a corporate request.
4. The Unitary Plan clearly identifies Epsom a well-established residential area of Auckland. It is generally regarded by most Aucklanders as being one of the more liveable and desirable parts of the city, and it is an essential part of our history. An enormous commercial enterprise has no place in such a community. It's completely out of character, along with being completely outside of the Unitary Plan.
5. As a child I grew up on the outskirts of London, in what was then a small town on the River Thames. As London has grown the town has been swallowed up and is now an Outer London Borough. Over the years councils voted to approve developments such as this in areas of the town that were entirely inappropriate. The result was that all of the housing and green spaces that I remember in the centre of the town are long gone, and everyone now lives in a suburb of what was already a suburb. The town now has no character and is virtually indistinguishable from any of the other grey suburbs that surround London. The Auckland council should learn from this, and it should enforce the conditions of the much debated Unitary Plan. This is the only way to safeguard our city from becoming a soulless collection of corporate structures, rather than a set of vibrant, liveable and integrated communities.

Submission no 157

6. We moved into Mountain Road so that our two teenage daughters could easily walk to the local school. Along with hundreds of other children they do this every morning and evening, walking along Owens Road and into Mountain Road. The footpaths are full of kids from Epsom Girls, Diocesan, Auckland Grammar and St Peters. The roads also see kids riding bicycles and scooters. The cars that travel at that time are mostly full of parents dropping off and picking up their children. This enormous (and out of Plan) development will create major logistical headaches both during the construction phase, and even after completion.

The safety risk of one of these children being struck by a large industrial machine or truck during the long building period is incredibly high. Kids don't always follow road signs, and they don't always do the logical thing. Given the nature, physical position and absolute size of this development there is no way that you can guarantee the safety of our children if this project is approved.

7. The plan will see 3 large heritage homes being demolished along Gillies Avenue. This is in addition to the 3 lovely old houses that Southern Cross demolished 20 years ago when they first got permission for their current hospital facility. We all know that if this development goes ahead then it is inevitable that Southern Cross will seek to further expand in coming years and more houses will be lost. Regardless of what the developers eventually do it's also highly likely that if this plan goes ahead other homes nearby will be sold or moved as living near to a very large 24/7 hospital facility will make the area unliveable. This is completely wrong in an area with a reputation for beautiful old residential houses. It's also completely outside of the Unitary Plan.
8. The submission indicates that there is likely to be extensive blasting and quarrying required to excavate the site and to establish adequate foundations for the new structure. I am strongly opposed to this as I work from home and I spend much of my day on the phone talking to people offshore. Blasting is certain to disrupt and interrupt my work. When I moved my business to Epsom last July this was not something that I had expected to have to deal with, and as a consequence I may suffer financial cost if I have to lease an office away from the inevitable noise and disruption.
9. The submission indicates that there is likely to be extensive blasting and quarrying required to excavate the site and to establish adequate foundations. I am strongly opposed to this as I read from prior experience in the area that blasting inevitably leads to dust, damage and general inconvenience to nearby properties. Our house is more than 100 years old and it will likely respond poorly to nearby blasting. The windows and walls are thin and the insulation is minimal. We will hear the blasting and it will be disruptive. The vibration and quarrying may do damage to the structure of our home. I do not trust the developer to make these issues good, and I have no confidence that they will abide by any covenants or restrictions that may be imposed if the Council approves this development.
10. The demolition of residential houses to build a commercial operation in the heart of a residential area appears to be out of touch with government policy on housing. Aren't we in the middle of a housing crisis and isn't the government trying to build 10,000 new homes for New Zealanders every year? Knocking down quality heritage homes to build a commercial structure in the middle of the city makes little sense in the current climate, and especially so given that

Submission no 157

the Unitary Plan has clearly designated areas to encourage such developments outlined in the plan itself.

11. The submission indicates that there is likely to be extensive blasting and quarrying required to excavate the site and to establish adequate foundations. I am strongly opposed to this as my wife has a serious medical condition that is likely to be aggravated by loud blasting, and by the inevitable increase in dust and particulates in the air.
12. The submission indicates that there is likely to be extensive blasting and quarrying required to excavate the site and to establish adequate foundations. I am strongly opposed to this as my children study at home and they all have important exams coming up in the next few years. One of the reasons we chose to live in Mountain Road was that the area was residential, and that the children would be able to study without disturbance.
13. The submission indicates that there is likely to be extensive blasting and quarrying required to excavate the site and to establish adequate foundations. I am strongly opposed to this as there is no way that this can be done without establishing a significant safety perimeter around the blasting and quarrying site. Inevitably this will cause major disruption to the local area traffic flows, and particularly to Gillies Avenue and Owens Road. This will back up onto the motorway, to Manukau Road, to Newmarket and to Mt Eden Village. This area is already one of the heaviest thoroughfares in this part of Auckland given the large number of schools in the area. We already experience extensive traffic delays and long wait times. Closing the main road will undoubtedly amplify and aggravate the already extensive congestion during the period of construction. It will also subsequently add large volumes of vehicles to a part of the city that should not be targeted for additional traffic.
14. I am alarmed at the prospect of a hospital of this scale operating 24/7 in a residential area. This is at odds with everything about the local area, and it is alien to the any concept of a quality residential amenity. This is a corporate venture of significant scale, and its place is not in the middle of one of Auckland's prime green residential areas.
15. The title of this month's National Geographic magazine is "Cities". The entire issue is focused on how to make urban areas more liveable, how to make communities thrive and how to make cities more "human." The Editor writes "Waking up every morning and knowing that the city is a little bit better than it was yesterday – that's very nice when you have children." I'm alarmed at the Southern Cross proposal and I certainly don't think it will make Epsom better tomorrow than it is today, and I don't think it will make it better for my children. The plan will only make it better for Southern Cross.
16. Finally, I simply cannot understand how the developer considers that a structure that could be up to 25m tall could – in any way, shape or form – be considered "appropriate" within a residential area that mostly has buildings that are no more than 8m tall. The proposed structure will be a massive visual impairment (aka "eyesore") and will undoubtedly be visible from many areas of the local community.

Approval of such a structure would be outside of what we all agreed in the Unitary Plan, and it would created a very significant, highly disruptive commercial structure that would sit within

Submission no 157

what is a low-profile, long established RESIDENTIAL area. This proposal from the developers is completely inappropriate.

Submission no 158

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 18 April 2019 4:46 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Sharon Cogan-Beck

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Sharon Cogan-Beck

Organisation name:

Agent's full name: Sharon Cogan-Beck

Email address: sharoncoganbeck@yahoo.com

Contact phone number: 021983400

Postal address:
9A Wilding Ave.
epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
Proposed Plan Change 21 (PC 21-private)

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

(a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS. (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies. (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is

Submission no 158

inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone. (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay. (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable. (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location. (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones. (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions. (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay. (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular – i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate, ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided, and iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City. (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act. (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

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

Submission date: 18 April 2019

Attend a hearing

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

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

Declaration

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

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

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

Yes

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

Submission no 159

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 15 April 2019 2:15 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Simon Nelson and Florence Sophia Holdsworth
Attachments: attachment1LegalReasonsforSubmissionApril15.pdf;
SNFSHOLDSWORTHPersonalsubmissionApril15_20190415140933.321.pdf

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Simon Nelson and Florence Sophia Holdsworth

Organisation name:

Agent's full name:

Email address: simon@holdson.co.nz

Contact phone number: 021890403

Postal address:
4 Shipherds Close
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:

Property address: 3 Brightside Road, 149, 151, and 153 Gillies Avenue, Epsom

Map or maps:

Other provisions:

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

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

The reason for my or our views are:
The Proposed Plan Change In Its Entirety

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

Submission no 159

Submission date: 15 April 2019

Supporting documents

attachment1LegalReasonsforSubmissionApril15.pdf

SNFSHOLDSWORTHPersonalsubmissionApril15_20190415140933.321.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.

Submission no 159

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 15 April 2019 2:00 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Simon Nelson and Florence Sophia Holdsworth
Attachments: SNFSHOLDSWORTHPersonalsubmissionApril15.pdf

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Simon Nelson and Florence Sophia Holdsworth

Organisation name:

Agent's full name:

Email address: simon@holdson.co.nz

Contact phone number: 021890403

Postal address:
4 Shipherds Close
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
The Proposed Plan Change In its Entirety

Property address: 3 Brightside Road, 149, 151, and 153 Gillies Avenue, Epsom

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:
See Attachment

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

Submission no 159

Submission date: 15 April 2019

Supporting documents
SNFSHOLDSWORTHPersonalsubmissionApril15.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.

Submission no 159

2. In addition we also have the flowing concerns about the proposed plan change PC 21.

- a) We have lived in Shipherds Close for about 24 years. Our choice of location was deliberate having resided in Epsom for about a decade prior to that. Our experience of living in the suburb had been very positive, the area being characterized by mainly comfortable character single dwellings set in mature gardens for the most part.
- b) We searched for some 9 months to find another existing residence in Epsom but this proved unsuccessful. We actually looked at three different properties in Shipherds Avenue during that time.
- c) We eventually purchased our property which was a vacant lot, being part of a bigger block (of about an acre) which had been sub-divided into four separate titles. The acre property had one modest bungalow on it which was retained by the developer and extensively remodeled and expanded and moved to become affixed on one of the 4 sections. The other 3 sections all had new dwellings erected on them.
- d) The building development meant that several mature trees were unfortunately lost, but for our part at least we retained the most prominent tree and built around it.
- e) In keeping with the character of the surrounding neighbourhood, we created extensive stone walling around the property to complement the use of such materials in the immediate vicinity.
- f) One of our boundaries comprises a low, wide stone wall which must have existed since the mid to late 1800's and this has been retained as a graphic reminder of the earlier history of our street. The wall is wide enough to easily walk upon. That same type of wall ran extensively through several Shipherds Ave properties and mostly still exists today.

Submission no 159

- g) We moved in at a time when litigation and appeals were still being pursued by residents concerning the Resource Consent Application involving 1-9 Brightside Road and the erection of the existing Brightside Hospital.
- h) Our top of mind concerns at that time were first, the effect on parking in the vicinity and secondly, the impacts on the neighborhood of the building and construction especially the removal of rock. Those same concerns remain important in relation to the PC21 application.

CONSTRUCTION

- i) About construction, it was estimated at that time (1994-96) that the excavation of soil and basalt rock would amount to 9,145m³. While we do not know the final figure, we well recall the blasting involved in the operation which took an inordinate amount of time, I believe well in excess of prior estimations. There was in addition the dust and inconvenience to neighbors and their families from the heavy transport needed to extract and cart the spoil away.
- j) It is estimated that were the proposed enlarged hospital proceed as presently envisaged, with underground carparking, the amount of soil and rock needing to be excavated and removed would be 17,150m³ [based on SCHL dimension figures of 7 (D) x 35 (W) x 70 (L) metres]. That constitutes a massive amount of material for removal and I understand could involve upwards of 4,000 truck movements over a period of 3 years which period I suggest may well be conservative, if the last experience is anything to go by. This factor alone will have enormous adverse impacts on residents in the vicinity.

BLASTING & REMOVAL

- k) In addition to this, if last time is any example, safety blast zones must be set up restricting movements and people in the zones for some minutes before each actual blasting activation. Such blasts are likely to be severe.

Submission no 159

- l) Our own home developed some cracks in the plasterwork over the last building period, which was not surprising given the force and amount of tremor experienced daily from the blasting operations. Since the building and construction was finished, no further damage was experienced, so I can only assume a “cause and effect” scenario in relation to these cracks.
- m) We believe a sustained exposure over a 3 year plus period of blasting potentially would risk damage not only to the plaster on the house but also to the swimming pool and the extensive stoneworks which we have built surrounding the property.
- n) The above illustrates just some aspects of the implications in terms of size and scale which a change to “Special Purpose Healthcare Facility and Hospital Zone” (if granted) would be visited upon the neighbourhood. There are others.

TRAFFIC & PARKING

- o) Because of the practical and everyday effect, the Parking aspect has created more comment than any other amongst folk in the vicinity. At the time of the last case, we were led to understand that the SCHL would be providing on site enough car parks for staff and visitors, either under the building or on the northern and eastern boundaries of the property.
- p) I don't believe anyone was naïve enough back then to expect 100% compliance, because even SCHL can't totally control the public and visitors who are entitled to park on local streets. However, it is evident to all current residents that numbers of staff regularly park on Shipherds Avenue and Brightside Road. Yet from personal observation, there are generally empty parking spaces inside the hospital grounds, so this factor is totally being ignored by SCHL at present as far as we can see.
- q) This spillover of vehicles into Brightside and Shipherds is actually acknowledged in the Transport Assessment Report - Section 2.1.4 on page 4 – where in the surveys undertaken to support the SCHL case, peak

Submission no 159

demand numbers in those streets showed 31 cars parked for between 8 to 12 hours which the Report author assumed to be hospital generated. By contrast the peak demand within the SCHL site was 50 cars. Both these figures must be contrasted against a total existing staff complement of approximately 130 persons employed over 3 shifts.

r) There can be little doubt that were a hospital to be constructed of the size proposed or depicted on the site, that traffic on and about the site and locality would increase, at least proportionately, with the increased staffing numbers required to both man the operation and due to the extra volume of patients and visitors.

s) I suggest this would be compounded should Ancillary Medical Consulting Rooms be part of any future proposed structure, which I believe is a permitted use under the Hospital Zone. It is worth noting that such rooms were disallowed in the 1994 Resource Consent decision. At that time:

“it was considered that with the Medical Consulting the intensity use of the site was increased to the point where the overall proposal would attract numbers of people and activity... not acceptable in terms of its effects and the Zone provisions for the neighbourhood. This would be particularly evident in the effects of increased vehicle traffic in the neighbourhood ...” (Mt Eden Planning Commissioner Panel dated 7 November 1994).

t) In examining the Flow Transport Assessment, it was a little difficult to accept the report was actually referring to the area in which we live. It certainly does not concur with our experience. I believe that one big omission is that it pays scant regard to the numbers of children who walk, and ride on bikes and scooters, around the Gillies, Owens, Brightside “block” twice a day in peak times during the school terms. The Flow Report survey itself is a little inadequate in that ignores several schools in the vicinity which I believe should have been considered as effecting the overall pattern, such as Auckland Boys Grammar School, St Peters College and Diocesan School for Girls.

Submission no 159

- u) All these schools have pupils travelling within the locale of this proposal and cannot be ignored, not only in terms of their effect on traffic movements, but also incidentally in terms of safety as regards the blasting and truck movements.
- v) The conclusion in the SFHL Consultants Assessment of the Effects Report - page 63 - is that the traffic effects are no more than minor and considered acceptable and can be “managed” under a plan change. To reach that conclusion they also advocate reducing the normal onsite parking requirements for hospitals which makes little sense in our view.
- w) The report further suggests that part of the “management” could include a “Staff Travel Plan to encourage hospital staff to travel by sustainable transport modes, and/or changes to existing available sight distances from intersections and any potential vehicle access provisions by removing on-street”.
- x) The first suggestion is risible given the propensity of staff to park off site currently, and the second, if I understand the language correctly, basically involves doing away with some existing on street parking, effectively making less parking availability and therefor increasing congestion.
- y) The existing transport and parking issues from personal experience are complex and would be compounded should the new Zone be permitted. In the first instance the right to build to 16m height and the sheer volume of any such new building, would have big impacts on this issue. Any further expansionist change, which could allow building to 25m as a restricted discretionary activity with minimal public input, would put the area under extreme pressure.
- z) In either option or eventuality, to change the zoning and permit such a massive commercial structure to be imposed upon an acknowledged unique and quality residential environment makes an absolute nonsense

Submission no 159

of the Auckland Unity Plan which professes to protect livable communities and which in any event could not be accommodated without significant adverse effects on adjacent properties, in particular the properties adjacent and situated in the same block on Owens Road.

AUCKLAND UNITARY PLAN

- aa) In that regard, the Unitary Plan has been in existence for only a very short time, and I believe that a consent to PC 21 to change the Zoning, would have severe adverse impacts and would undermine the character heritage environment of the neighbourhood. What is proposed in terms of structure will significantly dominate the environment and detract from the residential nature of the area. It also appears contrary to the Unitary Plan vision for the area which essentially, as I understand it, seeks to maintain the fundamental low density older residential nature, by the special character overlay which has been imposed.

- bb) There was surely an opportunity to have raised this issue during the years involving the PAUP process which started as early as September 2013. SCHL claim that they did not raise the issue as they did not own the sites involved (149-153 Gillies), that there was no process of identification from Auckland Council to make companies such as SCHL aware of the potential for rezoning, and that the properties were not on SCHL's radar in terms of possible expansion sites – see page 8 of SFH Consultants Report.

- cc) It is hard not be skeptical over some of those claims when on pages 11 and 12 of the same SFH Report, it is revealed that 153 Gillies was purchased in 2015, 151 Gillies in 2016, and 149 Gillies in 2017 the last as stated “with intention to carry out an extension plan.” One might legitimately ask why would SCHL be purchasing such sites, other than for expansion?

Submission no 159

BUSINESS CASE

- dd) Much has been made in supporting documentation to the PC21 application that the existing facility is operating at full capacity, with demand exceeding available theatre capacity and providing services for 4,500 patients each year. No figures are given for what a proposed bigger hospital would generate in terms of extra patients, vehicles, visitors, staff etc.
- ee) The nearest one can get to a picture of the future situation is in the figures that it is estimated that acute surgery procedures will increase by 30,000, or 31%, by 2037 and elective surgery procedures (where SCHL are primarily focused) by 77,000, or 43%, by 2037.
- ff) The Ernst & Young Business case asserts that DHB's are struggling to provide publicly funded surgery services for elective patients and that 25% of SCHL surgeries have been public funded by ACC or DHB's over the last 5 years. Further that it is critical that SCHL can expand its existing hospital facility at this site, to basically keep up with future demand.
- gg) In other words, inadequate public health funding is advanced as a justification for hospital expansion, along with anticipated future massive demand from the public sector (DHB's and ACC), a claimed social "responsibility to expand services and resources for the best interest of the community" plus a growing and ageing population.
- hh) These reasons are reinforced by a review of where specialists and surgeons work and live in relation to Brightside, and a claim that "proximity and convenience is of high importance to them" - E&Y Report 6.2.1 page 19. This claim I suggest is somewhat facile and tantamount to almost claiming that occupational residency should be a factor capable of overriding the provisions of the Unitary Plan. We reject that as a grounds for change.

Submission no 159

- ii) What is evident from the report is that this application is very much about a commercial enterprise and the assessment of its future expansion, with very little regard to the effects of that commercial expansion on the neighbourhood, in which it has hitherto been happy to operate.

- jj) Even as regards consideration of any alternatives to their proposal, (which is required under S32), the report seems totally unsympathetic and E&Y have not explored any such genuine alternative “hospitals” or sites. Rather the report has merely advanced reasons as to why any of SCHL’s own other sites would not in their opinion be suitable for their desired expansion plans.

- kk) In summary, the SCHL approach and attitude to the local environment and impacts of their proposal on residents seems woefully inadequate and we believe they have not complied with the S32 requirement.

Submission no 159

2. In addition we also have the flowing concerns about the proposed plan change PC 21.

- a) We have lived in Shipherds Close for about 24 years. Our choice of location was deliberate having resided in Epsom for about a decade prior to that. Our experience of living in the suburb had been very positive, the area being characterized by mainly comfortable character single dwellings set in mature gardens for the most part.
- b) We searched for some 9 months to find another existing residence in Epsom but this proved unsuccessful. We actually looked at three different properties in Shipherds Avenue during that time.
- c) We eventually purchased our property which was a vacant lot, being part of a bigger block (of about an acre) which had been sub-divided into four separate titles. The acre property had one modest bungalow on it which was retained by the developer and extensively remodeled and expanded and moved to become affixed on one of the 4 sections. The other 3 sections all had new dwellings erected on them.
- d) The building development meant that several mature trees were unfortunately lost, but for our part at least we retained the most prominent tree and built around it.
- e) In keeping with the character of the surrounding neighbourhood, we created extensive stone walling around the property to complement the use of such materials in the immediate vicinity.
- f) One of our boundaries comprises a low, wide stone wall which must have existed since the mid to late 1800's and this has been retained as a graphic reminder of the earlier history of our street. The wall is wide enough to easily walk upon. That same type of wall ran extensively through several Shipherds Ave properties and mostly still exists today.

Submission no 159

- g) We moved in at a time when litigation and appeals were still being pursued by residents concerning the Resource Consent Application involving 1-9 Brightside Road and the erection of the existing Brightside Hospital.
- h) Our top of mind concerns at that time were first, the effect on parking in the vicinity and secondly, the impacts on the neighborhood of the building and construction especially the removal of rock. Those same concerns remain important in relation to the PC21 application.

CONSTRUCTION

- i) About construction, it was estimated at that time (1994-96) that the excavation of soil and basalt rock would amount to 9,145m³. While we do not know the final figure, we well recall the blasting involved in the operation which took an inordinate amount of time, I believe well in excess of prior estimations. There was in addition the dust and inconvenience to neighbors and their families from the heavy transport needed to extract and cart the spoil away.
- j) It is estimated that were the proposed enlarged hospital proceed as presently envisaged, with underground carparking, the amount of soil and rock needing to be excavated and removed would be 17,150m³ [based on SCHL dimension figures of 7 (D) x 35 (W) x 70 (L) metres]. That constitutes a massive amount of material for removal and I understand could involve upwards of 4,000 truck movements over a period of 3 years which period I suggest may well be conservative, if the last experience is anything to go by. This factor alone will have enormous adverse impacts on residents in the vicinity.

BLASTING & REMOVAL

- k) In addition to this, if last time is any example, safety blast zones must be set up restricting movements and people in the zones for some minutes before each actual blasting activation. Such blasts are likely to be severe.

Submission no 159

- l) Our own home developed some cracks in the plasterwork over the last building period, which was not surprising given the force and amount of tremor experienced daily from the blasting operations. Since the building and construction was finished, no further damage was experienced, so I can only assume a “cause and effect” scenario in relation to these cracks.
- m) We believe a sustained exposure over a 3 year plus period of blasting potentially would risk damage not only to the plaster on the house but also to the swimming pool and the extensive stoneworks which we have built surrounding the property.
- n) The above illustrates just some aspects of the implications in terms of size and scale which a change to “Special Purpose Healthcare Facility and Hospital Zone” (if granted) would be visited upon the neighbourhood. There are others.

TRAFFIC & PARKING

- o) Because of the practical and everyday effect, the Parking aspect has created more comment than any other amongst folk in the vicinity. At the time of the last case, we were led to understand that the SCHL would be providing on site enough car parks for staff and visitors, either under the building or on the northern and eastern boundaries of the property.
- p) I don't believe anyone was naïve enough back then to expect 100% compliance, because even SCHL can't totally control the public and visitors who are entitled to park on local streets. However, it is evident to all current residents that numbers of staff regularly park on Shipherds Avenue and Brightside Road. Yet from personal observation, there are generally empty parking spaces inside the hospital grounds, so this factor is totally being ignored by SCHL at present as far as we can see.
- q) This spillover of vehicles into Brightside and Shipherds is actually acknowledged in the Transport Assessment Report - Section 2.1.4 on page 4 – where in the surveys undertaken to support the SCHL case, peak

Submission no 159

demand numbers in those streets showed 31 cars parked for between 8 to 12 hours which the Report author assumed to be hospital generated. By contrast the peak demand within the SCHL site was 50 cars. Both these figures must be contrasted against a total existing staff complement of approximately 130 persons employed over 3 shifts.

r) There can be little doubt that were a hospital to be constructed of the size proposed or depicted on the site, that traffic on and about the site and locality would increase, at least proportionately, with the increased staffing numbers required to both man the operation and due to the extra volume of patients and visitors.

s) I suggest this would be compounded should Ancillary Medical Consulting Rooms be part of any future proposed structure, which I believe is a permitted use under the Hospital Zone. It is worth noting that such rooms were disallowed in the 1994 Resource Consent decision. At that time:

“it was considered that with the Medical Consulting the intensity use of the site was increased to the point where the overall proposal would attract numbers of people and activity... not acceptable in terms of its effects and the Zone provisions for the neighbourhood. This would be particularly evident in the effects of increased vehicle traffic in the neighbourhood ...” (Mt Eden Planning Commissioner Panel dated 7 November 1994).

t) In examining the Flow Transport Assessment, it was a little difficult to accept the report was actually referring to the area in which we live. It certainly does not concur with our experience. I believe that one big omission is that it pays scant regard to the numbers of children who walk, and ride on bikes and scooters, around the Gillies, Owens, Brightside “block” twice a day in peak times during the school terms. The Flow Report survey itself is a little inadequate in that ignores several schools in the vicinity which I believe should have been considered as effecting the overall pattern, such as Auckland Boys Grammar School, St Peters College and Diocesan School for Girls.

Submission no 159

- u) All these schools have pupils travelling within the locale of this proposal and cannot be ignored, not only in terms of their effect on traffic movements, but also incidentally in terms of safety as regards the blasting and truck movements.
- v) The conclusion in the SFHL Consultants Assessment of the Effects Report - page 63 - is that the traffic effects are no more than minor and considered acceptable and can be “managed” under a plan change. To reach that conclusion they also advocate reducing the normal onsite parking requirements for hospitals which makes little sense in our view.
- w) The report further suggests that part of the “management” could include a “Staff Travel Plan to encourage hospital staff to travel by sustainable transport modes, and/or changes to existing available sight distances from intersections and any potential vehicle access provisions by removing on-street”.
- x) The first suggestion is risible given the propensity of staff to park off site currently, and the second, if I understand the language correctly, basically involves doing away with some existing on street parking, effectively making less parking availability and therefor increasing congestion.
- y) The existing transport and parking issues from personal experience are complex and would be compounded should the new Zone be permitted. In the first instance the right to build to 16m height and the sheer volume of any such new building, would have big impacts on this issue. Any further expansionist change, which could allow building to 25m as a restricted discretionary activity with minimal public input, would put the area under extreme pressure.
- z) In either option or eventuality, to change the zoning and permit such a massive commercial structure to be imposed upon an acknowledged unique and quality residential environment makes an absolute nonsense

Submission no 159

of the Auckland Unity Plan which professes to protect livable communities and which in any event could not be accommodated without significant adverse effects on adjacent properties, in particular the properties adjacent and situated in the same block on Owens Road.

AUCKLAND UNITARY PLAN

- aa) In that regard, the Unitary Plan has been in existence for only a very short time, and I believe that a consent to PC 21 to change the Zoning, would have severe adverse impacts and would undermine the character heritage environment of the neighbourhood. What is proposed in terms of structure will significantly dominate the environment and detract from the residential nature of the area. It also appears contrary to the Unitary Plan vision for the area which essentially, as I understand it, seeks to maintain the fundamental low density older residential nature, by the special character overlay which has been imposed.

- bb) There was surely an opportunity to have raised this issue during the years involving the PAUP process which started as early as September 2013. SCHL claim that they did not raise the issue as they did not own the sites involved (149-153 Gillies), that there was no process of identification from Auckland Council to make companies such as SCHL aware of the potential for rezoning, and that the properties were not on SCHL's radar in terms of possible expansion sites – see page 8 of SFH Consultants Report.

- cc) It is hard not be skeptical over some of those claims when on pages 11 and 12 of the same SFH Report, it is revealed that 153 Gillies was purchased in 2015, 151 Gillies in 2016, and 149 Gillies in 2017 the last as stated “with intention to carry out an extension plan.” One might legitimately ask why would SCHL be purchasing such sites, other than for expansion?

Submission no 159

BUSINESS CASE

- dd) Much has been made in supporting documentation to the PC21 application that the existing facility is operating at full capacity, with demand exceeding available theatre capacity and providing services for 4,500 patients each year. No figures are given for what a proposed bigger hospital would generate in terms of extra patients, vehicles, visitors, staff etc.
- ee) The nearest one can get to a picture of the future situation is in the figures that it is estimated that acute surgery procedures will increase by 30,000, or 31%, by 2037 and elective surgery procedures (where SCHL are primarily focused) by 77,000, or 43%, by 2037.
- ff) The Ernst & Young Business case asserts that DHB's are struggling to provide publicly funded surgery services for elective patients and that 25% of SCHL surgeries have been public funded by ACC or DHB's over the last 5 years. Further that it is critical that SCHL can expand its existing hospital facility at this site, to basically keep up with future demand.
- gg) In other words, inadequate public health funding is advanced as a justification for hospital expansion, along with anticipated future massive demand from the public sector (DHB's and ACC), a claimed social "responsibility to expand services and resources for the best interest of the community" plus a growing and ageing population.
- hh) These reasons are reinforced by a review of where specialists and surgeons work and live in relation to Brightside, and a claim that "proximity and convenience is of high importance to them" - E&Y Report 6.2.1 page 19. This claim I suggest is somewhat facile and tantamount to almost claiming that occupational residency should be a factor capable of overriding the provisions of the Unitary Plan. We reject that as a grounds for change.

Submission no 159

- ii) What is evident from the report is that this application is very much about a commercial enterprise and the assessment of its future expansion, with very little regard to the effects of that commercial expansion on the neighbourhood, in which it has hitherto been happy to operate.

- jj) Even as regards consideration of any alternatives to their proposal, (which is required under S32), the report seems totally unsympathetic and E&Y have not explored any such genuine alternative “hospitals” or sites. Rather the report has merely advanced reasons as to why any of SCHL’s own other sites would not in their opinion be suitable for their desired expansion plans.

- kk) In summary, the SCHL approach and attitude to the local environment and impacts of their proposal on residents seems woefully inadequate and we believe they have not complied with the S32 requirement.

Submission no 159

ATTACHMENT – Reasons for Submission

1. I/we oppose Proposed Plan Change 21 (PC 21-private) for the following reasons:

- (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
- (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
- (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
- (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
- (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
- (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
- (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

Submission no 159

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 160

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Tuesday, 16 April 2019 9:46 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Sophia Alice Johnston
Attachments: technical-submission-advice_20190416213248.510.pdf; Personal Comments Sophia.pdf

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Sophia Alice Johnston

Organisation name:

Agent's full name:

Email address: timandemma@xtra.co.nz

Contact phone number: 021353834

Postal address:
157 Gillies Ave
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:

Property address: 3 Brightside Road, 149, 151, 153 Gillies Avenue, Epsom

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:
See attached

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

Submission date: 16 April 2019

Submission no 160

Supporting documents

technical-submission-advice_20190416213248.510.pdf

Personal Comments Sophia.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.

Submission no 160

ATTACHMENT -- Reasons for Submission

1. **I/we oppose** Proposed Plan Change 21 (PC 21-private) for the following reasons:
 - (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
 - (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
 - (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
 - (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
 - (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
 - (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
 - (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and

Submission no 160

purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 160

As a student at Epsom Girls Grammar and someone who lives very close I am worried about the affect the size and height and general disruption the proposed plan would have on us.

I worry about the building height creating shade on our house and also worry about our privacy if we are outside on our lawn or in our pool.

I also am worried about how the building will look against a backdrop of Mt Eden and also next to the surrounding residential houses.

The blasting needed for the carpark excavation will be so loud and disruptive to our learning at school and also for us living very close by.

Gillies Ave is already a very busy road without the added problems of removing waste from the building site.

Withdrawn

Submission no 162

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 18 April 2019 4:01 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Suzanne Elgar

Categories:

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Suzanne Elgar

Organisation name:

Agent's full name:

Email address: suemelgar@gmail.com

Contact phone number:

Postal address:

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:

Property address: Removal of Residential One Houses on Gillies avenue to extend Brightside Hospital

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:

Residential one should not be used for other purposes

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

Submission date: 18 April 2019

Attend a hearing

Submission no 162

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

Declaration

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

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

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

Yes

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

Submission no 163

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Wednesday, 17 April 2019 9:30 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Sylvie Elizabeth Allen
Attachments: Submission Opposing PC21 - Sylvie Allen.pdf

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Sylvie Elizabeth Allen

Organisation name:

Agent's full name:

Email address: sylvie.e.allen@gmail.com

Contact phone number:

Postal address:

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:

The entire plan change.

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

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

The reason for my or our views are:

Please see attached.

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

Submission date: 17 April 2019

Submission no 163

Supporting documents
Submission Opposing PC21 - Sylvie Allen.pdf

Attend a hearing

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

Declaration

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

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

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

Yes

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

Submission no 163

ATTACHMENT TO:

SUBMISSION BY SYLVIE ELIZABETH ALLEN IN OPPOSITION TO A REQUEST FOR A PRIVATE PLAN CHANGE BY SOUTHERN CROSS HOSPITAL LTD IN RELATION TO PLAN CHANGE 21 (PRIVATE).

My name is Sylvie Allen. My parents, Gemma and John Allen, live at 32A Owens Road, Epsom, which is our family home and where I was raised and lived for eighteen years.

I wish to express my complete opposition to a Plan Change as proposed by Southern Cross Hospital Ltd (“SCHL”) in their application for Plan Change 21 (Private) (“PC21”) for the following reasons:

1. The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
2. While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
3. The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
4. The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
5. PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
6. Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
7. The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development

Submission no 163

consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

8. PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
9. PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
10. Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided, and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
11. The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
12. Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

In addition, I also have the following concerns:

1. The Eden/Epsom area is a well-established, leafy, residential area that attracts a wide-range of people, many of whom have lived in the area for many areas. The special character of the neighbourhood around Brightside Road, Shepherds Ave, Owens Road and Mountain Road is highly valued by residents and recognised under the Auckland Unitary Plan (“AUP”) as in need of protection by its designation as a single or mixed-use residential area with special character overlays.

Submission no 163

2. The Policies of Special Character Areas Overlay – Residential, as set out at chapter D18.3 of the AUP, are to;

(1) Require all development...to have regard and respond positively to the identified special character values and context of the area as identified in the special character area statement.

(2) Maintain and enhance the built form, design and architectural values of the buildings and the area, as identified in the special character area statement, so that new buildings...

(a) maintain the continuity or coherence of the identified special character area values of the area:

(b) maintain the streetscape qualities and cohesiveness

(e) maintain the setting of the special character area, where these features, such as mature trees and landform, contribute to the special character values of the area

(3) Discourage the removal or substantial demolition of buildings that contribute to the continuity or coherence of the special character area as identified in the special character area statement

(7) Encourage the retention of special features such as boundary walls, fences, paths and plantings that contribute to the character of the area.

3. In their PC 21 application, SCHL have given little regard to the special characteristics of the area. The SFH Assessment of Effects Report, commissioned by SCHL, states at page 17; *“The potential special character and value of the street block overall is relatively low”*. This blatantly ignores the special character overlays and the AUP designation of the area and undermines the value of the neighbourhood.
4. PC 21 would allow SCHL to remove two heritage homes and build a large commercial complex up to 25m high (which is more than two and a half times taller than the largest building in the area, Epsom Girls’ Grammar Raye Freedman Centre) and in close proximity to one-two storey residential houses. Not only would this be directly contrary to the purpose of the AUP designation, it would have an irreversible effect on the character and liveability of the area. The neighbourhood would change from being residential and low-rise – where children are safe to play, walk and ride their bikes around quiet streets - to a quasi-industrial zone. As a 24-hour commercial operation, the proposed changes would bring constant disturbance from noise and light pollution to an area where many children live and go to school. SCHL have failed to explain how they would address this issue and why a residential community should be expected to tolerate such interference for the sake of their private business, which is a wholly commercial enterprise.
5. I am particularly concerned that, if the proposal were to go ahead, the AUP which was meticulously planned, was subject to significant public consultation and has only been in operation for two years would be undermined and its effect eroded, leading to further degradation of residential communities across Auckland.

Submission no 163

6. The AEE (2019) indicates that SCHL has not undertaken an authentic s 32 analysis under RMA – failing to investigate alternative sites for its expansion of hospital services within the Auckland Isthmus.
7. Importantly, SCHL has already exhibited a willingness to locate its hospital services within business – light industry zones, as shown by its recent expansion of the Wairau Road Medical Complex on Auckland’s North Shore.
8. In summary, SCHL have not been able to satisfactorily demonstrate the need for a Plan Change at their 3 Brightside Road / 149-151 Gillies Ave site, other than the fact that it “fits their business model” as was stated at a meeting with residents in late 2018.
9. Should this Plan Change be permitted, it would result in a significant and irreversible deterioration in the fabric of the neighbourhood, with the flow on effects of increased commercialization in the local vicinity. The sites at 149-151 Gillies Ave were purposefully designated single house residential with special character overlay (151,153) under the AUP with the express intention of preventing this erosion of residential character from occurring.
10. SCHL were aware of this zoning when they purchased the three properties over 2015-2017.

Submission no 164

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Sunday, 14 April 2019 6:00 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Tara Keane
Attachments: Personal Statement of opposition to PC21 - Tara Keane.pdf; Technical Statement of opposition to PC21 - Tara Keane.pdf

Categories:

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Tara Keane

Organisation name:

Agent's full name: Sean Keane

Email address: mtecho@hotmail.com

Contact phone number: 0211913963

Postal address:
134 Mountain Road
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
The entire Plan Change

Property address: 3 Brightside Road, 149,151,153 Gillies Avenue, Epsom

Map or maps:

Other provisions:

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

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

The reason for my or our views are:
I wish to decline it in its entirety as indicated. Please see attachments

Submission no 164

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

Submission date: 14 April 2019

Supporting documents

Personal Statement of opposition to PC21 - Tara Keane.pdf

Technical Statement of opposition to PC21 - Tara Keane.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.

Submission no 164

Technical statement of opposition to PC21 from Tara Keane, 134 Mountain Road, Epsom, Auckland

1. I oppose Proposed Plan Change 21 (PC 21-private) for the following reasons:

- (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
- (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
- (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
- (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
- (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
- (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
- (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and

Submission no 164

purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 164

Personal statement of opposition to PC21 from Tara Keane, 134 Mountain Road, Epsom, Auckland

I have a number of personal concerns about what is being proposed in PC21

1. Every day I walk down to Owens Road, across Gillies Avenue and onto Diocesan School. There is already a lot of traffic and crossing the road feels a bit dangerous. I am very worried that the large new building will add lots more traffic, and make the road much busier noisier and less safe.
2. Lots of other kids from Dio, EGGS, Auckland Grammar and St Peter's walk, bike and scooter to school along Owens Road and Gillies Avenue. Sometimes the cars travel fast and near misses happen. If there is a lot more traffic on those roads then they will become more dangerous for school children.
3. I really like that we moved into this lovely leafy, residential area last year. Before that we lived in Coatesville which was also beautiful. I don't think we should change the feel of Epsom by building an enormous new hospital in this area. It would fit better elsewhere.
4. One of the things I like most about this area is the beautiful old houses. Pulling them down seems like a really bad idea. Epsom is really pretty and this plan may spoil it.
5. When I've been overseas with my family we have visited and seen the history of much older cities. We have so little history in Auckland that it seems a terrible idea to remove some of it for a hospital that could better be built elsewhere.
6. The Unitary Plan is not very old, and it took a lot of work to gain agreement and get it passed. It seems unfair to change it so soon after it was agreed. We had no idea of this change when we moved to Epsom.
7. The plan indicates that there is likely to be lots of blasting and quarrying to excavate the site and to establish the foundations for the new hospital. When we moved home one of my concerns about the city was noise and disruption as I have NCEA exams coming up. We chose Mountain Road precisely because it is in a well-established residential area which is not full of 24 hour commercial activities. We would not have made this choice if we had expected there to be loud blasting and quarrying.
8. The government's Kiwibuild housing program is about building new homes for New Zealanders. This plan will see beautiful old houses being demolished instead. This doesn't make sense.
9. A building of up to 25m tall won't fit in with the local area. It will be visible from everywhere locally, and will change the look and feel of living in Epsom.

Submission no 165

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 18 April 2019 12:31 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Te Aute Limited

Categories:

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Te Aute Limited

Organisation name:

Agent's full name:

Email address: macleans01@gmail.com

Contact phone number: 021355545

Postal address:
107 Market Road
Epsom
Auckland 1051

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
Whole of plan change request

Property address: 38 Owens Road and the surrounding residential environment and zones

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:

1. This private plan change request ("PCR") from Southern Cross Hospitals Ltd ("SXH"): (a) is inconsistent with and fails to achieve the purpose and principles of the Act; (b) is inconsistent with and fails to give effect to the relevant regional and district objectives and policies; and (c) would, if approved, starkly and obviously affect the environment adversely--including in particular the surrounding residential environment. 2. In making its request SXH has

Submission no 165

understated the actual and potential adverse effects of its PCR. 3. Applying the HFH zone to the SXH proposal land would be inappropriate.

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

Submission date: 18 April 2019

Attend a hearing

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

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

Declaration

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

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

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

Yes

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

Submission no 166

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 18 April 2019 3:31 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Terence Maurice Kennelly

Categories:

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Terence Maurice Kennelly

Organisation name:

Agent's full name: Terry Kennelly

Email address: terry@profitmultipliers.co.nz

Contact phone number: 0275 890 118

Postal address:
Unit 2
21 Ashton Road
Mt Eden
Auckland 1024

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:

Property address: 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

Map or maps:

Other provisions:
The 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:
See attachments

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

Submission no 166

Submission date: 18 April 2019

Attend a hearing

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

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

Declaration

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

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

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

Yes

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

Submission no 167

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 18 April 2019 4:46 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Terry Kennelly
Attachments: Southern Cross Submission Decline18042019.pdf; Southern Cross Submission Decline Reasons18042019.pdf

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Terry Kennelly

Organisation name:

Agent's full name: Terry Kennelly

Email address: terry@profitmultipliers.co.nz

Contact phone number: 0275 890 118

Postal address:
Unit 2
21 Ashton Road
Mt Eden
Auckland 1024

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:
The entire Plan change

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

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

The reason for my or our views are:
See attachments

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

Submission no 167

Submission date: 18 April 2019

Supporting documents

Southern Cross Submission Decline18042019.pdf

Southern Cross Submission Decline Reasons18042019.pdf

Attend a hearing

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

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

Declaration

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

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

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

No

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

Submission no 167

AUCKLAND COUNCIL PLAN CHANGE PC21

In addition to the Proposed Plan Change opposition to PC 21 i also have the following concerns:

1. I am concerned that this proposal put forward by Southern Cross shows no concern for Auckland's residential zones. The council has already new Unitary Plan zones in place and should not even consider changing a Residential zone to a Commercial zone. Along with the government's new policy, housing has a priority throughout not only Auckland but New Zealand.
There are considerably more alternative areas zoned Commercial that Southern Cross could build their hospital.
2. Increasing the traffic in Gillies Avenue Epsom as a result of erecting a hospital would be socially immoral and commercially insensitive as the traffic build-up on an already busy road would be overwhelming, especially trying to gain access to the motorway.
3. I have lived in the Mt Eden area for 23 years and while Mt Eden has retained much of its Housing heritage the same cannot be said about Epsom. The infill of new homes through Subdivision has wiped out many of the bungalow/villa type homes so once prevalent in Epsom.
To see more heritage homes lost to Epsom would be a travesty. The removal of these Homes, already zoned residential, for the benefit of a hospital is criminal.

Terry Kennelly
Unit 2, 21 Ashton road
Mt Eden
Auckland 1024

Submission no 167

ATTACHMENT -- Reasons for Submission

1. I/we oppose Proposed Plan Change 21 (PC 21-private) for the following reasons:

- (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
- (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
- (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
- (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
- (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
- (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
- (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

Submission no 167

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 168

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Sunday, 14 April 2019 6:15 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Tiani Keane
Attachments: Personal Statement of opposition to PC21 - Tiani Keane.pdf; Technical Statement of opposition to PC21 - Tiani Keane.pdf

Categories:

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Tiani Keane

Organisation name:

Agent's full name: Sean Keane

Email address: mtecho@hotmail.com

Contact phone number:

Postal address:
134 Mountain Road
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
The entire Plan Change

Property address: 3 Brightside Road, 149,151,153 Gillies Avenue, Epsom

Map or maps:

Other provisions:

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

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

The reason for my or our views are:
I wish to decline it in its entirety as indicated. Please see attachments.

Submission no 168

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

Submission date: 14 April 2019

Supporting documents

Personal Statement of opposition to PC21 - Tiani Keane.pdf

Technical Statement of opposition to PC21 - Tiani Keane.pdf

Attend a hearing

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

Declaration

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

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

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

Yes

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

Submission no 168

Technical statement of opposition to PC21 from Tiani Keane, 134 Mountain Road, Epsom, Auckland

1. I oppose Proposed Plan Change 21 (PC 21-private) for the following reasons:

- (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
- (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
- (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
- (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
- (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
- (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
- (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and

Submission no 168

purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 168

Personal statement of opposition to PC21 from Tiani Keane, 134 Mountain Road, Epsom, Auckland

I have a number of personal concerns about what is being proposed in PC21

1. Every day I walk down to Owens Road, across Gillies Avenue and onto Diocesan School. There is already a lot of traffic and crossing the road feels a bit dangerous. I am very worried that the large new building will add lots more traffic, and make the road much busier noisier and less safe.
2. Lots of other kids from Dio, EGGS, Auckland Grammar and St Peter's walk, bike and scooter to school along Owens Road and Gillies Avenue. Sometimes the cars travel fast and near misses happen. If there is a lot more traffic on those roads then they will become more dangerous for school children.
3. I really like that we moved into this lovely leafy, residential area last year. Before that we lived in Coatesville which was also beautiful. I don't think we should change the feel of Epsom by building an enormous new hospital in this area. It would fit better elsewhere.
4. One of the things I like most about this area is the beautiful old houses. Pulling them down seems like a really bad idea. Epsom is really pretty and this plan may spoil it.
5. When I've been overseas with my family we have visited and seen the history of much older cities. We have so little history in Auckland that it seems a terrible idea to remove some of it for a hospital that could better be built elsewhere.
6. The Unitary Plan is not very old, and it took a lot of work to gain agreement and get it passed. It seems unfair to change it so soon after it was agreed. We had no idea of this change when we moved to Epsom.
7. The plan indicates that there is likely to be lots of blasting and quarrying to excavate the site and to establish the foundations for the new hospital. When we moved home one of my concerns about the city was noise and disruption as I have NCEA exams coming up. We chose Mountain Road precisely because it is in a well-established residential area which is not full of 24 hour commercial activities. We would not have made this choice if we had expected there to be loud blasting and quarrying.
8. The government's Kiwibuild housing program is about building new homes for New Zealanders. This plan will see beautiful old houses being demolished instead. This doesn't make sense.
9. A building of up to 25m tall won't fit in with the local area. It will be visible from everywhere locally, and will change the look and feel of living in Epsom.

Submission no 169

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Sunday, 14 April 2019 6:30 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Tiernan Keane
Attachments: Personal Statement of opposition to PC21 - Tiernan Keane.pdf; Technical Statement of opposition to PC21 - Tiernan Keane.pdf

Categories:

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Tiernan Keane

Organisation name:

Agent's full name: Sean Keane

Email address: mtecho@hotmail.com

Contact phone number:

Postal address:
134 Mountain Road
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
The entire Plan Change

Property address: 3 Brightside Road, 149,151,153 Gillies Avenue, Epsom

Map or maps:

Other provisions:
The entire Plan Change

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

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

The reason for my or our views are:
I wish to decline it in its entirety as indicated. Please see attachments.

Submission no 169

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

Submission date: 14 April 2019

Supporting documents

Personal Statement of opposition to PC21 - Tiernan Keane.pdf

Technical Statement of opposition to PC21 - Tiernan Keane.pdf

Attend a hearing

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

Declaration

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

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

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

Yes

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

Submission no 169

Technical statement of opposition to PC21 from Tiernan Keane, 134 Mountain Road, Epsom, Auckland

1. I oppose Proposed Plan Change 21 (PC 21-private) for the following reasons:

- (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
- (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
- (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
- (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
- (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
- (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
- (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part

Submission no 169

of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 169

Personal statement of opposition to PC21 from Tiernan Keane, 134 Mountain Road, Epsom, Auckland

I have a number of personal concerns about what is being proposed in PC21

1. Lots of school children walk along Owens Road and Gillies Avenue. There is already a lot of traffic and this is a big, busy road. The traffic is often impatient. I am very worried that the planned new building will add lots more traffic, and make the road more dangerous.
2. I have noticed that the school kids that travel along the area around Gillies Avenue often bike and scooter, and they go quite fast. Sometimes there are near misses with cars that are also travelling fast. More traffic there will certainly make for more near misses, and possibly a major accident
3. We moved to Epsom last year from Coatesville. We loved the country and moving to Epsom was a big change, but its leafy and peaceful and we like living here. The new hospital will undoubtedly make the area busier, noisier and it will make the traffic worse.
4. The traffic along Gillies Avenue is always heavy, and its terrible in the morning's and afternoons. The new plan will create a busy hospital right along a road that is already a parking lot for much of the day.
5. We shouldn't change the feel of Epsom by building an enormous new hospital in this area. It would fit better elsewhere.
6. Why would we want to demolish beautiful old houses when we have so little history in Auckland. Isn't the government trying to build more residential housing?
7. The Unitary Plan is not very old, and it took a lot of work to gain agreement and get it passed. It seems unreasonable to change it so soon after it was agreed. We had no idea of this change when we moved to Epsom from Coatesville, and we may not have moved if we had known this was planned.
8. The plan indicates that there is likely to be lots of blasting and quarrying to excavate the site and to establish the foundations for the new hospital. When we moved home one of my concerns about the city was noise and disruption as I have University exams coming up. We chose Mountain Road precisely because it is in a well-established residential area which is not full of 24 hour commercial activities. We would not have made this choice if we had expected there to be loud blasting and quarrying.
9. A building of up to 25m tall won't fit in with the local area. It will be visible from everywhere locally, and will change the look and feel of living in Epsom.

Submission no 170

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Tuesday, 16 April 2019 9:31 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Tim Johnston
Attachments: Personal Comments.pdf; Technical submission_20190416211842.970.pdf

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Tim Johnston

Organisation name:

Agent's full name:

Email address: tjohnston@castlepartners.co.nz

Contact phone number: 0276 593 346

Postal address:
157 Gillies Avenue
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
The entire Plan Change

Property address: 3 Brightside Road, 149, 151, 153 Gillies Avenue, Epsom

Map or maps:

Other provisions:
The entire Plan Change

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

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

The reason for my or our views are:
See attachments

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

Submission date: 16 April 2019

Submission no 170

Supporting documents
Personal Comments.pdf
Technical submission_20190416211842.970.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.

Submission no 170

ATTACHMENT -- Reasons for Submission

I oppose Proposed Plan Change 21 (PC 21-private) for the following reasons:

The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.

While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.

The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.

The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.

PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.

Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.

Submission no 170

The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.

PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.

Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular

–

the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.

The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.

Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 170

1. I have the following concerns :

1. As a family we have lived in area for 6 years. We purchased our current property due to its character and the larger section size for our children. We moved from another character area near Dominion Rd but wanted the increase size in section which this area has.
2. The house we purchased was a 2 storey villa which we knew needed a large refurbishment – after living in the house for several years we started the process in 2015 to get a RC then a BC.
3. The RC required us to maintain the character of the property at 157 Gillies (which was built in 1908). It would have been cheaper to knock over the old house but we wanted and the council required us to maintain the character of the house at a large cost and 12 months construction.
4. So what concerns me and all our friends is how we are made to comply with the special character zone which we purchased in the area for while a commercial enterprise can think they can expand at will and have no consideration for the council zoning and the community at large who purchased to follow the rules set down.
5. If this occurs it sets a very dangerous precedent that there are no limits what can be achieved in already established zones through the greater Auckland area.
6. My job is involved in the property sector and I know that there is many nearby zoned land for the activity that Southern Cross are looking to undertake.
7. I firmly feel that they are doing this in this area only to utilise cheaper residential land to add to their existing land holding on Brightside to save money by bulldozing through regulation on the pretence they will get a water downed decision but a favourable one in any case. Which again sets the precedence for other developers with big wallets to push for aggressive plans but settle with a compromise – this should be declined in its entirety to stop this consistent behaviour which the public is getting fed up with.

Submission no 171

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 18 April 2019 2:01 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Vivienne Ann Prew
Attachments: Personal reasons for my opposition to Proposed Plan Change 21_20190418135551.728.pdf;
Technical submissions_20190418135556.682.pdf

Categories:

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Vivienne Ann Prew

Organisation name:

Agent's full name: Alister & Vivienne Prew

Email address: vivprew@hotmail.com

Contact phone number: 021 0795 012

Postal address:
63 Epsom Avenue
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
PC 21

Property address: 3 Brightside Road, 149,151,153 Gillies Avenue

Map or maps:

Other provisions:
The entire Plan change

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

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

The reason for my or our views are:
See attachments

Submission no 171

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

Submission date: 18 April 2019

Supporting documents

Personal reasons for my opposition to Proposed Plan Change 21_20190418135551.728.pdf

Technical submissions_20190418135556.682.pdf

Attend a hearing

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

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

Declaration

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

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

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

No

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

Submission no 171

ATTACHMENT -- Reasons for Submission

1. **I/we oppose** Proposed Plan Change 21 (PC 21-private) for the following reasons:
 - (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
 - (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
 - (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
 - (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
 - (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
 - (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
 - (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and

Submission no 171

purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 171

Personal reasons for my opposition to Proposed Plan Change 21

1. I am really worried that a major commercial activity can enter an area which has been a **residential area** for many years and which has been confirmed as such by the recent (much considered) Unitary Plan.
2. The **Unitary Plan** was an enormous amount of work but it has been accepted. If it can be overturned it makes a mockery of the plan and opens up any other area in Auckland to changes.
3. The **traffic** in this area – specifically along Gillies Avenue - is constantly heavy (it is a major route to the airport) and - at various times of the day, related to school day start and finishes, full of young pedestrians as well as vehicles. The safety of our children would be enormously compromised.

Not only would the traffic be horrendous during the very long, I imagine, construction phase but once construction was completed the traffic generated by huge commercial premises would add to an already overburdened road system. It is hard to imagine further traffic on Manukau, Mountain and Mt Eden Roads in the event of closure of Gillies Avenue during construction and after construction as people sought to avoid Gillies Avenue.

4. The **sheer possible size** of the proposed building defies belief in a residential area. It would be highly visible from many directions and this in an area where it has been considered vital to protect the view shafts to Maungawhau. (The size would mean such a building would also affect the privacy of people over a very wide area).
5. I have lived in Epsom since 1984. So many of our **old homes and trees** have been lost in that time. We really need to retain those that we still have.

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

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



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

AUCKLAND COUNCIL
23 APR 2019
CBD - ALBERT ST

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms (Full Name)

JANE CHARLOTTE GRACE MASON

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

Address for service of Submitter

410 PT CAVALIER ROAD
PT CAVALIER, AUCKLAND 1022

Telephone: 0911308942 Fax/Email: missjanemason@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 21
Plan Change/Variation Name: 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

The specific provisions that my submission relates to are:
(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)
Or
Property Address
Or
Map
Or
Other (specify) THE ENTIRE PLAN CHANGE

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

Submission no 172

The reasons for my views are:

I WILL LIKE IT DECLINED IN FULL
(SEE ATTACHMENTS)

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

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

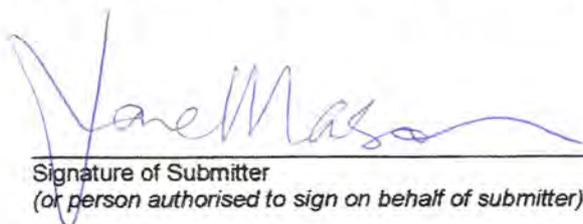
Decline the proposed plan change / variation

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

I wish to be heard in support of my submission

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

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


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

16.09.19
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 no 172

ATTACHMENT – Reasons for Submission

1. **I/we oppose** Proposed Plan Change 21 (PC 21-private) for the following reasons:
 - (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
 - (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
 - (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
 - (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
 - (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
 - (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
 - (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

Submission no 172

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

16.04.19
JANE MASON
4th PT CHEVALIER
PT CHEVALIER
AUCKLAND 1022
0211308942

To Whom It May Concern,
I oppose the private change PC21 in full.

I grew up in this area and attended school just down the road from our family home. What I love walking to school past all the beautiful old trees and heritage homes, feeling calm in the quiet without the chaos of commercialism.

Now as an adult my children visit their grandparents in our family home and they call it the wonderland. From a young age they have grown to love the character with trees and unique houses, not spoiled by commercial ventures.

One day I want them to attend school there and enjoy this established neighbourhood, with its beautiful old trees and houses.

Do not ruin this unique historic neighbourhood and become a mess of commercialism and ugliness. Safe it for future generations.
Kind regards
Jane Mason.

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

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



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

JAMES GARY CURRIE

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

Address for service of Submitter

149 Gillies Ave, Epsom

Telephone:

021 081 96185

Fax/Email:

currie_jim2010@hotmail.com

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 21

Plan Change/Variation Name

3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

The specific provisions that my submission relates to are:

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

Plan provision(s)

[Empty box]

Or

Property Address

[Empty box]

Or

Map

[Empty box]

Or

Other (specify)

The whole proposed plan change

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

Submission no 173

The reasons for my views are:

I live at 149 Gillies, and have for three years. There is a housing crisis in Auckland, and rental accommodation I can afford is impossible to find. The rent here is reasonable, but after having considered (continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

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

other rental options, have ~~not~~ ^{been} considered. The choices are very limited, it not possible for me to even consider.

*Continued on next page

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

Jim Currie

Signature of Submitter

(or person authorised to sign on behalf of submitter)

Date

18/04/2019

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.

Next page

Reasons for my views.

apart from my own concerns about being able to find affordable housing, most of the other tenants of the Boarding House, of which there are about 30, are, I believe, in the same precarious position. ~~Many~~ Some have no jobs, some are migrants, particularly Filipinos, who are struggling to make ends meet. It goes without saying that to rent in Auckland is beyond the means of many people ~~like them~~, and I find it almost absurd that when there is such a housing crisis in existence, that a large company like Southern Cross would choose to set up a large hospital in a zone ^{already} zoned for residential purposes, when it has other options.

and I believe it had the chance to oppose the zoning as it stands ~~at~~ when before the UP was put in place.

So, apart from the personal circumstances of myself and other tenants living here, if Southern Cross' planned amendment were to go ahead, it really would seem like the City is completely giving ~~into~~ ^{into} big business, and ignoring the heart of the city, its residents, and their practical, as opposed to commercial, needs.

Submission no 173

ATTACHMENT -- Reasons for Submission

1. I/we oppose Proposed Plan Change 21 (PC 21-private) for the following reasons:

- (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
- (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
- (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
- (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
- (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
- (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
- (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

Submission no 173

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

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

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



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms (Full Name)

STEPHEN HENRY MASON

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

Address for service of Submitter

41 OWENS ROAD, EPSOM, AUCKLAND 1023

Telephone:

(09) 6300 713

Fax/Email:

shjmmason@xtra.co.nz

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 21

Plan Change/Variation Name

3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

The specific provisions that my submission relates to are:

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

Plan provision(s)

Or

Property Address

Or

Map

Or
Other (specify)

THE ENTIRE PLAN CHANGE

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

Submission no 174

The reasons for my views are:

I WOULD LIKE IT DECLINED IN FULL
(See attachments)

(continue on a separate sheet if necessary)

I seek the following decision by Council:

- Accept the proposed plan change / variation
- Accept the proposed plan change / variation with amendments as outlined below
- Decline the proposed plan change / variation
- If the proposed plan change / variation is not declined, then amend it as outlined below.

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at a hearing


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

17.4.2019
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 no 174

ATTACHMENT – Reasons for Submission

1. **I/we oppose Proposed Plan Change 21 (PC 21-private) for the following reasons:**
 - (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
 - (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
 - (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
 - (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
 - (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
 - (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
 - (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

Rec'd 3/5/2019

Submission no 174

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 174

Personal Statement

Stephen Henry Mason
41 Owens Road
Epsom
Auckland 1023

I OPPOSE THE PRIVATE PLAN CHANGE PC21 IN ITS ENTIRETY.

My family and I have lived at the above address for over 25 years.

OUR AREA

We moved to Epsom primarily due to the distinctive residential character of the area. The foundation of Eden-Epsom's distinctiveness is the magnificent trees planted on the Owens and Gillies farms in the nineteenth century. This has inspired homeowners over generations to create the leafy suburbs we know today. Whilst its core is protected by three SEA's (Significant Ecological Area), Mt Eden Mountain, Government Gardens and The Pines, its spell spreads past Auckland Grammar to the motorway, into Mt Eden in one direction and encompasses the subject area of this Private Plan change application down past Epsom Avenue. Birdlife and birdsong are part of daily life – everyday kereru swoop through our garden, in spring we watch 20-30 tui scrapping with each other in our flowering tree and last night we went to sleep to the plaintive call of the ruru.

The second source of Epsom's distinctiveness is the mature built residential environment – a combination of predominantly late nineteenth and early twentieth century architectural styles, build, section size and layout, tree plantings and rock walls. Over the years these elements have fused into an indivisible ambiance.

The third source is the absence of obvious commercial intrusion. From Mt Eden Village eastwards to Manukau Road, from Badminton Hall by the motorway south to Rocklands Hall, the uninterrupted experience is residential. Along Gillies Avenue, any doctor or dental practices are located in houses.

OUR HOME

We live in a 98 year old Arts & Craft house, one of those identified in section 15.1.7.3.1. of the AUP, like 151 and 153 Gillies Avenue which Southern Cross is attempting to demolish.

Over our 25 year tenure we have strived to maintain the integrity of this particular architectural style and its surroundings regarding it as part of Auckland's heritage. Like many Epsom residents, we feel our role is to be custodians for future generations of Aucklanders.

Despite this attitude, we have experienced deep frustration and significant financial costs dealing with a rigid and impractical Council, ending up with watered-down, non-solutions to housing alterations, garaging and trees. However, we accepted that at least they were attempting to retain the character of the area.

Rec'd 3/5/2019

Submission no 174

OUR AUP

The Auckland Unitary Plan was released in late 2016 to address contemporary issues including population growth.

The Unitary Plan was the outcome of years of planning and a period of consultation and public submissions. It is noteworthy that Southern Cross chose not to participate.

The Unitary Plan stipulated that, whilst making changes to enable more growth, two core values must be protected – our *Manu Whenua* and our Historic Heritage and Special Character. It stated that “Auckland’s distinctive historic heritage is integral to the region’s identity and important to its economic and social wellbeing (and) areas with special character should be identified so their particular values can be maintained and enhanced”.

The Unitary Plan’s Special Character Schedule identifies Eden-Epsom as one of these areas. In recognition of the role they play in Eden-Epsom’s distinctive character, a large number of houses are identified as being in the Single House zone which is subject to Special Character Overlay and are “sites subject to demolition, removal and relocation rules”.

Hospitals are specifically excluded from residential, extensive business zones are set aside elsewhere for them.

SOUTHERN CROSS PC21 APPLICATION

According to an Auckland Council notification to us as an affected property, we were advised that Southern Cross has made a plan change request “to rezone land at 3 Brightside Road, 149,151,153 Gillies Avenue, Epsom from Mixed Housing Suburban and Single House Zones to Special Purpose – Healthcare Facility and Hospital Zone, to remove special character overlays from the site and to amend transport provisions to specify the parking requirement for the hospital”.

The arrogance of Southern Cross is breathtaking. Whilst the rest of the Auckland community, including members of the healthcare and hospital industry, participated in the 18 month AUP consultation and submission process and accepted the compromises required in the outcome, Southern Cross ignored the process and are now trying use their financial muscle to bulldoze through changes which violate the core principles of the Unitary Plan,

The Healthcare and Hospital zone provisions go far beyond what Southern Cross is currently applying for. Their application is a Trojan Horse. If the zone change is approved Auckland Council has very limited powers to stop Southern Cross from scaling up to fully utilize this zone’s provisions (and public will have zero input or influence).

SX could both rebuild the existing Brightside Hospital and build the proposed new hospital up to the 25 meter height as a discretionary activity. They could expand services very

Rec'd 3/5/2019

Submission no 174

significantly from their day hospital application (to a comprehensive complex including hospitals, boarding houses, visitor accommodation, dwellings, supported residential care and retirement villages) . Because of Council's limited powers of intervention if the subject area became a Health care and Hospital zone it would be unable to stop Southern Cross removing the trees and rock walls, despite their assurances.

Such a zone change would devastate a residential area which the Unitary Plan has made specific provisions to protect. Quality of life and property values for residents in the balance of the Brightside/Owens/Gillies residential block would collapse. Home owners would be forced to sell at discounted prices and move out. SX would then be able to take over the entire block to create a Mega Medical Metropolis in the heart of Epsom.

An entire residential block would be lost to commercial creep which started twenty years ago with a very small hospital located in the original Owens homestead at 3 Brightside. The resultant giant commercial complex would be completely out of keeping with, and a fracturing of, the unity of the wider Eden-Epsom low-profile residential character

Southern Cross's motivation to build a medical monolith in the heart of Epsom appears to be driven by a competitive fixation with Mercy Ascot, a patch war for market share. It cannot be justified by member best interests, a capacity short-fall or local demand.

Southern Cross members were not consulted. Faced with escalating charges and reducing services they would surely object to an unneeded hospital being built in the wrong place.

In addition to hospitals no longer being permitted in the residential zones applicable to the land in question, Epsom is already very well serviced with both public and private hospitals within a 10 kilometer radius and there is limited basis to claim increase future demand (Epsom population and demographic trends have been remarkably stable over decades as older residents downsize and move out of the area to be replaced by Grammar age families moving in each year). Epsom residents were not consulted whether they wanted another hospital.

Southern Cross appears to have made no attempt, as required under s.32 of the Act, to have examined alternatives and provide appropriate justification for deciding on this Private Plan change over the alternatives. In particular, they have shown no evidence why their proposed hospital could not be located in the many areas appropriately zoned for such a business under the Unitary Plan. At a late 2018 meeting with Southern Cross representatives, I asked Courtney Bennett, Chief of Property and Development, whether they had considered other sites. He stated "No, we hadn't thought of that".

Notwithstanding the fact that a Healthcare and Hospital Zone change would allow Southern Cross to build on a much larger scale, even the structure as described in PC21 overwhelms the residential area.

Rec'd 3/5/2019

Submission no 174

The enormity of the structure is demonstrated by comparison to a typical two-story Epsom house:

- Land area (m²) 9,000 verses 600 (15 times as large)
- Height (m) 16 verses 6 (2.5 times as high)
- Stories (Basement to rooftop) 5 verses 2 (2.5. times as many)
- Floor area (m²) 13,000 verses 300 (43 times as large)

Demolition of the two protected heritage homes at 151 and 153 Gillies Avenue and replacement with a 70 meter long monolithic mass would destroy the already fragile cohesion of Eden-Epsom's special character along this important road frontage.

These two houses are included in the above-mentioned Single House zone of the Auckland Unitary Plan which is subject to a Special Character Overlay. Their totality (architectural styles, build, section size and layout, tree plantings and rock walls) are typical of the special character values of this part of Epsom. To allow these houses to be demolished on the basis that its only two of many will create a precedent for others to be demolished, meaning that Special Character Area houses and magnificent trees will gradually disappear. Epsom's distinctive character will be eroded and bird life will retreat back to the SEA's.

Southern Cross would then be responsible for demolishing six heritage homes in this part of Epsom. Three quality heritage homes were lost 20 years ago when the Owens homestead and others were demolished to make way for Brightside hospital. Under this proposal another three (including the hostel at 149 Gillies Avenue) would be demolished.

Southern Cross will also be responsible for reducing housing for 30-40 people by demolishing the 149-153 Gillies houses. This is at odds with the Unitary Plan objective of enabling population growth by intensifying housing.

At 16 meters height (potentially 25), and of institutional appearance, the proposed building will visually dominate the area. Local residents' privacy and quality of life will be seriously eroded. Adjacent houses will rendered unlivable by the activities associated with a round-the-clock business.

Southern Cross is planning to excavate an estimated 15,000 cubic meters of hard basalt rock and dirt for a basement up to 7 meters deep. This will require blasting using explosives, jack hammers and digging. This could take up to 3 years.

(Over 20 years ago Southern Cross dug a basement in nearby Brightside Avenue and removed about 9,000 cubic meters. It took over 2 years. Frequent blasting into basalt was required. Gillies Avenue was closed twice daily for 30 minutes while blasting took place. Local residents feared injury during the blasting, reporting fly-rock frequently falling on their homes. Cracks from explosion vibrations occurred in nearby homes. Attempts at compensation were ignored by contractors and the Council)

Submission no 174

Potentially 40,000 tonnes of rock and dirt could now be blasted, dug and trucked away over the three years from the Gillies excavation site sited within 70 meters of the Gillies Avenue and Owens Road traffic lights.

It would take 4,500 truck loads (9,000 truck movements through Eden-Epsom streets) to remove the excavation spoil.

Over 1,000 students from Epsom Girls Grammar, Auckland Grammar, Diocesan School for Girls, Kohia Terrace School and Auckland Normal Intermediate walk, cycle or are driven through this intersection twice daily.

Eden-Epsom school children's safety will be at risk for on a twice daily basis from this dangerous excavation work and road congestion from this unprecedented number of truck movements.

Gillies Avenue is a significant arterial route, particularly during commuter hours and school drop off and pick up times. There is a serious risk of delays if street closures are required and of congestion from truck movements.

(Actual metrics of the excavation plan will be clarified when Southern Cross lodges a Resource Consent Application. Southern Cross's PC21 does not quantify).

Southern Cross has applied to amend transport provisions to specify the parking requirement for the hospital. This is not plausible. The west side of Gillies Avenue is no parking and there is a peak hour tow-away up Owens road. On weekdays carparks within 100 meter radius of the subject area are full by 7.30 am due to commuters parking to bus into town and high school student parking. Brightside staff numbers would at least double the existing Brightside Hospital. Patient and visitor numbers would be significantly greater. Southern Cross must be required to provide parking on their premises for their extra numbers.

CONCLUSION

If this PC21 application is approved, the implications are chilling for Aucklanders and devastating for our Auckland Unitary Plan.

It means that participation in the AUP consultation process was worthless. All the effort put in by Aucklanders to prepare submissions and consult is a waste of time. In future, ignore the process, attack whatever outcome through a Private Plan change application.

It means that protection of residential areas cannot be guaranteed despite it being one of the overarching principles of the AUP. A successful rezoning from residential to another purpose is precedent setting. It puts all other Auckland residential areas at risk from a domino effect as developers rush to exploit this opening for whatever opportunity they identify elsewhere.

Rec'd 3/5/2019

Submission no 174

The integrity of our AUP would be severely undermined. It would become increasingly unenforceable – it would mean the overarching principles could be ignored and the newly defined zones can be overturned within three years of publication.

A handwritten signature in black ink, appearing to read 'S H Mason', with a stylized, cursive script.

S H Mason

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

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



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms (Full Name)

Graham Mark Dexter.

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

Address for service of Submitter

43 Owens Rd Epsom AUCKLAND 1023.

Telephone:

027 2202154

Fax/Email:

dexiotopic@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 21

Plan Change/Variation Name

3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

The specific provisions that my submission relates to are:

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

Plan provision(s)

Or

Property Address

Or

Map

Or

Other (specify)

The entire Plan Change

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

Submission no 175

*I would like it declined in full.
(See attachments)*

The reasons for my views are:

(continue on a separate sheet if necessary)

I seek the following decision by Council:

- Accept the proposed plan change / variation
- Accept the proposed plan change / variation with amendments as outlined below
- Decline the proposed plan change / variation
- If the proposed plan change / variation is not declined, then amend it as outlined below.

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at a hearing

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

15/04/2019
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.

Rec'd 3/05/2019

Submission no 175

ATTACHMENT – Reasons for Submission

1. ~~I/we~~ **oppose** Proposed Plan Change 21 (PC 21-private) for the following reasons:
 - (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
 - (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
 - (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
 - (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
 - (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
 - (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
 - (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

Rec'd 3/05/2019

Submission no 175

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 175

Graham Dexter – 43 Owens Rd Epsom AUCKLAND 1023

0272202154

2. In addition, I also have these concerns:

(i) The council has basically turned Owens Rd into a major feeder between MT Eden Village and the motorway (SH1) to both the North and South. I would expect that the extra traffic in this immediate area both during the build phase and as a result of the hospital expansion will just add to the existing problems that residents of the area have in simply accessing their properties.

(ii) My home is now approximately 100 years old, and while I do not consider it to be 'heritage' or anything of a particularly grand nature, I am concerned that continual blasting and excavation within a handful of metres can and will have a detrimental outcome on my home. Damages etc. caused by this sort of endeavour can be notoriously difficult to recover.

(iii) There are already more hospitals and medical centres within a 5km radius of the location of the proposed development than I can count. I gave up at 6 major Hospitals and countless smaller medical centres and clinics, including specialists. I cannot for the life of me see why yet another major health centre is required within this area.

(iiii) I am absolutely gobsmacked that a major building would be approved that could be up to 25 metres tall could be considered appropriate in an area where most buildings are not more than 8 metres tall. If this were to be a residential building (example: The Pines), I am sure that there would be a huge number of restrictions, including the building / carpark footprint size when compared to the land area.

(iv) What precautions have been taken to safeguard the local animals, both wild and domestic, from the continual blasting and other such construction noise? Will we lose the charm of the native birds and terrify our own pets? Who will represent them?

Rec'd 3/05/2019

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

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



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms (Full Name)

MARIANNE SARA GITS

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

Address for service of Submitter

43 OWENS ROAD, EPSOM

Telephone:

0274 774 855

Fax/Email:

marianne-gits@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 21

Plan Change/Variation Name

3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

The specific provisions that my submission relates to are:

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

Plan provision(s)

Or

Property Address

Or

Map

Or
Other (specify)

The entire Plan Change

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

Submission no 176

The reasons for my views are:

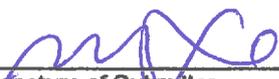
I would like it declined in full
(see attachments)

(continue on a separate sheet if necessary)

I seek the following decision by Council:

- Accept the proposed plan change / variation
- Accept the proposed plan change / variation with amendments as outlined below
- Decline the proposed plan change / variation
- If the proposed plan change / variation is not declined, then amend it as outlined below.

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at a hearing


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

15 APR 19
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 no 176

ATTACHMENT – Reasons for Submission

1. ~~I/we~~ **oppose** Proposed Plan Change 21 (PC 21-private) for the following reasons:
 - (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
 - (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
 - (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
 - (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
 - (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
 - (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
 - (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

Rec'd 3/5/2019

Submission no 176

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 176

15 April 2019

Marianne Gits
43 Owens Road
Epsom

I have lived in the area Eden-Epsom for the last 20 years and what I love about this area is its uniqueness of heritage, community, leafy streets full of trees and the bird wildlife that I hear and see every day in my backyard and on our doorstep.

I am very concerned about the idea that a major commercial enterprise can come into a well-established residential area that is clearly identified for residential activities only. If we allow this to happen now, what would be next? This is not progress.

We have numerous hospitals in the near vicinity so feel the area is sufficiently support by both hospitals and specialised medical facilities. We do not need another hospital in this area.

The increase in traffic, in and around the surrounding areas, is also a concern for me. With Gillies Ave being a main route for access to the motorway, a hospital will only add further congestion and parking restraints to this area which is already an extremely busy area during especially during peak times.

I am also very concerned about the prospect of further loss of hertiage homes in the area. This is what makes the Eden-Epsom area unique. Three quality heritage homes have already been lost when the first Southern Cross hospital was built 20 years ago. Now another three could be lost if this proposal goes ahead. This area has built a repuation around it's character and why people choose to live in this area.

Regards,

Marianne Gits

Rec'd 3/5/2019

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

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



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable):

Mr/Mrs/Miss/Ms (Full Name)

JANE MILLAR MASON

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

Address for service of Submitter

41 OWENS ROAD, EPSOM, AUCKLAND, 1023

Telephone:

(09) 6300713

Fax/Email:

jane.millarmason@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 21

Plan Change/Variation Name

3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

The specific provisions that my submission relates to are:

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

Plan provision(s)

Or

Property Address

Or

Map

Or

Other (specify)

THE ENTIRE PLAN CHANGE

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

Submission no 177

The reasons for my views are: I would like it declined in full

(See attachments)

(continue on a separate sheet if necessary)

I seek the following decision by Council:

- Accept the proposed plan change / variation
- Accept the proposed plan change / variation with amendments as outlined below
- Decline the proposed plan change / variation
- If the proposed plan change / variation is not declined, then amend it as outlined below.

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at a hearing

James H. Mason
Signature of Submitter
(or person authorised to sign on behalf of submitter)

17.11.2019
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 no 177

ATTACHMENT – Reasons for Submission

1. ~~I/we~~ oppose Proposed Plan Change 21 (PC 21-private) for the following reasons:
 - (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
 - (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
 - (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
 - (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.
 - (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
 - (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.
 - (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

Rec'd 3/5/2019

Submission no 177

- (h) PC 21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
- i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 177

I OPPOSE THE PRIVATE PLAN CHANGE PC 21 IN FULL.

My name is Jane Millar Mason and I live at 41 OWENS ROAD, EPSOM, AUCKLAND, 1023.

I have lived at 41 Owens Road, Epsom for 26 years, in a charming and cherished Arts and Crafts heritage home, set in a protected tree canopied garden and totally oppose the hugely increased footprint and skyprint of the new Southern Cross Brightside Hospital Plan.

I have spent 26 years having to back my car out into the congested traffic on Owens Road and battling Resource Consent to achieve a very watered down non-solution to our garage situation while Southern Cross can override our residential resource consent restrictions to obliterate character homes and trees to achieve their monstrous 16 metre (potentially 25 metres) high plans to satisfy their market share obsession with Mercy Ascot.

I am already surrounded by congested traffic and restricted parking from Epsom Girls' Grammar, Auckland Grammar, existing Brightside Hospital, Mercy Ascot Hospital and Government House, all adding to normal business and residential traffic and I do not want further congestion in my neighbourhood.

After hours night time noise pollution from hospital delivery trucks will also increase.
Curfews set at the previous Brightside extensions have not been adhered to.

For Southern Cross to achieve their proposed Brightside Hospital extensions our neighbourhood is to be exposed to several years of construction pollution, "bombing" of volcanic rock and a multitude of daily truck convoys.

My Arts and Crafts heritage home is constructed of rough cast/concrete/Marseille tiles roof, is a two storey building, is 96 years old and is at risk of damage.

I see myself as a caretaker of this beautiful house and neighbourhood for my children's generation and beyond and fiercely oppose the encroachment of our character and protected residential footprint.

Yours faithfully,
Jane Millar Mason,
41 Owens Road,
Epsom,
Auckland, 1023.
Sent from my iPad

