

AUCKLAND UNITARY PLAN OPERATIVE IN PART

PROPOSED PLAN CHANGE 28 (Private)

**1, 3, 5, 7, 10 and 12 Florence Carter
Avenue, Flat Bush**

SUMMARY OF DECISIONS REQUESTED

Enclosed:

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

Explanation

- You may make a “further submission” to support or oppose any submission already received (see summaries that follow).
- You should use Form 6.
- Your further submission must be received by 26 September 2019.
- Send a copy of your further submission to the original submitter as soon as possible after submitting it to the Council.

Summary of Decisions Requested

Plan Change 28 - (Private) 1, 3, 5, 7, 10 and 12 Florence Carter Avenue, Flat Bush

Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
1	1.1	Natural Line International Limited	Ericalu@naturalline.nz	Accept the plan modification	Accept the plan change due to its location and economic benefits
2	2.1	Auckland Transport Attention: Kevin Wong Toi	kevin.wong-toi@at.govt.nz	Accept the plan modification with amendments	Decline the plan change, unless the transport matters and concerns raised in this submission are resolved and/or appropriate suite of amended provisions that will address these matters are provided
2	2.2	Auckland Transport Attention: Kevin Wong Toi	kevin.wong-toi@at.govt.nz	Accept the plan modification with amendments	Approve the rezoning to Business - Mixed Use, with amended precinct provisions to manage transport effects
2	2.3	Auckland Transport Attention: Kevin Wong Toi	kevin.wong-toi@at.govt.nz	Accept the plan modification with amendments	Amend the various objectives and policies as stated in Attachment 1 to address transport related matters
2	2.4	Auckland Transport Attention: Kevin Wong Toi	kevin.wong-toi@at.govt.nz	Accept the plan modification with amendments	Amend the special information requirements in the proposed precinct provisions to include 'commercial services'
2	2.5	Auckland Transport Attention: Kevin Wong Toi	kevin.wong-toi@at.govt.nz	Accept the plan modification with amendments	Seeks further information to confirm Integrated Transport Assessment mode share assumptions and trip generation
2	2.6	Auckland Transport Attention: Kevin Wong Toi	kevin.wong-toi@at.govt.nz	Accept the plan modification with amendments	Seeks early vesting of required land from 2 Florence Carter Avenue as public road

Plan Change 28 - (Private) 1, 3, 5, 7, 10 and 12 Florence Carter Avenue, Flat Bush

Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
2	2.7	Auckland Transport Attention: Kevin Wong Toi	kevin.wong-toi@at.govt.nz	Accept the plan modification with amendments	Amend proposed Precinct Plan 2 - Pedestrian Movement Plan to identify more indicative pedestrian connections through the site to Ormiston Road and Te Irirangi Drive
2	2.8	Auckland Transport Attention: Kevin Wong Toi	kevin.wong-toi@at.govt.nz	Accept the plan modification with amendments	Amend the proposed precinct standards, assessment criteria and special information requirements relating to travel plan, travel demand management plan and site travel management plans to provide further emphasis on future (rapid) as well as existing public transport
2	2.9	Auckland Transport Attention: Kevin Wong Toi	kevin.wong-toi@at.govt.nz	Accept the plan modification with amendments	Amend the proposed precinct provisions to address rates of supply of on-site parking as identified in the submission
3	3.1	Watercare	ilze.gotelli@water.co.nz	Accept the plan modification with amendments	Accept the plan modification with amendments
3	3.2	Watercare	ilze.gotelli@water.co.nz	Neither accepts or opposes the plan modification	Neither accepts or opposes the plan change. The purpose of the submission is to address the technical feasibility of the proposed water and wastewater servicing arrangements and to determine how any effects will be appropriately considered and managed

Plan Change 28 - (Private) 1, 3, 5, 7, 10 and 12 Florence Carter Avenue, Flat Bush

Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
3	3.3	Watercare	ilze.gotelli@water.co.nz	Accept the plan change with amendments	Seeks further information to verify whether the water supply network infrastructure is likely to be adequate for the plan change. Particularly relating to water demand, capacity of existing water supply and confirmation of funding for upgrades
3	3.4	Watercare	ilze.gotelli@water.co.nz	Accept the plan modification with amendments	Seeks further information to verify whether there is sufficient capacity in the wastewater network to accommodate the plan change and confirmation of funding for upgrades
3	3.5	Watercare	ilze.gotelli@water.co.nz	Accept the plan modification with amendments	Seeks confirmation to confirm that any infrastructure upgrades that are required to cater for the various proposed options will be upgraded at no cost to Watercare
4	4.1	Takai Tamata	1 Tonu'U Court Chapel Park Auckland 2016	Opposes the plan modification	Decline the plan change due to amenity reasons unless a house (not a unit) around the area can be found for the submitter

Submissions

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Erica Luo

Organisation name: Natural Line International Limited

Agent's full name:

Email address: Ericaluo@naturalline.nz

Contact phone number: 0212645559

Postal address:
2/8 Laidlaw Way
East Tamaki
Auckland 2019

Submission details

This is a submission to:

Plan modification number: Plan Change 28

Plan modification name: PC 28 (Private) 1, 3, 5, 7, 10 and 12 Florence Carter Avenue, Flat Bush

My submission relates to

Rule or rules:

Property address: 1, 3, 5, 7, 10, 12 Florence Carter Avenue, Flatbush (Formerly part of 79 Ormiston Rd), Flat Bush

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

1. It was business-mixed use zone before, no reason to change to a low level zone, and it is just located across the Botany Junction shopping center; 2. The change will increase the value of the relevant land; 3. It would be beneficial for people around this area.

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

Submission date: 7 August 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.

22 August 2019

Auckland Council
Private Bag 92300
Auckland 1142

Attention: Bronnie Styles, Planning Technician, Auckland-wide Planning Unit

Email: unitaryplan@aucklandcouncil.govt.nz

Dear Bronnie

PROPOSED PRIVATE PLAN CHANGE 28 – 1, 3, 5, 7, 10 AND 12 FLORENCE CARTER AVENUE, FLAT BUSH

Please find attached Auckland Transport's submission on the Proposed Private Plan Change 28 to the Auckland Unitary Plan Operative in Part.

If you have any queries in relation to this submission, please contact Kevin Wong Toi, Principal Planner, on 09 447 4200.

Yours sincerely



Tracey Berkahn
Executive General Manager, Planning and Investment

Encl: Auckland Transport's submission on Proposed Private Plan Change 28 – 1, 3, 5, 7, 10 and 12 Florence Carter Avenue, Flat Bush

**SUBMISSION ON PROPOSED PRIVATE PLAN CHANGE 28 - 1, 3, 5, 7, 10 AND 12
FLORENCE CARTER AVENUE, FLAT BUSH**

Auckland Council – Plans and Places
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

From: Auckland Transport – Planning and Investment
Private Bag 92250
Auckland 1142

This is Auckland Transport's submission on Proposed Private Plan Change 28 to the Auckland Unitary Plan Operative in Part. The proposed plan change seeks to enable mixed use development, including office, retail, commercial services and residential activities and includes providing for building heights of between 20 and 28 metres and capacity limits for business activities. The submission relates to the proposed change in zoning from Business – Light Industry to Business – Mixed Use, and creation of a Florence Carter Avenue precinct at 1, 3, 5, 7, 10 and 12 Florence Carter Avenue, Flat Bush.

Auckland Transport is a Council Controlled Organisation (CCO) of Auckland Council with the legislated purpose to contribute to an “effective, efficient and safe Auckland land transport system in the public interest”. In fulfilling this role, Auckland Transport is responsible for:

- a. The planning and funding of public transport;
- b. Promoting alternative modes of transport (i.e. alternatives to the private motor vehicle);
- c. Operating the local roading network; and
- d. Developing and enhancing the local road, public transport, walking and cycling networks.

Auckland Transport could not gain an advantage in trade competition through this submission.

Auckland Transport's submission is:

To support Proposed Private Plan Change 28 in part in its provision of zoning for a Business – Mixed Use zone and Florence Carter Avenue Precinct to be created at 1, 3, 5, 7, 10 and 12 Florence Carter Avenue, Flat Bush, provided that the concerns raised in this submission are appropriately considered and addressed to ensure that the extent, scale and intensity of potential effects and the methods for mitigating these effects are addressed to achieve a rezoning and precinct provision that are appropriate to the transport context.

If the transport concerns cannot be addressed to Auckland Transport's satisfaction, the rezoning should not proceed and the proposed plan change should be declined.

The reasons for Auckland Transport's submission:

Plan change proposals, such as Proposed Private Plan Change 28, must ensure that a full and appropriate assessment is undertaken. Such assessments must clearly identify how the

proposal will appropriately manage any adverse effects on the local and wider transport network, including identifying what infrastructure or other methods to manage transport demand is necessary to service the implementation of the zone, precinct and development of the site(s) and how this will be provided for by the applicant (or future developers). If such infrastructure cannot feasibly be provided or enabled, then alternative less intensive activities should be considered, or the plan change / proposal declined.

Auckland Transport makes this submission to ensure that this plan change appropriately manages the effects of the proposal (re-zoning to Business – Mixed Use, applying amended precinct provisions, and the resulting anticipated development enabled by the plan change) on the local and wider transport network.

This submission relates to the following specific parts of the proposed plan change:

1. Overview - support for mix of activities enabled and strategic location
2. Amend proposed precinct provisions for transport
3. Traffic generation and modelling - mode share assumptions, trip generation sensitivity testing and modelling approach / outputs
4. Intersection upgrading
5. Walking movement plan
6. Travel plan strategy and travel demand management
7. Parking provisions and associated effects.

Auckland Transport's position on the proposed provisions is set out in **Attachment 1**. The position, reasons and relief sought reflect Auckland Transport's overall objective of ensuring that the plan change has appropriately identified the extent, scale and intensity of potential effects and the methods for mitigating these effects where this is required, including provisions that are appropriately representative of the transport context.

Auckland Transport seeks resolution of the various matters raised in this submission which, for example, could include information for improved modelling of trip generation and mode share and amended provisions that appropriately manage effects on the transport network.

As identified in the application material, resource consents have been granted for specific activities and subdivision of the land subject to the plan change and adjacent land. Those consents can be considered as equivalent to permitted baselines for levels of effects and the existing environment, although the rezoning is likely to mean some of those consents will not be implemented in their current form. This submission does not seek to re-address those existing consents.

Auckland Transport seeks the following decision from Auckland Council:

That the Council approves Proposed Private Plan Change 28 in part, including rezoning to Business – Mixed Use, provided that the transport matters and concerns raised in this submission are resolved and/or that Council identifies an appropriate suite of amended provisions that will address these matters.

If Auckland Transport's concerns are not resolved, then the plan change should be declined.

In all cases where amendments to the plan change are proposed, Auckland Transport would consider alternative wording or amendments which address the reason for Auckland

Transport's submission. Auckland Transport also seeks any consequential amendments required to give effect to the decisions requested.

Auckland Transport is available and willing to work through the matters raised in this submission with the applicant.

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



Signed for and on behalf of Auckland Transport

Tracey Berkahn
Executive General Manager, Planning and Investment

22 August 2019

Address for service of submitter:
Kevin Wong Toi, Principal Planner
Auckland Transport
20 Viaduct Harbour Avenue
Auckland Central
Auckland 1010
Email: Kevin.Wong-Toi@at.govt.nz

Attachment 1 – Comments and points requiring addressing / further clarification

Issue	Position (Support/ Oppose)	Reasons	PC – Decision / relief sought
Overview - support for mix of activities enabled and strategic location	Support	The proposed Business – Mixed Use zone allows compact intensive development for a diverse mix of business and residential activities. Combined with a location within walking distance of a proposed rapid transit route ¹ the proposal is an opportunity for achieving integrated land use and transport benefits, including modal shift to public transport, reduced travel distances, quality pedestrian connections between local destinations and transit stops/stations, and the appropriate management of car parking.	<ul style="list-style-type: none"> • Approve the re-zoning to Business – Mixed Use, with amended precinct provisions to manage transport effects
Amend proposed precinct provisions for transport	Support in part - seek amendments to Precinct provisions	<p>Objectives and policies need to be capable of managing effects of discretionary and non-complying activities as indicated in the proposed activity table and support intensive development. Many of the precinct standards state that development not complying with the standard is a discretionary activity, including those related to pedestrian movement, trip generation and travel demand management.</p> <p>A rapid transit route on Te Irirangi Drive is being planned, although it may not be operational before initial occupation of the Florence Carter Avenue Precinct. There is potential to investigate opportunities for the proposed development to be supported by a future station or stop along this route. The location and form of this station or stop is subject to the work programme of the Airport to Botany project, including the development of options. Without directing pedestrians to a single location which may prove to be incorrect, the precinct should have a number of direct walking connections out to Te Irirangi Drive and Ormiston Road, both through the precinct and at the frontages.</p>	<ul style="list-style-type: none"> • Precinct Objective 4 for pedestrian access and safety be amended to also provide for connectivity between the precinct and public transport stop / station on Te Irirangi Drive. • Precinct Objective 6 be amended to: “Transport and land use patterns <u>along the Ormiston Road and Te Irirangi Drive corridors</u> are integrated, particularly around access to the precinct by all modes <u>and managing effects on the transport network</u> to achieve a sustainable, liveable community. “

2.2

2.3

¹ Airport to Botany rapid transit project to improve southern and eastern access between Auckland Airport, Manukau and Botany. Part of this route runs along Te Irirangi Drive <https://at.govt.nz/projects-roadworks/airport-to-botany-rapid-transit/#overview>

Issue	Position (Support/ Oppose)	Reasons	PC – Decision / relief sought
		<p>Precinct Objective 4 should be amended to also seek to ensure connectivity between the precinct and the future rapid transit route (public transport).</p> <p>Precinct Objective 6 should also recognise the particular context of the Precinct in terms of being located at the intersection of a future rapid transit corridor and the potential transport integration benefits associated with managing effects on the transport network.</p> <p>A new objective is requested to support the policies and standards relating to the management and provision of transport mitigation measures by highlighting the timing and staging considerations of providing transport mitigation in co-ordination with the development of the land uses.</p> <p>In principle, Precinct Policy 1 is supported as providing opportunities for sustainable travel behaviour. Amendments are proposed to Policy 1 to reference transport and land use integration to align with the outcomes identified in Objective 6. Further amendments are proposed to define the policy direction around “sustainable travel behaviour” that is reflected in the standards around pedestrian movement and travel demand management.</p> <p>Precinct Policy 4 should be amended to: “avoid dwellings on the ground floor of the public road frontages of Florence Carter Avenue, Ormiston Road and Te Irirangi Drive.” The two blocks (of approximately 4 and 5 hectares) are of sufficient area to accommodate an internal street network with perimeter block development, which may be public road or private lane. If such a development typology is applied, it could accommodate dwellings fronting that internal network, while the main public roads have business frontages.</p>	<ul style="list-style-type: none"> • A new Precinct Objective 6(A): <u>“Ensure transport infrastructure upgrades required as part of the mitigation of transport effects are staged and provided for to support the anticipated timing of the transport demands.”</u> • Precinct Policy 1 be amended to: <u>“Optimise the transport and land use opportunities provided by the site’s proximity to key transport corridors through the provision of a mixture of residential and commercial opportunities and measures that promote sustainable travel behaviour support and enable transport choices including public transport, walking and cycling”.</u> • Precinct Policy 4 be amended to: <u>“Avoid dwellings on the ground floor of public road frontages of Florence Carter Avenue, Ormiston Road and Te Irirangi Drive.”</u>

Issue	Position (Support/ Oppose)	Reasons	PC – Decision / relief sought
		<p>Precinct Policy 5 should be amended to emphasise connectivity with the external transport network, including to public transport services noting that these connections will be “supported and enabled” through the proposed pedestrian movement plan rather than only “promoted.”</p> <p>Precinct Policy 6 references managing private vehicle travel in and out of the precinct. As a consequential amendment to the proposed wording in Objective 6, it is proposed that Policy 6 is amended to recognise travel demand management measures as part of managing effects on the transport network. This proposed amendment to Policy 6 also supports the travel demand management plan standard.</p> <p>Precinct Policy 7 should be amended to identify the Ormiston Road / Florence Carter Avenue intersection as the primary <u>vehicle</u> access to the precinct, and that walking and public transport modes will need direct connectivity to Te Irirangi Drive rapid transit.</p> <p>As a consequential amendment to the proposed inclusion of a new objective addressing the timing of required mitigation, a new policy is requested that recognises the need for the staging of mitigation so that it is in place before the critical level of effects are generated as reflected in the trip generation standards and assessment criteria.</p> <p>Consequential amendments will be required to the standards giving effect to the above amended policies, including the ‘Dwellings on the ground floor’ standard; ‘Pedestrian Movement Plan’ standard and the ‘Precinct Plan 2 – Pedestrian Movement Plan’ to improve connectivity to public transport; and ‘Travel Demand Management Plan’ standard to promote public transport</p>	<ul style="list-style-type: none"> • Precinct Policy 5 be amended to: Provide for pedestrian connectivity through sites <u>and to the external transport network</u> via the provision of footpaths and facilities consistent with a Pedestrian Movement Plan, shown in Precinct Plan 2, that:... (b)“are designed to <u>support and enable</u> the maximum use and safety of transport modes other than private motor vehicles <u>and, in particular, to support direct walking connections to public transport stops / stations.</u>” • Precinct Policy 6 to be amended to: “Manage private vehicle travel in and out of the Florence Carter Avenue Precinct, particularly during peak travel periods, <u>including the application of travel demand management measures.</u>” • Precinct Policy 7 be amended to: “(b) Ormiston Road and Florence Carter

Issue	Position (Support/ Oppose)	Reasons	PC – Decision / relief sought
			<p>Avenue intersection as the primary <u>vehicle</u> access to the precinct. <u>(c) direct walking connectivity between the Precinct and the Te Irirangi Drive public transport stop / station.</u></p> <ul style="list-style-type: none"> • A new Precinct Policy 7(A): <u>“Provide and co-ordinate the upgrade of transport infrastructure within the precinct so that such upgrades occur either before or concurrent with staged development of the precinct, including any required upgrades to the Ormiston Road and Florence Road intersection”.</u> • Consequential amendments to the standards giving effect to the above amended policies, including the ‘Dwellings on the ground floor’ standard; ‘Pedestrian Movement Plan’ standard and the ‘Precinct Plan 2 – Pedestrian Movement Plan’ to improve connectivity to public transport; ‘Travel Demand

Issue	Position (Support/ Oppose)	Reasons	PC – Decision / relief sought
			Management Plan' standard to promote public transport.
Special information requirements	Support in part - seek amendments to the Precinct provisions	The special information requirements makes reference to activities where a site travel plan must be provided. The list of activities does not include commercial services which is specifically provided for in the Precinct activity table. An amendment is requested to include commercial services in the list of activities.	<ul style="list-style-type: none"> 14xx.x. Special information requirements to be amended to: (2) Offices, retail, food and beverage, entertainment facilities, <u>commercial services</u> or education facilities greater than 100m² per site:
Traffic generation and modelling - mode share assumptions and trip generation sensitivity testing. modelling approach and outputs	Support in part - Seek further information to confirm Integrated Transport Assessment mode share assumptions and trip generation	<p>The range of activities and intensities possible under the Business – Mixed Use zone provisions and the proposed precinct provisions is potentially greater than has been used for the modelling of mode share and trip generation sensitivity testing. The use of the report 'Anticipating Flat Bush' by McDermott Consultants for Manukau City Council (2010)² may not be the most appropriate demographic profile, given the differences between Dannemora residential development and the proposed Florence Carter Avenue Precinct.</p> <p>The mode share assumptions should also change in relation to new transport infrastructure investment, such as Airport to Botany Rapid Transit, and the design of development should not be confined to responding to existing public transport.</p> <p>Trip generation sensitivity testing should be undertaken for 'maximum case feasible' and 6 – 8 storey development rather than 2 – 6 storey shown in simulations.</p>	<ul style="list-style-type: none"> Provide further information on mode share assumptions, including in relation to future new transport infrastructure investments, to confirm that development design will be fit for purpose Provide further trip generation sensitivity testing for 'maximum case feasible' (at caps for office, retail and commercial services, with residential above up to 6 – 8 storey development rather than 2 – 6 storey shown in simulations)

2.4

2.5

² Refer to letter dated 17 April 2019 "Clause 23 RMA Further Traffic Information Request" from Traffic Planning Consultants Ltd.

Issue	Position (Support/ Oppose)	Reasons	PC – Decision / relief sought
		As part of this testing, clarification is also sought around some aspects of the traffic modelling set out in the Integrated Transport Assessment. This includes confirming the traffic volumes between intersections and future traffic flows ³ , explaining how aspects of the SIDRA results will be managed / operate given some of the predicted queue lengths ⁴ and to consider a network model given the congestion likely to be experienced both on the surrounding network and within the subject site.	<ul style="list-style-type: none"> • Provide clarification and further information on aspects of the traffic modelling, including the traffic volumes, SIDRA outputs and need for area-based modelling to confirm that the assessment of traffic effects is fit for purpose. • Consequential amendments to standards or development and activity thresholds if mode share assumptions and / or trip generation sensitivity testing changes.
Intersection upgrading	Seek early vesting of required land from 2 Florence	Ormiston Road / Florence Carter Avenue intersection upgrade requires a trigger development threshold. There should also be early vesting of the required land from existing 2 Florence Carter Avenue, which is outside the proposed precinct and which could potentially be	<ul style="list-style-type: none"> • Approval of Proposed Plan Change 28 should be contingent upon vesting of the land required for future

2.6

³ In section 6.1.2 of the Integrated Transport Assessment is noted that “Auckland Transport Saturn model for the area only provides future “link” traffic flows and not future turning movements, particularly at the traffic signal controlled intersection of Ormiston Road and Te Irirangi Drive.” SATURN models do show turning movements if required.

⁴ For example, The SIDRA results show a ‘95% back of queue distance’ of 410m for the Florence Carter Ave right turn movement in the PM peak hour (Integrated Transport Assessment, Attachment 4, 2026 SIDRA Intersection Analysis Results – Plan Change, Ormiston Rd / subdivision intersection). The length of this northern section of Florence Carter Ave is only 230m. The eastern section is only 200m.

The ‘95% back of queue distance’ for the southern arm (through movement) of the Te Irirangi / Ormiston intersection is 490m (PM peak movement). The site access on Te Irirangi is only 250m from the Te Irirangi / Ormiston intersection. Therefore, the 376 vehicles predicted to exit via the ‘left in/left out’ site access on Te Irirangi in the PM peak will not be able to freely do so, as the SIDRA results suggest.

Issue	Position (Support/ Oppose)	Reasons	PC – Decision / relief sought
	Carter Avenue as public road	under different ownership and outside the control of the applicant by the time it is needed for the intersection upgrade works.	intersection upgrade from 2 Florence Carter Avenue
Walking Movement Plan	Support provision of a Pedestrian Movement Plan (proposed Precinct Plan 2) but seek more pedestrian linkages through the precinct and directly to the Te Irirangi Drive and Ormiston Road frontages	<p>The ability of the Precinct to function in a manner that achieves the outcomes identified in the objectives with a high level of land use and transport integration with rapid transit will depend on the convenience and safety of the pedestrian connectivity through the precinct and to the future rapid transit stop / station, as well as to the East - West Ormiston Road public transport route.</p> <p>The design of development should not be confined to responding to existing public transport. There is potential to investigate opportunities for the development enabled by the proposed plan change to be supported by a future station or stop along the planned Airport to Botany rapid transit route. The location and form of this station or stop is subject to the work programme of the Airport to Botany project, including the development of options. Without directing pedestrians to a single location which may prove to be incorrect, the precinct should have a number of direct walking connections out to Te Irirangi Drive and Ormiston Road, both through the precinct and at the frontages.</p>	<ul style="list-style-type: none"> Amend proposed Precinct Plan 2 – Pedestrian Movement Plan to identify more indicative pedestrian connections through the site to Ormiston Road and Te Irirangi Drive.
Travel Plan Strategy and Travel Demand Management	Support in part but seek further emphasis on future as well as existing public transport, and management	The Travel Plan Strategy, submitted with the request for the private plan change, identifies Travel Plans as a “developer to include requirement in tenancy agreements” type provision. The proposed precinct provisions go further in a Travel Demand Management Plan (TDMP) standard, requiring a TDMP for “any offices, retail, food and beverage, entertainment facilities or education facilities greater than 100m ² GFA per site.” Proposed precinct assessment criteria include implementation of measures such as travel planning. Proposed Special Information Requirements include a “site travel management plan.”	<ul style="list-style-type: none"> Amend the plan change’s Precinct standards, assessment criteria and special information requirements relating to Travel Plan, Travel Demand Management Plan and site travel management plans to provide further emphasis

2.7

2.8

Issue	Position (Support/ Oppose)	Reasons	PC – Decision / relief sought
	of on-site parking supply	<p>The Travel Plan, Travel Demand Management Plan, and site travel management plan provisions should provide further emphasis on future as well as existing public transport and, in particular, on the opportunities for the future rapid transit route to provide high quality accessibility to and from the precinct.</p> <p>On-site parking supply should be managed, including at early stages of development. This is to ensure parking provision does not influence travel behaviour to the detriment of the precinct policies and objectives, or result in under-development of the precinct due to parking area requirements. See parking submission comments below.</p>	on future (rapid) as well as existing public transport.
Parking provisions associated effects	Support in part - seek amendments to precinct provisions to manage on-site parking supply	<p>The proposed Precinct provisions address private motor vehicle trip generation thresholds, but not directly the supply of on-site parking.</p> <p>On-site parking supply should be managed, including at early stages of development. This is to ensure parking provision does not influence travel behaviour to the detriment of the precinct policies and objectives, or result in under-development of the precinct due to parking area requirements.</p> <p>The Auckland Unitary Plan E27 parking rates allow a maximum of one parking space per 30m² office GFA, no maximum for commercial services, entertainment facilities and retail, and no maximum for residential activity. The proposed precinct provisions should be amended to include maximum parking rates, particularly for residential activity, at say one space per apartment in a transferable building pool. The overall precinct parking rate maximum should be reduced further when rapid transit is available. The transport context of a Business – Mixed Use zoning and the proposed precinct</p>	<ul style="list-style-type: none"> Amend the proposed Precinct provisions to address rates of supply of on-site parking as identified in this submission.

2.9

Issue	Position (Support/ Oppose)	Reasons	PC – Decision / relief sought
		provisions in this location justifies a departure from the Auckland Unitary Plan parking standards. The on-site parking provision could significantly affect the opportunity for this site to function as an intensive mixed-use node on the rapid transit corridor.	

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Mark Bourne

Organisation name: Watercare Services Limited

Agent's full name: Ilze Gotelli

Email address: ilze.gotelli@water.co.nz

Contact phone number: 021 831 470

Postal address:
Private Bag 92521 Wellesley Street
Auckland
1141

Submission details

This is a submission to:

Plan modification number: Plan Change 28

Plan modification name: PC 28 (Private) 1, 3, 5, 7, 10 and 12 Florence Carter Avenue, Flat Bush

My submission relates to

Rule or rules:
Water and Wastewater servicing

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:
Refer to submission

I or we seek the following decision by council: Accept the plan modification with amendments

3.1

Details of amendments: Refer to attached submission

Submission date: 22 August 2019

Supporting documents
Watercare Submission PC28 Florence Carter Avenue_22August2019.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.

Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

Attn.: Planning Technician

unitaryplan@aucklandcouncil.govt.nz

TO: Auckland Council

SUBMISSION ON: Plan Change 28 (private) - 1, 3, 5, 7, 10 and 12 Florence
Carter Avenue, Flat Bush

FROM: Watercare Services Limited

ADDRESS FOR SERVICE: ilze.gotelli@water.co.nz

DATE: 22 August 2019

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

1 INTRODUCTION

1.1 Watercare's purpose and mission

Watercare Services Limited ("**Watercare**") is New Zealand's largest provider of water and wastewater services. Watercare is a council-controlled organisation under the Local Government Act 2002 ("**CCO**") and is wholly owned by the Auckland Council ("**Council**").

Watercare provides integrated water and wastewater services to approximately 1.5 million people in Auckland. Watercare collects, treats and distributes drinking water from 11 dams, 26 bores and springs, and four river sources. Typically, 430 million litres of water is treated each day at 15 water treatment plants and distributed via 89 reservoirs and 90 pump stations

to 450,000 households, hospitals, schools, commercial and industrial properties. Watercare's water distribution network includes more than 9,000 km of pipes. The wastewater network collects, treats and disposes of wastewater at 18 treatment plants and includes 7,900 km of sewers.

Watercare is required to manage its operations efficiently with a view to keeping overall costs of water supply and wastewater services to its customers (collectively) at minimum levels, consistent with effective conduct of the undertakings and maintenance of long-term integrity of the assets. Watercare must also give effect to relevant aspects of the Council's Long-Term Plan, and act consistently with other plans and strategies of the Council, including the Auckland Unitary Plan and the Auckland Future Urban Land Supply Strategy.¹

2 SUBMISSIONS

2.1 General

This is a submission on a change proposed by JKGL Group Ltd ("**Applicant**") to the Auckland Unitary Plan (Operative in Part) that was publicly notified on 25 July 2019 ("**Proposal**").

The Applicant proposes to rezone 93,444m² (approximately) of Light Industry zoned land at 1, 3, 5, 7, 10 and 12 Florence Carter Avenue, Flat Bush to a Mixed Use Zone ("**Plan Change Area**").

Watercare neither supports nor opposes the Proposal. The purpose of this submission is to address the technical feasibility of the proposed water and wastewater servicing arrangement to ensure that the effects on Watercare's existing and planned water and wastewater network are appropriately considered and managed in accordance with Resource Management Act 1991 ("**RMA**").

3.2

In making its submission, Watercare has considered the relevant provisions of the Auckland Plan 2050, Te Tahua Taungahuru Te Mahere Taungahuru 2018 – 2028/The 10-year Budget Long-term Plan 2018 – 2028, the Auckland Future Urban Land Supply Strategy 2015 and 2017, the Water Supply and Wastewater Network Bylaw 2015, the Water and Wastewater Code of Practice for Land Development and Subdivision and the Watercare Asset Management Plan 2016 - 2036. It has also considered the relevant RMA documents including the Auckland Unitary Plan (Operative in Part) and the National Policy Statement on Urban Development Capacity 2016 which (among other matters) requires local authorities to ensure that at any one time there is sufficient housing and business development capacity which:

- (a) in the short term, is feasible, zoned and serviced with development infrastructure (including water and wastewater);
- (b) in the medium term, is feasible, zoned and either:
 - (i) serviced with development infrastructure, or

¹ Local Government (Auckland Council) Act 2009, s58.

- (ii) the funding for the development infrastructure required to service that development capacity must be identified in a Long Term Plan required under the Local Government Act 2002; and
- (c) in the long term, is feasible, identified in relevant plans and strategies, and the development infrastructure required to service it is identified in the relevant Infrastructure Strategy required under the Local Government Act 2002.²

2.2 Specific parts of the Proposal

The specific parts of the Proposal that this submission relates to are the proposed water and wastewater servicing arrangement and the effects of the Proposal on Watercare's existing and planned water and wastewater network.

Watercare has reviewed the Proposal (including the relevant plans and the AR & Associates Report "Plan Change – Infrastructure Capacity Assessment) and considers that:

- (a) the proposed wastewater capacity and servicing requirements have been adequately assessed as part of the Proposal;
- (b) subject to development occurring in accordance with the proposed staging conditions and infrastructure upgrades described further below:
 - (i) the proposed wastewater servicing arrangement is technically feasible and consistent with the requirements of the National Policy Statement on Urban Development Capacity; and
 - (ii) any adverse effects of the Proposal on Watercare's existing and planned wastewater infrastructure network will be appropriately managed; and
- (c) it is not in a position to confirm whether, in Watercare's opinion, the proposed water capacity and servicing arrangement is appropriate.

2.2.1 Water supply

2.2.1.1 Water supply infrastructure

As part of the previous subdivision, a water supply network was installed to service the site. This consists of watermains and fire hydrants along the site's road frontages. This infrastructure has been vested to Watercare.

2.2.1.2 Water supply servicing for the Plan Change Area

It is expected that the site will include a range of land uses including retail, supermarkets, offices, residential apartments, accommodation, retirement living, hotel and large format retail. The Infrastructure Capacity Assessment prepared for the Proposal by AR & Associates assumes that this existing water supply infrastructure is sufficient to cater for all possibilities. In the Assessment, AR & Associates assert that they expect the firefighting

² National Policy Statement on Urban Development Capacity 2016, policy PA1.

level of service of FW3 may be achievable. They note that if additional water supply capacity is required, it can be supplemented by booster pumps, or alternative options with in the sites.

To verify that the water supply network infrastructure is likely to be adequate for the new proposal, Watercare requires:

- (a) an assessment of the likely water demand for various potential development options (similar to what is presented for wastewater);
- (b) an assessment of the capacity of the existing water supply network to cater for the potential development options; and
- (c) confirmation of how those upgrades intend to be funded should they be required.

3.3

We note that any additional firefighting requirements over FW2 will need to be catered for on site.

2.2.2 Wastewater

2.2.2.1 Wastewater infrastructure

Similar to water supply, a wastewater network was constructed during the previous subdivision. The wastewater network consists of 225mm wastewater lines on Florence Carter Avenue, Ormiston Road, and Te Irirangi Drive. These lines discharge into a 225mm wastewater pipe that then discharges into the East Tamaki Branch Sewer.

2.2.2.2 Wastewater servicing for the Plan Change Area

The Infrastructure Capacity Assessment presents several different development scenarios and estimates wastewater flows of 21.6 to 22.0 l/s. AR & Associates conclude in the Assessment that the existing downstream 225m wastewater line has an estimated capacity of 43 l/s and therefore should have capacity to cater for the development.

While the wastewater network is likely to have the capacity to service the Plan Change Area, this should be verified by a capacity assessment by Watercare.

3.4

Watercare notes that even if it is likely that there is sufficient capacity in the wastewater network at the time of this plan change, this does not confirm capacity at the time of development. Specific capacity requirements will be assessed at the time Engineering Plans and Building Consents are lodged. Should the existing network be undersized to cater for the Proposal, the network will need to be upgraded at the Applicant's cost.

3 Decision sought

Watercare seeks a decision that ensures that the water and wastewater capacity and servicing requirements of the Proposal will be adequately met, such that the water and wastewater related effects are appropriately managed.

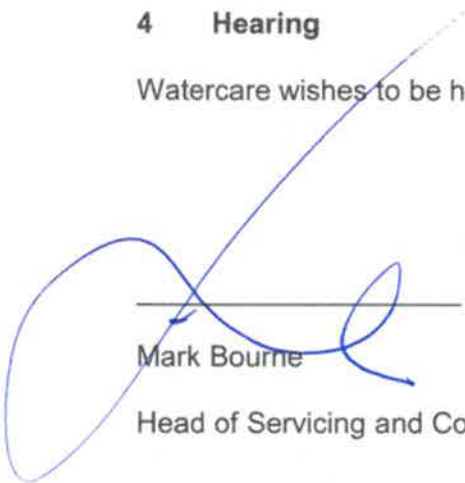
To enable that decision to be made, Watercare requests that:

- (a) The Applicant presents an assessment of the likely water supply demand from different development proposals to confirm whether the existing water supply infrastructure is likely to be sufficient to cater for these options.
- b) The Applicant submits a request for a capacity assessment to confirm capacity in the wastewater network.
- c) The Applicant confirms that any infrastructure upgrades that are required to cater for the various proposed options will be upgraded at no cost to Watercare.

3.5

4 Hearing

Watercare wishes to be heard in support of its submission.



Mark Bourne
Head of Servicing and Consents

1 Tenuu Court,
Chapel Park.
15-8-19.

AUCKLAND COUNCIL
19 AUG 2019
CBD - ALBERT ST

To whom it may concern,

Kia Orana / Greetings,

My name is Takai Tamata, tenant
at No. 1. Tenuu Court, Chapel Park

I read through the Proposal Plan you had
sent to me. I don't think that the plan is good,
it is not wise to do this to me/us. living specially
these addresses. Not happy with the plan.

My submission on the plan is wrong. I disagree.
My reason for disagree / opposed to your plan
is, you have no heart for the people, who
are living here ^(settling for years) all you care is your plan.

Me and my family been living here for 21yrs
I am a pensioner with some health problem
that I never want to be moved anywhere
else, was and is my plea to the Housing NZ.

I found this area is suitable for old people
with health issues and hard working people
people who loves and cares about others.

No ~~drinking~~ drinking, fighting & so forth, nothing to
live in fear, unlike other areas. I know.

I just don't want to leave this area ^{because} ~~it~~
close to my church, doctors, shops, banks
and extra. If you people can find me

a house, not a unit / flat, around this area
maybe I say yes. because I have espine
problem, nerves & muscular, arthritis & others
that why why I am not happy and so worried.

God cares for the needy. Yours Takai Tamata.