

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 88 - Monika Olds
Date: Friday, 10 March 2023 10:01:05 am

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Monika Olds

Organisation name:

Agent's full name:

Email address: monikaolds@gmail.com

Contact phone number:

Postal address:
31 First View Ave
Beachlands
Auckland 2018

Submission details

This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

My submission relates to

Rule or rules:
Rezoning of 307Ha of Beachlands Village in the area of Formosa Golf Course from rural to future Urban Residential etc

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

Our road network from Beachlands to either Whitford, Howick, or Ormiston is simply not built to deal with the increase in traffic this development will cause, should it be approved in its current form. The traffic analysis was completed at a time when traffic was not at its true rate, during covid! It is not only Whitford-Maraetai Rd that would get impacted by this substantial increase but all surrounding areas as well. The current proposal is relying on other parties to do their part. For example changing, enlarging the marina, and banking on that 80% of new people living out here will catch the ferry to go to work is a stretch. How about everyone else going to East Tamaki or the Airport, no Ferry travels in that direction. All infrastructure impacted needs to be updated adequately and future proved. We don't need another Whangaparoa debacle. I urge you to please consider all opposing submissions as this would change our neighborhood, significantly. Everything proposed should be readdressed and amended and it should stay Rural.

321.1

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

Submission date: 10 March 2023

Attend a hearing

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

Declaration

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

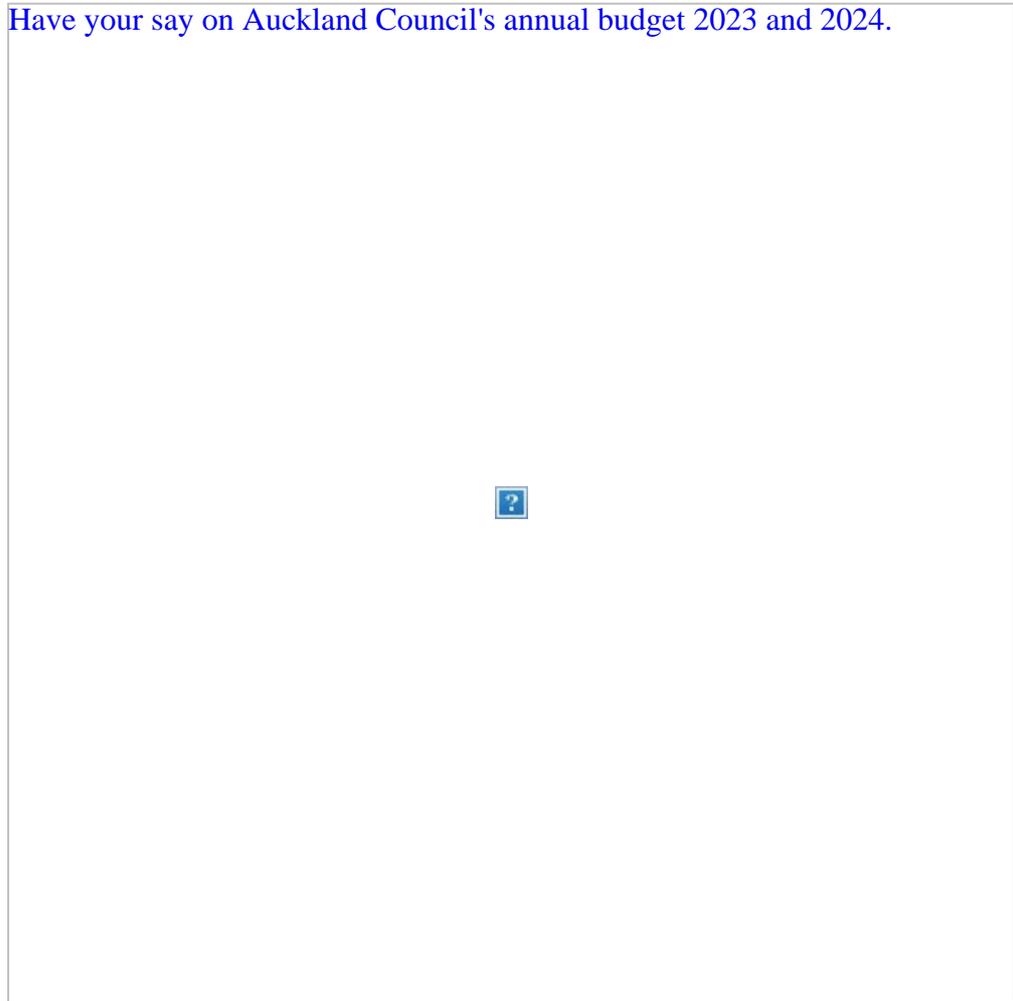
Are you directly affected by an effect of the subject matter of this submission that:

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

Yes

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

[Have your say on Auckland Council's annual budget 2023 and 2024.](#)



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I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes No

The reasons for my views are: roadings - at present the roadings needs upgrading. Schooling - Population increase daily. Crime Rate - we need permanent station. One of my big concerns is the amount of parks etc for children

(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 would like to say we have lived in Beachlands since 1975 + have seen a lot of change. We do not agast progress as long as it is to help the community + not make it into a overdeveloped suburb.

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 S Miller Date 9-3-23
(or person authorised to sign on behalf of submitter)

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

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

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

I could / could not gain an advantage in trade competition through this submission.
If you could gain an advantage in trade competition through this submission please complete the following:
I am / am not directly affected by an effect of the subject matter of the submission that:
(a) adversely affects the environment; and
(b) does not relate to trade competition or the effects of trade competition.

Submission on a notified proposal for policy statement or plan change or variation
Clause 6 of Schedule 1, Resource Management Act 1991
FORM 5

Auckland Council
Te Kaitiaki o Tamaki Makaurau

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/Ms/Ms/Ms (Full Name) Sandra Miller
Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter
97 Beachlands Road, Beachlands.

Telephone: 021 554 097 Fax/Email: glexansg@hotmail.com
Contact Person: (Name and designation, if applicable)

Scope of submission
This is a submission on the following proposed plan change / variation to an existing plan:
Plan Change/Variation Number PC 88 (Private)
Plan Change/Variation Name Beachlands South

The specific provisions that my submission relates to are:
(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s) Re zoning of 2071sq South of Beachlands Village in the area of Pomona Golf Course from Rural to Future Urban Residential etc.
Or
Property Address
Or
Map
Or
Other (specify)

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

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

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



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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) Nigel Coyle Hannan

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

Nigel Hannan Trust

Address for service of Submitter

758 Whitford-Maraetai Road, Beachlands 2671

Telephone: Fax/Email:

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

Plan Change/Variation Name

The specific provisions that my submission relates to are:

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

Plan provision(s)

Or
Property Address

Or
Map

Or
Other (specify)

Submission

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

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes No

The reasons for my views are:

The requirement for the areas outlined in I.7.6(3) to be protected and maintained by a covenant on the record of title for each site within the precinct, and the obligations that these covenants will place on future property owners, as outlined in I.7.6(5) and I.7.6(6), constitute an excessive hurdle and negatively impact the current property owners' ability to develop and subdivide their land.

323.1

(continue on a separate sheet if necessary)

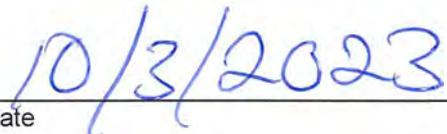
I seek the following decision by Council:

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

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



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



 Date

Notes to person making submission:

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

State
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:

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

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



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

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Ms/Miss/Mo (Full Name)

CHARLES JAMES PEAKE

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

Address for service of Submitter

5 HAWKE CRESCENT BEACHLANDS

Telephone:

0277106065

Fax/Email:

marypeake@xttra.co.nz

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 88 (Private)

Plan Change/Variation Name

Beachlands South ✓

The specific provisions that my submission relates to are:

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

Plan provision(s)

Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Or

Property Address

Or

Map

Or

Other (specify)

Just, inadequate transport planning and contributions.

Submission

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

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes No

The reasons for my views are:

Inadequate transport facilities for Beachlands and district. 324.1

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

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

1 Four lane highway from Beachlands to the top of ORMISTON Road and beyond.

2 Ferries to be bigger and better so the contribution needs to double

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

EMAIL: marypeake@xtra.co.nz

M.J. Peake

27.2.23

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

Date

Notes to person making submission:

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

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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:

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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)

CAROL MARGARET OVER

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

Address for service of Submitter

5 CRAIG RD MARGARET 2018

Telephone:

09 5791812

Fax/Email:

carol.over20@gmail.com

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 88 (Private)

Plan Change/Variation Name

Beachlands South

The specific provisions that my submission relates to are:

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

Plan provision(s)

Rezoning of 307Ha South of Beachlands Village in the area of Farnosa Golf Course from Rural to future Urban Residential etc

Or

Property Address

Or

Map

Or

Other (specify)

Submission

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

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes No

The reasons for my views are:

SEE ATTACHED

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

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

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

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

10/3/2023

Date

Notes to person making submission:

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

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

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

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

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

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

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

PLAN CHANGE PC 88 SUBMISSION --BEACHLANDS SOUTH

The proposed development is not in compliant with the Auckland Unitary Plan, it exceeds the density permitted in the plan, plus the application fails to satisfactorily address many of the implications associated with a huge increase in population of a fragile coastal environment, where local infrastructure is already struggling to cope.

325.1

For example the Roading infrastructure - The vast majority of those living in our community are reliant on Whitford-Maraetai Road for access to the greater Auckland area and, any substantial increase in congestion on a road not designed or built to cope with the traffic levels it currently experiences, is of a real concern.

There is limited access to public transport, no secondary school (and no absolute guarantee of one) and very few employment opportunities in the area. The Applicant's claims the development will provide 1000 local jobs and thus reduce traffic movement on Whitford-Maraetai Rd is unsubstantiated – the commercial and retail activities they propose could just as easily add further congestion to Whitford-Maraetai Rd., not reduce it.

325.2

Our community is reliant on Whitford-Maraetai Rd to access emergency services at Middlemore Hospital and for emergency vehicles servicing our area, our secondary school pupils rely on it for their education, and a majority of those in employment rely on it to commute to their workplace etc. The list could go on and on. The road is the life-line to our community and if blocked by a traffic incident, our community comes to a standstill, yet the applicant, while referencing a staged approach to upgrading some intersections, has provided no plans whatsoever to improve the road themselves despite this road not being designed to deal with the high volume of traffic it now experiences on a daily basis, let alone the extra traffic generated not only by the 3000 dwellings they propose, but also the extra traffic from the recently approved 227 dwelling development (and a further 24 vacant lots for future development) at 109 Beachlands Rd., plus the proposed 174 lot development in Whitford forest. (Not forgetting the urban zone of 200 lots already approved for Maraetai.)

The Hobsonville development has been used a a model for this development, however Hobsonville is located only 5 minutes away from a motorway. This is not the case in Beachlands.

325.3

The safety and well-being of our community is already being compromised by volume of traffic currently using Whitford- Maraetai Road.

This application should not be a consideration until the infrastructure of the road is ungraded to four lanes.

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 88 - Samuel Edward Shallard
Date: Friday, 10 March 2023 11:31:05 am

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Samuel Edward Shallard

Organisation name:

Agent's full name: Sam Shallard

Email address: samshallard@gmail.com

Contact phone number:

Postal address:
68 Second View Ave
Beachlands
Auckland 2018

Submission details

This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

My submission relates to

Rule or rules:

.

Property address: .

Map or maps: .

Other provisions:

.

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

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

The reason for my or our views are:

On balance I think the developers are doing a great job and it will be a huge success for the our community

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

Details of amendments:

Submission date: 10 March 2023

Attend a hearing

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

326.1

Declaration

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

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

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

No

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

[Have your say on Auckland Council's annual budget 2023 and 2024.](#)



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Waka Kotahi NZ Transport Agency Reference: 2023-0075

Form 5

Submission from Waka Kotahi on Private Plan Change 88: Beachlands South under Schedule 1 of the Resource Management Act 1991

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

Via email: unitaryplan@aucklandcouncil.govt.nz

Name of submitter: Waka Kotahi New Zealand Transport Agency (Waka Kotahi)

This is a submission from Waka Kotahi on a private plan change request from the applicant, Beachlands South Limited Partnership (BSLP), to the Auckland Unitary Plan (Operative in part) under Schedule 1 of the Resource Management Act 1991 (RMA). The plan change seeks to rezone approximately 307 hectares of land south of the Beachlands township from Rural – Countryside Living zone to a mix of Future Urban, Residential – Mixed Housing Urban, Business - Local Centre, Business – Light Industry; Business – Mixed Use; and Open Space zone.

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

1. Waka Kotahi role and responsibilities

Waka Kotahi is a Crown Entity established by Section 93 of the Land Transport Management Act 2003 (LTMA). The objective of Waka Kotahi is to undertake its functions in a way that contributes to an effective, efficient, and safe land transport system in the public interest. Waka Kotahi roles and responsibilities include:

- Managing the state highway system, including planning, funding, designing, supervising, constructing, maintaining and operating the system.
- Managing funding of the land transport system, including auditing the performance of organisations receiving land transport funding.
- Managing regulatory requirements for transport on land and incidents involving transport on land.
- Issuing guidelines for and monitoring the development of regional land transport plans.

Waka Kotahi interest in this plan change stems from its role as:

- A transport investor to maximise effective, efficient and strategic returns for New Zealand.
- A planner of the land transport network to integrate one effective and resilient network for customers.
- Provider of access to and use of the land transport system to shape smart efficient, safe and responsible transport choices.

Waka Kotahi supports planned development in appropriate areas and considers that this should occur in a manner which does not compromise the effectiveness, efficiency, resilience and safety of the transport network. Therefore, Waka Kotahi seeks to participate in these proceedings to ensure that the nature of the development does not adversely affect the transport network and ensures good environmental outcomes.

In this case, the land is not identified for development in any strategic document and the region has adequate capacity for housing growth which will be further enhanced through the introduction of Medium Density Residential Standards.

2. Government Policy Statement on Land Transport

Waka Kotahi also has a role in giving effect to the Government Policy Statement on Land Transport (GPS). The GPS is required under the LTMA and outlines the Government's strategy to guide land transport investment over the next 10 years. The four strategic priorities of the GPS 2021 are safety, better travel options, climate change and improving freight connections. A key theme of the GPS is integrating land use, transport planning and delivery. Land use planning has a significant impact on transport policy, infrastructure and services provision, and vice versa. Once development has happened, it has a long-term impact on transport. Changes in land use can affect the demand for travel, creating both pressures and opportunities for investment in transport infrastructure and services, or for demand management.

The proposed residential development enabled by the plan change would inevitably be private vehicle based given its distance from strategic public transport corridors. This would increase vehicle kilometres travelled, particularly by long distance commuters thereby leading to increased emissions.

Waka Kotahi gives effect to the GPS through a number of strategic plans including:

- Arataki - our ten-year view of the step changes and actions needed to deliver on the government's current priorities and long-term outcomes for the land transport system;
- Toitū Te Taiao - Our Sustainability Action Plan. This notes two big challenges around reducing greenhouse gases and improving public health;
- Keeping Cities Moving - our national mode shift plan based around shaping urban form, making shared and active modes more attractive and influencing travel demand and transport choices.

The proposed development by virtue of its car-centric nature, does not align with these strategic plans and consequently the strategic direction of the GPS which Waka Kotahi must give effect to.

3. Emissions Reduction Plan

The Emission Reduction Plan was finalised in May 2022 and contains wide ranging actions/outcomes for multiple sectors. The transport sector has a significant role to play as the plan calls for a 41% reduction in emissions from the transport sector by 2035 (from 2019 levels). The transport section of the ERP includes the following focus areas:

1. Reduce reliance on cars and support people to walk, cycle and use public transport
2. Rapidly adopt low-emissions vehicles
3. Begin work now to decarbonise heavy transport and freight.

There is limited employment, education, retailing and social service opportunities currently available in Beachlands and Maraetai. The closest nearest major centre is Botany, which is approximately 15km away. Together with the dispersed nature of the travel to work destinations, further residential growth in Beachlands,

regardless of an increase in on-site services, is still anticipated to contribute to increasing light vehicle VKT in Auckland.

Furthermore, the Section 32 Assessment Report refers to the proposal as 'transit adjacent development' (TAD). Waka Kotahi understands that TADs typically consist "of development near a public transport station or stop that does not prioritise the station as a point of focus, instead allowing car access to dominate the needs of pedestrians, cyclists and public transport users¹."

Waka Kotahi is unable to support a proposal that is designed in such a way and in such a location that it will remain car-dominated and car-reliant for the foreseeable future given the focus of the ERP.

4. Statutory Planning Documents

The proposal would not give effect to relevant statutory documents such as the National Policy Statement on Urban Development Capacity (NPS-UD) and the Auckland Regional Policy Statement (RPS). The proposal is inconsistent with the NPS-UD as it would not contribute to a well-functioning urban environment as it does not have good accessibility by public or active transport, and it would not support reductions in greenhouse gases.

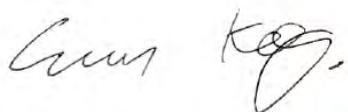
In terms of the RPS, as the proposal represents an unplanned expansion of the urban area it would not give effect to a number of RPS provisions including (but not limited to) B2.2 (urban growth and form), B2.3 (a quality-built environment) and B2.6 (rural and coastal villages and plans).

5. Decision sought

Waka Kotahi opposes the zoning sought by the plan change to the extent outlined in this submission and in Attachment 1 below, and requests that it be declined. The proposed plan change is not aligned with the strategic direction, growth plans or investment plans developed by Council or Central Government. If Council is of mind to progress the plan change, the triggers and related provisions need substantial work to align with the statements and assumptions in the Integrated Transport Assessment (ITA).

6. Hearings

Waka Kotahi wishes to be heard in support of its submission. If others make a similar submission, Waka Kotahi will consider presenting a joint case with them at a hearing. Waka Kotahi is willing to work with the Council and/or the applicant in advance of a hearing.



Evan Keating
Principal Planner – Poutiaki Taiao / Environmental Planning
System Design, Transport Services
Pursuant to an authority delegated by Waka Kotahi NZ Transport Agency

Date: 10 March 2023

¹ https://planning.org.nz/Attachment?Action=Download&Attachment_id=5359

Address for service: Waka Kotahi NZ Transport Agency'
PO Box 973
Waikato Mail Centre
Hamilton 3240

Contact Person: Emily Hunt
Telephone Number: +64 7 958 7884
E-mail: Emily.Hunt@nzta.govt.nz
Alternate Email: EnvironmentalPlanning@nzta.govt.nz

Attachment 1 – Waka Kotahi Submission points on Auckland Unitary Plan, Proposed Private Plan Change 88 (Private) – Beachlands South

Point #	Issue	Support / Oppose	Reason for comment	Decision requested
1	Alignment of the entirety of Plan Change 88 with strategic direction.	Oppose	<p>Waka Kotahi opposes Proposed Private Plan Change 88 in its entirety for the following reasons:</p> <ul style="list-style-type: none"> • Within the Auckland Plan Development Strategy (Tā mātou rautaki whakawhanake) the Beachlands-Maraetai area is not anticipated to experience much further growth once the existing area is built out. Further growth is expected to occur in the existing urban area, with the remaining growth occurring in greenfield areas within the Rural Urban Boundary. The remaining approximately 6% of growth (~24,500 dwellings), is expected to occur in rural areas. These rural areas include the satellite towns of Warkworth and Pukekohe, smaller rural settlements, rural lifestyle living, and the remaining 'traditional' rural area. <p>Approximately 60% of the growth in rural areas (14,800 dwellings) is expected to be in the two main satellite towns of Warkworth and Pukekohe. Growth is focused on these towns given their already well-established levels of commercial and community services and, in the case of Pukekohe, it's level of public transport service and connectivity via the Auckland rail network.</p> <p>Projects are underway and/or identified in long-term plans such as the Auckland Transport Alignment Project and the Auckland Future Urban Land Supply Strategy for these towns to be supported by significant infrastructure improvements.</p>	Waka Kotahi seeks that the plan change be declined on the basis that it does not align with the strategic plans.

327.1

			<p>As such, there are no plans for transport investment to support growth in the Beachlands area. Development of the proposed plan change area would effectively undermine the growth of established centres which are being supported by high levels of investment and infrastructure, including high quality transport links to jobs and services in urban Auckland.</p> <ul style="list-style-type: none"> • The Auckland Unitary Plan already enables adequate capacity for housing growth across Auckland’s urban area which will be further enhanced through the introduction of Medium Density Residential Standards through plan change 78 (PC78). • The proposed development of this site is inconsistent with the National Policy Statement for Urban Development (NPS UD) as it will not provide a well-functioning urban environment, nor support a reduction in greenhouse gas emissions and does not provide an integrated approach to land use and infrastructure planning. • The proposed private plan change does not align with the objectives and policies of the RPS that require an integrated and inclusive transport system that is planned, funded and staged to integrate urban growth. 	
2	Integrated Transport Assessment – Modelling and travel patterns	Oppose	<p>Waka Kotahi do not agree with the assumptions used in the ITA such as the level of development proposed and the trip rates which rely on the internalisation of trips.</p> <p>Many of the assumptions around future public transport use which feed into the traffic numbers have not been justified and are not tied to any public transport related triggers.</p>	<p>Waka Kotahi seeks that the plan change be declined on the basis that there is insufficient information to quantify the transport effects of the proposed development.</p>

327.2

			<p>The ITA is very focused on trips for work and employment relying extensively on census data. Yet this is only about 1/4 - 1/3 of daily household trips (Household Travel Survey, Auckland report prepared for MoT). No information is supplied about other trips. These trips, their VKT impact, and their possible impact on interpeak and weekend congestion have not been accounted for.</p> <p>The ITA (and the plan change as a whole) do not explain how the 'yield' of the proposed plan change has been calculated. This is fundamental input to any transport assessment and needs to be clearly outlined with assumptions and uncertainties identified.</p> <p>Until these assumptions are amended and tested, the modelling results cannot be relied on.</p>	
3	Integrated Transport Assessment - Public Transport (Bus Services)	Oppose	<p>Waka Kotahi does not agree with the assumptions used in the ITA relating to the proportion of trips using public transport and the potential for increased frequency of public transport services. Waka Kotahi also notes that applicant has not incorporated public transport or associated infrastructure upgrade progression in the proposed development staging table.</p> <ul style="list-style-type: none"> • The ITA states "In general, the bus services are very limited in this area and the infrequent service (once hourly) is likely to discourage new users", however also assumes that by 2024 bus mode share has doubled. No justification is given for this assumption. • The ITA states that "In response to greater residential catchment, it is appropriate to assume that Auckland Transport will increase the bus frequency during both peak and off-peak periods to/from Auckland City". This lacks justification particularly given Auckland Council's current funding constraints. Even if this were to occur, it may be that such services are diverted away from other existing areas or not able to be provided until the area has seen significant development. 	Waka Kotahi seeks that the plan change be declined on the basis that the assumptions relating to public transport use lack justification.

327.3

			<ul style="list-style-type: none"> Waka Kotahi notes that pre-pandemic the 739 bus which services the subject area was operating towards the lower end of the current RPTP 'target' patronage range. It is unknown if Auckland Transport will have an appetite to increase services until patronage at least doubles, especially given the route is lengthy and substantially improving frequency would therefore be costly. Furthermore, the further doubling of bus mode share to 4% by 2038 is unsupported by any evidence in the ITA. Figure 24 of the ITA mentions 'feeder bus services' beginning from 2023/24 and Table 17 of the ITA mentions a 'shuttle service'. These services are not elaborated on further in the ITA. Furthermore, Page 42 of the ITA uses the justification of 'good feeder services' for greater than population growth levels of patronage growth. The trigger for these services is not provided for in the ITA. There is uncertainty in the proposed route of future bus services within the development in that: <ol style="list-style-type: none"> The plan change movement plan doesn't show the bus route connecting to the ferry service and; The bus route is shown running along the main road through the site. This road runs through the proposed future urban zoned land which presents questions around sequencing and if the entire road would have to be in place for the bus service to connect into the development. 	
4	Integrated Transport Assessment - Ferry Services	Oppose	<p>Waka Kotahi does not support the justification that a ferry service will support higher density development in Beachlands.</p> <p>While it is positive to see the support for the ferry service, given most trips from the development would be to locations elsewhere in Auckland (i.e., not the CBD) this is likely to have a minimal impact on mode shift and reducing VKT.</p>	<p>Waka Kotahi seeks that the plan change be declined on the basis there is uncertainty that the proposed addition of ferry capacity which the ITA relies on will occur.</p>

327.4

			<p>Given the single boat operation, the weekend ferry services are proposed to run every 1.40 hours. This is a low level of frequency and is unlikely to achieve more than a minimal level of mode shift. It is also not required by the triggers in the plan change which provides uncertainty that it is a viable mode shift solution.</p> <p>Furthermore, the triggers don't require any level of interpeak or outside peak service, despite the ITA discussing the benefits of improving these and the focus of the proposal on integrating with a high-quality ferry service.</p> <p>It is further noted that the terminal is in a private marina which provides limited scope to expand the ferry terminal. No evidence has been provided to demonstrate that an eventual fleet of 200 seat boats could practically enter the marina. Given that the current 99-seat boat cannot always carry all their passengers and need to leave some behind for the next sailing, Waka Kotahi question whether the current site and facilities are fit for purpose, especially given there is proposed to be a 275% uplift in passenger numbers.</p>	
5	Integrated Transport Assessment - Active Modes	Oppose	<p>Waka Kotahi has concerns that this plan change does not demonstrate connectivity beyond the site for active modes.</p> <p>The site is relatively isolated from the surrounding urban areas with hostile roads for active modes and long walking distances. Aside from recreational walking which is generally on paths and tracks and will be within the vicinity of the development, the only active mode trips external to the site are likely to be to/from the ferry terminal.</p> <p>The ITA has not identified high quality pedestrian and cycling links across Jack Lachlan Drive to the existing Beachlands area nor have intersections been proposed to be upgraded along this route.</p>	<p>Waka Kotahi seeks that the plan change be declined as the location does not adequately provide for active mode connectivity to surrounding urban areas.</p> <p>If the plan change is to progress, Waka Kotahi seek that the plan is amended to include specific planning provisions (including objectives, policies and rules) to require subdivision and development to provide active mode connections to adjacent sites and ensure intersections are designed to prioritise vulnerable road users.</p>

327.5

327.6

			<p>Furthermore, there is a lack of improvements to cycle connections into and through the recent neighbouring development to connect to residential and commercial destinations in these areas. While they are outside the site, they are likely fundamental to this development connecting in a sustainable manner to the rest of the community.</p> <p>Whitford-Maraetai Road doesn't have any pedestrian or cycling uses identified on it in the movement plan yet could be a main active transport link to the commercial area in the northeast corner.</p> <p>Most of the intersection plans included in the ITA appear unsafe for pedestrians and cyclists. If the plan change was to progress these intersections should be designed prioritising vulnerable road users.</p>	
6	Integrated Transport Assessment – Road Upgrades	Oppose	<p>The ITA (page 41) states that “There is currently no allocated funding for the upgrade of either Whitford-Maraetai Road to four lanes or the construction of the new Whitford Road bypass. However, it is anticipated that in three decades (2051) government funding would have been allocated for these improvements.”</p> <p>There is no justification provided for this assumption. Given minimal growth is anticipated in Beachlands there is no evidence the upgrade of Whitford-Maraetai Rd would be prioritised unless unanticipated growth was to occur there, noting it is not identified in the Auckland Transport Alignment Project (ATAP)² .</p> <p>While it is recognised that the Whitford-Maraetai Rd corridor is not Waka Kotahi infrastructure, Waka Kotahi has an interest as a co-funder of the local network. If this were to be funded, it would divert funds from other projects which may have a higher priority.</p>	Waka Kotahi seeks that the plan change be declined as it would require substantial additional infrastructure which is not currently required or funded.

327.7

² ATAP Recommended Strategic Approach report 2016


			<p>Waka Kotahi consider that this development is creating a need for infrastructure that is not planned for and otherwise wouldn't be required, and that four laning would further enable development. If Council were of the mind to progress the plan change, Waka Kotahi would want consideration and funding for this to be undertaken upfront and not deferred until the Future Urban Zone is live as the proposed live-zoned land also contributes to this need.</p>	
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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 88 - AR and Ca Astell
Date: Friday, 10 March 2023 12:01:00 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: AR and Ca Astell

Organisation name:

Agent's full name: Anthony Richard and Celia Amy Astell

Email address: tcastell@xtra.co.nz

Contact phone number:

Postal address:
5 Intrepid Crescent
Beachlands
Auckland 2018

Submission details

This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

My submission relates to

Rule or rules:
PC 88 (Private): Beachlands South

Property address: This includes the properties at 110 Jack Lachlan Drive; and 620, 680, 682, 702, 712, 722, 732, 740, 746, 758 and 770 Whitford-Maraetai Road, Beachlands.

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

The plan change does not take include any provisions to upgrade the Whitford Maraetai Road which is currently at near capacity. The plan change will double the population in Beachlands and assumes people living in the area and moving into the area will use public transport and the existing pine harbour ferry with no provisions for extending the ferry service which the developers have no control over. The majority of workers do not work in the central city, so the ferry is not an option for them. There is nowhere near enough public transport to accommodate these people to other parts of the extensive city of Auckland areas nor will there ever be. At present, the available buses only commute every hour and can carry a maximum 53 passengers. We already have 14 school buses clogging up the roads twice daily during the week. The developer wants to create a modal shift to public transport, but we currently have only one bus an hour, which goes to botany, to travel to Howick in peak times would take 1 hour 30 min or 20 minutes by private car. Most residents travel by car as the public transport is not fit for purpose for the diverse areas residents travel to for

328.1

work/school/shopping and this is not addressed.

There is not enough provision for parking in the new development, the developer makes assumptions that public transport will be used but currently 75% of residents use a car to transport themselves out of the area to work and school and only a small amount use the hourly bus service or ferry. The ferry car parking is currently at full capacity and there is nowhere to extend it, the developer suggest a shuttle bus but has not offered who will provide this and does not offer parking facilities close to the ferry for its own homeowner or the rest of residents in the area. The developer proposes high intensity housing/apartments close to the ferry (high frequency public transport) which is currently at capacity, and this in turn creates more pressure on the existing transport, and less opportunities for street parking by ferry users as the apartment dwellers will have limited off street parking, which will create traffic safety issues for all residents as they negotiate the narrow streets surrounding the Pine harbour marina. The main arterial road into Beachlands is at near capacity already and upgrades have been neglected. The area is completely isolated if the road is blocked by an accident or major weather event and the only other road into the area is a deteriorating coastal road which was blocked by a slip in the last major weather event and Maraetai beach road is often flooded - the developer is relying on AT to upgrade the roads and this must be completed before we allow any further development - there is currently hundreds of new homes being built on Beachlands Road in a development which will add hundreds of cars to this existing road with no potential upgrades planned. The local board itself had concerns about the traffic generated by the new plan changes. Howick local board is opposed to the development due to the inflow of traffic into their area. The developer suggests the existing Pine harbour ferry service supports higher intensity development but does not offer proof of this when over 75% of residents use the road to travel. Who is upgrading the ferry - it is privately owned land?

328.2

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

Submission date: 10 March 2023

Attend a hearing

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

Declaration

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

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

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

Yes

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

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 88 - Tracey Bothwell
Date: Friday, 10 March 2023 12:01:01 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Tracey Bothwell

Organisation name:

Agent's full name:

Email address: tbothwell22@gmail.com

Contact phone number:

Postal address:
14 Te Makuru Lane
Maraetai
Auckland 2018

Submission details

This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

My submission relates to

Rule or rules:
Rezoning of 307Ha south of Beachlands Village in the area of Formosa Golf Course from rural to future urban residential.

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

The impact of urban residential housing (3000 dwellings) to the area of Beachlands will impact the local area in a negative way due to the lack of infrastructure.

Local transport routes (Maraetai to Howick, Brookby to Howick, Ormiston to Maraetai) to schooling (no high school in the local area), work and tourism/visiting friend/family is already at very high volume with the current population. This development will have a sufficient impact on our local roads and ability to travel in a timely and safe manner. Concerns on the Ferry service from Pine Harbour to Auckland CBD, with major changes and investment this service will not been able to serve the additional population.

329.1

Concerns on the environmental and human impact of coastal housing of this type in a significant weather event.

329.2

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

Submission date: 10 March 2023

Attend a hearing

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

Declaration

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

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

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

Yes

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

[Have your say on Auckland Council's annual budget 2023 and 2024.](#)



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10 March 2023

File ref: AUP PPC 88

Planning Technician
Auckland Council
Private Bag 92300
Auckland 1142

unitaryplan@aucklandcouncil.govt.nz

Dear Sir/Madam

**SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA TO PROPOSED PLAN CHANGE 88
(PRIVATE): BEACHLANDS SOUTH**

To: Auckland Council

Name of submitter: Heritage New Zealand Pouhere Taonga

1. **This is a submission on the following proposed change to the Auckland Unitary Plan (Operative in Part) (the proposal):**
2. Proposed Private Plan Change 88, from the Beachlands South Limited Partnership (BSLP), to rezone approximately 307 hectares of land south of the Beachlands township. Specifically, the request seeks to change the Auckland Unitary Plan (AUP) as follows:
 - rezone the land from Rural – Countryside Living zone to a mix of Future Urban, Residential – Mixed Housing Urban, Business - Local Centre, Business – Light Industry; Business – Mixed Use; and Open Space zones.
 - introduce a new precinct to replace the existing Whitford precinct (and sub-precinct) provisions.
 - extend the Stormwater Management Area Flow 1 control over the plan change area.
3. **Heritage New Zealand could not gain an advantage in trade competition through this submission.**
4. Heritage New Zealand Pouhere Taonga (HNZPT) is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) for the identification, protection, preservation, and conservation of New Zealand’s historical and cultural heritage. Heritage New Zealand is New Zealand’s lead agency for heritage protection.
5. **The specific provisions of the proposal that Heritage New Zealand’s submission relates to are:**
6. Please refer to Attachment 1.
7. **Heritage New Zealand’s submission is:**
8. Historic heritage is a matter of national importance under Section 6(f) of the Resource Management Act 1991 (the RMA). The definition of historic heritage under Part 2 of the RMA includes



archaeology. Therefore, effects on archaeological sites must be taken into account by council when assessing Proposed Private Plan Change 88 (PC88).

9. HNZPT does not object to the purpose of PC88 for urban development within the Beachlands South Precinct; acknowledging that the urbanisation of the Beachlands South area aligns with the Auckland Regional Policy Statement (RPS).
10. HNZPT's submission relates to the inadequate assessment of effects on historic heritage for the Beachlands South Precinct.

Identification of historic and cultural heritage and archaeology

11. HNZPT is supportive of the direction of PC88 in the "Identification, recognition, protection, and enhancement of Mana Whenua cultural values associated with the site and locality" (section 10.2, page 134, PPC88 request document). However, HNZPT considers that the proposed planning provisions do not sufficiently address the identification and protection of wider heritage values, negating responsibilities under s.6(f) of the RMA.
12. HNZPT acknowledges the following reports that support PC88:
 - Appendix 27 - Archaeological Assessment of Beachlands South Structure Plan and Private Plan Change, March 2022 by Clough and Associates Limited and Attachment 11 – Policy B5.2.2-Historic Heritage Assessment by Clough and Associates Limited, June 2022.
 - Appendix 28 – Tapuwae Ohiti I Kahawairahi (Cultural Values Assessment) by Ngai Tai Ki Tamaki, March 2022.
13. HNZPT notes that the structure planning assessment states there are no historic heritage values within the extent of PC88.¹ HNZPT questions however, how this conclusion is reached when a full heritage impact assessment identifying the historic heritage landscape of the plan change area has not been undertaken. The accompanying 2022 Archaeological Assessment focuses only on the potential effects of the project on archaeological values and the significance of those effects and recommendations for their management (Clough et al March 2022 page 1).
14. HNZPT notes that Auckland Council's Heritage Unit requested further information regarding historic heritage to identify how any adverse effects on any potential significant historic heritage place/s identified within the proposed plan change area will be managed in accordance with Chapter B Regional policy statement, B5-Nga rawa tuku iho me te ahua – Historic heritage and special character. They also sought an historic heritage assessment that addressed the full plan change area and the actual or potential effects of all forms of development.
15. We do not consider the response to the request contained in Attachment 11 comprehensively addresses identification of known historic heritage or the potential for historic heritage to exist within the plan change area.
16. HNZPT also considers that while, the applicant's response to Council's request (PC88-Beachlands South PPC Clause 23 Response 05-08-2022) identifies buildings at 740 and 678 Whitford Maraetai Road as having potential heritage values associated with the historic farmscape, no assessment of

¹ section 8.1 of the Application Request concludes Issue 3 – Built/Historic Heritage and character of the RPS was "not considered to be relevant as there are no built/historic heritage or character items/areas identified within the PPC area" (page 44)



these buildings or their wider landscape context in which they are located and or associated has been undertaken.

17. The applicant states that as 740 and 678 Whitford Maraetai Road are within the area to be rezoned Future Urban any historic heritage within these properties is unlikely to be affected because of the proposed Plan Change. HNZPT considers that a decision cannot be made without first fully identifying, assessing, and understanding all of the Precinct's historic heritage values.
18. The plan change presently identifies and provides protection of cultural sites of value to Māori within the proposed Future Urban zone. Accordingly, HNZPT considers the same approach should be given to the wider historic heritage in the Precinct through this plan change process. Again, undertaking a Precinct wide heritage assessment ensures appropriate provisions are in place to provide for the Beachlands South Precinct from its adoption for the long-term management and protection of the area's heritage values.
19. Figure 1, Attachment 11– Policy B5.2.2 Historic Heritage Assessment identifies geotechnical testing locations in relation to the recorded archaeological sites. HNZPT notes in H8 of August 2022 the clause 23 response, that those geotechnical works identify archaeological material. In particular, recorded site R11/2523 as being larger than that identified in the initial site record; and a potential new site in the vicinity of R11/2527 which would appear to be outside of the EPAN. None of the sites shown in Figure 1, Attachment 11, page 4 in relation to these and other recorded archaeological sites in the vicinity show their site extents, or buffers to inform future management promoting avoidance and minimising of effects. No additional identification or assessment of these sites appears to have been undertaken as part of the archaeological assessment.
20. Accordingly, an integrated heritage impact assessment of the entire Beachlands South Precinct, including archaeological extents and historic heritage (such as the historic built heritage environment, historic farmscapes and site R11/1444 possible gum digging pit) is required to inform appropriate long-term management and protection of historic heritage values within the plan change area.

Precinct Plan 4 - Cultural Landscapes

21. HNZPT notes that the applicant has engaged with all ten mana whenua groups who have an associated registered interest in this area: the preparation of Tapuwae Ohiti i Kahawairahi - Cultural Values Assessment (CVA) from Ngāi Tai ki Tāmaki; as well as the on-going dialogue the applicant has with Ngāi Tai ki Tāmaki in respect of the development of the Beachlands South Precinct.
22. HNZPT acknowledges that this collaboration has afforded special recognition of the recorded historic Pā site (R11/1619), key views, and spiritual connections of significance to Ngāi Tai ki Tāmaki.² These sites being identified in the proposed Precinct Plan 4 - Cultural Landscape Plan.
23. HNZPT is supportive of Objectives I.3(5) and I.3(6), and policy I.4(5) recognising the cultural values (spiritual connections, views, archaeological sites) as identified on the Cultural Landscape Plan (Precinct Plan 4). However, we are concerned with how the information in the Precinct Plan 4 will be applied in practice when the information is stated to be indicative, and only the historic Pa

² “..provides recognitions of key ancestors, the connection of significance to Ngai Tai which ensure hononga to ancestors, the connection and leadership, and whakapapa are all preserved to honour the special significance of this cultural history.”
Application request, para 9.4 page 104



(R11/1619) has been afforded statutory protection through standard I.7.10 Mana Whenua (Appendix 3 – Beachlands South Precinct Provisions, page 24).

24. While HNZPT is supportive of the Precinct Plan 4 - Cultural Landscape Plan, in its present form it does not provide necessary information to ensure the avoidance and long-term protection of the heritage values being identified; provide the extents of the sites identified. Plus, in our view, the plan should be expanded to identify and address wider historic heritage values; or there should be an accompanying Historic Heritage Landscape Plan to identify and address the Precinct's wider historic heritage values.

Pa (R11/1619) - Site and Place of Significance to Mana Whenua

25. HNZPT, while supportive of the recognition of the significant Pa (R11/1619), does not support the proposed planning framework under PC88 as being sufficient to provide long term heritage protection of the site.
26. However, HNZPT considers the assessment of historic heritage significance of the archaeological sites in the project area based on the criteria in the AUP (Chapter B5.2.2) (Clough et al, March 2022: takes a somewhat reductionist view of Pa site R11/1619 and associated sites in that it considers the historical and social value of the Pa and other Māori sites as little to moderate, whereas Ngāi tai Ki Tamaki identify these values as considerable/outstanding.
27. Ngāi Tai ki Tāmaki state in the CVA of the Pa's significance to them, along with the surrounding land in which visible history (defensive ditch) and cultural connection with the Pa. HNZPT notes on page 19 of the CVA that Ngāi Tai ki Tāmaki accept the proposed planning framework set out in PC88 as acceptable. Clough and Associates recommend that the Pa site and associated sites in close proximity should be protected (2022 archaeological assessment, page ii).
28. HNZPT however, considers there is a disjoint between the CVA and the archaeological assessment and the proposed planning framework of PC88. Both the CVA and the archaeological assessment state the Pa and associated sites are of high significance (both cultural values and historic heritage values), however, this is not reflected in the proposed planning framework.
29. Ngāi Tai ki Tāmaki have clearly identified the Pa has high cultural significance to them as, amongst other values, a visible landmark within the Beachlands landscape associated with occupation by Māori. While Clough states the Pa as of "considerable/high values in terms of its [archaeological] information potential and rarity in the local context" as well as having considerable values in terms of the knowledge criterion (2022 archaeological assessment, page 62-63). The Knowledge criteria alone, associated with archaeological information potential, having been assessed as considerable therefore meets the criteria set out in B5.2.2.(3) for a place with historic heritage value to be included in Schedule 14.1 Schedule of Historic Heritage, and B6.5.2(3) to be considered for inclusion as significant to Mana Whenua in Schedule 12 Sites and Places of Significance to Mana Whenua Schedule.
30. As a site of heritage significance HNZPT consider the Pa should be a scheduled site and identified as an overlay in the AUP (D21 Sites and Places of Significance to Mana Whenua Overlay and D17 Historic Heritage Overlay/ Schedule 14.1 Schedule of Historic Heritage).



31. HNZPT does not support the opinion of the applicant that the proposed precinct provisions under PC88 provide 'sufficient or equivalent protection' as if the Pa were scheduled as a site and place of significance to Mana Whenua (H4 & H5, PC88-Beachlands South PPC Clause 23 Response 05-08-2022). While it is acknowledged that activity status for the proposed provisions would be the same, HNZPT considers that the policy framework set out in D21 provides the appropriate protection when assessing the potential for adverse effects on mana whenua values by buildings, development, or subdivision was proposed within the extent of the Pa.

32. **The reasons for Heritage New Zealand's position are as follows:**

- HNZPT does not support how the PPC88 proposes to manage historic heritage of the site, via the use of the existing accidental discovery rules in the AUP. When plans and consents are already in place and the ability to avoid and or minimise effects is limited.
- PC88 focuses on known archaeological and cultural landscape only. There are no provisions proposed to appropriately avoid, remedy, or mitigate effects on the Beachlands South Precinct's historic heritage, including archaeology.
- A historic heritage impact assessment identifying the range of historic heritage of the entire plan change area is required to determine the wider heritage significance and therefore ensure appropriate protection is applied.
- Stronger protection mechanisms should be applied for the protection of the Pa (R11/1619)
- Precinct Plan 4 – Cultural Landscape features, other than the Pa (R11/1619) areas not linked to provisions to ensure protection.
- Precinct Plan 4 – Cultural Landscape should be accompanied by Historic Heritage Landscape plan.

33. **Heritage New Zealand seeks the following decision from the local authority:**

Accept proposed Plan Change 88 (Private) – Beachlands South, with amendments as outlined in Attachment 1 to this submission.

34. **Heritage New Zealand wishes to be heard in support of our submission.**

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

Yours sincerely

BHParslow

pp for Sherry Reynolds
Director Northern Region



HERITAGE NEW ZEALAND
POUHERE TAONGA

Address for service: Alice Morris
amorris@heritage.org.nz
PO Box 105 291
Auckland City 1143



Attachment 1:

Heritage New Zealand Pouhere Taonga Submission Table to PC88 (Private) -Beachlands South					
Sub point	PC88 Proposed Plan Provision	Support or Oppose	Reason for Submission	Relief Sought	
I.1 Beachlands South Precinct					
1	I.1 Beachlands South Precinct	Oppose	The wider historic heritage of the Beachlands South Precinct has not been fully considered to address the impacts and protection requirements of historic heritage from inappropriate use, development, and subdivision.	The preparation of a Heritage Impact Assessment, addressing built, cultural, and archaeological heritage to inform the final planning provisions for the Beachlands South Precinct.	330.1
2	I.2. Precinct Description	Oppose	The description of the Precinct's wider historic heritage landscape (historic heritage, cultural and archaeology), in addition to the existing description of the Mana Whenua Cultural Landscape, is required to provide for the wider heritage context of the Precinct.	The addition of a Precinct Description of the Historic Heritage Landscape incorporating the findings from the Heritage Impact Assessment.	330.2
3	I.2. Precinct Description	Oppose	Historic Heritage, Cultural and Archaeological features are not identified through the descriptions of the descriptions of zoning and sub-precincts.	The addition of relevant historic heritage, cultural and archaeological features in the description of the relevant sub-precincts from the findings from the Heritage Impact Assessment and the Cultural Values Assessment.	330.3
4	I.2 Precinct Description – Mana Whenua Cultural Landscape	Support	The statements reflect the direction set through the Cultural Values Assessment.	Retain	330.4
I.3 Objectives (precinct-wide)					
5	I.3 Objectives	Support in part	There are no objectives relating to historic heritage and archaeology.	The addition of appropriate historic heritage and archaeological objective.	330.5



6	1.3(5) Mana Whenua cultural, spiritual, and historical values and their relationship associated with the Māori cultural landscape, including ancestral lands, water, waahi tapu, and other taonga, in the Beachlands South Precinct are identified, recognised, protected, and enhanced	Support	This objective provides the direction for the protection of the cultural landscape of Beachlands South Precinct to ensure mana whenua values are protected and enhanced.	Retain	330.6
7	1.3(6) The tangible and intangible mana whenua values of the pa site identified on Precinct Plan 4 are protected and enhanced.	Support	This objective provides the direction for the protection of the cultural landscape of Beachlands South Precinct to ensure mana whenua values are protected and enhanced.	Retain	330.7
I.4. Policies					
8	I.4. Policies	Oppose	There are no policies relating to historic heritage and archaeology.	The addition of appropriate historic heritage and archaeological policies.	330.8
9	I.4.(5) Mana Whenua	Support	This policy provides guidance on the protection of Mana Whenua's cultural, spiritual, and historic values are protected and enhanced.	Retain	330.9
I.7 Standards					
10	I.7 Standards	Oppose	There are no standards to protect the "key views and spiritual connection" identified on Precinct Plan 4 – Cultural Landscape.	Amend the standards for Sub-precinct A: Marina Point, EPAN and Open Space Network, to address the protection of Historic Heritage, cultural and archaeological features.	330.10
11	I.7.6 Ecological Protected Area Network	Support in part	PC88 documentation implies protection/acknowledgement of the known archaeological sites within the EPAN. However, that narrative has not been carried through into the	Amendment of Rule I.7.6 to address the protection of the archaeological and cultural sites, identified in the Cultural Landscape Plan, which are located within the EPAN extents.	330.11



			proposed planning provisions relating to EPAN.	
12	I.7.10 Mana Whenua	Support in part	<p>The purpose of I.7.10 Mana Whenua, is “to recognise and protect important sites associated with the cultural landscape at Beachlands South.” However, the provisions only relate to the management of effects on the Pa (R11/1619).</p> <p>The rule should manage the inappropriate use, development, and subdivision on all historic heritage.</p>	Amend Rule I.1.7.10 to expand the protection and management of effects on all historic heritage features within the Precinct.
Precinct Plan 4 – Cultural Landscapes				
13	Precinct Plan 4 – Cultural Landscapes	Support in part	The Cultural Landscape provides relative information of known archaeological sites and areas of spiritual significance to Mana Whenua within the Beachlands South Precinct. It does not address any other/wider historic heritage or archaeology that may be present this matter is addressed above (Ref to point 1).	The formation and inclusion of a wider Historic Heritage Landscape Plan to the precinct plans.
14	Precinct Plan 4 – Cultural Landscapes	Support in part	The indicative depiction on Precinct Plan 4 to only serve as a reminder for future planning and development phases of the presence of archaeological sites, that should be avoided as far as practicable does not provide the required level of protection of historic heritage.	Detailed historic heritage plans are provided for each sub-precinct to ensure clarity of the specific cultural elements to be considered when undertaken the development of the sub-precincts.

330.12

330.13

330.14



D21. Sites and Places of Significance to Mana Whenua Overlay				
15	Amend D21. Sites and Places of Significance to Mana Whenua Overlay	support	HNZPT does not support the use of the Precinct Plan 4 and Standard I.7.10 Mana Whenua as the most effective mechanise of protection the identified significant Pa (R11/1619).	Amend D21. Sites and Places of Significance to Mana Whenua Overlay to schedule the Pa (R11/1619) as an overlay. Consequential changes (e.g., statements/mapping) necessary in scheduling the Pa.
Schedule 14.1 Schedule of Historic Heritage				
16	Amend Schedule 14.1 Schedule of Historic Heritage	support	HNZPT does not support the use of the Precinct Plan 4 and Standard I.7.10 Mana Whenua as the most effective mechanise of protection the identified significant Pa (R11/1619).	Amend Schedule 14.1 Schedule of Historic Heritage to schedule the Pa (R11/1619) as an overlay. Consequential changes (e.g., statements/mapping) necessary in scheduling the Pa.

330.15

330.16

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)

WILLIAM JAMES OVER

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

Address for service of Submitter

5 CRAIG RD, MARAETAI

Telephone:

027 2896161

Fax/Email:

billover23@gmail.com

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 88 (Private)

Plan Change/Variation Name

Beachlands South

The specific provisions that my submission relates to are:

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

Plan provision(s)

Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to future Urban Residential etc

Or

Property Address

[Empty box]

Or

Map

[Empty box]

Or

Other (specify)

Submission

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

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes No

The reasons for my views are:

ATTACHED ON SEPARATE SHEET

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

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

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

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

10 - 3 - 23
Date

Notes to person making submission:

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

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

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

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

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

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

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

BEACHLANDS SOUTH ----PC 88 Notified proposal

I oppose aspects of the Beachlands South development particularly because of the lack of infrastructure in relation to Roads, Sewerage disposal, Public Transport and water. There are no definite guaranteed improvements in this application in relation to these subjects only assumptions.

Roading is dangerous now between Maraetai and Whitford/Botany. This must be addressed prior to any new development as the construction traffic (Trucks, Tradies etc) alone would be an enormous added hazard. This road is the only access form Maraetai to Whitford/Botany.

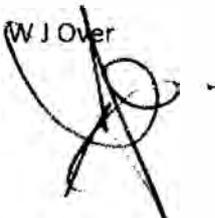
331.1

The statement that 200 seat ferries will solve some problems without any guarantee that wharf construction and changes to the Marina and parking will occur does not solve the roading problem as only a small percentage of the residents work in the city. Most have to get to Manukau ,Mangere, The airport or East Tamaki.

Sewerage disposal needs to be addressed with more certainty as spraying waste over the Farmland is a very short term answer.

It should be noted that Auckland Council in 2019 opposed the Purchase of this site for development due the cost of the infrastructure required. Too many assumptions are in this proposal and it is inconsistent with the Auckland Plan which focuses growth within the rural urban boundary

331.2

W J Over


**Submission on a notified proposal for policy
Statement or plan change or variation
Clause 6 of Schedule 1, Resource Management Act 1991
Form 5**

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

Auckland 1142

By email. unitaryplan@aucklandcouncil.govt.nz

Submitter Details

Mr Matthew Gary Cockram
Address for service of submitter
27 Porterfield Road
Whitford
RD1 Howick
Auckland 2571
Ph. +64 21 907 097
matthew.cockram@cooperandcompany.org

Scope of submission

This is a submission on the proposed **Plan Change PC88** (Private), known as Plan Change 'Beachlands South'

1. My name is Matthew Cockram. I make this submission in my personal capacity.
2. My wife and I through our family trust own the property at 27 Porterfield Road, Whitford, located nearby and to the south of the site of the Beachlands South PPC. We are permanent residents of that property.
3. I hold a practising certificate as barrister and solicitor of the High Court of New Zealand. Until my retirement from Bell Gully in 2005 I practised law in the areas of property development, construction and projects. I am and since 2005 have been Chief Executive Officer of Cooper and Company NZ. In that capacity I am closely involved in complex property development and projects.
4. I express no fundamental objection to the PPC, recognising the legal and technical veracity of the thrust of the arguments made for its adoption in the Proposal.
5. I do wish to submit on areas for further focus, consideration and refinement.

Process

6. The documentation provided with the notification of the PPC is voluminous and technically complex.
7. In my view as a result of: the 'bundling' of the initial, questions and response documentation as well as the need to follow several statutory evaluation models the Proposal taken in its entirety, lacks coherence and understandability. It is simply not possible for a layperson to be able to sensibly assimilate the entire Proposal and comment upon it in detail given the breadth of technical issues covered.
8. It is unfortunate that a suitably structured synopsis of the key points and issues with an invitation to comment has not been provided. That would assist in securing more informed and widespread community engagement.
9. In the case of the supporting technical assessments layperson submitters are not qualified to give meaningful feedback. For this reason I will be relying upon the expert technical reviews Council will need to seek and advise on when reporting back on the Proposal. There may be matters for further submission arising from that exercise.

Engagement with Council and other Authorities

10. The Proposal makes much of the Applicant's willingness to fund infrastructure. This is very good and I support the principle that there is a place for private sector provision and funding of infrastructure. In this case it also shows the Applicant is well capitalised and aware of the challenges for Council and other infrastructure providers to fund infrastructure particularly where the site concerned is well beyond termination points of existing urban infrastructure.

332.1

11. The PPC is significant in its scope and breadth, particularly in the intensity of housing offered. As such, the thresholds for satisfying and demonstrating how fundamental infrastructure will actually be provided should be specific and high.
12. It is not adequate, in my submission, to claim the Applicant will fund it. It is simply not as easy as that.
13. The Proposal does not adequately address what will be the inevitable need for close collaboration and interface with Council, Watercare, Auckland Transport, Vector, Chorus and other network infrastructure providers. This is an issue for, by way of example:
 - a. Connection and integration of the systems with existing networks;
 - b. Any cash, operation, management or other contribution required at the outset or over time by the network infrastructure agencies;
 - c. The operation, maintenance and repair of the systems;
 - d. Setting of levies (which in itself is relatively novel as ratepayers will be making a payment to a party other than the local authority for services normally covered by general rates);
 - e. Responsibility for collection of levies from site or home owners;
 - f. Handover of the systems at the end of any concession period;
 - g. End of life replacements and how they are to be provisioned for along the way.
14. I have reviewed the Crown Infrastructure Partners (CIP) letter of commitment. It is equivocal and highly conditional.
15. The Fact Sheet of CIP for the Milldale developmentⁱ is informative of the matters which would need to be resolved. For a scheme contemplating some initial 3,700 residential units CIP entered into partnering agreements with the developer, Auckland Council, Auckland Transport, Watercare and ACC (as funder). In that case a substantial cash contribution was committed by the Auckland Council group.
16. Given the scale and intensity of what is proposed a comprehensive plan and scheme should be presented alongside the Proposal to demonstrate how these issues will be dealt with and the commitments obtained from the counterparties to them.
17. I submit that the Applicant is 'missing a trick' in not considering (at least on the papers) the creation of community title type structures to provide a means for in perpetuity governance, operation and maintenance of community assets to a high quality and standard. The Applicant's involvement will necessarily be for a long time but this will not be for as long as the life of the assets being created.

Proposal – Proposed Plan Provisions

- | | |
|---|--------------|
| <p>18. The Proposal is light on detail and even confusing with respect to the Future Urban area. Reference is made to the live zone. Presumably, this is to all of the site, except that proposed for Future Urban?</p> <p>19. Clearly the Proposal has been split to be in two parts, the live and future, in order to contain up front infrastructure investment and “kick for touch” the very serious upgrades which would be triggered by the future zone going live (e.g. the Whitford bypass).</p> <p>20. There is reference in the supporting papers to possible future connections to the existing Beachlands waste water treatment facility and to Watercare’s water network. This is in addition to noting that Auckland Transport will be looking at wider transport implications such as expanded bus services.</p> <p>21. I submit the Proposal should be considered and evaluated for effects on the basis of the entire site being zoned similar to that proposed for the live zone. Failing that the proposed Future Urban should be dropped.</p> | <p>332.2</p> |
| <p>22. Inadequate provision is made for off street parking. Both Hobsonville and the Terrace House area adjacent to the Pine Harbour Marina show the risk of inadequate offsite parking and the detrimental effect to amenity and the general experience of the area. It is not adequate to respond that people will be “taking the ferry”. That is in part true but does not reflect the reality of where the majority of residents in the BSP will work and be educated per Stantec’s own studies of Trip Generation.</p> | <p>332.3</p> |
| <p>23. The Golf Sub Precinct is interesting and will be an attractive amenity. At 9 holes the course will not be an economic enterprise. As such, who will run it, how will its maintenance be funded and how can there be assurance that it will remain as a functioning golf course for a reasonable time in to the future (see 17. above).</p> | <p>332.4</p> |

Transport

- | | |
|---|--------------|
| <p>24. I submit that before the PPC be advanced the Applicant and/or Council secure a binding commitment from Auckland Transport to upgrade within a specific stated time Whitford/ Maraetai Road utilising to the full the existing designation for that corridor (i.e. including the Whitford bypass).</p> <p>25. This should be a modern designed full service arterial road with four lanes, median separation, intersection controls, cycle and bus lane/ stops provision.</p> <p>26. Without this upgrade the PPC lacks adequate provision for its transportation effects. Indeed, the Proposal on its face seems to recognise that at the time for the up zoning of the Future Urban area the demand on infrastructure (upgraded as contemplated by the Proposal) will be at capacity.</p> | <p>332.5</p> |
|---|--------------|

27. I am a daily user of the Pine Harbour ferry service. I drive to the Ferry terminal (approx. 10 mins), park and take the ferry to downtown Auckland. I have 3 minute walk from the ferry terminal to my office. On the rare occasions that I need to drive in, the drive can be anything from 35 minutes to over an hour and a half.
28. For those in the BSP who will work or be educated in downtown Auckland, the ferry service is excellent and I commend its promotion as a central feature of the Proposal.
29. However, the Proposal in its analysis of the Ferry service overlooks or glosses over the following:
- a. Currently the demand on the ferry service on weekday mornings is more often than not at capacity.;
 - b. On those days demand upon the carpark is nearing capacity;
 - c. There is no recognition that capacity is further seriously constrained on the seemingly quite frequent occasions that a vessel is out for maintenance or repair or where services are disrupted by weather;
 - d. Passenger facilities in Pine Harbour are woefully inadequate – particularly on wet days, where there is only shelter for a small number of people;
 - e. The Applicant does not own or control the Marina and has not demonstrated how it can actually effect improvements either for: on land passenger amenities (shelter, parking, bus stops); to the piers; the channels; or waterspace for additional or larger boats;
 - f. To achieve the reduction in vehicle movements (and therefore keep emissions down) and to avoid over crowding the existing carpark the creation of feeder bus/ shuttle services through and around the BSP **and** the wider Beachlands – Maraetai area is essential;
 - g. The Applicant has not demonstrated how it will secure the collaboration and involvement of Auckland Transport to scope and then upgrade or acquire new vessels and undertake terminal improvements.
30. The progressive upscaling of passenger capacity as demand is created by additional population makes sense but there is a mismatch as increases in demand grow incrementally while increases in capacity are necessarily “lumpy”. Supply of capacity should be introduced ahead of demand.
31. The thresholds described in Table 2 of the BSP Provisions take no account of the existing conditions of:
- a. an under capacity Whitford – Maraetai Road; and

332.6

332.7

- b. a strained by excess demand ferry service.
32. The thresholds are mischievously expressed. They are in paras (b) – (e) expressed in ranges for individual items and in the conjunctive, that is, all of the individual aspects need to be achieved to trigger the threshold. For example, to provide a further 100 seats in the morning peak, there must be 250 – 500 dwellings or lots AND up to 3,500sqm of light industrial. Why only those two uses, what about commercial and retail? What happens at 425 dwellings and 3,000sqm of light industrial?
33. The threshold table further stretches credibility in that the ferry passenger capacity is mis stated. In the peak period of 6.45am to 8.45am on weekdays, the present number of services are 6, with three services each by the 48 and 98 seat boats. The total seats available in that period is 438 and not the 500 implied by Table 2 Para (b). Instead of stating an increase in capacity by a given number of seats, the table should refer to a simple increase in capacity to the targeted number.
34. Presumably on the future zoning of the Future Urban zone, the effects and requirements for transport and other infrastructure tip in to a much more expansive scope? As this rezoning is seemingly inevitable in the 15 – 30 year time horizon, transport and other infrastructure should be designed, scoped and built for that demand and not incrementally, to avoid expensive and disruptive re work later? This reinforces the submission above that if this is not provided for the Future Urban zone should be entirely withheld.
35. Finally, the Transport analysis focuses, admittedly as required by the process, on the effects of the Proposal if implemented. There is an effective assumption that ‘all other things remain the same’. Unfortunately, it takes no serious account of future demands from outside of the Proposal site. If for no other reason this is where the involvement of the agencies such as Council and Auckland Transport who have a region wide purview is essential.

It is my request of Council (and the Applicant) that they consider my submissions and comments and that the Proposal be amended accordingly.

I may wish to be heard in support of my submission.



MG Cockram

10 March 2023

ⁱ https://www.crowninfrastructure.govt.nz/wp-content/uploads/2018/11/Milldale-Fact-Sheet_FINAL-12-Nov.pdf

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 88 - Andrew James Grimmer
Date: Friday, 10 March 2023 12:46:12 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Andrew James Grimmer

Organisation name: N/A

Agent's full name: N/A

Email address: andrew@classicss.co.nz

Contact phone number:

Postal address:
2 Tui Brae Pine Harbour
Beachlands
Auckland 2018

Submission details

This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

My submission relates to

Rule or rules:
Proposed rezoning

Property address: Beachlands South Formosa Golf Course

Map or maps:

Other provisions:
None

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

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

The reason for my or our views are:
My thoughts as a long-time resident of Beachlands.

The proposal if it was to proceed would greatly change Beachlands as a rural seaside community. The proposed design of 5 & 6 storey high density apartment dwellings would dramatically change the visual aspect of this rural community. The infrastructure in Beachlands and driving too Beachlands such as roading, power, telecommunications, water, sewerage, public transport, and waste management are already at capacity. If the development is to go a head an investment in infrastructure needs to be done first and paid for by the developer not by ratepayers or Auckland Council.

333.2

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Roading will not only impact just the roads to and from Beachlands it will also affect people in Maretai and surrounding areas. Traffic during peak times it currently under a great deal of strain and

once out of the Beachlands Whitford areas the roads to Howick over to Sandstone Hill feeding into the Botany, Ormiston, Manukau area are already strained.

Ferry upgrades need to be done before any development takes place, only 6% of people currently living in Beachlands Mairangi work in the City. How will roads cope on days when the ferries are cancelled? Not all Residents will use the Ferries, most people will be working in the South Auckland area and with currently no bus upgrades planned all travel will be via roads. Putting pressure on already strained infrastructure, increasing accidents, delays, and damage to existing roading networks.

333.3

Water, a development of this magnitude to use bore water for all needs, housing, golf course, community throughout the rezoned area does not seem practical. Town water needs to be available for all dwellings if rezoning is passed.

333.4

Sewage system to process the amount of wastewater, grey and black from the development of this size does not seem to be adequate. The environmentally conscious community of Beachlands and surrounding areas, waterways, and seas need to be protected from seepage, the ground would not be able to cope with the volume and issue as we have seen in the past would be repeated. A development waste water system is required and one that could cope with issues from flooding as we are currently experiencing.

The volume of extra people from the development would put pressure on an already strained community. We currently do not have enough parking for the ferry, Countdown parking strained at busy times. Roding in and around the shopping centre have not been built to take all the extra traffic. Schools, Doctors, emergency services are under pressure.

Put the infrastructure in and reconsider the size of the housing from high rise to single double or triple individual housing and access via the spine road not from Tui Brae Road, which is a small dead end street not built for the large volume of vehicles.

Beachlands is a seaside community and that how it should remain for people to enjoy, as it is currently zoned.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: The developers of Beachlands South to provide infrastructure outlined to be put in place before the development starts and at their cost.

Submission date: 10 March 2023

Attend a hearing

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

Declaration

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

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

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

Yes

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

[Have your say on Auckland Council's annual budget 2023 and 2024.](#)



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

Clause 6 of Schedule 1, Resource Management Act 1991
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Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

Ms Helen Mary Cahill

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

Address for service of Submitter

156 Second View Avenue, Beachlands, Auckland 2018

Telephone:

273071712

Fax/Email:

byca@xtra.co.nz

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 88 (Private)

Plan Change/Variation Name

Beachlands South

The specific provisions that my submission relates to are:

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

Plan provision(s)

Rezoning of 307Ha South of Beachlands Village in the area of Formosa Golf Course from Rural to Future Urban Residential etc.

Or

Property Address

Or

Map

Or

Other (specify)

Submission

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

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes No

The reasons for my views are:

See my detailed submission attached

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

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

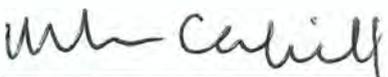
Decline the proposed plan change / variation

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

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)

10th March 2023.
~~03/10/2023~~

Date

Notes to person making submission:

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

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

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

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

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

Submission of Helen Cahill

I, **Helen Mary Cahill**, of 156 Second View Ave, Beachlands, oppose the proposed Private Plan Change 88 for the following reasons:

Summary

Development is a by-product of progress.

Whilst, in principle, I’m not averse to appropriate urban intensification, this must be undertaken within the rules and constraints of Auckland Council’s Planning regulatory framework and in a manner that benefits everyone.

The key theme of my submission is that prior to making its decision on this section 32 Request for PPC-88, Auckland Council must undertake a thorough investigation to satisfy itself that the substantial critical infrastructure required to support this proposed extensive development can and will be made available in an appropriate timeframe, to avoid extremely damaging environmental and social outcomes to Beachlands residents and the Whitford Precinct at large.

The correct sequencing of this decision-making process will be essential to ensuring that an informed and non-detrimental decision is made, to the benefit of all those affected in the Beachlands and surrounding communities.

Submission Introduction

There are a number of reasons for my views not supporting this PPC-88, which will be addressed below:

Without wishing to state the obvious, this is not a Hobsonville development situation, nor despite the Developer’s suggestions to the contrary, is it appropriate to compare the recent Hobsonville development and this proposed scheme. Three very strong distinctions can be drawn in relation to their original ownership structure, physical locations and transport infrastructure available.

(a) Hobsonville

- I. Hobsonville has been developed from the former Hobsonville Air Base, ~ 167 hectares on the upper Waitemata Harbour in northwest Auckland. Almost certainly its classification wasn’t coastal/rural for planning purposes. Prior to commencement of the development the Crown was the land owner and presumably had a say in the social, educational and recreational facilities it required from the development, before disposing of its land.
- II. Hobsonville is ~5 minutes from the SH18 motorway enabling access south via SH16 into the CBD but also enabling connection from SH18 to SH1 if there are any major traffic problems on SH18 into the CBD. At **27 km to the CBD** – this would represent ~29-34 minutes commute into town at 16:00 hrs or 37-46 minutes if reverse commuting home from the Ferry Building Downtown. (*time taken 09 March 2023*).
- III. The Hobsonville ferry terminal is situated at, and the ferry operates from, the end of a standalone wharf in the upper reaches of the Inner Harbour, with no interface with private vessels.

(b) Beachlands South

- I. In the Beachlands South situation the Developer is the private land owner, and the Crown (*or Auckland Council*) will have to purchase any land it believes should be reserved for any social, educational and recreational facilities, it wishes to see existing on the site (*if the funds are available and an acceptable price can be agreed*), which situation didn’t exist in Hobsonville.
- II. Beachlands South is ~30-35 minutes during rush hour from the SH1 motorway for north or south journeys via Redoubt Rd. or similar timings for any junctions between there and Mt. Wellington . At **37 km to the CBD** – this would represent ~70-80 minutes commute into town at 16:00 hrs or 75-80 minutes if reverse commuting home from the Ferry Building Downtown. (*time taken 09 March 2023*), virtually double that of Hobsonville – presumably reflecting its truly rural position (*and somewhat compromised transport location*

334.1

on a peninsula).

- III. The Beachlands South ferry terminal is situated at the far end of Pine Harbour Marina at the bottom of ‘A’ and ‘B’ piers and has to compete for space to operate amongst ~530 other berthed vessels, ~240 boats in the dry stack and other vessels visiting for marine maintenance services provided by a busy boat yard operating forklift and heavy lift crane – vessel haul-out facilities.

There are a number of issues which I wish to address separately.

1. Transport (road/ferry and bus) Infrastructure:

- 1.1 Auckland Council, on the face of it has a highly structured Residential Planning and Development Process, including the following documents to facilitate its implementation:

- b. **Regional Policy Statement** – including **B.2 Tāhuhu whakaruruhau ā-taone (The sheltering ridge pole) Urban Growth and Form**
- c. **Auckland Unitary Plan (Operative in Part) (AUP-OP)** which includes *inter alia* the classification of its Rural Urban Boundary (RUB) – which “... **defines the extent of urban development to 2041 and areas to be kept rural. Its purpose is to help achieve well-planned, efficient urban development, conservation of the countryside and its productive rural landscape, and improve certainty about the sequenced provision of infrastructure to support growth and development in existing urban areas and greenfield areas.....**”

The RUB is one of a number of methods in the Proposed Auckland Unitary Plan to better manage Auckland’s future development along with structure plans, zones, precincts, overlays and framework plans.”¹

- d. **District and Precinct Plans** - of which the **I441 Whitford Precinct Plan** addresses and controls the Beachlands area.
- e. The **National Policy Statement – Urban Development 2020 (NPS-UD)** created to accelerate residential housing development , including through reclassification of various areas as which was required to be incorporated in Tier 1 Councils, of which Auckland Council is one) which included the concept of Medium Density Residential Standards (‘MDRS’) to enable high density developments adjacent to rapid transit services “.....**any existing or planned frequent, quick, reliable and high-capacity public transport service that operates on a permanent route (road or rail) that is largely separated from other traffic**”

- 1.2 Whilst reviewing the alterations required to incorporate the **NPS-UD** requirements within its Unitary Plan, Auckland Transport imposed in its **Executive Summary** ² a **qualifying constraint** on Beachlands, precluding it from being reclassified within the Urban zone, on a number of grounds:

*“.....Beachlands was subject to significant transport infrastructure constraints that **will not be able to be addressed in the next 10 years**. In particular, intensification beyond that which can be met by the constrained transport network within and connecting to the identified Beachlands area is likely to generate adverse effects including:*

- i. *further exacerbation of the existing accessibility issues to employment, education and community services in the local area; and*
- ii. *without support from sufficient transport infrastructure and significant roading network upgrades, increased traffic congestion and air pollution as a result on reliance on private vehicle trips.” (para.1)*

- 1.3 It recognised that:

“..Beachlands is predominantly a car-reliant coastal settlement positioned on a peninsula.

¹ Rural Urban Boundary: Proposed Auckland Unitary Plan: Fact Sheet

² **PPC-78 – Intensification** Section 32 and section 77J / 77L new or additional qualifying matter: Infrastructure – Beachlands Transport Constraints Control Evaluation Report

334.2

Although there are ferry and bus options these are limited and infrequent with capacity constraints.

The **Whitford-Maraetai Road is the only road connection** to the wider regional destinations to the west and **has limited capacity to accommodate additional traffic**. Significant investment (including acquisitions) would be required to upgrade the road and the surrounding rural roading network.“ (para.2)

- 1.4 Auckland Transport indicated the capital funds required to address these shortcomings would be in excess of \$200 million which was currently unbudgeted for.³
- 1.5 Auckland Transport also considered that:
 “... The **inability to provide** new dwellings with adequate access to employment, education and community services, including by public and active transport is a **significant resource management issue**. Providing for the level of intensity anticipated by the Medium Density Residential Standards (**‘MDRS’**) and **Policy 3 of the National Policy Statement for Urban Development (‘NPS-UD’)** within the constrained Beachlands area **does not align with Objective 1 of the NPS-UD** which emphasises the importance of a well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.
- 1.6 In Auckland Transport’s view:
 “... the Beachlands Transport Constraint is a necessary qualifying matter to be included in PPC78 to justify limiting further residential intensification in areas subject significant transport infrastructure constraints. This is **considered necessary to achieve**:
- the **overarching objective of the NPS-UD** for well-functioning urban environments which enable people and communities to provide for their social, cultural, economic and environmental wellbeing and health and safety; and
 - **RPS objectives** seeking to provide for quality compact urban environments. “⁴
- 1.7 “An options assessment identified three responses to this issue, with the recommended option being only the changes necessary to accommodate the qualifying matter. This is through the application of the **Infrastructure – Beachlands Transport Constraints Control** to land zoned Mixed Housing Urban and Low Density Residential.⁵ The **qualifying matter control limits development to one dwelling per site as a permitted activity, and requires resource consent for development of two or more dwellings as a non-complying activity.** “(para.4)
- 1.8 The reason for setting out the detail of Auckland Transport’s Executive Summary is twofold:
- a) the Auckland Transport document identifies extremely succinctly the infrastructure problems in the area which are critically relevant to consideration by Auckland Council of the PPC-88 S.32 Request;
 - b) since its publication, the situation described by Auckland Transport has only worsened due to completion of further development and commencement of new residential development (a further 350 dwellings) within the Beachlands Precinct.
- 1.9 The current Government’s recent **Global Policy Statement on Land Transport (GPS)** indicated a significant policy change in the direction of land transport investment in order to commit to its **Net Zero Emissions Strategy by 2050**. Whilst this plan may be derailed slightly by the urgent need to put together an “*emergency style*” package to respond to the massive maintenance and repair needs arising from the destruction wrought by Cyclone Gabrielle, it appears highly unlikely that the Government would be looking to support funding for the Whitford Bypass any time within the next

³ **PPC-78 – Intensification** Section 32 and section 77J / 77L new or additional qualifying matter: Infrastructure – Beachlands Transport Constraints Control Evaluation Report – page 9 (pqrg.24)

⁴ **PPC-78 – Intensification** Section 32 and section 77J / 77L new or additional qualifying matter: Infrastructure – Beachlands Transport Constraints Control Evaluation Report – page 5

⁵ This classification was applied to the existing Beachlands Precinct inside the Jack Lachlan Drive demarcation boundary, with no further development outside that boundary.

20-30 years. Without such financial support, the Beachlands, Omana, Maraetai daily commute should the PPC-88 Request be granted, would become untenable. On that basis Auckland Council would clearly fail to deliver the NPS-UD Objective 1 to deliver a well-functioning urban environment.

- 1.10 Whilst the Developer has put a number of arguments forward to indicate that it's Proposal has addressed these problems, I don't believe the steps suggested are adequate to address the significant constraints that exist and will attempt to address these below.
- 1.11 The Developer's S.32 Request provides no substantive detail about any new ferry terminal infrastructure, as to where or when it would be made available, or that the roading improvements proposed would in any way significantly address the current transport problems, certainly at the cost they have indicated.
- 1.12 Auckland Transport has stated ⁶:

To provide for the level of increase in ferry capacity that is likely to be required from additional housing development, funding of a new ferry terminal site in the vicinity of the current Pine Harbour marina area would be required. As an initial estimate, for a proposed development in 2019 for 1,500 – 2,000 dwellings found costs to develop a new ferry terminal to be between \$10 million and \$13 million for the required infrastructure and dredging requirements. It is anticipated that costs would be significantly higher to cater for an additional 18,788 dwellings that could be enabled under PPC78 with no qualifying matter applied. Proposed growth would require a number of new vessels of 150 plus seated capacity which would incur further capital investment and operational costs. An increase in demand would require an increase in service frequency which would increase operating costs by approximately 25% - 40%. These capital and operating costs are currently unbudgeted.

- 1.13 Although the Developer has indicated that it's Infrastructure financing partner Crown Investment Partners (CIP) would advance \$16 million for this purpose, this would appear to be inadequate. Furthermore, the Developer has suggested that it would introduce 200 seater ferries, which will be incapable of operating inside the existing Pine Harbour Marina area, due to size constraints. The Developer has provided no information about the position of a new terminal. Certainly the cost, both initially and for annual ongoing maintenance of channels and a new terminal would, almost certainly, exceed the financing proposed by CIP.
- 1.14 Furthermore it would be necessary to undertake a Cost Sensitivity Analysis, to ascertain whether passengers would be able to afford the ferry fares, which once subsidies are lifted in June. The Pine Harbour ferry return ticket cost of \$23.20 could prove too expensive for a number of residents from Beachlands and the surrounding areas, particularly since there could be additional onward travel costs up to the \$20 cap on daily commute costs in the Auckland city area, (which could result in a daily Public Transport commute cost of up to \$43.20). This situation would be further exacerbated when new levies were imposed to recover costs for the new infrastructure vessels and terminal. There would be a real risk of driving ferry users back into cars, since this would become the less expensive commuter option. The only alternative would be that Auckland Transport would have to heavily subsidise the services once more – something that as it has indicated has not been budgeted for.
- 1.15 The PPC-88 Request far exceeds Auckland Council's budgeted 30 year plan for infrastructure upgrades in the Beachlands/Whitford area. And the reality is that it wouldn't just be Beachlands and Whitford that would be impacted by the Development. Access to typical employment areas from Beachlands (East Tamaki, Howick, Airport) etc. all have significant congestion points already – Sommerville roundabout and the turn out from Murphy's Bush Road onto Redoubt Rd., being just 2 examples.

2 The National Policy Statement – Urban Development 2020 (NPS-UD)

Should Auckland Council undertake a Housing Capability Assessment before taking any decisions regarding PPC-88 to re-zone Beachlands South from Rural to Urban/MDRS?

334.3

⁶ PPC-78 – Intensification Section 32 and section 77J / 77L new or additional qualifying matter: Infrastructure – Beachlands Transport Constraints Control Evaluation Report- Para 26 page 9

- 2.1 The Whitford Precinct, which incorporates the Beachlands South area is **Rural zoned**. The Whitford Precinct area doesn't feature in **Auckland Council's July 2021 Housing Capability Assessment ("HBA")** for the Auckland region, ⁷ presumably precisely because the Whitford Precinct is rural zoned.
- 2.2 The "**purpose**" of an **HBA** is to provide information on *inter alia* demand and supply of housing in its **urban** environment and the impact of planning and infrastructure decisions of the relevant local authorities on that demand and supply ⁸.
- 2.3 Before Auckland Council makes any decision whether to re-zone Beachlands South for MDRS, I would suggest it is incumbent on the Council, as a minimum, to seek "*information and comment*" from infrastructure providers, ⁹ a direct requirement of S. 3.5 "*.....to satisfy itself that the additional infrastructure to service the development capacity is likely to be available*" ¹⁰, to ascertain the adequacy/capacity/suitability of both existing and proposed infrastructure required to support the Development.
- 2.4 It would be disingenuous to argue that Auckland Council isn't required to carry out an HBA, (*before making any decision on whether to approve the PPC-88 request*) because Beachlands South is classified as **Rural** rather than **Urban** entity and that an HBA assessment is only required when evaluating an **Urban** proposition. Trying to perform an HBA assessment after granting such approval for re-zoning to **Urban**, to then arrive at the conclusion already reached by Auckland Transport, would gravely risk legal action from the Developer.
- 2.5 Failure to undertake this task, when a member of its own body – **Auckland Transport**, has already raised a Qualifying Constraint against Beachlands, clearly determining that Beachlands clearly **isn't and won't be infrastructure ready for at least the next 10 years**, would also be a gross breach of **Objective 1 of the NPS-UD**, not to mention its duty of care to those residents not only on the existing Beachlands and outlying communities but also new residents in the Beachlands South area, given the disastrous consequences it would impose on their lives. The making of any decision on this planning application before undertaking that analysis would also arguably be *ultra vires* its duties to the Beachlands residents.
- 2.6 Until the Council's HBA has been undertaken it will not be in a position to challenge the robustness of the Developer's proposals and its consultant's assertions in this area.
- 2.7 The Developer's argument for reclassification from **Rural** to **MDRS** zoning is heavily themed around the increased ferry utilisation becoming the answer to all Beachlands transport problems.
- 2.8 The Developer's Transport Consultant Stantec postulates that the increased ferry utilisation will create a **Transit Oriented Community (TOC)**, stating:
- "The proximity and accessibility to the Pine Harbour Ferry terminal as well as the magnitude and density of development enables Beachlands South to be realised as a Transit Oriented Community (TOC) – a form of high-density development)."*¹¹
- ".....The existing Pine Harbour ferry service supports higher intensity development in proximity to the ferry and strong connections to it. The proposed transit adjacent development will support public transport use and less reliance on private vehicle trips."*¹²
- 2.9 And yet, the expanded ferry service, assuming that Sealink agreed to operate larger ferries from a new terminal if it was built to accommodate the operation (*which could be difficult to guarantee, given that Sealink is an independent commercial operator and there is no evidence in the Developer's Submission that it has obtained Sealink's support for its Request*), **would likely carry only a further ~500-600 more passengers each day by 2028 from a proposed MDRS development which resulted in upwards of ~4,000 dwellings and possibly 8,000-10,000 more residents**, the bulk of whom would be

⁷ S.3.25 National Policy Statement – Urban Development 2020 (NPS-UD)

⁸ S.3.20 National Policy Statement – Urban Development 2020 (NPS-UD)

⁹ S.3.21 National Policy Statement – Urban Development 2020 (NPS-UD)

¹⁰ S.3.5 Availability of additional infrastructure- National Policy Statement – Urban Development 2020 (NPS-UD)

¹¹ Appx 11 Integrated Transport Assessment- Beachlands South Executive Summary (pg. iii)

¹² Unio Environmental S 32 Assessment Report – Beachlands South Precinct – S.3 Executive Summary page 2

forced to commute by car on still inadequate road transport infrastructure.

2.10 Whilst Stantec’s states:

*...”This presents the significant opportunity to maximise use of this public transport service to promote **modal shift from private vehicle use** and deliver an integrated land use and transport development outcome to create a well-functioning urban environment.”*

to use this marginal increase in passenger numbers (still only ~5-6% of total commuters) to justify rezoning of rural/coastal land to Medium Density Residential Standard (MDRS) would be wholly inappropriate, especially since the ferry is incapable of providing commuters with transport to the majority of the employment locations residents need to travel to.

2.11 Furthermore, the projected increase in ferry passenger numbers in 14 years is remarkably linear rather than exponential – it certainly doesn’t demonstrate the modal shift in transport from road to ferry that a **Rapid Transit Service** should attract. This is a mere doubling of the existing passenger numbers despite the proposed doubling of Beachlands’ population.

2.12 The capture of increased ferry passenger numbers is also based on a network of feeder bus services – presumably that would have to be budgeted for and provided by Auckland Transport, funds that are not currently available.

2.13 Failure to undertake this HBA Transport Infrastructure analysis would constitute an egregious failure of the clearly defined planning process, particularly since the ferry infrastructure required to support the Developer’s argument for re-zoning of Beachlands South to MDRS isn’t in existence and possibly won’t be in the future, due to either commercial reasons or operational constraints.

2.14 To allow this development to proceed without the certainty that critical infrastructure will be in place and support the residents in that community would be a serious planning failure, inflicting commuting chaos on an already overstretched service at peak operational periods, with passengers being left behind at the terminal generally entailing a 20-minute wait until the next ferry service in peak periods. ¹³ It would also breach the **NPS-UD Objective 1** requirements.

3 The Whitford Precinct I441 Plan and other Planning Considerations

3.1 Whitford Precinct is described as follows:

[It] .. covers approximately 3735ha of rural land that lies entirely within Tūranga, Waikōpua, Te Puru and Beachlands stream catchments, collectively known as the Whitford catchment. The precinct is a rural area located close to the urban areas of Botany, Howick and Flat Bush. The precinct provisions provide for countryside living development, subject to a management framework in order to maintain and enhance landscape character, rural amenity values and the environmental quality of the area.

3.2 *Sub-precinct B lies within both the Te Puru and the Beachlands south stream catchments. It has a coastal edge and includes specific provisions addressing both the landscape character and environmental considerations. An average site size of 5ha is applied to this sub-precinct.*

3.3 *The hill country and ridgelines surrounding the precinct not only contribute significantly to landscape character and rural amenity values within the area, but also to the surrounding suburbs of Howick and Cockle Bay and the wider Whitford area. **Limiting the number of buildings and structures in the skyline ridge and hill country areas is therefore critical to maintaining rural amenity and the perception that the precinct is rural in character.***

3.4 Furthermore The Whitford District I441 plan refers to the Coastal Indicative Constraints Area

The coastal edge contributes to the existing character and amenity values of Whitford’s landscape, refer to Whitford Precinct: Precinct plan 3. Views of the coastal edge, estuarine areas and the inner Hauraki Gulf are a source of significant amenity to the area. The coastal indicative constraints area

¹³ Appx 11, Integrated Transport Assessment- Beachlands South 3.3.4 page 23

334.4

*covers the area where land subdivision, use and development can influence coastal landscape and amenity within the precinct. The primary purpose of this constraints area is to protect existing landscape character and amenity values associated with the coastal edge including beaches, intertidal areas, estuaries, cliffs, escarpments and coastal slopes.*¹⁴

- 3.5 From a layperson’s perspective, the drive from Whitford, particularly from Clifton Road, provides a spectacular vista of the Pohutukawa Coast with panoramic views across to Rangitoto, Waiheke and further north. The same observation could be made when viewing the coastal edge from the ferry or a private vessel. As Auckland City becomes more congested, it is scenic views like this that will become even more important to enable distinction between the rural urban boundary – to know you have escaped the city and are now in the country. Once you allow development to destroy this vista, it is lost for all future generations. Protection of a green belt is critical and many people choose to live in the Beachlands area precisely of the enjoyment they derive from the beautiful location they are fortunate enough to live in.
- 3.6 The Developer’s proposal, particularly for the high rise and high density development around Marina point and along the cliff edge, is a complete antithesis of the Whitford Precinct objectives and would severely diminish the enjoyment not only of residents of Beachlands but also those of the surrounding suburbs of Howick and Cockle Bay and the wider Whitford area.
- 3.7 To allow this development to proceed would be in direct contravention of the **NPS-UD Objective 1:**
New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.
- 3.8 *It also clearly fails to satisfy Objective 3 of the NPS-UD which requires that Auckland Council’s Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:*
 - a) *the area is in or near a centre zone or other area with many employment opportunities*
 - b) *the area is well-serviced by existing or planned public transport*
 - c) *there is high demand for housing or for business land in the area, relative to other areas within the urban environment.*
- 3.9 Beachlands is clearly rurally situated, with no meaningful employment opportunities in the township, with ~80-85% of commuters driving to work, since public transport doesn’t provide a viable alternative to the multitude of employment destinations that residents commute to. Given that situation and with the risk of the development resulting in a doubling of car commuting, this would also contravene **NPS-UD Objective 8: to support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change.**

4 Water infrastructure

- 4.1 Beachlands was for reasons stated above excluded from “urban” reclassification for the reasons provided by Auckland Transport¹⁵. However, another major infrastructure impediment is the proposed Development’s lack of access to suitable waste-water treatment facilities.
- 4.2 Watercare is unable to take waste-water from the new development since its current treatment works at Okaroro Drive is being operated at or near full capacity already.
- 4.3 Returning to **S. 3.5 NPS-UD**, it is critical that Auckland Council “.....satisfy itself that the

334.5

¹⁴ Whitford Precinct I441 Plan pages 2-3

¹⁵ **PPC-78 – Intensification** Section 32 and section 77J / 77L new or additional qualifying matter: Infrastructure – Beachlands Transport Constraints Control Evaluation Report –

additional infrastructure to service the development capacity is likely to be available”.

This needs to occur by way of the **HBA** that must be undertaken of all infrastructure aspects of the Developer’s proposal, prior to consideration as to whether the plan should be approved or not.

- 4.4 The on-site treatment of waste water in this extremely environmentally sensitive coastal area is an extremely high risk activity – as witnessed by the recently successful prosecution of the Formosa Golf Club for failure to maintain its on-site waste water treatment plant, which had resulted in unacceptable discharges of inadequately treated waste water.
- 4.5 It is also understood that Whitford Manor which similarly has an on-site waste water treatment plant is also experiencing difficulties in meeting the required discharge standards.
- 4.6 Given that the Developer’s proposal is for treatment of waste-water on the Development site itself, to consider allowing a development of this magnitude to proceed without being satisfied that the necessary safeguards will be in place to protect not only existing but also future residents risks not only an environmental disaster but also would seriously compromise the **NPS-UD’s Objective 1** that:

*New Zealand has **well-functioning urban environments** that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.*

5. Education

- 5.1 The Developer has indicated that he will make land available to the Ministry of Education for construction of a primary and secondary school.
- 5.2 Despite the significant traffic generated by the need to bus and privately drive secondary school children to Howick and beyond, the Government (*Ministry of Education*) has indicated in a response to a 2020 petition¹⁶ that a new secondary school would likely not be available before 2030.
- 5.3 It would appear that whilst the Developer has ear-marked land for a secondary and primary school – this land would have to be purchased by the Ministry of Education (*assuming a price could be agreed for its acquisition*). The Developer has made no commitment to provide any educational facilities, nor for that matter recreational facilities.

334.6

6. Medical Services

- 6.1 The Beachlands Medical Centre is at capacity, currently short of 2 General Practitioners. The practice has for some considerable time now been unable to attract new GPs to join the practice. One aspect of this situation is that, for those residents fortunate enough to be registered with the Practice, it can take a considerable time (5-7 days) to get an appointment to see a GP.
- 6.2 Adding to the population in such a significant way will cause a major problem. GPs can only effectively provide GP (*not emergency*) services to a defined number of patients, beyond which they have to close their lists.
- 6.3 There is a country-wide shortage of GPs and young doctors do not appear to be willing to select the GP specialisation for provision of medical services in the community For the Developer to intimate that GPs will fall over themselves to move to Beachlands South is disingenuous and would be to the significant detriment of the new residents that might move to the area.
- 6.4 My understanding is that most other medical practices within a reasonable driving distance are similarly unable to offer the health care required for our community. Should emergency or hospital care is needed, this would require transportation to Middlemore Hospital, which is already known to be at or beyond full capacity with significant delay times before being treated. The time required for an ambulance or other emergency vehicle to reach a patient in Beachlands, Maraetai or the surrounding area, could be extensive, and a return journey to hospital may result in a life-threatening

334.7

¹⁶ *Petition 2020/82 of Angela Mason “We Need a High School on the Pohutukawa Coast, Auckland”*

or life-ending delay, again a failure to meet the requirements of **Objective 1 NPS-UD**.

7. Conclusion

- 7.3 In summary – there is a Planning Process. Auckland Council needs to follow that process.
- 7.3 Before contemplating re-zoning Beachlands South from **Rural/Coastal** to **MDRS/FUZ**, the Council **MUST** undertake an HBA to both satisfy itself, and more importantly protect existing and potentially future residents from a developmental disaster by:
- a. undertaking a detailed Infrastructure analysis to determine whether the Developer’s proposals to address clearly significant infrastructure shortcomings are sufficient to mitigate the effects of the proposed Development, and
 - b. the Council and Government have access to the funds they would be required to produce to support the subsequent functioning of the Development; or
 - c. whether the Whitford Precinct should continue to carry its Rural/Coastal status for future generations to enjoy.
- 7.4 An even more radical proposal would be that those individuals tasked with making this Decision should take it upon themselves to experience the commute to and from Beachlands during peak travel periods, to understand precisely what the existing residents have to cope with.
- 7.5 They could also take the opportunity to appreciate the coastal vista the present landscape offers.
- 7.6 **Infrastructure first, then consider how the Development can proceed.**

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 88 - Anne McSkimming
Date: Friday, 10 March 2023 1:01:11 pm

The following customer has submitted a Unitary Plan online submission.

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Full name of submitter: Anne McSkimming

Organisation name:

Agent's full name:

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Contact phone number:

Postal address:
3 Kibblewhite Avenue
Beachlands
Auckland 2018

Submission details

This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

My submission relates to

Rule or rules:
Rezoning of 307 Ha south of Beachlands in the area of Formosa Golf Course from rural to future urban residential

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:

Transport and road infrastructure: My main concerns are that transport and road infrastructure will not support the size of the proposed development in Beachlands South. The proposed plan will double the size of Beachlands over the next 10 to 15 years. The proposed plan is to shift towards shared and active modes of transport. Beachlands has maintained its rural classification because of limited transport links. I consider that there will be considerable traffic load increases to both Whitford - Maraetai Rd and Jack Laughlin Dr well in excess of that indicated by the company Santec in the PC88 Attachment 8 Integrated Transport Assessment.

PC 88 Appendix 11 Integrated Transport Assessment 2.3.2 Mode Share Distribution. Figure 5 states that "of the 72% of the people leaving the Beachlands area, only 5-8% travelled to Auckland City Centre." This demonstrates that most Beachlands residents do not currently work in Auckland city. The developers have suggested there will be an increase in the use of public transport - buses

335.1

and ferries. Present figures do not line up with data.

There is only one main road in and out of Beachlands at present. BSL has a proposed \$75 million contribution towards transport infrastructure, with a staged approach to upgrading intersections and roundabouts and a contribution to ferry services. There is no planned contribution to upgrading the main Whitford Maraetai road in their proposal. They contend that maintaining and widening the road is not their responsibility. All traffic heading out of Beachlands/ Maraetai crosses 2 narrow bridges (Waikoloa and Whitford) When there is an incident that closes the Beachlands/Maraetai road, traffic is diverted to the coast road that is often reduced to one lane. The development would go against the council's emission reduction plan with a large percentage of Beachland's population currently relying on private vehicles to get to work, shops, and health services.

PC88 Attachment 8 transportation Response section 4.1 Ferry Mode Share

Therefore I believe that the following statement by Stantec in the paragraph headed Whitford-Maraetai Rd Congestion is totally incorrect to conclude that "the proportion of trips from Beachlands to South or East Auckland is likely to reduce in favour of trips to the Auckland CBD." These conflicting reports lead me to believe that the full Santec Assessment should be peer reviewed.

PC88 Appendix 11 Integrated Transport Assessment 3.5.2 Jack Lachlan Drive

The proposal states that Jack Lachlan road will likely be upgraded to a primary collector road and will be the only road connected to the subdivision until the FUZ is developed. I am concerned about this aspect as our property borders Jack Lachlan Drive and this will change the road into very high use. Subsidence has already occurred on this road and council has marked it for repairs that haven't eventuated yet. What assurance will we as affected property owners have that the road will be upgraded in time to support the development?

PC88 Appendix 11 Integrated Transportation Assessment 3.3.5 Ferry Network Summary.

The summary states the existing ferry terminal location and marine conditions places constraints on vehicle size and capacity meaning people get left behind. There are 4 main issues: lack of capacity and customer service, limited modal integration, limited terminal capacity, limited service span. The ferry company is privately owned as also the Marina. This report has no firm commitment from these companies to upgrade facilities, vessels and increase capacity.

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

Submission date: 10 March 2023

Attend a hearing

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

Declaration

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

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

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

No

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

[Have your say on Auckland Council's annual budget 2023 and 2024.](#)



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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 88 - Katja Kershaw
Date: Friday, 10 March 2023 1:16:24 pm

The following customer has submitted a Unitary Plan online submission.

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Auckland 2571

Submission details

This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

My submission relates to

- Rule or rules:
- Environment
- Storm Water
- Wasterwater
- Infrastructure
- Whitford Village
- Public Transport
- Education
- Parking
- Recreational Sports.

The plan change allows for many more houses where the run off goes to the Waikopua estuary and catchment. A sensitive area that already suffers from sediment collection interfering with the canal leading in and out of Pine Harbour. Studies or modelling do not show the impact and have not been included in the information.

336.1

Stormwater
There is a lack of detail on the storm water predictions or quality of water to prevent beaches from closing. Currently in heavy rainfall the beaches in the area are unsafe to swim. This situation would be exacerbated. Where is the current bacterial count and how this would be mitigated.

336.2

Sewage
No detail is shown or accounted for the growth in the planning reports. The current sewage system cannot cope with the increase. 2017 it was show that the treatment plant copes with 1,2000,000 litres with no rain. The increase has not been shown to be calculated to accommodate increase.

336.3

Infrastructure
An added 3000 dwellings will add to the pressure of the main arterial road Maraetai-Whitord Highway which is at capacity. Cars will need to travel for work. Four years ago plate recognition technology showed 15000 cars travelled in and out of Beachlands through Whitford each day. This

336.4

far exceeded the 8000 predicted. This rate will have risen since this time.

The current highway is with current levels is backed up from Howick through Whitford and half way to Beachlands at peak times now.

By pass Whitford – Manuaku city had plans in place to upgrade the highway and by pass the village of Whitford. This plan was shelved with the merger of Auckland council. This would need to be a priority to accommodate 3000 more dwellings, inhabitants and businesses.

Recreational Sports - The Pony Club is in Whitford and currently poses significant risk to those crossing the road. There are no safety measures in place. An increase in the traffic is a death wish. Cycle ways have not been considered for the growing sport of mountain biking and the park that exists in the Whitford forest. Cycleways need to be included for the surrounding areas and access to neighbouring Okaroa road.

Auckland Transport has no budget set aside for the improvements needed for the plan change.

Cycleways along the main arterial corridor would need to be considered.

Public Transport – there is no public transport along the corridor between Beachlands and Whitford to lessen traffic. The current busway systems are slow and unsustainable for work related hours in the city to the point where the service is not used.

Parking

The current MDRS do not allow for sufficient parking in developments. The current plan does not deal with this issue. The plan needs to include how condensed housing will cope with this.

Education: The Ministry of Education does not have any plans to build schools in this area. With a 15 to 20 year growth plan this will put un realistic pressure Beachlands and Maraetai Primary Schools. These schools are at capacity now. Howick College has already reached its roll number which is the catchment school for the area.

336.5

Property address: 10 Lachlan drive, Beachlands

Map or maps:

Other provisions:

Environment

The plan change allows for many more houses where the run off goes to the Waikopua estuary and catchment. A sensitive area that already suffers from sediment collection interfering with the canal leading in and out of Pine Harbour. Studies or modelling do not show the impact and have not been included in the information.

Stormwater

There is a lack of detail on the storm water predictions or quality of water to prevent beaches from closing. Currently in heavy rainfall the beaches in the area are unsafe to swim. This situation would be exacerbated. Where is the current bacterial count and how this would be mitigated.

Sewage

No detail is shown or accounted for the growth in the planning reports. The current sewage system cannot cope with the increase. 2017 it was show that the treatment plant copes with 1,200,000 litres with no rain. The increase has not been shown to be calculated to accommodate increase.

Infrastructure

An added 3000 dwellings will add to the pressure of the main arterial road Maraetai-Whitford Highway which is at capacity. Cars will need to travel for work. Four years ago plate recognition technology showed 15000 cars travelled in and out of Beachlands through Whitford each day. This far exceeded the 8000 predicted. This rate will have risen since this time.

The current highway is with current levels is backed up from Howick through Whitford and half way to Beachlands at peak times now.

By pass Whitford – Manuaku city had plans in place to upgrade the highway and by pass the village of Whitford. This plan was shelved with the merger of Auckland council. This would need to be a priority to accommodate 3000 more dwellings, inhabitants and businesses.

Recreational Sports - The Pony Club is in Whitford and currently poses significant risk to those crossing the road. There are no safety measures in place. An increase in the traffic is a death wish. Cycle ways have not been considered for the growing sport of mountain biking and the park that exists in the Whitford forest. Cycleways need to be included for the surrounding areas and access to neighbouring Okaroa road.

Auckland Transport has no budget set aside for the improvements needed for the plan change.

Cycleways along the main arterial corridor would need to be considered.

Public Transport – there is no public transport along the corridor between Beachlands and Whitford to lessen traffic. The current busway systems are slow and unsustainable for work related hours in

the city to the point where the service is not used.

Parking

The current MDRS do not allow for sufficient parking in developments. The current plan does not deal with this issue. The plan needs to include how condensed housing will cope with this.

Education: The Ministry of Education does not have any plans to build schools in this area. With a 15 to 20 year growth plan this will put un realistic pressure Beachlands and Maraetai Primary Schools. These schools are at capacity now. Howick College has already reached its roll number which is the catchment school for the area.

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

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

The reason for my or our views are:

The plan for the development looks reasonable but does not fit into the supporting infrastructure to make this workable. There will be a significant increase in traffic which has not been extrapolated

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

Details of amendments: A full plan of the points made must be a workable viable plan for the area for this to proceed.

Submission date: 10 March 2023

Attend a hearing

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

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

Declaration

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

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

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

Yes

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

[Have your say on Auckland Council's annual budget 2023 and 2024.](#)



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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)

John Keith Byers

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

Address for service of Submitter

156 Second View Ave, Beachlands

Telephone:

021 3071710

Fax/Email:

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 88 (Private)

Plan Change/Variation Name

Beachlands South

The specific provisions that my submission relates to are:

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

Plan provision(s)

Rezoning of 307Ha South of Beachlands Settlement from Rural to Urban, Transport impacts, Education impacts

Or

Property Address

Or

Map

Or

Other (specify)

Submission

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

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes No

The reasons for my views are:

See attached

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

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

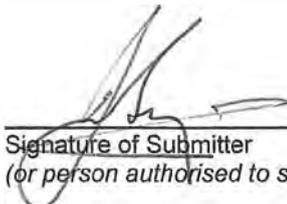
Decline the proposed plan change / variation

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

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing


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

10/03/23
Date

Notes to person making submission:

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

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

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

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

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

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

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

I, John Keith Byers, of 156 Second View Ave, Beachlands, **oppose** the proposed Private Plan Change 88 for the following reasons:

1. Beachlands Urbanisation

- 1.1 Beachlands currently sits outside the Auckland Rural Urban Boundary (RUB) as a Coastal Settlement. A lot of Beachlands residents, myself included live in Beachlands for precisely this reason and have no desire to see the further urbanisation of our community. The applicants PPC seeks to effectively double the size of Beachlands in terms of dwellings, population and consequently vehicles.
- 1.2 Auckland City Council (ACC) in all its planning and policy documents to date has continued to confirm that Beachlands will remain outside the RUB and that there is no budget or plans for additional infrastructure to change this stance for at least the next 10 years. These Plans should not be put aside or taken lightly. ACC should confirm its intentions and stick with these plans.
- 1.3 The type of urban intensification envisaged by the applicants PPC in my view is inconsistent with the Auckland Plan and completely inappropriate for the Beachlands/Maraetai Coastal Settlement and by association the Whitford Precinct also.
- 1.4 The type of housing (apartment blocks) and intense urban development proposed by the PPC would achieve Auckland's housing needs much more effectively and efficiently if it were built somewhere along the North/South corridor near a transport hub where there are already train and motorway access readily available.

337.1

2. Transport

- 2.1 2018 Census data, indicated that approximately 80% of travel out of Beachlands is by private motor vehicle to destinations primarily in the South and East of Auckland. The purpose of such trips is mostly for work or accessing services in locations such as East Tamaki, Auckland Airport, Howick and Penrose. Only 6% of travel (presently approximately 500 people per day) travel on the Pine Harbour ferry to the Auckland CBD. The nearest motorway, train or bus terminal access points are all more than 20 km or 35 mins driving away. The public bus service to the area is very limited, amounting to around 1% of travel, primarily because Beachlands is a designated Coastal Community outside the RUB and therefore does not warrant public transport investment. i.e. (\$ spent per person transported). Auckland Council in effect confirmed this state of affairs when they placed a "Transport Constraint" on the further development of Beachlands when they reviewed intensification opportunities in their recent PC78 analysis.
- 2.2 The natural consequences of this is that in reality travel modes are not likely to change much with the influx (doubling) of residents proposed by this PPC. It would seem completely incongruous and utterly wrong (as well as fly in the face of the Governments latest Transport Policy) that Auckland Council would encourage the

337.2

increase in Co2 emissions and other undesirable effects of more vehicular traffic on the Howick-Whitford-Maraetai Road if they approved this PPC.

- 2.3 The applicants PPC places considerable importance on the proximity of the Pine Harbour ferry service and its ability to drive transport “mode change”. However the increased patronage figures quoted in the PPC in fact show negligible assumed change in the present patronage rate so I am at a loss to understand how the “mode change” happens. Presumably the number of people who want to go to the CBD daily is fairly limited. To cope with the increase in passengers from the increase in population the PPC proposes an increase in ferry size and frequency of operation. However the proposed larger ferries will not be able to operate inside the existing Pine Harbour marina due to their size and limitations on upgrading the existing terminal (hut). This means a new ferry terminal will likely need to be built outside the marina. CIP funding for this eventuality does not appear to be provided for in the PPC. Also in order to construct the new terminal considerable and continued annual dredging of channels will be required. This will require Environmental Resource Consents to dump the dredgings in the pristine waters of the Hauraki Gulf. The existing resource consents for dredging of the marina are already fully allocated.

337.2

3. Education

- 3.1 In the applicants PPC considerable emphasis has been placed on the potential provision of a High School in the development. They are of course only providing access to the land. The NZ taxpayer will still need to purchase the land and build the facility which would cost in the region of \$60 -70m. (Wakatipu High School in Queenstown opened in 2018 is 10,000 sqm on 8 hectares and cost in excess of \$50m). In responding to a recent local petition for a High School in Beachlands the Ministry of Education stated that

“The Ministry’s analysis shows that any projected growth for the Beachlands and Maraetai areas could be managed for a number of years by Howick College reducing its out-of-zone enrolments, and the Ministry has been working with the college to reduce these numbers. In the short term, there is sufficient scope and capacity in the existing network of schools to accommodate secondary growth from the Pōhutukawa Coast. After 2025, additional capacity would be required at Howick College”.

337.3

- 3.2 I am well aware that a new High School is one of the desirable outcomes of this PPC as far as local parents are concerned (even though the applicants have cynically used this as a sweetener for the locals). However in the overall context of education facilities in the Auckland region is it really necessary?. Clearly from the Ministry’s own admission its only necessary if the development enabled by PPC-88 goes ahead. Therefore if Auckland Council approve this PPC they would be forcing an additional \$60-70million of totally unnecessary expenditure on the NZ taxpayer. The pupils who would use this High School are already accounted for in the Ministry’s long term plans and the taxpayer would be better served if this development occurred near an existing transport hub and the prospective pupils accommodated by better utilising existing space at already under-utilised schools.

From: [wendy.hansen](#)
To: [Unitary Plan](#)
Subject: Proposed Plan Change PC 88 (Private): Beachlands South Ltd Submission
Date: Friday, 10 March 2023 1:23:22 pm

Sent from [Mail](#) for Windows

Dear Sir/Madam

Re - Proposed Plan Change PC 88 (Private): Beachlands South Ltd
Feb 17

I agree that the development may need to go ahead but have **Requested Amendments** outlined below

Re - Rezoning/Urbanisation of Beachland South at Formosa

I understand that a request by Kainga Ora to buy Formosa & Ahureka around October 2019 was **rejected**. **Reasons** given were that:

(i) it was **inconsistent with the Unitary Plan** which was focusing its growth strategy within the Rural Boundary and **specifically along the motorway and rail infrastructure**.

(ii) The proposed development required **significant infrastructure investment** which was not budgeted.

Kainga Ora's letter to Auckland Council dismissed the Council's **infrastructure** concerns stating that infrastructure costs would be **met by Kainga Ora**. These would consist of:

- a. **Upgrade of the Beachlands Whitford Road to four lanes** including a Whitford Village bypass
- b. Renewal and capacity **upgrade of Beachlands wastewater treatment plant**
- c. A new potable supply
- d. **Upgrades to the ferry wharf** and associated dredging to facilitate large ferries to provide for increased ferry capacity
- e. Potential for the establishment of a **new secondary school**
- f. 3.5km **coastal walkway and revegetation works**
- g. General amenity provisions including **significant reserves and stream restoration**

Requested Amendments -

All these **cost commitments** are highly to be recommended and **should be required from Beachlands South Ltd**

1. I object to the **high density** of apartment blocks very close to Tui Brae in the Marine precinct.

- **Beachlands South Ltd** reasoning is that it is closer to the Ferry. However at present only 6% of the Beachland population use the ferries. The ferries are at capacity during peak hours with people working in the city and they take up much of the available parking.
- There is some suggestion that larger ferries may be built but where and how long will it take to do this?
- The Ferry is quite expensive so the people who will take advantage of the small amount of affordable housing will not be able to afford it.
- Most of the population of Beachlands & Maraetai work out of the area and use the **Beachlands Whitford Road** as would the people from the new development.
- People from the new development need to be closer to buses and cars need to be closer too. So moving the high density further with the development makes more sense.
- **Beachlands South Ltd's** agreement to fund the 2 lane Whitford roundabout will not solve the peak hour backups there and it will probably be more dangerous ie Panmure Roundabout.
- **Beachlands South Ltd's** various plans do not match ie. they do not show the fairway reserve in the same way in all the plans. Appendix 6, 8, 9, are not the same as appendix 1. It is critical that there is transparency and that the community is given **correct and consistent information**. The developer needs to be very clear as to which plan will prevail, those in appendix 1 or the others.
- Figure 11 on page 25 in Appendix 6 is most concerning...the developer needs to explain why this figure is showing such a high number of apartment blocks all located within the Marine precinct when the other appendices don't show this.

338.5

Requested Amendments

1. High density apartments & Roading

- It would be better to have **high density apartments** located along the full length of the proposed **Spine Road** which will run through the entire development.
- The **transition from low density, single dwelling units, to higher densities needs to occur gradually** and thus any development directly adjoining existing properties should rather be terrace houses no more than 2 or 3 storeys and most definitely not apartment blocks. Accommodate the above suggestions.
- An **indepth** look at the plans and more clarity about what is planned.
- **Upgrade of the Beachlands Whitford Road to four lanes** including a

338.1

Whitford Village bypass. This bypass road already exists on paper.

- There will be considerable wear and tear on roads by **Beachlands South Ltd's** trucks. **A substantial amount should be paid for high quality repairs to road surfaces.**

2. **Water, waste water, electricity etc.** More clarity is needed.

- On the plans there is not any real information on whether the existing infrastructure ie. water, waste water, electricity etc. could accommodate such an extensive development. All the plans seem to mention that infrastructure will need to be upgraded but it does not say who will be responsible for doing this, who will pay for this and when this will happen.
- What is the **storm water plan** - slippage and flooding needs to be urgently taken into consideration especially in the light of the recent weather disasters.
- The amount of concrete needs to be reduced and spongy areas used.

338.3

3. **Phases of Development** - More clarity is needed.

- There is not much clarity on the phases for development. It would be impossible for such a huge area to be developed at the same time yet there is no mention of which areas will be developed when. Too much land being rezoned. If this is a 30 year development why do they need to rezone all of it now?

338.2

4. **School/s** - More clarity is needed about what to do with the increase of students

- **Beachlands South Ltd's** has offered Land for a school but the Ministry has no plans(or money) in the immediate future. Beachlands & Maraetai at capacity and the development will add more pressure to the road by busing students out, I believe Howick Botany schools are at capacity as well.

338.4

Sincerely Yours
Wendy Hansen
10 Tui Brae
Beachlands
0274448572

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 88 - Michael Holmes Sommerville
Date: Friday, 10 March 2023 1:31:00 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Michael Holmes Sommerville

Organisation name: Self

Agent's full name:

Email address: michaelhsommerville@gmail.com

Contact phone number:

Postal address:
17 Liberty Crescent,
Beachlands
Auckland 2018

Submission details

This is a submission to:

Plan change number: Plan Change 88

Plan change name: PC 88 (Private): Beachlands South

My submission relates to

Rule or rules:
Infrastructure, primarily roading.

Property address: The road between Beachlands roundabout and Howick/Ormiston.

Map or maps:

Other provisions:

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

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

The reason for my or our views are:
The existing road is in poor condition and struggles to cope with the existing level of vehicle traffic. An increase of the magnitude involved with the increase in housing will further exacerbate the holdups thus decreasing productivity and increasing CO2 levels unnecessarily.

This appears to be an uncoordinated development and while the housing increase will satisfy an Auckland wide need to increase housing stock, it is not being done in a well planned and organised way.

A development like Hobsonville was well planned and coordinated and this development lacks similar planning planning and coordination within the big picture.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

339.1

Details of amendments: Decline the application.

Submission date: 10 March 2023

Attend a hearing

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

Declaration

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

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

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

No

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

[Have your say on Auckland Council's annual budget 2023 and 2024.](#)



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email may be those of the individual sender and may not necessarily reflect the views of Council.

.. Strategy .. Policy .. Planning ..

Proposed Plan Change 88 (Private) to the Auckland Unitary Plan - Beachlands South

10 March 2023

Auckland Council
Unitary Plan
Private Bag 92300
Auckland 1142
unitaryplan@aucklandcouncil.govt.nz

Attention: Planning Technician

Please find attached a formal submission to Proposed Plan Change 88 (Private) to the Auckland Unitary Plan. The details of the submitter are:

Submitter Details

Full Name:	Craig Shearer
Submission on behalf of:	Pine harbour Marina Limited
Address for service:	C/- Shearer Consulting Ltd, 4 Park Road, Titirangi AUCKLAND 0604
Email:	craig@craigshearer.co.nz
Telephone number:	021 735914

Pine Harbour Marina Limited could not gain an advantage in trade competition through this submission.

Introduction

Pine Harbour Marina Limited ("PHML") owns and operates a 570 berth marina at the end of Jack Lachlan Drive at Beachlands. As well as a 10 ha marina basin, 2.4ha of which is owned by PHML, the Marina encompasses 5.8 hectares of land which is in use for a range of marine services, ferry, hard stand, boat parking, car parking, commercial, industrial and future residential activities.

The land is zoned Marina Zone and Residential – Terrace Housing and Apartment Buildings, in the Auckland Unitary Plan, and the Pine Harbour "Precinct" overlays the site. The Pine Harbour Precinct

provides for further higher density development of the area to provide a distinctive, vibrant mixed-use development to create a thriving community clustered around a world class marina, and to reinforce its role as a passenger transport node.

PHML generally supports the proposal by Beachlands South Limited Partnership to rezone 307 hectares of land for a mixture of residential, business, open space and future urban zones. We believe the proposed plan change will lead to an excellent use of the land and will be well placed to provide a balanced and sustainable community which will add significantly to the services and living environment of the wider Beachlands community.

There are however some aspects of the proposed plan change that PHML is not yet comfortable with. These are matters that directly impact upon the use and development of the Pine Harbour Marina holdings and business that we have yet to have the opportunity to discuss in detail with Beachlands South Limited Partnership. We are confident that these issues can be satisfactorily resolved through technical and engineering design discussions, but until we have done so, we oppose the development in relation to these three matters. We note that discussions have commenced between PHML and the promoter of Proposed Plan Change 88, and we have agreed to continue them to try clarify concerns and resolve issues that continue to arise.

The specific provisions of Proposed Plan Change 88 that this submission relates to are:

- Transport, and in particular the emphasis on access to increased ferry services at the terminal at Pine Harbour;
- Water Supply; and
- The potential for stormwater flooding on Marina property.

1. Transport

A key component of the PPC88 is access to and increases in ferry services at Pine Harbour Marina. The proposed Beachlands South Precinct provisions state at page 2:

The transport network in the wider Beachlands area and services at the Pine Harbour Ferry Terminal will be progressively upgraded and funded over time to support development in the precinct. The precinct includes provisions to ensure that the subdivision and development of land for business and housing is coordinated with the construction and delivery of infrastructure, including upgrades to the road network and ferry services to manage adverse effects on the local and wider network.

PMHL is conscious that in the long term 307 ha of land will become available for urban uses, with a potential residential yield of 3,000 dwellings (Section 32 Assessment, page 3). Further, the Beachlands South Precinct requires at 1.7.3 ferry service thresholds be achieved as dwelling development proceeds, with the progressive provision of an additional capacity as development stages occur, ultimately leading to an additional 650 ferry passengers being provided for between the hours of 0645 and 0845 on weekdays when up to 2918 dwellings are developed. At present there are 6 ferry services between 0645 and 0845 weekdays, with capacity averaging about 80 passengers per trip.

Of critical importance to these assessing this proposed ferry service increase is that the ferries operate out of a restricted space, which is owned by PHML, a private company. Increased services have not been agreed with PHML, which owns the jetties from which the ferries operate. The current operator is restricted to using small ferries because of access and configuration restrictions at the terminal, and the services currently have a limited lease of the jetties used as the terminal and to store their ferries when not in use.

To achieve the increases in services envisaged in PPC88 and the Precinct provisions requires Beachlands South Limited Partnership to undertake discussions and formulate agreements with PHML and Auckland Transport, and these have not yet occurred. Until this occurs and all three parties have developed an agreed position, we cannot confirm the increases in ferry patronage proposed are achievable.

340.1

2. Water Supply

According to the Plan Change documentation water supply for the proposed development will be derived from a number of sources. Included as one of the sources is a water supply agreement with Pine Harbour Living Limited, a commercial and certified supplier of potable water which takes water from the Beachlands Aquifer. The agreement proposes 765m³ per day be obtained from this supplier for the Beachlands South development. We note that in October 2021 Council approved via a non-notified resource consent an increase in the amount of water Pine Harbour Living Limited could take from this source. The bore is located close to Pine Harbour Marina at 24 Tui Brae.

PHML also has a water supply agreement with Pine Harbour Living Limited. The agreement requires Pine Harbour Living limited to supply up to 810m³ per day or 160,000m³ per year to PHML. If demand exceeds that amount, the supplier is obligated to apply for a variation to Auckland Council for a variation to its consent to obtain more water for PHML. Future water demand is likely to increase as Terraced Housing and Apartment Buildings zoned land is developed, as marine industry uses develop, and as the marina operations expand.

PMHL's concern with the proposed increase in the supply of water from this bore to accommodate PPC88 development is that we have had no opportunity to review the technical data justifying the increase in availability of groundwater from the bore. With increases in extraction there may be impacts upon the availability of water for PHML's operations and development programme. As an example, we are aware of at least one other authorised user of the aquifer resource having issues with adequate supply (the aquifer level has dropped, possibly from excessive extraction). PHML has not had the opportunity to determine with confidence that there is adequate capacity in the aquifer for supply to the Beachlands South Precinct, and until we have had the opportunity to with confidence accept there is adequate capacity PHML is opposed to additional water for development being derived from the Tui Brae bore owned by Pine Harbour Living Limited.

340.2

3. Flooding

Pine Harbour Marina is located at the bottom of a reasonably extensive catchment, which drains into the sea via a watercourse running through land owned by PHML. When the marina was developed, there was virtually no urban development in the upper catchment, but with the development proposed by PPC88, nearly all the contributing catchment will be developed. Auckland Council flood hazard maps show parts of the marina, especially those closest to the watercourse as potentially being prone to flooding in extreme weather events. This effect can be exacerbated by the influence of high tides

coinciding with peak flows occurring through the stream close to its outlet into the sea. This reinforces results of previous flood studies.

Although there has been one discussion with Beachlands South Limited Partnership on the results of the flood assessment and modelling work they have completed prior to lodging the plan change, PHML has not had the opportunity to assess these results in detail. Until we have been able to do so and determine that adequate measures are being proposed to avoid an/or mitigate any effects upon Marina holdings, we are opposed to the stormwater management and flood control proposals proposed by Beachlands South Limited Partnership.

340.3

4. Conclusion

Overall PHML supports the overall intent and strategic direction provided in PPC88 and consider provided matters of concern involving ferry transport services, water supply and flooding are resolved, the plan change can be approved and development can proceed. Until those matters are resolved PHML opposes those aspects of PPC88

Pine Harbour Marina Limited does wish to be heard in support of this submission at a hearing.

Please contact the undersigned if you have any queries regarding this submission.

Yours faithfully



Craig Shearer
Director, Shearer Consulting Limited