

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 88 - Anne
Date: Friday, 10 March 2023 1:46:00 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Anne

Organisation name:

Agent's full name: Anne

Email address: annediped@gmail.com

Contact phone number:

Postal address:

2018
Beachlands
Manukau 2018

Submission details

This is a submission to:

Plan change number: Plan Change 88

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

My submission relates to

Rule or rules:

Rezoning of 307Ha south of Beachlands village in the area of Formosa golf course from rural to future urban residential etc

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

*Concern that the narrow bridges at Waikopua, Whitford village and Mangamangaroa will not withstand more traffic, buses, trucks etc, if ANY of these bridges fail then the population of the Pohutukawa coast will be left with Maraetai coast road as their only option

*Insufficient infrastructure, eg waste water, roading, schooling, medical services

*impact on neighbouring suburbs such as Botany, Pakuranga etc

341.1

341.2

341.3

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

Details of amendments: Upgrade roading, widen bridges. Provide senior school, increase medical facilities, upgrade wastewater facilities

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.

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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)

Mr I vanSidney Bos hoff

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

Address for service of Submitter

8 Tui Brae, Beachlands 2018 Auckland

Telephone:

211684101

Fax/Email:

ivanboshoff850@gmail.com

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 88 (Private)

Plan Change/Variation Name

Beachlands South

The specific provisions that my submission relates to are:

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

Plan provision(s)

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

Or

Property Address

Or

Map

Or

Other (specify)

Submission

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

I **support** the specific provisions identified above

342

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 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.

See attached separate sheet

I wish to be heard in support of my submission

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

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

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

08.03.2023

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.

1. Transport - Currently the Marine precinct in the proposal will accommodate the majority of apartment blocks. According to the developers this is because this is the area closest to the ferry terminal which will allow those living in the apartments to live within walking distance of the ferry. What they have not addressed is that the ferry is already at full capacity to accommodate more passengers. They make the claim that the ferry facilities will be upgraded over time but there is no clear agreement that either AT or Pine Harbour are investing in upgrading the ferry terminal. Large ferries are not able to enter the small terminal. The Pine Harbour Marine carpark is currently overflowing with vehicles so much so that cars are being parked all the way to the green area on the shore. What other options will there be? If they say there will be buses then their argument to consolidate all the high density housing in one precinct does not make sense and indeed it would be better to have high density housing located along the full length of the proposed Spine Road which will run through the entire development. This means residents in this new development of around 3,000 dwellings will have to rely on cars, adding potentially another 6,000 cars on the road which is also at capacity and does not take into account the new development behind Countdown. There is one road in and one road out of Beachlands which is not going to be upgraded either as per the statements from AT in the next year or two. This poses a huge risk to people's safety as the roads will be congested and the developer is only investing in the intersections at Whitford and Beachlands. Current time to travel from East Tamaki/Botany to Beachlands in peak times is approx 1 hour. 342.2

2. Education - there is an area set aside for a school according to the developer. However, MOE have not confirmed any school and this is once again a concern as all these children will need to go to schools outside of Beachlands resulting in more traffic along this Beachlands-Maraetai Rd and impacts Howick, Flat Bush and other surrounding areas. 342.5

3. Emergency services - currently a volunteer fire service exists in Beachlands, no A&E and no manned police station. If there is an emergency, we have to rely on surrounding areas emergency services coming out to incidents. The closest A&E is in Botany and this is also at capacity with min 4 hours wait. 342.6

4. Water - There is no clear information on whether the existing infrastructure ie. water, waste water, could accommodate such an extensive development. All the plans seem to mention is that infrastructure will need to be upgraded but it does not say who will be responsible for doing this, who will pay for this and when this will happen. The water plan they have should be properly considered and well developed wastewater system is required and one that is flood proof. Who will pay for the wastewater drainage etc. if this plan does not work? Floods, slippage etc is also something that is not clear in the proposal. We live in the adjoining houses below the golf course and if there is high density housing, we need to ensure our houses are protected from any slips, flooding etc. - we don't want a repeat of Hawkes Bay or other Auckland areas from recent times. 342.3

5. Power - Current power supply will not cope with such an extensive development. Once again, I could not find relevant substantial information in their proposal. 342.4

6. Status as a rural community – This rezoning will impact the identity of Beachlands as a rural community and the fabric/character of the Beachlands Village. The transition from low density, single dwelling units, to higher densities needs to occur gradually and thus any development should rather be terrace houses no more than 2 or 3 storeys and most definitely not apartment blocks. If Beachlands is to retain its status as a rural community under the Auckland City Council Unitary Plan then any proposal to move dwelling construction from 342.1

essentially single/double level dwellings to a high proportion of high-density housing, changes the Beachlands status diametrically.

1. The transition from low density, single dwelling units, to higher densities needs to occur gradually and thus any development should rather be terrace houses no more than 2 or 3 storeys and most definitely not apartment blocks. 2. The Beachlands-Maraetai Rd needs to be changed from 2 lane to 4 lanes to accommodate the increased traffic. 3. Water plan needs to be reviewed again, stormwater, flooding plans all need to be reviewed. 4. Power supply needs to be upgraded. 5. A school needs to be confirmed or the road needs to be upgraded to accommodate the large increase in traffic. 6. Emergency services need to be put in place to address higher traffic accidents and other emergencies, policing for a higher population needs to occur.

Finally, a development of the size proposed cannot proceed without proper and full infrastructure (as indicated above) and, that infrastructure should be paid for by those wanting rezone and re develop the area in the rezoning application.

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 88 - Patrick Gallagher
Date: Friday, 10 March 2023 2:16:02 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Patrick Gallagher

Organisation name:

Agent's full name:

Email address: ppgallagher@xtra.co.nz

Contact phone number:

Postal address:
45 First View Avenue
Beachlands
Auckland 2018

Submission details

This is a submission to:

Plan change number: Plan Change 88

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

My submission relates to

Rule or rules:
All Plan Change 88 documents on Auckland Council's website as of 10/03/2023

Property address: 110 Jack Lachlan Drive; and 620, 680, 682, 702, 712, 722, 732, 740, 746 758 and 770 WhitfordMaraetai Road, Beachlands.

Map or maps:

Other provisions:
Nil

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:
In principle I support planned development as it provides housing, workplaces, schools, and assets for a growing city.

The proposed development at Beachlands South has three key participants: Auckland Council, Beachlands South Limited Partnership (BSLP), and stakeholders. Auckland Council has previously declined to support the urbanisation of Beachlands because development does not fit within the Auckland Plan and because the necessary infrastructure construction costs (road, wastewater, and potable water) have not been budgeted in Auckland Council's Long-Term Plan. Given Council's current budget challenges they cannot even consider such infrastructure expenditure particularly when it will benefit so few. Auckland has multiple choices of easier land development areas that are closer to existing infrastructure and away from the coast at Silverdale, Wainui, Dairy Flat, Westgate, Kumeu,

343.1

Takanini, Drury, Karaka, Paerata and Pukekohe.

BSLP's Structure Plan and Section 32 Assessment Report focus heavily on development within its property boundaries and does not adequately address the impacts the development will have on existing road, wastewater, and potable water supply.

There are two stakeholder groups: Current and potential future. Current stakeholders are concerned about the lack of area wide wastewater and transport planning. Potential future stakeholders will want a great environment to live and work in and assets that work. Without infrastructure solutions both stakeholder groups lives will be negatively impacted.

For all the above reasons I cannot support Private Plan Change 88.

343.2

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.

No

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

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An Auckland Council Organisation

20 Viaduct Harbour Avenue, Auckland 1010
Private Bag 92250, Auckland 1142, New Zealand
Phone 09 355 3553 Website www.AT.govt.nz

10 March 2023

Plans and Places
Auckland Council
Private Bag 92300
Auckland 1142
Attn: Planning Technician

Email: unitaryplan@aucklandcouncil.govt.nz

Re: Proposed Private Plan Change 88 – Beachlands South

Please find attached Auckland Transport's submission on the Proposed Private Plan Change 88.

If you have any queries in relation to this submission, please contact Chris Freke, Principal Planner - Land Use Policy and Planning South at Chris.Freke@at.govt.nz, or on 0274 661119.

Yours sincerely

A handwritten signature in black ink, appearing to read "Chris Freke".

Chris Freke
Principal Planner - Land Use Policy and Planning South

cc:
Unio Environmental Ltd
Private Bag 92518
Auckland 1141
Attention: Vijay Lala/ Nick Roberts
Email: vijay.lala@tattico.co.nz

Encl: Auckland Transport's submission on Proposed Private Plan Change 88 – Beachlands South





**FORM 5 – SUBMISSION ON NOTIFIED PROPOSAL FOR PRIVATE PLAN CHANGE 88
BEACHLANDS SOUTH UNDER CLAUSE 6 OF SCHEDULE 1, RESOURCE
MANAGEMENT ACT 1991**

To Auckland Council
Private Bag 92300
Auckland 1142

Submission on: Proposed Private Plan Change 88 from Beachlands South Limited Partnership to rezone approximately 307 hectares of land south of the Beachlands township. This includes the properties at 110 Jack Lachlan Drive; and 620, 680, 682, 702, 712, 722, 732, 740, 746, 758 and 770 Whitford-Maraetai Road, Beachlands.

Specifically, this plan change aims to:

- rezone the northern portion of the land (159.54 hectares) from Rural – Countryside Living zone to a mixture of Future Urban, Residential – Mixed Housing Urban, Business - Local Centre, Business – Light Industry; Business – Mixed Use; and Open Space zones;
- rezone the southern portion (147.58 hectares) from Rural – Countryside Living zone to Future Urban Zone, requiring a future plan change to zone the land for development;
- introduce a new precinct (with six sub-precincts), aiming to guide residential, commercial, recreational and educational development and to replace the existing Whitford precinct (and sub-precinct) provisions; and
- extend the Stormwater Management Area Flow 1 control over the plan change area.

From Auckland Transport
Private Bag 92250
Auckland 1142



1.0 Introduction

1.1 Beachlands South Limited Partnership (**the applicant** or **BSLP**) has lodged a proposed private plan change (**PPC 88** or **the plan change**) to the Auckland Unitary Plan: Operative in Part (**AUPOP**) to rezone approximately 307 hectares of land in Beachlands from Rural – Countryside Living to a mix of business, residential, open space and Future Urban zones.

1.2 Auckland Transport is a Council-Controlled Organisation of Auckland Council (**the Council**) and the Road Controlling Authority for the Auckland region. Auckland Transport has the legislated purpose to 'contribute to an effective, efficient and safe Auckland land transport system in the public interest'¹. In fulfilling this role, Auckland Transport is responsible for:

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

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

2.0 Auckland Transport's submission is:

2.1 The key overarching considerations and concerns for Auckland Transport are described as follows:

Auckland Plan 2050

2.2 The Auckland Plan 2050 (**Auckland Plan**) is a 30-year plan for the Auckland region outlining the long-term strategy for Auckland's growth and development, including social, economic, environmental and cultural goals. The Auckland Plan is a statutory spatial plan required under section 79 of the Local Government (Auckland Council) Act 2009. The section 32 report² for PPC 88 characterises the statement in the Auckland Plan³ concerning 6% of dwelling growth occurring in rural areas as a "goal". The Auckland Plan simply states that 6% of dwelling growth is anticipated in rural areas (as part of a quality compact approach to

¹ Local Government (Auckland Council) Act 2009, section 39.

² Section 32 report, pages 3 and 25.

³ Auckland Plan, page 217.



accommodating growth) and envisages limited residential development in rural zones being focused in the existing countryside living zone.⁴

- 2.3 Transport outcomes identified in the Auckland Plan to enable this growth include providing better connections, increasing travel choices and maximising safety. To achieve these outcomes, focus areas outlined in the Auckland Plan include targeting new transport investment to the most significant challenges, making walking, cycling and public transport preferred choices for many more Aucklanders and better integration of land use and transport.⁵ The high-level direction contained in the Auckland Plan identifies future urban form outcomes and informs the strategic transport priorities to support growth.
- 2.4 The PPC 88 area is not identified as an existing or future urban area in the Auckland Plan. Rather, it is identified as a rural area outside the Rural Urban Boundary.

Managing Auckland-wide growth and rezoning

- 2.5 The high-level spatial pattern of future regional development is represented in the Auckland Plan including the Future Urban Zone in the AUPOP and further defined through sub-regional level planning such as Structure Plans, to then be enabled through appropriate plan change processes. Whilst the applicant has prepared a Structure Plan, the PPC 88 area is not identified for growth via a Future Urban Zone within the AUPOP and is therefore not included in any long term planning process or plan by Auckland Transport or Auckland Council for transport infrastructure.
- 2.6 Growth across the region, including incremental growth enabled through the AUPOP as well as large scale greenfield growth, places pressure on the available and limited transport resources that are required to support the movement of additional people, goods and services. The funding and planning processes for the Regional Land Transport Plan (**RLTP**) and Regional Public Transport Plan (**RPTP**) take into consideration the Auckland Plan, Future Urban Land Supply Strategy (**FULSS**) and AUPOP to signal timing and location of new or intensified urban areas.
- 2.7 In this regard, the alignment of the AUPOP enabled growth and plan changes with the provision of transport infrastructure and services is contingent on having a high level of certainty around the funding and delivery of the required infrastructure and services. Without this certainty, Auckland Transport is concerned that there will continue to be significant transport network deficiencies in the provision and co-ordination of transport responses to the dispersed growth enabled across the region, and potentially significant adverse effects on the transport network.

⁴ Auckland Plan, page 208.

⁵ Auckland Plan, Transport and Access, Focus Areas 2, 4 and 5.



Sequencing of growth and alignment with the provision of transport infrastructure and services

- 2.8 Guidance on the sequencing and timing of future urban land identified in the Auckland Plan (i.e. “unzoned” greenfield areas of development) is discussed in the Future Urban Land Supply Strategy 2017 (**FULSS**), and subsequently incorporated into the updated Auckland Plan in 2018. This document sets out the anticipated timeframes for “development ready” areas over a 30-year period. The FULSS helps to inform infrastructure asset planning and funding priorities, and in turn supporting development capacity to ideally be provided in a coordinated and cost-efficient way via the release of “development ready” land. The analysis undertaken for the FULSS provided for a broad determination of bulk infrastructure requirements, acknowledging the need for more detailed planning through structure planning and bulk infrastructure planning and delivery/construction processes. These planning and delivery processes need to be considered in order to have land ready for development. PPC 88 is unanticipated within this forward planning process.
- 2.9 The urbanisation of land proposed through plan changes (such as PPC 88) which is unexpected means that it precedes planning and delivery of infrastructure and services and requires careful consideration of transport needs. This includes the requirement for applicants/developers to mitigate the transport effects associated with their developments and to provide transport infrastructure needed to service their developments. In the case of significant expansions of existing rural and coastal towns and villages, this is reflected in the requirement for “structure planning and plan change processes in accordance with the Appendix 1 Structure plan guidelines”.⁶ In particular, Appendix 1 Section 1.4.6. *Transport networks* sets out matters to be addressed which include integration of land use and development⁷, support for multi-modal and interconnected access⁸, and identifying and managing effects of transport on land uses⁹. The applicant has produced a Structure Plan, however for the reasons which will be elucidated further within this submission, the transport assessment within the Structure Plan is not considered to adequately address Section 1.4.6 (e.g. (3) *Support for transport and accessibility that is multi-modal and interconnected with an appropriate number and location of access points*). Addressing the effects arising from subdivision and development is dependent on funding to support the planning, design, consenting and construction of transport infrastructure, services and improvements. There is a need to assess and clearly define the responsibilities relating to the required infrastructure and the potential range of funding and delivery mechanisms including the role of applicants/developers, and in consideration of the financially constrained environment that Auckland Council and Auckland Transport are operating within.

⁶ AUPOP, B2.6.2 Policy (3).

⁷ AUPOP, Appendix 1 1.4.6 (1).

⁸ AUPOP, Appendix 1 1.4.6 (3).

⁹ AUPOP, Appendix 1 1.4.6 (4).



- 2.10 Further to this and for clarity, as the growth that would be enabled by PPC 88 is unanticipated there is no current identified funding for delivery of any transport network infrastructure or upgrades in the RLTP. The RLTP sets out the 10-year programme of transport infrastructure investment required to support planned and enabled growth in the Auckland region and is aligned with the Council's priority areas and spend proposed within the Council's 10 Year Budget 2021-2031.
- 2.11 The applicant has identified¹⁰ that *the transport upgrades required to address the effects resulting from the PPC are expected to be fully funded by BSLP whom are currently in discussions with Crown Infrastructure Partners to develop an Infrastructure Funding Agreement.*
- 2.12 While this appears promising, the extent of required transport network improvements and services to ensure integration of land use and transport infrastructure and mitigate the proposal's transport effects has not been agreed between the applicant and Auckland Transport. As matters presently stand:
- 2.12.1 The funding required is not certain (funding of these improvements is a fundamental issue and a solution is not yet adequately assessed or identified in all cases); and
- 2.12.2 The applicant's proposed suite of network improvements is insufficient to mitigate PPC 88's adverse effects, as addressed in more detail in **Attachment 1** and **Attachment 2** (noting that the spatial extent of effects is not fully considered and there is no confidence that the proposed ferry improvements can be implemented).
- 2.13 The plan change proposal will lead to a substantial expansion of the Beachlands area and requires the provision (including funding and delivery) of transport infrastructure and services to the area to meet the network demands from the development. The need to coordinate urban development with infrastructure planning and funding decisions and reduce greenhouse gas emissions is highlighted in the objectives of the National Policy Statement on Urban Development 2020 (**NPS-UD**) which are quoted below (with emphasis in bold):
- Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:*
- (a) *the area is in or near a centre zone or other area with many employment opportunities*
- (b) ***the area is well-serviced by existing or planned public transport***

¹⁰ Beachlands South Precinct Private Plan Change Request, Section 32 Assessment Report 31 March 2022, page 75.



(c) *there is high demand for housing or for business land in the area, relative to other areas within the urban environment.*

Objective 6: Local authority decisions on urban development that affect urban environments are:

- (a) ***integrated with infrastructure planning and funding decisions;*** and
- (b) *strategic over the medium term and long term;* and
- (c) *responsive, particularly in relation to proposals that would supply significant development capacity.*

Objective 8: New Zealand's urban environments:

- (a) *support reductions in greenhouse gas emissions; and [...]*

- 2.14 While Auckland Transport is mindful of the Environment Court's findings on the relevant NPS-UD objectives and policies for a private plan change such as PPC 88,¹¹ the Regional Policy Statement (**RPS**) objectives and policies in the AUPOP place similarly clear emphasis on the efficient provision of infrastructure and on the integration of land use and development with infrastructure, including transport infrastructure. Refer, for instance, to Objectives B2.2.1(1)(c) and (5) and B3.3.1(1)(b), and Policies B2.2.2(7)(c), B2.4.2(6) and B3.3.2(5)(a) (e.g. Policy B3.3.2(5)(a) is to: *"Improve the integration of land use and transport by ... ensuring transport infrastructure is planned, funded and staged to integrate with urban growth.* In addition, Objective B2.6.1(2), which specifically applies to coastal towns and villages, requires that *"Rural and coastal towns and villages have adequate infrastructure"*.
- 2.15 Supporting implementation of NPS-UD Objective 8, and related Policy 1(e) more broadly, Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan¹² and Auckland's Transport Emissions Reduction Pathway¹³ both have a strong focus on reducing private (light) vehicle trips and providing for active modes and public transport as a method to reduce greenhouse gas emissions.
- 2.16 Auckland Transport considers that the lack of alignment between any rezoning of the subject site and the funding, planning and delivery of supporting infrastructure and services is a key issue in assessing the effects associated with the proposal. It is important to ensure that any adverse transport effects can be appropriately mitigated. The assessment of effects should also consider whether it is necessary to limit the scale of any growth that could be realistically supported based on the extent of mitigation provided by the applicant (including both the extent of development enabled by any live zoning and provision of a Future Urban Zone) and the degree of alignment with NPS-UD Objective 8 and Policy 1(e) to reduce greenhouse gas emissions.

¹¹ E.g. *Middle Hill v Auckland Council* [2022] NZEnvC 162, at [49].

¹² Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan pages 82 and 83.

¹³ Auckland's Transport Emissions Reduction Pathway, Section 3.



Intensification Planning Instrument / Plan Change 78

- 2.17 Notification of PPC 88 coincides with Auckland Council's implementation of the NPS-UD intensification directives and also the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 which, among other things, requires medium density residential standards (**MDRS**) for specified urban areas. Beachlands has been identified by Auckland Council as an urban area where MDRS will be applied (under Plan Change 78) and is subject to a *qualifying matter*¹⁴ (proposed Beachlands Transport Infrastructure Constraints Control).
- 2.18 Transport effects of PPC 88 should be considered in conjunction with the potential effects from Plan Change 78 (with and without the qualifying matter) which may result in increased residential development and consequential incremental increased demands on the transport network. This includes how the level of growth enabled by PPC 88 affects the overall network capacity in the vicinity of the plan change and, in turn, how this impacts the planning, funding and delivery of the transport network improvements.

Assessment and identification of effects and mitigation

- 2.19 In the context of PPC 88, the extent, scale and intensity of potential transport effects and the methods for mitigating these effects will require a combination of both wider strategic transport network connections, upgrades and facilities and developer mitigation. This includes ferry services which are relied on by the applicant as an integral part of PPC 88.
- 2.20 Based on its analysis to date, Auckland Transport is concerned that:
- 2.20.1 PPC 88 will have potentially significant adverse transport effects, and the application material is considered to understate the effects;
 - 2.20.2 there are many feasibility issues associated with upgrading the current ferry service to the point where it could cater for the applicant's assumed use of it; and
 - 2.20.3 the provisions of PPC 88 and the applicant's proposed improvements to transport infrastructure will be inadequate to mitigate those effects.
- 2.21 The applicant's framework to give effect to the provision of transport infrastructure mitigation requirements includes the application of staging / threshold mechanisms. If the plan change is approved, these mechanisms would need to be amended / strengthened and agreed so as to result in planning provisions that are clearly expressed, enforceable and effective and do not place any undue funding and planning risk on Auckland Council or Auckland Transport in regard to non-compliance with these provisions. Failure to address these concerns will result in adverse effects on the transport network.

¹⁴ RMA Section 771.



2.22 The above overarching considerations have informed the following specific submission points.

3.0 Specific parts of the plan change that this submission relates to:

3.1 Auckland Transport **opposes** PPC 88 in its entirety, based on the matters/concerns raised in this submission (including the main body and **Attachments 1 and 2**) and because the adverse effects of the proposal on the transport network have not been adequately identified nor demonstrated as adequately avoided or mitigated.

3.2 Auckland Transport acknowledges and appreciates the responses that the applicant provided on queries requested through the Clause 23 process prior to the notification of the private plan change. However, a number of key concerns remain as detailed in **Attachments 1 and 2**.

4.0 Decisions sought from the Council:

4.1 Auckland Transport's primary position at this time is that the Council should decline PPC 88. **Attachments 1 and 2** provide further detail of the decisions sought from the Council, including alternative relief in the event that Auckland Transport's primary relief (that PPC 88 be declined) is not accepted.

4.2 In the alternative to and without limiting the primary relief of declining PPC 88, the secondary relief Auckland Transport seeks is that the Council decline PPC 88 in relation to the Future Urban Zone change, in the event the request to live zone the requested area is supported by the Council.

4.3 In all cases where amendments to the plan change are proposed, Auckland Transport would consider alternative wording or amendments to the objectives, policies, rules, methods and maps which address the reason for Auckland Transport's submission. Auckland Transport also seeks any further, other or consequential relief required to respond to the reasons for this submission and/or give effect to the decisions requested.

4.4 In the event that PPC 88 is approved, consideration will need to be given to amendments required to the PPC 88 provisions to address the Beachlands Transport Constraints Control proposed through Plan Change 78 (**PC 78**), particularly in the event that the notified qualifying matter is not upheld. This may also potentially influence the proposed zoning and land use patterns within PPC 88.

4.5 Given the difficulties of establishing a base line demand and associated transport requirements whilst PC 78 is still being determined, it is requested that processing



of PPC 88 be suspended pending decisions or direction as to the outcomes of the PC 78 process.

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

5.0 Appearance at the hearing

5.1 Auckland Transport wishes to be heard in support of this submission.

5.2 If others make a similar submission, Auckland Transport will consider presenting a joint case with them at the hearing.

Name: Auckland Transport

Signature:

A handwritten signature in black ink, appearing to read 'Sarah Wilson', is centered below the 'Signature:' label.

Sarah Wilson
Manager, Land Use Policy and Planning South

Date: 10 March 2023

Contact person: Chris Freke
Principal Planner - Land Use Policy and Planning South

Address for service: Auckland Transport
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Attachment 1

The following table sets reasons supporting Auckland Transport’s primary relief (that PPC 88 should be declined). It also identifies where, in the event this relief is not granted, amendments sought to PPC 88 Beachlands South Precinct Provisions and AUPOP maps.

Italics = *PPC 88 notified text*

Strikethrough = ~~proposed deletions~~

Bold and underline = **proposed additions**

Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
Inconsistency with AUPOP Regional Policy Statement (RPS) and NPS-UD	Entire Plan Change	Oppose	<p>There are a number of RPS objectives and policies (and related NPS-UD provisions) which the proposal is assessed as not being consistent with for the following reasons:</p> <p>Areas of concern include:</p> <ul style="list-style-type: none"> a. Acknowledging B2.6, Objective B2.2.1 (4) seeks that development is <i>contained within</i> coastal villages. The development is not <i>within</i> a coastal village. b. Policy B2.2.2 (4) displays a clear preference for intensification within the Appendix 1A urban area (“promote”) compared with “enable” within coastal towns and villages. Objective B2.4.1(1) reinforces this preference. c. Policy B2.6.2(g) <i>requires access to the town or village through a range of transport options including walking and cycling</i>. This is not adequately addressed within the provided precinct provisions. d. Policy B3.3.2(5) (b) encourages land use patterns which <i>reduce the rate of growth in demand for private vehicle trips</i>, 	<p>Decline PPC 88 as the proposal is assessed as inconsistent with a number of RPS objectives and policies (with related concerns in relation to relevant NPS-UD provisions).</p> <p>Without limiting the primary relief of declining PPC 88, in the event that the primary relief is not supported, Auckland Transport seeks that the Council decline the plan change in relation to the Future Urban Zone change (in the event the Council accepts the request to live zone the requested area).</p>

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Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
			<p><i>especially during peak periods.</i> The NPS-UD Objective 8(a) and Policy 1(e) seek well-functioning urban environments that support reduction in greenhouse gas emissions. Even if the ferry is a viable public transport option, it currently accommodates only 6% of external trips (with a further 1% by bus). Even if the applicant’s ITA conclusions are agreed with (which is not currently the case), looking forward, even with a more than doubling of the ferry mode share to 14% coupled with a revised 2.5% for public bus, this still leaves the majority of trips to and from the PPC 88 area being via private motor vehicle. This is not a land use pattern which supports reduction in vehicle trips nor a well-functioning urban environment due to a lack of accessibility for all people between housing and jobs (in particular employment locations outside of Beachlands) by way of public or active transport.</p> <p>Further, PPC 88 includes FUZ also premised on reliance on public transport. Almost all the proposed FUZ is between 1.5km and 3km (straight line) from the ferry berth which is not conducive to achieving this range of objectives and policies. This is demonstrated by the applicant’s¹⁵ Ferry Walking Isochrones (replicated below) showing that only approximately a quarter of the PPC 88 area is within a 15 minute walk of the ferry and none of the FUZ is within a 20 minute walk. It is acknowledged that 5 to 10 minute cycling journeys serve sites across all the proposed ‘live’ zoned area.</p>	

¹⁵ Clause 23 Response, Attachment 13, Transport (Stantec) dated 3/9/22, Attachment 1.



Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
			 <p>e. RPS Policies B2.4.2(7), B3.3.2(5)(f), B3.3.2(6) and B2.6.2(1)(e) recognise the need for protection of sensitive activities from the effects of existing infrastructure (e.g. arterial road network); in particular effects of noise on public health and amenity are not addressed by appropriate provisions.</p> <p>f. Plan Change 78 seeks to introduce a transport based qualifying matter (QM) to Beachlands which would limit development (PC 78 Policy B2.4.2(2) and (4)(b) and (c) and (5)). The combination of PPC 88 plus PC 78 without the QM in place may result in the need to undertake very significant upgrades to Whitford Maraetai Road such as four laning. This is not assessed by the applicant and has implications for the staging of development with transport upgrades.</p>	



Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
			<p>Alignment with the RPS will also depend on a range of matters being satisfactorily addressed or retained including:</p> <ul style="list-style-type: none"> a. Agreement with the extent of infrastructure required, provision of appropriate funding and PPC 88 provisions which deliver that infrastructure in a coordinated way (Objective B2.2.1(1) (c) and (d) and (5), Policies B2.4.2(6) and Objective B2.6.1(2) and Policy B2.6.2(1)(b) and B.3.3.2 (4) and (5)). b. Retention of precinct provisions providing for active (walking and cycling) mode connections and prioritising active mode connections within the PPC 88 area (Policy B2.3.2 (1)(b) to (d) and (2)(b)). <p>Finally, B1.2 of the AUPOP details the range of regulatory and non-regulatory methods to implement the objectives and policies in the RPS, including the Auckland Plan, the Long Term Plan (LTP), and the RLTP.¹⁶ The RLTP is a 10-year investment programme for transport in Auckland, developed by Auckland Transport together with Waka Kotahi New Zealand Transport Agency and KiwiRail to respond to growth and challenges facing Auckland over the next decade. The infrastructure required to service the development proposed by PC 88 is not included in the RLTP.</p>	
Transport assessment assumptions, lack of transport effects identified including lack of necessary transport mitigation	Entire plan change	Oppose	The Integrated Transport Assessment (ITA) supporting PPC 88 has been reviewed and it is concluded that elements of the ITA's assumptions are not sufficiently robust and consequentially, the proposed mitigation is not sufficient in extent.	Decline PPC 88 as the actual and potential adverse effects on the transport network have not been appropriately assessed and addressed.

344.3

¹⁶ Documents to which regard must be had under section 74(2)(b)(i) of the RMA.



Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
			<p>The assessment of likely vehicle trips from PPC 88 is understated and includes unrealistic assumptions around passenger transport mode share. It also relies on complementary employment/development and a school which may or may not occur in the timeframes assumed.</p> <p>This will have the effect of additional vehicle trips on the limited routes serving the area. These effects have not been fully assessed. Auckland Transport is concerned that PPC 88 will have significant adverse transport effects and that upgrades beyond those identified within the ITA will be required.</p> <p>Attachment 2 provides detailed reasons for these concerns which are briefly summarised as:</p> <ul style="list-style-type: none"> a. Mode Share Assumptions: Are considered to be overly optimistic including assumed increase in Central Business District (CBD) workers residing in the area compared with existing, limited ability to reach other employment centres (e.g. Airport, East Tamaki) by public transport and limited bus services. b. Proposed Ferry Service Mitigation: It is unclear how the applicant could provide the proposed additional capacity at the existing ferry berth and with the current ferry fleet without significant investment. The current ferry berth and fleet is running near or at capacity. Methods for achieving mitigation proposed are not transparent. c. Proposed Bus Mitigation: Service expansion is not planned and would involve significant cost, with potentially little improvement in mode shared due to long travel times. Based on current network design, due to the length of route and range of destinations (requiring transfers) this is likely to be (and remain) an unattractive alternative to private vehicles. 	<p>In the event that the plan change is approved, Auckland Transport seeks for the objectives, policies, rules and other precinct provisions to be strengthened to avoid adverse effects on the transport network including, without limitation, measures such as:</p> <ul style="list-style-type: none"> a. reducing the development capacity; b. additional or revised infrastructure requirements based on a more robust assessment of demand; c. address scenarios where assumed schools and employment do not eventuate or occur later than assumed; d. address scenarios where passenger transport upgrades, in particular to ferry services, do not eventuate; e. additional infrastructure or service requirements, or alterations to those proposed; f. provisions addressing the risk of key assumptions not coming to pass; and/or g. stronger staging or review provisions or consent activity status.

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Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
			<p>d. Integrated Transport Assessment (ITA): There are a wide range of matters which either require further detail or additional assessment. Examples include the spatial extent of the ITA (too limited), extent of improvements proposed are not holistic (intersection approaches not addressed in all circumstances), uncertainty around base modelling and reliance on Hobsonville Point as an unreasonable comparison.</p>	
<p>Delivery of active mode connections</p>	<p>Entire plan change</p>	<p>Oppose</p>	<p>Good accessibility and travel choice needs to be provided, which includes access to safe active mode and public transport infrastructure and services. Inadequate provision for active modes will result in a dependence on private motor vehicles resulting in development that has a high total vehicle kilometres (VKT) and greenhouse gas emissions.</p> <p>Whilst the applicant's mode share forecasts are not supported, in order to best support the potential to achieve the mode share forecasts it is important that high quality active mode links are provided early in subdivision and development staging, to provide for access to centres and public transport nodes as soon as dwellings are occupied and non-residential activities establish. To further support mode share, safe linkages from PPC 88 to existing Beachlands are important.</p> <p>Beachlands Precinct 1 (I403) contains a number of requirements to retain the rural character of Jack Lauchlan Drive (particularly Rule I403.6.7(9)). It is unclear how these provisions will be addressed by PPC 88.</p> <p>Notwithstanding this:</p>	<p>If PPC 88 is approved, amend the precinct provisions to incorporate policies, standards and matters of discretion/assessment criteria as appropriate to provide for timely, efficient, safe and effective active mode networks by:</p> <ul style="list-style-type: none"> a. Requiring establishment of safe active mode connections to / from the ferry berth and to local facilities early in development so active mode connections are immediately available to provide travel options and assist in establishing active travel patterns. b. Ensuring safe walking and cycling facilities are provided for as part of the proposed road/street network including local roads and access ways and provisions for rear access along roads with cycle facilities. <p>This may include (without limitation) alterations to Policies 11 to 18 and alterations to Standard I.7.3 staging of development with Transport</p>



Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
			<ul style="list-style-type: none"> a. There are no provisions relating to the staging of safe crossing points along and across Jack Lachlan Drive to link the new area with the existing Beachlands urban area. b. A two-way cycle path is proposed on all collector roads and Jack Lachlan Drive along with footpaths on primary collectors which are comparatively narrow. These outcomes are not supported in relation to encouraging active mode share. c. Upgrading the Jack Lachlan Road frontage is supported, if PPC 88 is approved. The staging standard (1.7.3 (1)) is only linked to the establishment of a school or the business area when some upgrades may be necessary to link to the ferry and established networks within Beachlands including any frontage adjoining a development. 	<p>Upgrades to include timing of delivery of key active mode infrastructure such as the Fairway Reserve.</p> <p>Amendments may also be necessary to I403.</p>
Development staging	Entire plan change	Oppose	<p>The Precinct Plan 5 includes a movement network across both the proposed 'live' urban zones and the Future Urban zone. Interim issues may arise where connectivity relies on future transport links through the FUZ area that may not eventuate or whose timing is uncertain.</p> <p>These may include:</p> <ul style="list-style-type: none"> i. the ability to provide efficient bus routes to the first stages of development as the collector route will initially be a long cul de sac that buses may not be able to turn around in; ii. the Jack Lachlan Drive/Whitford Maraetai Road intersection which will be the only access point to the development; and iii. access to the business area which will be by way of cul de sac to Jack Lachlan Drive. 	<p>If PPC 88 is approved, amend the precinct policies, provisions and plans to ensure the ability to serve by active mode and passenger transport the needs of each stage of development, connect with the surrounding network and ensure that interim adverse effects are adequately avoided, remedied or mitigated.</p>

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Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
			There is a need for the 'live' urban zoned area to be capable of operating in isolation from the FUZ and this may require changes to the movement network and provisions.	
Stormwater management culvert upgrade	Precinct provisions and plan	Support in part	The supporting material notes the need for culvert upgrades across Jack Lachlan Drive. In regard to the replacement, relocation or upgrade of any culvert structures, Auckland Transport considers that these need to be incorporated as part of the suite of road network upgrade mitigation measures and coordinated with the overall staging of the PPC 88 build out. Without this there is a risk of flooding and/or damage to the key route into and out of the plan change area.	Decline PPC 88 or in the event the plan change is approved, include within PPC 88 precinct provisions direction on the timing and nature of any culvert upgrades across existing roads so as to address the risk of damage to, or flooding of the road. This could include raising of the existing road where required.
Traffic noise mitigation	Entire plan change	Oppose	It is widely accepted nationally and internationally that noise from transport networks have the potential to cause adverse health and amenity effects on people living nearby. That potential has been documented by authoritative bodies such as the World Health Organisation (WHO) ¹⁷ including the publication Environmental noise guidelines for the European region in October 2018 (WHO Europe Guidelines) ¹⁸ .	Decline the plan change or if PPC 88 is approved, amend the plan change by including precinct provisions (objectives, policies and rules) to require that future activities (or alterations to existing buildings) sensitive to noise from adverse effects arising from the road traffic noise associated with the operation of the Whitford – Maraetai arterial road.

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¹⁷ World Health Organisation, Guidelines for community noise, 1999; World Health Organisation, Night noise guidelines for Europe, 2009; World Health Organisation, Burden of disease from environmental noise, 2011.

¹⁸ World Health Organisation, Environmental noise guidelines for the European region, 2018.



Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
			<p>Arterial roads pass through both urban and rural areas and most have sufficient traffic volumes to generate sound above WHO Europe Guideline levels, indicating there will be impacts on human health and amenity where noise-sensitive activities locate nearby.</p> <p>Auckland Transport supports protection of public health and amenity and seeks that activities sensitive to noise which propose to locate adjacent to existing arterial routes are appropriately protected. The proposed Precinct provisions do not address this issue, beyond the proposed yard requirements, which are inadequate to address the effects of noise, on noise sensitive activities.</p>	<p>Recent examples of suitable provisions, subject to adaptation, include I452 Waihoehoe Precinct - I452.1 Precinct description, Objective 7, Policy 18 and associated provisions (e.g. I452.6.10 and matters of discretion/assessment criteria).</p>
Reference to ferry terminal	Whole of plan change	Oppose	<p>PPC 88 refers to the Pine Harbour Ferry Terminal. This does not accurately reflect the facilities available the facilities are a ferry berth. A ferry terminal has a much wider range of facilities than a ferry berth.</p>	<p>Decline PPC 88 or in the event the plan change is approved, change all references from ferry terminal to ferry berth where referring to the existing Pine Harbour Marina ferry berth.</p>
Impact of traffic on Whitford Village	All	Oppose	<p>The ITA does not address the impact of additional traffic on Whitford Village or the potential transport requirement of providing the Whitford Bypass to address this. In addition, the feasibility and impact of the proposed double lane roundabout on Whitford Village has not been adequately assessed.</p>	<p>Decline the plan change or if PPC 88 is approved, amendment of precinct provisions with potential removal of the double lane roundabout and replacement with Whitford Bypass as a Transport infrastructure requirement.</p>

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Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
Access to business centre and Whitford-Maraetai Road		Oppose	<p>The precinct provisions and ITA do not assess any requirements for access to the proposed business zone on the north eastern corner of the precinct or limitations on access to Whitford-Maraetai Road and associated measures to avoid adverse effects on this key arterial route:</p> <ul style="list-style-type: none"> i. Whitford-Maraetai Road. The business zone appears to rely on a single cul de sac road connecting with Jack Lachlan Drive. ii. There are no provisions requiring road access from the west to sites adjoining Whitford-Maraetai Road land which otherwise would rely on access to it.. iii. In the event the FUZ zone and movement network applying to it is retained, there is no justification for the nominated access points which are only on the land owned by the applicant. 	<p>Decline PPC 88 or in the event the plan change is approved, amendments to the precinct provisions to secure revised Transport infrastructure provisions to avoid adverse effects on the key arterial road: Whitford-Maraetai Road.</p>

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Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
Key intersections	New provision	Oppose	<p>The ITA identifies a number of intersection upgrades within Jack Lachlan Drive. It suggests the provision of traffic signals at all intersections. It is important that the design of intersections are confirmed at the time of initial connection and consideration given to 'when' in the development process they are provided.</p> <p>The ITA recommends signals at all key intersections. Auckland Transport considers that the form of the intersection should be determined as part of the consent and engineering approval process.</p> <p>The ITA is silent on the need for an intersection of the indicative local collector street serving the proposed business area with Jack Lachlan Drive and Karo Drive. Auckland Transport regards this as a key intersection.</p>	<p>Decline PPC 88 or in the event the plan change is approved, amend the plan change to alter the precinct provisions and plan to include the following amendments:</p> <ol style="list-style-type: none"> Delete reference to traffic signals from PPC 88; Identify key intersections on the precinct plan including collector on collector, and intersection of the proposed road serving the proposed business area and Jack Lachlan Drive; and introduce policies and provisions around determining the appropriate form and timing of key intersections. <p>Examples of suitable provisions are found in 1452 Waihoehoe Precinct (e.g. Policy 7, 1452.9(4) Special Information requirements).</p>
Zoning	Zoning Plan	Oppose	<p>It is considered inappropriate to include FUZ for the southern part of PPC 88. The FUZ signals a further significant increase in the size of Beachlands and given its distance from the ferry berth by active modes (1.5m to 3km +) this would not appear to support a public transport focused 'transit orientated community' or be consistent with PPC 88 Objectives 8 and 9. Overall, there is insufficient justification for including the FUZ land within PPC 88.</p>	<p>While Auckland Transport seeks that PPC 88 be declined in its entirety, if PPC 88 is approved, then only the 'live zone' should be included (i.e. the proposed areas of FUZ should be excluded).</p>

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Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
			<p>In addition, the ITA identifies that the inclusion of the FUZ (which would enable a further 900¹⁹ to 1,100²⁰ dwellings) would require, among other upgrades, four laning of Whitford Maraetai Road. This is not addressed within PPC 88 Transport infrastructure requirements.</p>	
Zoning	Sub-precinct E Golf	Oppose	<p>Policy 34, provision of Sub-precinct E (Golf), the Golf Course Overlay and ITA assessment²¹ all indicate retention of a nine hole golf club through to 2038. The (non-statutory) Master Plan and Structure Plan also recognise the golf course.</p> <p>Sub-precinct E Golf however has a MHU zone and there is no requirement to retain the golf course within proposed provisions (meaning the MHU zone could be implemented at any time).</p> <p>The ITA does not specify the expected yields of the Golf precinct and this, combined with a lack of sufficient requirement to retain the golf course means the future development potential is uncertain.</p>	<p>Decline the plan change unless additional information is provided to satisfy Auckland Transport's concerns regarding the potential housing yields from Sub-precinct E.</p> <p>Relief may include:</p> <ol style="list-style-type: none"> a. the alteration of Sub-precinct E Golf from a MHU zone to a 'Sport and Active Recreation zone'; or b. update the ITA to replace the nine-hole golf course with land use assumptions based on MHU zone including any additional transport infrastructure required to mitigate further transport network effects, including additional funding, financing and staging of delivery details to be provided in updated precinct provisions and plans. Without this, there is no certainty about

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¹⁹ Attachment 10 Beachlands South Private Plan Change Economic Assessment, March 2022, page 7.

²⁰ Attachment 8 Wastewater Reticulation and WWTP Concept Design, March 2022 GWE Consulting Engineers, pdf page 25, Section 8.

²¹ Integrated Transport Assessment Beachlands South Prepared for Beachlands South Limited Partnership, March 2022, Section 7.1.1 Live Zoned, 6th bullet point and Table 11.



Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
				delivery of necessary infrastructure or mitigation of its adverse effects. 344.15
Zoning and Precinct Plans	All zoning and precinct plans	Oppose	Zoning and precinct plans may require amendment (particularly sub-precinct plan 5) to reflect modifications in relief sought in the event PPC 88 is approved.	Decline PPC 88 or in the event the plan change is approved, modify all zoning and precinct plans to support relief sought.
Objectives	Objective 10	Support	Objective 10 ²² is supported subject to some amendments to the wider objective and policy framework.	Decline PPC 88 or in the event the plan change is approved, retain the same or similar wording of Objective 10 which reflects the outcomes of the objectives. 344.16
Objective	New	Support	A new objective is requested to provide substantial support for the implementation of transport network infrastructure prior to subdivision and development.	Include new objective: <u>Objective (10A): Subdivision and development does not occur in advance of the availability of operational transport infrastructure.</u> 344.17
Policies	Policy 11	Support in part	Policy 11 only refers to adverse effects on the safety, efficiency and effectiveness of the <u>surrounding road</u> network. The policy should be amended so that effects on the <u>wider transport</u> network are included within its scope. This will reflect both the full extent of effects and also that the transport infrastructure upgrades are not limited to road network but include active modes, bus services and ferries. It is also consistent with the wording of 1.2 Precinct Description which refers to both the local and wider network (i.e. the term 'transport network' encompasses all areas of the network where adverse effects may be present).	Decline PPC 88 or in the event the plan change is approved, amend PPC 88 Policy 11 as follows or similar to achieve same outcome: <i>(11) Require subdivision and development in the precinct to be coordinated with required transport infrastructure upgrades to minimise the adverse effects of development on the safety, efficiency and effectiveness of the surrounding road transport network.</i> 344.18

²² (10) Subdivision and development in the precinct is coordinated with the efficient provision of required transport, water, energy and telecommunications infrastructure.



Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
Policies	Policy 12	Support in part	Amendments are requested to support active mode infrastructure delivery concurrently with residential uses.	Decline PPC 88 or in the event the plan change is approved, amend as follows: <i>(12) Promote a mode shift to public transport and active modes by:</i> <i>(a) Encouraging walking and cycling connections to the Pine Harbour Ferry Terminal, including along the indicative coastal walkway and indicative primary and secondary collector roads as shown in Precinct Plan 5; and</i> <i>(b) Encouraging streets to be designed to provide safe separated access for cyclists on collector roads; and</i> <u>(c) Providing direct active mode connections to ferry and town centres at the same time as residential development establishes.</u>
Policies	Policies 14 to 18	Support in part	Policies 14, 16, 17 and 18 are supported subject to amendments to the wider objective and policy framework. The wording in Policy 17 should be strengthened to emphasise the importance of streets being attractively designed to provide for all modes of transport in the ways specified. Policy 15 refers to Cross Section Details for various road type designs. These have been requested to be deleted from I.12 Appendix 1 (later in the table).	Decline PPC 88 or in the event the plan change is approved, retain same or similar wording for policies 14, 16, 17 and 18 which reflect the outcomes of the policies. Amend Policy 17 to commence “Require...” rather than “Encourage...”. For Policy 15 amend as follows: (15) Encourage <u>Require</u> the design of new collector and local roads to be in general accordance with the road design and cross

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Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
			<p>Auckland Transport supports provisions within Precinct Plans which indicate overall minimum road reserve widths as well as the functional requirements and key design elements for street design.</p> <p>a. Auckland Transport seeks the deletion of the road cross-section diagrams included in the draft precinct provisions.</p> <p>b. Road layouts may need to be changed to reflect constraints or localised requirement (e.g. additional or lessor width may be required compared to the standard).</p>	<p>section details provided in I.12 Appendix 1: Beachlands South Precinct <u>and</u>; Road Design and Cross Section Details.</p>
Policy	New	Support	A new policy is requested to provide substantial support for the implementation of transport network infrastructure prior to subdivision and development.	<p>Include new policy:</p> <p><u>Policy (13A); Require that subdivision and development does not occur in advance of the availability of operational transport infrastructure.</u></p>
Table IX.4.1 Activity table All Sub-Precincts	New provision		A permitted activity standard (the same as proposed new companion Special Information requirement I.10(6)) is requested to be included to monitor the transport triggers for (A1) and (A3) and(A28), (A29) and (A30).	<p>If PPC 88 is approved, amend the precinct provisions to include a new provision such as <i>1452.9. Special information requirements</i> (Waihoehoe Precinct) and be applicable to permitted development as well as subdivision, development or uses that require consent.</p>
Table IX.4.1 Activity table All Sub-Precincts	Table IX.4.1	Support in part	Table provisions (eg. (A10), (A21) and (A22)) which link development with construction of specific transport infrastructure upgrades are a recognised way of managing transport network effects and achieving land use and transport integration and are supported.	<p>If PPC 88 is approved, retain provisions which require staging of transport infrastructure upgrade outcomes which address the transport network effects of growth enabled by PPC 88 and amend as appropriate to give effect to other relevant relief sought in this submission (refer to submission points below concerning I.7.3</p>

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Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
			<p>Noting however that additional transport infrastructure upgrades are considered to be necessary to mitigate the effects of growth enabled by this plan change.</p>	<p>and e.g. consideration of stronger staging or review provisions or consent activity status).</p>
Notification	I.6	Oppose	<p>Subclause (5) precludes subdivision (A22) from public or limited notification. This is not considered appropriate as subdivision which does not comply with Transport Upgrades (A22) is a matter which may impact affected parties such as Auckland Transport or the wider community.</p> <p>There may also be a cross reference error in (5), it appears that (5) should refer to (3) and (4) rather than (1) and (2).</p>	<p>If PPC 88 is approved, amend or delete (5) to enable public or limited notification of subdivisions and correct any possible cross referencing errors.</p> <p style="text-align: right;">344.25</p>
I.7. Standards	<p>I.7. Standards All relevant [...] standards apply [...]except [...]: [...]</p> <ul style="list-style-type: none"> • E27.6.1 – Trip Generation 	Oppose in part	<p>The provisions of EA E27.6.1 are considered appropriate unless PPC 88 provisions can satisfactorily address the effects on the transport network.</p>	<p>If PPC 88 is to be approved, remove E27.6.1 from Standard I.7 unless PPC 88 transport provisions are amended to satisfactorily address the effects of growth enabled by it on the transport network.</p> <p style="text-align: right;">344.26</p>
I.7.3. Staging of Development with Transport Upgrades	I.7.3. Staging of Development with Transport Upgrades	Oppose in part	<p>Notwithstanding points raised in other parts of this submission relating to the adequacy, timing and appropriateness of the nominated transport upgrades (specifically the Integrated Transport Assessment and its recommendations), Auckland Transport considers that the transport mitigation measures and timing of delivery provided in I.7.3 need amending as the</p>	<p>Decline PPC 88 or alternatively amend the plan change to incorporate provisions addressing the staging and timing of transport infrastructure and services with the proposed development build-out including but not limited to:</p> <p style="text-align: right;">344.27</p>



Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
			<p>provisions do not provide the right mitigation at the appropriate stages and adverse effects may result.</p> <p>In addition to the network improvements identified by the applicant, the following are recommended:</p> <ul style="list-style-type: none"> a. Inclusion of provision of active mode connections in a timely manner such as early active mode access to the ferry facility or bus services; b. Transport network improvements including but not limited to: <ul style="list-style-type: none"> i. Whitford-Maraetai Road (and shoulder) widening to three or possibly four lanes; ii. intersection upgrades to two lane roundabouts; iii. the Whitford Bypass; iv. safety improvements including new or upgraded road safety barriers and hazard removal (trees, non-traversable swales, power poles); v. safety improvements to Whitford Road between the village and Somerville Road intersection, including Maungamaungaroa Bridge; vi. improvements to the intersections of Ormiston Road and Murphys Road and Whitford Road and Somerville Road; vii. upgrading of the ferry berthing area and land side infrastructure (likely to exceed the amount nominated within the ITA); viii. higher capacity ferries that are available to operate at (at least) a 20 minute headway to the capacity identified within the ITA and I.7.3; ix. increased active mode connectivity throughout the PPC 88 area; 	<ul style="list-style-type: none"> a. additional infrastructure or service requirements, or alterations to those proposed (such as listed in <i>Reasons (a) to (e)</i>); b. provisions addressing the risk of key assumptions not coming to pass such as listed in <i>Reason (f)</i>); c. improvements in clarity and interpretation such as listed in <i>Reasons (g) to (k)</i>); and/or d. stronger staging or review provisions or consent activity status.

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cont



Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
			<ul style="list-style-type: none"> x. intersection approach improvements; and xi. safe design where two-way cycle ways are proposed. <p>c. Connections through the development (including staging of internal networks and intersections) so that buses can operate efficiently;</p> <p>d. Additional public transport services for the Precinct Plan area;</p> <p>e. The outcomes in Table 2, Column 2 do not address the full suite of mitigation proposed within the ITA²³ which includes 3.5 hours of additional weeknight ferry operations, permanent weekend ferry services and supporting bus shuttle services to service the park and ride area;</p> <p>f. The modelling and mitigation requirements rely to a degree on employment and education facilities being in place which reduce the need to travel beyond Beachlands. However if these are not provided, alternative (higher trip generation) outcomes would result and are not addressed in 1.7.3.</p> <p>Auckland Transport considers further modelling is required to reflect more appropriate , mode share and employment destination assumptions, as well as further yield details (golf course), and that this exercise may identify further transport network mitigation measures needed to address the effects of growth enabled by this plan change.</p> <p>The reasons for these conclusions are outlined in the whole of plan submission noted above under the Issue/Provision heading <i>Transport assessment assumptions</i> and Attachment 2.</p>	

²³ Integrated Transport Assessment Beachlands South prepared for Beachlands South Limited Partnership | March 2022, page 55.



Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
			<p>In addition, there are a range of interpretation matters which require amendment or clarification within 1.7.3:</p> <ul style="list-style-type: none"> g. Within Table 2 for residential dwellings the reference is to “more than XX dwellings or residential lots”. Much greater clarity in the drafting of the precinct provisions is required to ensure that lots and dwellings (including potential development pursuant to permitted activity rights) are appropriately counted. This would align with ITA²⁴ expectations: <i>These upgrades are included in the proposed precinct provisions and are required to be implemented prior to any subdivision and development of land.</i> h. Where residential development is permitted based on the relevant AUPOP provisions, then these dwellings would not necessarily require a land use consent. Further, a ‘residential lot’ may have up to three dwellings as of right. This has obvious implications in terms of the way items in Column 1 of Table 2 are drafted. A robust monitoring mechanism is essential. As presently drafted, the provisions are uncertain. i. Ensure that the drafting of 1.7.3 generally reflects the operation of Table 2 (which requires transport infrastructure in Column 2 to be operational before the activities, development or subdivision enabled in Column 1 is undertaken). It should also be made clear that: <ul style="list-style-type: none"> o an exceedance of an individual threshold in a row (e.g. by a single dwelling or a single m² as the case may be) brings the next row into play / necessitates completion of the upgrades in the next row; and 	

²⁴ Integrated Transport Assessment Beachlands South prepared for Beachlands South Limited Partnership | March 2022.



Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
			<ul style="list-style-type: none"> o upgrades in Column 2 are cumulative – i.e. each row in Column 2 should also refer to the upgrades in the rows above as having to be operational to enable the activities, development and subdivision in Column 1. j. The employment associated with non-residential activities potentially has lesser or positive impact and combining them with residential or including them at all may not be appropriate given the main concern is around the generation of additional trips on the road network serving Beachlands. They are also not as reliant on the Ferry or passenger transport as a mode of transport. k. Text should be amended for consistency (e.g. to refer to activities, development and subdivision). 	
I.7.7. Stormwater Quality	I.7.7. Stormwater Quality and related Matters for discretion and assessment criteria	Oppose in part	<p>An amendment is requested to reflect that Auckland Transport has additional requirements for any stormwater devices or networks which will be vested to the organisation as asset owner.</p> <p>The applicant is also advised that Auckland Transport expects industry wide safety guidance to be issued which will alter the shape, size and depth of rain gardens. These changes are likely to mean that the indicative rain gardens shown in <i>I.12. Appendix 1: Beachlands South Precinct, Road Design and Cross Section Details</i> would no longer be suitable and that additional areas/width would need to be provided for stormwater management.</p> <p>Auckland Transport seeks stronger stormwater provisions which require consideration of whole of life costs and effectiveness over time and use of communal devices to treat road runoff.</p>	<p>Decline PPC 88 or in the event the plan change is approved, amend as follows:</p> <p>Administrative matter: Correct subsections so they commence with (a) rather than (f) and include additions as shown.</p> <p><i>(1) Stormwater runoff from new or redevelopment of, existing high contaminant generating carparks and all publicly accessible carparks exposed to rainfall and all roads must be treated with a stormwater management device(s) meeting the following standards:</i></p> <p><i>(f) [...]</i></p> <p><i>(h) For all other trafficked impervious surfaces, water quality treatment in accordance with the</i></p>



Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
				<p><i>approved stormwater management plan must be installed; and</i></p> <p><u>(i) for all roads proposed to be vested in Auckland Transport, the Auckland Transport 'Transport Design Manual' and design requirements.</u></p> <p>Amend Plan Change provisions to include whole of life costs and effectiveness of treatment over time associated with publicly vested stormwater assets as a matter for discretion and policy</p>

344.29



Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
I.7.8. Fairway Reserve	I.7.8. Fairway Reserve	Oppose	Fairway Reserve is a critical link to support ferry berth access and movement around the area. It is vital that it remains open and available at all times. The proposed provisions already pre-empt the privatisation of the active mode link by enabling limitations in hours within the PPC 88 provisions (in the event Fairway Reserve is not vested in Council).	<p style="text-align: right;">344.30</p> <p>If PPC 88 is approved, amend (3) to ensure 24 hour access, regardless of Reserve ownership. <i>(3) The Fairway Reserve must be available for public use at all times. Unless written approval has been obtained from the council. In all circumstances the Fairway Reserve must be available for public use between the hours of 7am and 11pm.</i></p> <p>Amend (4) to apply where reserve is not vested in Council:</p> <p><u>(4) Where the Fairway Reserve is not vested in Council, t</u><i>The registration of an access easement on the title to which the Fairway Reserve applies is required to ensure preservation of the reserve and its ongoing maintenance by the owner(s) of the land concerned.</i></p> <p style="text-align: right;">344.31</p>



Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
I.9. Assessment – restricted discretionary activities	I.9.1 (3) Matters of discretion (3) New buildings, other than buildings for residential units in a residential zone:	Oppose	Minor amendments are recommended to broaden the matters of discretion to include active modes (replacing 'road' with 'transport').	<p>If PPC 88 is approved, amend (3) to make clear the broader matters of discretion (I.9.1) with the following amendments.</p> <p><i>(3) New buildings, other than buildings for residential units in a residential zone</i> <i>[...]</i> <i>(c) Infrastructure servicing;</i> <i>(d) Design and sequencing of upgrades to the existing transport road network and ferry services;</i> <i>(e) The extent to which development achieves the outcomes outlined in the Beachlands South Sustainability Strategy; and</i> <i>(f) Movement network on Precinct Plan 5.</i></p>

344.32



Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
I.10. Special information requirements	New provision	Support	A new provision is requested to enable the accurate monitoring of development in I.7.3 Table 2.	If PPC 88 is approved, include a new provision: 344.33 <u>(6) All activities</u> <u>All applications are to provide a register of development and subdivision that has been previously approved under Standard I.7.3 Staging of Development with Transport Upgrades. The register shall include details of the maximum number of dwellings or amount of retail, commercial or light industrial GFA proposed to be enabled (as well as anticipated dwellings/GFA for any subdivision proposal involving superlots) completed since the most recent transport upgrade under 1.7.3 Table 2 in a format which illustrates compliance (or otherwise) with 1.7.3.</u>
I.10. Special information requirements	I.10 (4). Special information requirements	Support	This provision is supported as it will be appropriate to provide an ITA should a variation from the proposed mitigation be put forward.	Decline PPC 88 or in the event the plan change is approved, retain same or similar provision. 344.34
I.12. Appendix 1: Beachlands South Precinct, Road Design and Cross Section Details		Oppose in part	Auckland Transport supports the inclusion of general road construction standards within precinct provisions however provisions need to provide for flexibility to respond to changing design standards over time and while balancing the need for certainty. Auckland Transport seeks provisions within Precinct Plans which indicate overall minimum road reserve widths as well as the functional requirements and key design elements for street design. These should be supported by appropriate activity status, matters	If PPC 88 is approved, further relief sought is the deletion of drawings in Appendix 1 and replacement with a table structure similar to that included as I452.11 Appendix 1: Design Details for the Waihoehoe Precinct taking into account the reasons for this submission points listed in (a) to (j). Relief should include an activity within <i>Table IX.4.1 Activity table</i> (as a restricted



Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
			<p>for discretion and assessment criteria to provide for instances where these provisions are not met. Auckland Transport also considers it appropriate that when development is undertaken next to a rural road, the road should be upgraded to the appropriate urban standard.</p> <p>In respect of I.12:</p> <ul style="list-style-type: none"> a. Auckland Transport seeks the deletion of the road cross-section diagrams included in the draft precinct provisions. b. I.12 does not indicate the need to provide a geometry capable of accommodating buses to likely bus routes. c. Any two way cycle facilities need to be supported by appropriate design or else need to be on both sides with potential additional road width. d. Roads may need to be changed to reflect constraints or localised requirement (e.g. additional or lessor width may be required compared to the standard). e. The local road of 15 metres is less than the usual minimum local road standard. f. The one-sided local road with no footpath on one side needs to be justified or removed with local road as a default with criteria where not required (e.g. park edge). g. The terminology of some of the road types such as “local collectors” is confusing. h. There are insufficient provisions and criteria to address departures from I.12. i. The movement network includes an overly fine grained network and some local roads may not be required and should be removed from the movement plan. j. Jack Lachlan Drive is not included within I.12. 	<p>discretionary activity) and appropriate matters of discretion and assessment criteria.</p>

344.35
cont



Attachment 2: Integrated Transport Assessment (ITA) Analysis

The information below sets out a greater level of detail of the assessment carried out of the applicant's ITA and supports some of the details provided in Attachment 1.

Mode Share Assumptions

For the reasons described below, Auckland Transport considers that a lower public transport mode share (ferries and buses) should be assumed compared with that which the applicant relied on for its ITA:

344.36

- a. The ITA assumes that the residents of the PPC 88 area will include a greater proportion of city centre workers than the existing Beachlands settlement. However, the ITA does not provide detail nor justification for why the expected demographic would have different employment patterns to the existing Beachlands population (which is already reasonably well served by ferries).
- b. Main employment centres (East Tamaki, Auckland Airport, Penrose, Wiri West and Manukau Central) for the existing Beachlands residents cannot feasibly be serviced by public transport and therefore are likely to continue to be predominantly accessed by private vehicle trips. There are no reasons given within the ITA for this employment pattern to substantially change (local employment is acknowledged and addressed under 'trip generation' below).
- c. The ITA uses Hobsonville Point as a case study for estimating the potential future Beachlands travel patterns. The ITA justifies this based on similarities such as proximity to ferry berth, coastal amenities and being a new development. However, assessment regarding the differences between Beachlands and Hobsonville Point with regard to patterns of employment and the potential to be served by frequent bus services has not been provided. In Auckland Transport's view, this is not a reasonable comparison as the transportation environment of Hobsonville Point differs significantly from Beachlands in several ways, including proximity to transport corridors, and accessibility of key employment locations by public transport. Comparison with Hobsonville Point mode share increases (for ferries) is not therefore considered appropriate.
- d. Overall, Auckland Transport considers the existing Beachlands area ferry mode share is the most reasonable base case study for what mode share and destination pattern could be realistically achieved from PPC 88. This is a 6% ferry mode share and is reliant on upgrading ferry capacity (discussed below).



- e. Existing bus services (Route 739) are provided to give accessibility to Beachlands rather than patronage driving demand. Average passenger occupancy in 2019 was 9.2 passengers per hour (very low). Auckland Transport considers it highly unlikely that, even with longer term potential increases to frequency and connectivity, mode share would increase beyond 2%. It is noted the applicant has revised the forecast mode share down from the initially suggested 4% to a more realistic 2.5%²⁵. Reasons for this include:
- Beachlands' isolation (at least 17 km) from any major employment areas in the main urban area outside the CBD; and
 - the dispersed layout and relatively low density of jobs in those employment areas (mainly East Tamaki / Highbrook, Manukau / Wiri and the Airport)

Proposed Ferry Services Mitigation

The mitigation proposed by the applicant (1.7.3, Table 2, Column 2 (b) to (e) relative to ferries) may not be appropriately relied on as either mitigation or the basis of a *transit orientated community* given the complexities of providing the improvements at this stage. This is for the following reasons:

344.37

- a. Auckland Transport recognises there is an existing, longer-term need for improvements to the ferry services at Pine Harbour. Improvements to ferry services will require significant funding and time and likely include better frequency, improved customer experience and larger, low / zero emission ferries. No funding has been allocated and forward planning has not advanced sufficiently to be included within the RLTP. Forward planning demand for improvements in ferry services has not included PPC 88 to date as it is unanticipated growth.
- b. Auckland Transport considers that both the increase in capacity and frequency proposed cannot be achieved based on the current ferry berth and ferry passenger capacity. This is because the existing berth cannot accommodate any significant increase in the ferry length or width (passenger capacity). In addition, the 'one way' travel within the Pine Harbour Marina (due to width restrictions) and tidal constraints limit the frequency of ferries thus precluding the option of 'smaller ferries but more often'.
- c. Further, as noted in the ITA, available space for bikes on-board Pine Harbour vessels is very limited. This suggests that opportunities for active mode journeys are limited, i.e. can only use the ferry for destinations around the city centre terminal, as users cannot reliably get space on the vessel for their bikes.
- d. 1.7.3, Table 2, Column 2 (b) to (e) proposes increases in passenger capacity and also frequency between 6.45am and 8.45am weekdays. The scale, timing and extent of improvements which Column 2 (b) to (e) recommends are considered to be significantly beyond the ability of the applicant to sufficiently influence the provision of, have no certainty of timing and are subject to variables which land based transport infrastructure is not

²⁵ Clause 23 Response, Attachment 8, Transport (prepared by Stantec), Section 4.2, page 11.



(e.g. coastal consents and assessment under the New Zealand Coastal Policy Statement, consideration of the Marine and Coastal Area Act and marine treaty claims).

- e. In addition, there currently is no dedicated terminal, an absence of storage facilities for bikes and the park and ride area can also not accommodate additional demands, including those from the plan change area.
- f. Overall, it is unclear how the applicant has determined that the increased capacity could feasibly be used for services from the Pine Harbour Marina.

Proposed Bus Services Mitigation

The ITA assumes that Auckland Transport will increase the bus frequency during both peak and off-peak periods for services to and from Auckland City. However, this is not planned and would involve significant cost, with potentially little improvement in mode share. Based on current network design, due to the length of route, range of destinations (requiring transfers) and existing infrastructure this is likely to be unattractive. As the service is likely to still be less preferable than driving, patronage is likely to stay low, which further worsens the economic viability of providing such a service.

If the development were to proceed, the proposed staging would, without appropriate through road connections, have limited options for efficient services (resulting from cul-de-sacs limiting suitable routes and turning opportunities).

Alternatively, providing a through road connection may lead to 'gaps' in service to existing Beachlands and Maraetai (due to route alterations to accommodate PPC 88). This would likely lead to the need for an additional route, however based on current and projected (2%) patronage, this would not be a highly utilised service.

Additional assessment and plan provisions are required to ensure that the bus services to support the proposal are feasible, funded and reflected in staging provisions 1.7.3.

344.38

Technical Assessment

Auckland Transport has identified a range of technical matters which it does not consider are addressed satisfactorily in the ITA and which may directly impact the recommendations / mitigation proposed:



- a. The ITA notes that the road network including Whitford-Maraetai Road and Whitford Road has known safety issues. It is acknowledged that lowering the speed limits has contributed to improved safety on these routes. However, safety concerns remain, and the ITA does not adequately discuss the potential for additional traffic generated by PPC 88 to exacerbate safety issues.
- b. Two important intersections for assessment which would distribute traffic to the external network including the Whitford Road/Chapel Road roundabout and the Ormiston Road/Murphy's Road signalised intersection have not been assessed within the ITA. These two intersections are likely to be important in distributing the development traffic to the wider network and the ITA should include these intersections in the assessment and any mitigation required.
- c. The ITA presents proposed intersection upgrades to increase capacity. Auckland Transport notes that some of the intersection upgrades (such as increasing the number of lanes in a roundabout, installing zebra crossings across two-lane approaches, adding slip lanes etc) may create or worsen safety issues for vulnerable users. No assessment of safety implications is provided to rationalise the intersection upgrades, therefore the suitability of this mitigation is not confirmed.
- d. The applicant has proposed upgrades to whole intersections impacted by the development; however, upgrades have not been proposed where individual approaches to intersections are impacted by the development. For example, the development traffic exacerbates the delays and queue lengths on the Whitford Park Road approach at intersection 6 in the AM peak hour. This approach in the 2024 base model was predicted to operate over capacity with a level of service (LOS) E, 95th percentile queue lengths at 250m and delays of 50 secs/vehicle. With the additional traffic from development enabled by this plan change, this approach is predicted to operate with a LOS F, a queue increase of 90m, and an additional 25 seconds delay per vehicle. Consideration should be given to impacts and mitigation required on the operation of approaches and not just whole intersections impacted by the plan change enabled growth. This approach to intersection improvements should be considered for all the intersections and development years.
- e. A two-way cycle path is proposed on all collector roads and Jack Lachlan Drive. We note that a two-way cycle path is not a preferred option as per the Auckland Transport Transport Design Manual, and it is not clear why this infrastructure option has been selected. Changes to provisions are sought to ensure that any two-way cycle paths are supported by a safe design. It is not clear why the footpaths proposed on the Primary Collectors are narrower than those proposed on the Secondary Collectors. It is Auckland Transport's view that more needs to be done to integrate walking and cycling into the development.
- f. The ITA states that the traffic modelling method utilises a network wide spreadsheet model. Information about this model is not provided, nor is other key information about origin-destination movements or route choice so the model outputs cannot be easily assessed.



- g. The trip generation assessment of the ITA compares multiple information sources (including trip generation data collected internally by Stantec) and selects which rates were to be used for each land use typology. The rates from each data source are not presented and it is not clear why each specific information source was used for each rate. Furthermore, the internally collected data used is not provided. It appears that optimistic rates may have been used. It is recommended that a conservative approach to the trip generation be adopted and it is requested that the model inputs are clearly presented.
- h. In determining the inbound/outbound directional distribution, the ITA has used information in the Institute of Transportation Engineers Trip Generation Manual (ITE) document. The ITA does not discuss how these rates compare with the actual inbound/outbound traffic patterns of the existing Beachlands area.
- i. Overall, Auckland Transport considers that a range of additional transport upgrades and improvements would be required, if PPC 88 is approved, which are not included in the ITA or the proposed precinct provisions (refer to the further discussion in **Attachment 1**).

344.39

Comparison with Hobsonville Point

The ITA uses Hobsonville Point as a case study for estimating the potential future Beachlands travel patterns. The ITA justifies this based on similarities such as proximity to ferry berth, coastal amenities and being a new development. This is considered not a reasonable comparison as the transportation environment of Hobsonville Point differs significantly from Beachlands in several ways, including the employment patterns, proximity to other urban areas and services, proximity to transport corridors (motorway), and accessibility of key employment locations by public transport.

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

A N D

IN THE MATTER of a submission under clause
6 of the First Schedule to the
RMA on Private Plan
Change 88: Beachlands
South

**SUBMISSION ON NOTIFIED PROPOSAL FOR PRIVATE PLAN CHANGE 88:
BEACHLANDS SOUTH TO THE AUCKLAND UNITARY PLAN (OPERATIVE IN PART)**

To: Auckland Council

Name of Submitter: Auckland Council
(contact: Warren
Maclennan)

Address: 35 Albert Street
Private Bag 92300
Auckland 1142

INTRODUCTION

1. This is a submission on Private Plan Change 88: Beachlands South (**PPC 88**) to the Auckland Unitary Plan (Operative in Part) (**AUP**) by Beachlands South Limited Partnership (**Applicant**).
2. Auckland Council could not gain an advantage in trade competition through this submission.
3. This submission by Auckland Council in its capacity as submitter (**ACS**) relates to PPC 88 in its entirety and all provisions of PPC 88 including:
 - a. the Beachlands South Precinct;
 - b. the Auckland Unitary Plan Maps.
4. This submission has been informed by discussions with Auckland Transport (**AT**).

GENERAL REASONS FOR THE SUBMISSION

5. While there are some positive aspects to PPC 88 (the plan change's treatment of cultural values and the Applicant's approach to engagement with Ngāi Tai ki Tāmaki being a good

example of this), at this stage ACS has significant concerns with PPC 88 in its entirety as it:

- a. Does not promote sustainable management of resources, will not achieve the purpose of the RMA, and is therefore inconsistent with Part 2 of the RMA;
- b. Does not manage or enable the efficient and integrated use, development and protection of natural and physical resources;
- c. Does not avoid, remedy or mitigate adverse effects;
- d. Is inconsistent with, or fails to give effect to, provisions of relevant planning instruments;
- e. Does not meet the requirements of section 32 of the RMA; and
- f. Does not meet the requirements of section 75 of the RMA.

SPECIFIC REASONS FOR THE SUBMISSION

6. In particular, but without limiting the generality of the above, ACS has significant concerns with PPC 88 in its entirety for the reasons stated below.

Overview

7. Based on ACS's review of the plan change information, ACS's broad concerns with PPC 88 are as follows:
 - a. ***Inadequate integration of infrastructure with land use*** – PPC 88 does not adequately integrate the planning, provision and funding of transport infrastructure with land use / urbanisation. In this regard PPC 88:
 - does not adequately give effect to relevant higher order objectives and policies in the National Policy Statement on Urban Development (**NPS-UD**) and the Regional Policy Statement (**RPS**) chapters of the AUP (chapters B2 and B3); and
 - is inconsistent with key parts of the Auckland Plan 2050 (**Auckland Plan**), the Long-Term Plan 2021-2031 (**LTP**), and the Regional Land Transport Plan 2021-2031 (**RLTP**).
 - b. ***Does not give effect to B2.6 of the AUP*** – PPC 88 (and the unplanned growth that it would enable) does not adequately give effect to the objectives and policies of B2.6 of the AUP concerning the growth and development of existing rural and coastal towns and villages, including the Appendix 1 Structure plan guidelines.
 - c. ***Does not promote a quality compact urban form*** – Linked to the above matter is a concern that PPC 88 will not promote a quality compact urban form, contrary to the provisions of Chapter B2 of the AUP, including (for example) Objectives B2.2.1(1) and B2.4.1(1).
 - d. ***Inconsistent with Auckland Plan 2050*** – Contrary to statements in the section 32 report, PPC 88 is inconsistent with those parts of the Auckland Plan that address dwelling growth in rural areas / zones.
 - e. ***Potentially significant adverse effects*** – PPC 88 will result in potentially significant adverse effects on the environment, which are not adequately addressed by the proposed Precinct provisions. Of particular concern to ACS in this regard are:

- PPC 88's potentially significant adverse effects on infrastructure (including but not limited to traffic and transport effects); and
 - PPC 88's potentially significant adverse character effects on the existing Beachlands settlement.
- f. **Concerns relating to greenhouse gas emissions** – ACS is concerned that inadequate consideration has been given to the increase in greenhouse gas emissions contributing to climate change, resulting from vehicle trips caused by PPC 88. As an associated concern, it is noted that there is significant uncertainty in relation to the Applicant's claims concerning mode shift.
- g. **Does not give effect to NPS-UD expectations for well-functioning urban environments** – There is a concern that PPC 88 will not result in / contribute well-functioning urban environments, contrary to Policy 1 of the NPS-UD, particularly in terms of the "minimum requirements" relating to:
- Good accessibility; and
 - Greenhouse gas emissions.
- h. **Concerns arising from IPI / Beachlands Transport Constraints Control** – ACS has a number of concerns arising from the Intensification Planning Instrument, Plan Change 78 (**PC 78**), and PPC 88's interrelationship with the proposed Beachlands Transport Constraints Control qualifying matter proposed in PC 78, both in terms of:
- the adequacy of the Applicant's assessment of transport effects; and
 - PPC 88's consistency with the Beachlands Transport Constraints Control, should PPC 88 be approved.
- i. **Concerns as to whether PPC 88 zoning / precinct provisions are the most appropriate** – There is an outstanding issue as to whether the Applicant has adequately established that PPC 88's proposed zoning and Precinct provisions are the most appropriate, or whether the current Countryside Living zone overlaid by the existing Whitford Precinct remain the most appropriate zoning and provisions for the plan change area. ACS also considers that, even if the plan change is approved, the Applicant has not adequately justified the proposed area of Future Urban zoning.
- j. **Concerns relating to specific aspects of the PPC 88 provisions** – In relation to the proposed Precinct provisions, ACS has several concerns, if PPC 88 is approved. Its concerns include:
- The adequacy of the transport infrastructure upgrades / proposed mitigation identified and relied upon to support PPC 88;
 - The adequacy of the transport infrastructure and staging provisions to mitigate the transport effects of PPC 88 and ensure appropriate integration of land use and transport infrastructure;
 - The reference to a Design Review Panel in the precinct text;
 - The treatment of indicative open spaces / reserves in the precinct text and plans;
 - The need for a full review of the natural hazards / stormwater management aspects of PPC 88 in light of recent severe weather events in the Auckland

region;

- Clarity of the provisions generally.

8. Each of the above matters is discussed in greater detail below.¹

PPC 88 fails to integrate infrastructure with land use – Does not give effect to / inconsistent with various planning instruments

9. ACS is concerned that PPC 88 does not adequately integrate the planning, provision and funding of infrastructure with land use / urbanisation and does not give effect to higher order objectives and policies in this regard.

Legal Framework

10. The NPS-UD and RPS Chapters B2 and B3 of the AUP contain objectives and policies that place strong emphasis on the importance of ensuring the integration of infrastructure, including transport infrastructure,² with land use / urbanisation. Section 75(3) of the RMA requires PPC 88 to “give effect to” these higher order provisions. This is a strong directive requiring the relevant objectives and policies to be implemented.³

11. By way of example:

- a. Objective 6 of the NPS-UD which requires local authority decisions on urban development that affect urban environments to be “*Integrated with infrastructure planning and funding decisions*”.⁴
- b. A range of RPS provisions in chapters B2 and B3 address the need for the integration of infrastructure provisions, planning and funding with land use, and the timely, efficient, and adequate provision of infrastructure:
 - B2.2.1 Objective (1)(c): “A quality compact urban form that enables ...(c) better use of existing infrastructure and efficient provision of new infrastructure”;
 - B2.2.1 Objective (5): “The development of land within the Rural Urban Boundary, towns, and rural and coastal towns and villages is integrated with the provision of appropriate infrastructure”;
 - Policy B2.4.2(6): “Ensure development is adequately serviced by existing infrastructure or is provided with infrastructure prior to or at the same time as residential intensification”;
 - B2.6.1 Objective (2) “Rural and coastal towns and villages have adequate infrastructure.”
 - B2.6 Policy (1)(c) “Require the establishment of new or expansion of existing rural and coastal towns and villages to be undertaken in a manner that does all of the following: ... (b) incorporates adequate provision for infrastructure”;

¹ Without limiting the generality of the above submission points.

² ACS’s submission is focused on transport infrastructure. ACS understands that Watercare Services Limited intends to file a submission addressing wastewater and water supply issues.

³ *Environmental Defence Society Inc v New Zealand King Salmon Company Ltd* [2014] NZSC 38 at [77].

⁴ In referring to Objective 6, ACS is mindful of the Environment Court’s findings on the relevant NPS-UD objectives and policies for a private plan change such as PPC 88, *Middle Hill v Auckland Council* [2022] NZEnvC 162, at [49].

- B3.3.1 Objective (1)(b): “Effective, efficient and safe transport that: ... (b) integrates with and supports a quality compact urban form”;
- B3.3.2 Policy (5), Integration of subdivision, use and development with transport: “Improve the integration of land use and transport by:
 - (a) ensuring transport infrastructure is planned, funded and staged to integrate with urban growth;
 - (b) encouraging land use development and patterns that reduce the rate of growth in demand for private vehicle trips, especially during peak periods...”

c. B2.9 Explanation and Principal Reasons for Adoption, states:

In addressing the effects of growth, a key factor is enabling sufficient development capacity in the urban area and sufficient land for new housing and businesses over the next 30 years. The objectives and policies guide the location of urban growth areas. They identify how greenfield land which is suitable for urbanisation will be managed until it is re-zoned for urban development. They encourage provision for Mana Whenua to develop and use their resources. They also set out the process to be followed to ensure that urban development is supported by infrastructure on a timely and efficient basis.

They should be considered in conjunction with the Council's other principal strategic plans such as the Auckland Plan, the Long-term plan and the Regional Land Transport Plan. The strategies and asset management plans of infrastructure providers will also be highly relevant.

[Emphasis added]

- d. The explanatory text at B3.5 of the RPS confirms the intention that *“development, especially that associated with growth in greenfield areas, must be integrated and co-ordinated with the provision of infrastructure and the extension of networks”*.
- e. B1.2 of the AUP details the range of regulatory and non-regulatory methods to implement the objectives and policies in the RPS, including the Auckland Plan, the LTP, and the RLTP.⁵ In relation to each of those documents:
 - The Auckland Plan emphasises that “[e]nsuring that infrastructure networks have sufficient capacity to service growth is critical”;⁶
 - The LTP budgets for Council expenditure, including infrastructure investment, for the next 10 years through to 2031. The infrastructure required to service the development proposed by PPC 88 (including for instance any required upgrades to Whitford-Maraetai Road) is not budgeted for in the LTP;
 - The RLTP is a 10-year investment programme for transport in Auckland, developed by Auckland Transport together with Waka Kotahi New Zealand Transport Agency and KiwiRail to respond to growth and challenges facing Auckland over the next decade. The infrastructure required to service the development proposed by PC 88 is not included in the RLTP.

⁵ Documents to which regard must be had under section 74(2)(b)(i) of the RMA.

⁶ Auckland Plan: Our Development Strategy - Auckland's Infrastructure, Coordinating Investment and Planning to Enable Growth, at page 236.

Discussion

12. Matters concerning the provision, timing and funding of infrastructure are directly relevant to decisions on zoning, and it is poor resource management practice and contrary to the purpose of the RMA to zone land for an activity when the infrastructure necessary to allow that activity to occur without adverse effects on the environment does not exist, or there is a high degree of uncertainty as to whether that infrastructure will be provided in a timely and efficient way.⁷
13. A key concern for ACS is that PPC 88 does not adequately provide for the strategic integration of transport infrastructure, and the planning / funding of such infrastructure, with land use, contrary to the thrust of the above provisions. The provision of such infrastructure works – which are of course physical resources in terms of the RMA – will not be achieved at a rate with which the Council (representing the community) can adequately physically and economically respond to.
14. Where infrastructure needed to support a plan change is not planned or provided for, it is incumbent on the Applicant to show how the infrastructure needed to service the development would be provided. Drawing on the outcome of Auckland Transport's analysis of PPC 88 to date (which is outlined in Auckland Transport's submission and not repeated here), there appear to be significant infrastructure issues that remain to be addressed. For ACS, the concerns arise that:
 - a. PPC 88 has not adequately assessed the potential traffic and transport effects, with the Integrated Transport Assessment making a number of unreliable assumptions (e.g. concerning mode share);
 - b. The proposed mitigation and transport upgrades relied upon in PPC 88 are insufficient to give effect to the higher order objectives and policies identified above; and
 - c. PPC 88 is very likely to necessitate a range of transport infrastructure improvements (beyond those identified by the Applicant), which are not planned or funded.
15. In addition to the concerns raised separately by Auckland Transport in its submission – concerns which ACS shares – ACS records the following matters and concerns.
16. The section 32 report supporting PPC 88 states that the transport and infrastructure requirements for the plan change will be fully funded and does not rely on Council funding. Section 7.1 of the Section 32 report asserts that transport infrastructure (except for a "contribution to Ferry Services and Associated Infrastructure") will be funded by a "CIP/IFF" model applying levies to the new residents and businesses in the live zoned areas of Beachlands South. Infrastructure costs of \$75m are proposed to be met in this way. However, the section 32 report acknowledges that the funding model used is indicative only and may require significant further recalculation.
17. ACS considers that it is highly likely that the full cost of transport infrastructure required to service PPC 88 will be significantly in excess of \$75m both due to cost escalation and the Applicant's list of required projects being incomplete.
18. An inadequate basis is provided for the \$75m estimate of infrastructure costs in terms of how this has been calculated and the underlying assumptions. If additional upgrades are required as a result of PPC 88 as outlined in AT's submission (e.g. road widening to 3 or possibly 4 lanes, widened shoulders, intersection upgrades to two lane roundabouts, the Whitford Bypass etc), then the costs of those upgrades are not included in the estimated costings. Nor are those projects included in the Precinct provisions. It is also unclear whether the

⁷ See, for instance, *Foreworld Developments Ltd v Napier City Council* EnvC Wellington W8/2005, 2 February 2005.

“contribution” to Ferry Services and Associated Infrastructure is for the full cost of the necessary works, or whether this relies in part on public funding. PPC 88 also relies on capacity expansion of bus services to achieve its predicted mode share. The Applicant has confirmed through a clause 23 information response that it will not contribute towards bus improvements⁸ or park and ride facilities⁹, and this will require public funding.

19. ACS has significant doubts as to whether the required transport infrastructure to support PPC 88 can and will be funded via the Infrastructure Funding & Financing Act 2020 (**IFF Act**). The IFF Act provides a financing and funding tool with the ultimate decision-maker being the Crown. Special Purpose Vehicle(s) (**SPV**) can be created for projects and enabled by the legislation to raise finance for the infrastructure. This is then funded by the collection of multi-year levies to repay the finance raised. The multi-year levy amount and term as well as who will pay for the infrastructure (the project beneficiaries) would be presented as part of a proposal and eventually agreed by Cabinet, based on the specifics of each funded infrastructure project, and recommended to the Governor-General in Council by the responsible minister. On completion of a specific infrastructure project, the asset would be vested in Council.
20. A high-level letter has been provided by the Applicant as evidence of its engagement with Crown Infrastructure Partners (**CIP**) regarding and creation of an SPV for PPC 88. This letter indicates that critical details are yet to be resolved such as full beneficiary analysis and the true quantum of cost of the necessary infrastructure. Without these details it is not possible to determine whether the levy per apartment and house is reasonable and sustainable. As such, the infrastructure funding solution proposed by the Applicant is theoretical and does not provide the requisite level of certainty that the infrastructure necessary to enable PPC 88 without adverse effects on the environment will be provided in a timely and efficient way. Again, in any event, there is an underlying concern that the Applicant’s list of required infrastructure upgrades is incomplete.
21. For the reasons given above (and the additional reasons stated in Auckland Transport’s submission), ACS considers PPC 88 does not give effect to the NPS-UD and RPS objectives and policies identified above, and demonstrates inconsistency with the Auckland Plan, LTP and RLTP.

PPC 88 does not give effect to B2.6 of the RPS

22. PPC 88 does not adequately give effect to the objectives and policies of B2.6 of the AUP concerning the growth and development of existing rural and coastal towns and villages, including the Appendix 1 Structure plan guidelines.
23. In particular, ACS is concerned that:
 - a. The plan change will not enable the growth and development of Beachlands in ways that are consistent with the local character of Beachlands and the surrounding area, contrary to Objective B2.6.1(1)(d). It will also not maintain or enhance the existing character of the village, contrary to Policy B2.6.2(1)(a). Beachlands is a rural and coastal village which “retains a significant rural and coastal character”.¹⁰ The Applicant’s assessment¹¹ that the proposed development outcomes will be complementary to the character of Beachlands requires careful review within the context of the wider planning history that has led to the current planning provisions relating to Beachlands and the Whitford Rural area.

⁸ Clause 23 Response 14 July 2022, Unio Environmental letter dated 14 July 2022, Appendix 2, response T13.

⁹ Clause 23 Response 14 July 2022, Unio Environmental letter dated 14 July 2022, Appendix 2, response T20.

¹⁰ As noted in I403.1 Precinct Description, Beachlands 1 Precinct in the AUP.

¹¹ Section 32 report, page 52.

- b. For reasons already canvassed above, PPC 88 does not make adequate provision for transport infrastructure, contrary to Objective B2.6.1(2) and Policy B2.6.2(1)(b).
- c. As a significant expansion of Beachlands, PPC 88 must give effect to Policy B2.6.2(3) by following structure planning and plan change processes in accordance with Appendix 1 Structure Plan Guidelines. This policy brings in Appendix 1, which inter alia sets out matters that the required structure plan “must identify, investigate and address”. Having regard to the prescribed matters, ACS does not consider PPC 88 has adequately addressed Appendix 1, including:
- 1.4.4 Use and activity (1) – *Contribution to a compact urban form and the efficient use of land in conjunction with existing urban areas to give effect to the regional policy statement.* Refer to discussion at paragraph 24 onwards below in this regard.
 - 1.4.6 Transport networks (1) – *Integration of land use and development with the local and strategic transport networks.* As addressed above, based on Auckland Transport’s analysis of PPC 88 to date, ACS considers that the plan change does not provide the requisite integration and that the infrastructural improvements proposed are insufficient.
 - 1.4.7 Infrastructure (2) – *The location, scale and capacity of existing and new infrastructure to serve the structure plan area.* Again, there is a concern that PPC 88 has significantly under-stated the level of new infrastructure required to serve the plan change area.

PPC 88 does not achieve a compact urban form

24. Linked to the above matter is a concern that PPC 88 will not achieve a compact urban form. The B2.6 ‘pathway’ for considering potential expansions of existing rural and coastal towns and villages (involving structure planning and a plan change) on the one hand, and the AUP’s promotion of a quality compact urban form on the other, are not mutually exclusive. As noted, clause 1.4.4 of Appendix 1 to the AUP provides that the required structure plan must identify, investigate, and address the contribution to a compact urban form, as well as the efficient use of land in conjunction with existing urban areas to “give effect to the regional policy statement”. Provisions in Chapter B2 directed at achieving a quality compact urban form (e.g. Objective B2.2.1(1) and Objective B2.4.1(1)) remain relevant to PPC 88.
25. There is a concern as to whether from a regional planning perspective, the significant expansion of Beachlands proposed in PPC 88 – nearly a doubling of Beachlands – will achieve a quality compact urban form. For example, it is unclear whether the zoning pattern proposed in PPC 88, with a combination of Future Urban and ‘live’ zoning stretching south towards Whitford Village, will result in a quality ‘compact’ urban form, as opposed to a more sprawling form of development and subdivision.¹²
26. Flowing from the above, an associated concern arises as to whether PPC 88 gives effect to provisions in Chapter B2, such as Objective B2.2.1(1) and Objective B2.4.1(1)).

PPC 88 is inconsistent with the Auckland Plan

27. Contrary to analysis in the section 32 report, PPC 88 is inconsistent with statements in the Auckland Plan concerning dwelling growth in rural areas / zones.
28. The section 32 report states at page 3:

¹² Refer e.g. to the AUPIHP’s discussion of “quality compact urban form” at 5.4 of the Overview Report dated 22 July 2016, page 44.

The Auckland Plan has a goal of 6% of Auckland's minimum dwelling target to be accommodated in rural areas. This equates to a total of 24,498 dwellings. The PPC for Beachlands South has a potential residential yield of 3,000 dwellings over the live zoned area which represents a significant opportunity to deliver approximately 12.2% of Auckland's dwelling target in existing rural areas. ...

29. The passage in the Auckland Plan¹³ relied on above does not provide a rationale for seeking significant urbanisation of this rural zoned land. Further, the section 32 report appears to misconstrue the statement in the Auckland Plan concerning 6% of dwelling growth occurring in rural areas by characterising it as a "goal". The Auckland Plan simply states that 6% of dwelling growth is anticipated in the rural area. The Auckland Plan, as part of a quality compact approach to accommodating growth, envisages limited residential development in rural zones, and identifies that provision for residential growth will be focused in the existing countryside living zone.¹⁴

PPC 88 will have potentially significant adverse effects on the environment

30. PPC 88 will result in potentially significant adverse effects on the environment, which are not adequately addressed by the proposed Precinct provisions.
31. Of particular concern to ACS in this regard are:
- a. PPC 88's potentially significant adverse traffic and transport effects. ACS relies on Auckland Transport's assessment in this regard, as outlined in its contemporaneous submission.
 - b. PPC 88's potentially significant adverse character effects on the existing Beachlands settlement, as addressed above in the context of Objective B2.6.1(1)(d) and Policy B2.6.2(1)(a).

Inadequate consideration given to the increase in greenhouse gas emissions

32. ACS is concerned that inadequate consideration has been given to the increase in greenhouse gas emissions contributing to climate change, resulting from vehicle trips caused by PPC 88. Based on Auckland Transport's analysis of the plan change to date, there is uncertainty in relation to the Applicant's claims concerning mode shift, which may indicate a much higher level of vehicle use. In this regard, as addressed below, a concern arises as to whether PPC 88 appropriately gives effect to Policy 1(e) of the NPS-UD.
33. ACS also notes that section 74(2)(d) of the RMA requires a territorial authority to have regard to the emissions reduction plan when changing any district plan.
34. Transport Target 1 of the current Emissions Reduction Plan reads:¹⁵
- Target 1 – Reduce total kilometres travelled by the light fleet by 20 per cent by 2035 through improved urban form and providing better travel options, particularly in our largest cities
35. The proposed development will result in significantly increased traffic volumes. This aspect of PPC 88 illustrates an obvious tension with Target 1 of the Emissions Reduction Plan. Residents moving further from the centre of Auckland will result in an increase in total kilometres travelled by the light fleet.

¹³ Auckland Plan, page 217.

¹⁴ Auckland Plan, page 208.

¹⁵ Te Hau Mārohi ki Anamata: Towards a Productive, Sustainable and Inclusive Economy: Aotearoa New Zealand's First Emissions Reduction Plan (May 2022) at page 175.

36. ACS also notes that Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan and Auckland's Transport Emissions Reduction Pathway both have a strong focus on reducing private (light) vehicle trips and providing for active modes and public transport as a method to reduce greenhouse gas emissions. For example, Auckland's Climate Plan's transport goal targets include encouraging non-vehicle modes (T1, T3 and T4) and promoting public transport use (T2)¹⁶.

PPC 88 will not result in / contribute to well-functioning urban environments

37. There is a concern that PPC 88 will not result in / contribute well-functioning urban environments, contrary to Policy 1 of the NPS-UD, particularly in terms of the "minimum requirements" relating to:

- a. Good accessibility; and
- b. Greenhouse gas emissions.

38. Policy 1(c) and (e) of the NPS-UD are as follows:

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

...

- (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and

...

- (e) support reductions in greenhouse gas emissions; and ...

Policy 1(c) – Good accessibility

39. The section 32 report over-emphasises the degree to which Beachlands, with the proposed expanded Beachlands South area, will be self-sufficient. It is more appropriate to assume that there will be significant reliance on connections with the Auckland urban area, and in particular the housing, jobs, community services, provided for in the Auckland Area. "Good" accessibility is a function of the adequacy of links to that area and the location of this proposal relative to alternatives that provide, or have the potential to provide, significantly better accessibility options. To that extent, this proposal, which is essentially ad hoc (not being consistent with current planning for the location and servicing of growth for the region), cannot be confidently regarded as being adequately accessible.

Policy 1(e) – Greenhouse gas emissions

40. Policy 1(e) gives effect to Objective 8(a) of the NPS-UD ("New Zealand's urban environments... support reductions in greenhouse gas emissions").
41. As addressed above, ACS is concerned that inadequate consideration has been given to the increase in greenhouse gas emissions resulting from vehicle trips caused by PPC 88, and that PPC 88 may involve a much higher level of vehicle use than assessed in the plan change documentation. It is accordingly questionable whether PPC 88 will appropriately give effect to Policy 1(e).

Relevance of the Intensification Planning Instrument (Plan Change 78)

42. Notification of PPC 88 coincides with Auckland Council's implementation of the NPS-UD intensification directives and also the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 which, among other things, requires medium density

¹⁶ Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan pages 82 and 83.

residential standards (**MDRS**) for specified urban areas. Council's Plan Change 78 (**PC 78**) identifies Beachlands as an urban area where MDRS will be applied, but also proposes a qualifying matter: the Beachlands Transport Constraints Control.

43. The Beachlands Transport Constraints Control has been proposed to be included as a qualifying matter in PC 78 due to the "significant constraints in addressing gaps in transport infrastructure provision to that area".¹⁷ It is proposed to apply the Infrastructure – Beachlands Transport Constraint Control across all land zoned Mixed Housing Urban and Low Density Residential within the Beachlands area. One dwelling per site would be enabled as a permitted activity. Two or more dwellings would require resource consent as a non-complying activity. An objective and policy are also proposed. It is noted that the Applicant has made a submission on PC 78 opposing the proposed Beachlands Transport Constraints Control.
44. The transport effects of PPC 88 should be considered in conjunction with the potential effects from PC 78 (with and without the qualifying matter), which may result in increased residential development and increased demand on an already constrained transport network.
45. In the event that PPC 88 is approved, consideration will need to be given to the need for amendments to the PPC 88 provisions to address and ensure consistency with the Beachlands Transport Constraints Control proposed through PC 78.

PPC 88 zoning and precinct not the most appropriate / existing zoning and precinct remains appropriate

46. The current Countryside Living zoning and existing Whitford Precinct applying to the plan change area is the result of detailed planning over many years, including:¹⁸
 - a. Plan Change 8 (**PC 8**) to the former Manukau District Plan introduced a new Chapter 12A – Whitford Rural Area. It followed a detailed study of the Whitford Rural Area. PC 8 arrived at a carefully crafted set of provisions, which allowed for countryside living that maintains and enhances the particular landscape character, rural amenity values and environmental quality of the Whitford rural area. The thrust of the provisions in the Whitford Rural Plan was carried through to the Whitford Precinct in the AUP.
 - b. Plan Change 30 (**PC 30**) to the Manakau District Plan, which zoned 112 hectares of land south of the original Beachlands village and was made operative in November 2014. The plan change created a new zone for additional housing but retained a defensible edge bounded by Jack Lachlan Drive to the south, Beachlands and Karaka Roads to the north, and Whitford-Maraetai Road to the east. The zone was developed to allow for low-density residential development, while allowing open space and management of natural and physical resources, and which integrates positively with and maintains and enhances the key features of the original Beachlands village. The thrust of these provisions was carried through to the Beachlands 1 Precinct of the AUP.
47. PPC 88 assumes the current zoning is not the most appropriate for the area. However, given the careful planning that underpins the present zoning and precinct, undertaken over many years, the section 32 report has not adequately made the case for why the existing, carefully planned zoning and precinct are not the most appropriate provisions for the land.
48. Any assessment of PPC 88 must involve very careful consideration of whether, in fact, the current Countryside Living zone overlaid by the existing Whitford Precinct remain the most appropriate zoning and provisions for the plan change area.
49. ACS's current view is that:

¹⁷ PC 78 Section 32 Report – Infrastructure – Beachlands Transport Constraint Control, at paragraph 17.

¹⁸ NB: The following does not represent an exhaustive summary of the area's planning history.

- a. The current zoning and precinct remain the most appropriate option in section 32 terms; and
- b. Even if the plan change is approved, the section 32 report has inadequate detail to justify the proposed area of Future Urban Zone.

The PPC 88 Precinct provisions are inadequate

50. In relation to the proposed Precinct provisions, ACS has several concerns, if PPC 88 is approved, as outlined below:

Transport infrastructure

- 51. Relying on AT’s analysis, ACS does not consider the transport infrastructure upgrades / proposed mitigation identified and relied upon in PPC 88 to be adequate to support the plan change and mitigate effects.
- 52. If PPC 88 is approved, ACS seeks amendments to the Precinct provisions to incorporate any additional required upgrades (beyond those identified in the ITA) identified as necessary through further assessment, including (without limitation) to address matters raised in AT’s submission on PPC 88. | 345.4

Transport Infrastructure and Staging

- 53. If PPC 88 is approved, ACS seeks amendments to the precinct description, objectives, policies, standards, and other provisions (including e.g. precinct maps) to ensure that urban development does not occur in advance of necessary transport infrastructure being in place and operational. For example, but without limitation: | 345.5
 - a. The precinct text (e.g. the precinct description and purpose statement in I.7.3) uses uncertain language such as “manage adverse effects”. This should be amended to use more certain language such as “minimise”. ACS however does support the acknowledgement in the precinct description that transport infrastructure upgrades are necessary to address adverse effects on the local **and wider** network, which should in turn be reflected throughout the precinct provisions. | 345.6
 - b. Objective 10 and Policy 11 refer to the coordination of subdivision and development with the provision of transport infrastructure. Clearer directive language should be adopted to ensure that subdivision and development is avoided prior to necessary transport infrastructure being constructed and operational. Amended or additional objectives and policies to this effect should be included such as: | 345.7
 - Objective: Subdivision and development does not occur in advance of the availability of operational transport infrastructure.*
 - Policy: Require that subdivision and development does not occur in advance of the availability of operational transport infrastructure.*
 - c. Policy 11 only refers to adverse effects on the safety, efficiency and effectiveness of the surrounding road network. The policy should be amended so that effects on the wider transport network are included within its scope. | 345.8
 - d. The purpose of standard I.7.3 Staging of Development with Transport Upgrades uses the uncertain term “manage”. Amend to use more certain language such as “minimise”. The purpose statement should also be expanded to reference relevant objectives and | 345.9

policies relating to the integration of land use and transport.

- e. Standard I.7.3 (e.g. standard (2)) would also generally benefit from further amendments to ensure that any relevant infrastructure upgrades listed in Column 2 are operational **before** the relevant level of activity / land use / subdivision in Column 1 is allowed to occur, and that there is no ambiguity as to the operation of I.7.3 and Table 2 (for instance, that it is clear that the exceedance of a single threshold brings the next row of upgrades into play, and that upgrades in Column 2 are cumulative). 345.10
- f. Noting the unplanned nature of PPC 88, more stringent activity status for non-compliance with standard I.7.3 may be required (i.e. non-complying activity status), to signal that any such proposal requires greater scrutiny, and to reflect the importance of operational infrastructure upgrades being in place. 345.11
- g. The drafting of I.7.3 is at times inconsistent. Amendments are sought generally to ensure consistency (e.g. to refer to activities, development and subdivision where appropriate). 345.12
- h. Again, the infrastructure specified in Table 2: Threshold for Subdivision and Development as shown on Beachlands South: Precinct Plan 6 is inadequate to mitigate the adverse transport effects of PPC 88. All necessary upgrades must be specified in this table. The upgrades must also be specified with the requisite specificity to enable certain application and enforcement. For instance, site (C) is on Precinct Plan 6 is described “upgrade to Trig Road (south) intersection” and it is unclear what upgrade would satisfy this standard. 345.13
- i. Without limiting the above, amendments may draw on provisions contained in the recently approved Waihoehoe, Drury Centre and Drury East precincts, adapted as necessary to address the particular circumstances of PPC 88. 345.14

Design Review Panel

- 54. The reference to a Design Review Panel in the precinct text is inappropriate and should be deleted. Such an entity may or may not be established through resource consents. Its establishment should not be assumed. 345.15

Indicative Open Spaces / Reserves

- 55. A number of open space / reserve areas are depicted indicatively on Precinct Plans 1 and 3. Precinct Plan 1 also depicts an area of Sport and Active Recreation zoning.
- 56. The quantum and location of indicative open spaces should be reviewed based on the Council’s Open Space Provision Policy 2016. It cannot be assumed that political approval to acquire the indicative open spaces, as shown, will be obtained, even if consistent with the Council’s Open Space Provision Policy 2016.
- 57. Further, ACS does not support ‘locking in’ zoning of land for open space now.¹⁹ The standard process is for the Council to negotiate with landowners for park acquisition during subdivision and development, then complete gazettal of reserves. The Council then rezones these with the relevant open space zone by way of updating plan changes, for example PC 60 – Open Space and Other Rezoning Matters. It is preferable for that the Sport and Active Recreation zoned land to be depicted as indicative open space (which is consistent with the approach otherwise taken in PPC 88).

¹⁹ I.e. the proposed Sport and Active Recreation zoned land.

58. In light of the above matters, if PPC 88 is approved, ACS seeks the following:
- a. Amendments to the Precinct Description to include a statement that open spaces / reserves depicted in the precinct plans are indicative only, and that open spaces other than esplanade reserve may be privately owned, owned by the Crown, or (subject to Council approval) vested in the Council; 345.16
 - b. Amendments to include a note on Precinct Plans 1 and 3 drawing attention to the above statement; 345.17
 - c. Amendments to depict the Sport and Active Recreation zoned land as indicative open space (rather than as live open space zoning); 345.18
 - d. Amendments to the indicative locations of open spaces depicted on the precinct plans to achieve consistency with the Open Space Provision Policy 2016 to the greatest extent possible (e.g. to remove indicative open space from the Large Lot Zone); 345.19
 - e. An amendment to I.7.8(3) to delete any wording potentially limiting public access to the Fairway Reserve; 345.20
 - f. An amendment to I.7.8(4) to add the words “Where the Fairway Reserve is not vested in Council, ...”; 345.21
 - g. Amend the matters of discretion for development of publicly accessible open space greater than 1000m² to refer to “ownership and maintenance”, and amend the assessment criteria to enable consideration of ongoing maintenance if private ownership of publicly accessible open space is proposed. 345.22

Natural hazards / stormwater management

59. The Auckland region recently experienced two closely-timed severe weather events: the Auckland Floods (January 2023) and Cyclone Gabrielle (February 2023). These events have prompted the Council to direct further work to investigate the regional and localised impacts of flooding, and the implications for land use planning, regulatory, current plan changes to the Auckland Unitary Plan (including Plan Change 78), infrastructure and other policy settings.²⁰
60. In light of these severe weather events, ACS considers that it would be prudent for the natural hazards / stormwater management aspects of PPC 88 to be fully reviewed and re-assessed. Such review and re-assessment should extend to the need for revised and more robust precinct provisions (whether to the precinct objectives, policies, rules and other provisions including amendments to maps/plans), should PPC 88 be approved. 345.23

Clarity of provisions

61. The provisions as proposed require review to ensure that they are clearly able to be interpreted and applied. As an example, the matters of discretion in 1.9.1 and other parts of the plan change refer to the Beachlands South Sustainability Strategy. That is a document that can be altered at any time without a statutory process and some of its content is not robust enough to be the basis for a matter for discretion or assessment criteria. 345.24

RELIEF SOUGHT

62. At its meeting on 8 December 2022, the Council’s Planning, Environment and Parks

²⁰ Refer Minutes of Planning, Environment and Parks Committee dated 2 March 2023.

Committee resolved (further to resolution number PEPCC/2022/11/d) to delegate authority to the Chair and Deputy Chair of that Committee (and a member of the IMSB) to approve a council submission:

- a. Seeking to have the private plan change declined unless council’s concerns around infrastructure funding, financing and delivery, climate change impacts and any other relevant matter are addressed; and
- b. In the event that the council’s concerns around infrastructure funding, financing and delivery, climate change impacts and any other relevant matter can be addressed, that the private plan change be approved with modification.

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

- a. The primary relief sought by ACS is for the Panel to decline PPC 88 in its entirety; or 345.1
- b. In the alternative to and without limiting the primary relief of declining PPC 88, the secondary relief ACS seeks is that the Panel decline PPC 88 in relation to the Future Urban Zone change in the event the Panel accepts the request to live zone the requested area; or 345.2
- c. Without limiting the primary and secondary relief, in the event that PPC 88 is granted in part or in full, ACS seeks: 345.3
 - Amendments to the Precinct provisions as outlined in this submission; and
 - Such further, other, or consequential relief, including in relation to PPC 88’s explanatory text, objectives, policies, activity table, rules, matters of discretion, assessment criteria, special information requirements, and maps/plans that reflects or responds to the reasons for this submission.

Conclusion

- 64. ACS wishes to be heard in support of its submission.
- 65. If others make a similar submission ACS would be prepared to consider presenting a joint case with them at any hearing.

DATED 10th March 2023

On behalf of Auckland Council:²¹



Councillor Richard Hills, Chairperson of the Planning, Environment and Parks Committee

²¹ Member Henare, IMSB, opposed.

A handwritten signature in blue ink, appearing to be 'AD', located in the upper left quadrant of the page.

Councillor Angela Dalton, Deputy Chairperson of the Planning, Environment and Parks Committee

Hi,

We have now tried to submit the online form three times to no avail.

On that basis my submission follows. Can you please upload this submission so that it is reviewed and send an acknowledgement receipt. Thank you.

Kind regards
Lesa Freeman

027 5596022

Full name of submitter:

Lesa Maree Freeman

Organisation name:

NA

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NA

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Contact phone number:

027 5596022

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**9 Tui Brae Pine Harbour
Beachlands
Auckland 2018**

Submission details

This is a submission to:

Plan change number: Plan Change 88

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

My submission relates to

Rule or rules:

Proposed rezoning

Property address:

307 Ha South of Beachlands Village in the area of Formosa Golf Course

Map or maps:

Those referenced by Auckland City Council in their correspondence dated 20 January 2023

Other provisions:

None

Do you support or oppose the provisions you have specified?

I or we oppose the specific provisions identified

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

Yes

The reason for my or our views are:

1. The proposal if approved will lead to changes that will impact forever the identity of Beachheads as a rural community and the fabric/character and visualisation of the Beachlands Village. The visual photographs produced by Beachlands South Limited show that post the proposed rezoning there will be development that includes at least 1390 dwellings that are at least 5 or 6 stories in height. This is in stark contrast to the existing Beachlands topography. If Beachlands is to retain its status as a rural community under the Auckland City Council Unitary Plan then any proposal to move dwelling construction from essentially single/double level dwellings to a high proportion of high-density housing, changes the Beachlands status diametrically.

346.1

2. My submission is that the proposal should be rejected until such time as agreement is reached with Beachlands South Limited that they will provide at their cost, all infrastructure (including but not limited to roading, water, sewerage, flood management, waste management, power, transport, telecommunications) and associated services that Auckland City Council deem appropriate to support the additional 3900 plus dwellings that are proposed subsequent to this proposed plan change.

346.5

Critically:

- Roading upgrades are required to support the additional populations that come with 3900 plus new dwellings identified in Stage 1 of the proposed developments. Specifically, the existing rural two lane road between Beachlands and Whitford needs to be upgraded to a four lane road. This upgrade would also need to include the provision of safe and efficient entry/exit ways for communities along the roadway in particular, the upgrading Jack Lachlan Drive to cope with the increased traffic volumes this includes the provision of cycle lane and footpaths on Jack Lachlan Drive, and a cycle lane from Beachlands to Whitford.

346.2

- The proposal is for the use of bore water for all uses including residential, community and commercial across the proposed rezoned areas. Whilst I am no expert on these matters, common sense suggests that this will not work for a development of the size proposed by this rezoning application. On that basis town water needs to be available for all dwellings post the rezoning.

346.3

- The sewerage system proposed seems to be inadequate to process wastewater for a development of the size proposed. The proposal that wastewater could be dispersed across the existing ground water systems will not work; any proposal needs to consider the needs of a more environmentally conscious community, and have consideration for an area that has in the past had issues with water

346.4

egress into nearby streams and creeks. A properly considered and well developed wastewater system is required and one that is flood proof.

Finally, a development of the size proposed cannot proceed without proper and full infrastructure (as indicated above) and, that infrastructure should be paid for by those wanting rezone and re develop the area in the rezoning application.

I or we seek the following decision by council:

Decline the plan change, but if approved, make the amendments I requested

Details of amendments:

Beachlands South Limited to provide at their cost all infrastructure as outlined above including Beachlands South Limited provide at their cost all infrastructure in particular provision of adequate roading, footpaths, and cycle ways to deal with an increased volume of traffic that will come once development commences; and has adequate solutions in place for local roading that is, Jack Lachlan Drive; and any proposals for upgrading of ferry services does genuinely take into account the proposed population increases

346.5

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.

Signed

Lesa Freeman

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 88 - Anthony Martin Andrew
Date: Friday, 10 March 2023 2:31:00 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Anthony Martin Andrew

Organisation name:

Agent's full name: Anthony Martin Andrew

Email address: tonya@resultsad.co.nz

Contact phone number:

Postal address:

816 North Road

Clevedon

Auckland 2582

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: The Beachlands South Development

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

The development as documented and disclosed appears to be in the best interests of properly managed urban growth in this area.

347.1

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

Declaration

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

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

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

No

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

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From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 88 - Angela Mary Mason
Date: Friday, 10 March 2023 2:48:30 pm
Attachments: [PC88_Submission_CampaignForHighSchool.pdf](#)
[Govt_Response_HS_Petition.pdf](#)
[New_High_School_Pohutukawa_Coast_Report_for_MoE_July_2021.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Angela Mary Mason

Organisation name:

Agent's full name:

Email address: amasonhome@icloud.com

Contact phone number: 0275421922

Postal address:
2 Marangai Place
Beachlands
Auckland 2018

Submission details

This is a submission to:

Plan change number: Plan Change 88

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

My submission relates to

Rule or rules:

Property address:

Map or maps: Appendix 1 - Zoning Map

Other provisions:
Community Sub-precinct C & Structure Plan - provision for a high school

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

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

The reason for my or our views are:
Approval of PC88 will require the process to develop a new high school within Sub-precinct C be implemented within the first stage of development.

348.1

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

Details of amendments: Please see attached letter and supporting documents.

Submission date: 10 March 2023

Supporting documents

PC88 Submission CampaignForHighSchool.pdf
Govt_Response_HS Petition.pdf
New High School Pohutukawa Coast Report for MoE July 2021.pdf

Attend a hearing

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

Would you consider presenting a joint case at a hearing if others have made a similar submission?
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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Team Leader Central/South, Plans & Places
Auckland Council
135 Albert Street
Auckland 1010

19 February 2023

Tēnā koē,

RE: LETTER OF SUPPORT WITH AMENDMENTS
BEACHLANDS SOUTH, PRIVATE PLAN CHANGE 88

On behalf of the parent/caregiver-led campaign for a high school on the Pohutukawa Coast, I am writing in support of the Beachlands South Private Plan Change 88, with amendments.

Should one be scheduled, I wish to be heard at a hearing on this plan change.

Need for a secondary college on the Pohutukawa Coast

Currently, over 750 high school aged students in the Beachlands/Maraetai area are bussed to secondary colleges around Auckland, mainly on or near the Howick Peninsula.

This bus commute increases traffic congestion and potential road hazards along the Whitford-Maraetai Road during the AM peak travel time and greatly reduces the social connection between high-school aged residents and their home community (see uploaded report *Kahawairahi College: A New Secondary School in Wairoa. Report for the Minister of Education, Date: July 2021. Parent/caregiver-led campaign for a new secondary school on the Pohutukawa Coast, Wairoa, Auckland*).

Community support for a secondary college in Beachlands

On 3 June 2021, together with the Franklin Local Board, I presented a petition to the NZ Parliament on behalf of 3,600 signatories from Beachlands, Maraetai, Clevedon, Hunua, Brookby, Whitford and other local communities in the Wairoa district, Franklin Ward.

My petition asked the Minister of Education to provide a secondary college for this area:

To meet Auckland's housing shortage, the Pohutukawa Coast was up-zoned under the Auckland Unitary Plan 2016 and may be close to 20,000 population by 2031. The Pohutukawa Coast growth area includes Whitford, Beachlands, Maraetai, Clevedon and Kawakawa Bay. Currently, there is no high school for this growing community and high-school students must bus up to 20km along high-speed rural roads with high crash rates. The Ministry of Education needs to build a high school to serve the Pohutukawa Coast.

Link to petition:

https://www.parliament.nz/en/pb/petitions/document/PET_89684/petition-of-angela-mason-we-need-a-high-school-on-the

Additional support:

- Ngāi Tai ki Tāmaki kindly provided the name for our future high school: Kahawairahi College, and has confirmed their support for a secondary college on the Formosa site.
- All primary school principals within the Howick Community of Learning (including Beachlands School, Maraetai School, Brookby School, Clevedon School, and Hunua School) support a high school in the Beachlands area (see Appendix F, *ibid*).
- The Counties Manukau East division of the NZ Police support a high school in the Beachlands area (see page 25, *ibid*).

Political support for a secondary college in Beachlands

During our campaign and together with the Franklin Local Board, we met with the Rt Hon Judith Collins, elected representative, and Anahila Kanongata'a-Suisuiki, Labour list MP. These MPs represent our local electorate of Papakura. Both Members of Parliament (MPs) have campaigned with the Ministry of Education on our behalf and sent letters of support alongside the petition that was presented to Parliament in June 2021 (see Appendix B, *ibid*).

These MPs have held regular meetings with the Minister of Education, the Deputy Minister of Education and Ministry of Education staff to raise awareness within the ministry of the need for a secondary college in Beachlands.

On 29 October 2021, the Minister provided a written response to the high school petition and all campaigners. The Minister generally agrees with the Kahawairahi College report findings, including high-school population growth forecasts.

The Minister also states that further investigation and planning for this high school facility is needed by Ministry staff, working together with the applicant of the Beachlands South plan change and the local community (see uploaded: *Government Response to Petition 2020/82 of Angela Mason*).

Support for Private Plan Change 88, with amendments

The plan change applicant, Beachlands South LP, has committed to allocating sufficient land area for a new high school within the existing Formosa Golf Course at 110 Jack Lachlan Drive. As shown on PC88 Appendix 1, this high school site would be in the future 'Community Zone.'

East Auckland Planning and Development staff from the Ministry of Education have initially advised that at least 2,000 additional dwellings in the Beachlands / Maraetai area are needed for the Minister to consider funding a high school at the Formosa site before circa 2035.

If the Beachlands South development proceeds, there would likely be sufficient dwellings and high school-aged population within the Beachlands area to justify the Minister funding a secondary college within the next three to five years, with a view to opening a college by 2028.

I understand that the applicant is currently working with the Ministry of Education to secure a preliminary agreement around land acquisition for a high school facility. While these negotiations are commercially sensitive and not available for public scrutiny, they indicate a willingness from the Ministry of Education to build and operate a secondary college if Plan Change 88 is approved.

I support Plan Change 88 and ask the Plan Change decision-makers to consider the secondary education needs of high school age youth in the Beachlands and Wairoa area in their assessment.

I also ask that a specific area or zone for the secondary college be identified within the PC 88 'Community Zone.' This high school zone should be of sufficient size to accommodate an education facility needed to serve the high-school age population of Beachlands and other communities in the local Wairoa area.

Amendment request: Auckland Council & Minister of Education to designate a site within PC88 'Community Zone'

We support the Beachlands South proposal, with amendments. These amendments are:

- That a specific area for a secondary college within the PC88 'Community Zone' be identified on the submitted site zoning plan (Appendix 1). This area should be provided for within the sub precinct in a manner that is consistent with Precinct Plan 3 which shows the indicative location of the school as a key structuring element of Beachlands South and this is considered appropriate. This area should be of a sufficient size to accommodate a secondary college for the high-school aged population on the Pohutukawa Coast and the local Wairoa area. 348.2
- Alternatively, if site planning for a high school is not advanced to a point where the applicant can identify a specific site within the PC 88 'Community Zone,' then prior to approval of the plan change, the applicant should provide to the Council a written commitment from the Minister of Education that, should PC 88 be approved with a minimum of 1,000 new dwellings, the Minister will immediately seek a Notice of Requirement under s167 of the RMA to formally designate an area within the Community Zone that is of a sufficient size to accommodate a secondary college for the high-school aged population on the Pohutukawa Coast and the local Wairoa area. Note, the request to submit for a Notice of Requirement will also be made to the Minister of Education. 348.3
- That the precinct plan require development of a secondary college facility in the FIRST stage of any development within the Beachlands South precinct. 348.4
- That road access to the secondary college facility be vested to the Council, to ensure free public access to and from the college site. Development standards should require that this vested road reserve be of a sufficient width and form to accommodate safe bicycle lanes and 348.5

pedestrian footpaths, so that high school students are encouraged to bike, scooter, and/or walk to the college campus. To facilitate access from the existing Beachlands community, improvements to Jack Lachlan Drive should be made, including pedestrian footpaths and a bicycle lane along both sides of this road and a speed limit reduction to 50km/h.

348.5
cont

- That precinct plan development standards require a suitable landscape buffer surrounding the high school campus, including mature trees of appropriate size and spacing to provide screening of the school fields, as viewed from the public road, as well as shade and wind shelter for students.
- That a stop for the proposed Pine Harbour shuttle be located on the road to/from the college and Jack Lachlan Road, within 50m of the college campus entrance. Similarly, that a bus stop be located within a 50m radius of the college, so that high school students can access public bus services to Maraetai and Whitford, and beyond.

348.6

348.7

Other PC 88 matters

For the avoidance of doubt, I am submitting in my capacity as the coordinator of the parent/caregiver-led campaign for a high school on the Pohutukawa Coast.

Under this submission, I am not commenting on the wider plan change layout, road or intersection upgrades, or proposed infrastructure connections.

Nāku iti noa, nā

Angela Mason

Attachments:

1. Report: *Kahawairahi College: A New Secondary School in Wairoa; Report for the Minister of Education*, Date: July 2021 by the Parent-led campaign for a new secondary school in the Wairoa Area, Pohutukawa Coast AUCKLAND.
2. Government Response to Petition 2020/82 of Angela Mason “We Need a High School on the Pohutukawa Coast, Auckland”

**Government Response to
Petition 2020/82 of Angela Mason**

“We Need a High School on the Pohutukawa Coast, Auckland”

Presented to the House of Representatives

In accordance with Standing Order 380

Government response to Petition of Angela Mason

Introduction

- 1 The government has carefully considered the petition of Angela Mason; “We Need a High School on the Pohutukawa Coast, Auckland” The petition asked *“That the House of Representatives urge the Ministry of Education to build a new high school to serve the growing community on the Pohutukawa Coast, Auckland Region.”*
- 2 The government responds to the petition in accordance with Standing Order 380.
- 3 The government understands that previous planning by the Ministry of Education did not indicate the need for a new secondary school in this area. However, planning in the Ministry’s National Education Growth Plan is iterative and responsive to change. Proposed housing developments in this area, should they occur, may require new schooling by 2030.

Government Response

Petition summary

- 4 On 3 June 2021, Angela Mason, on behalf of Pōhutukawa Coast communities, presented a formal submission to the Education and Workforce Committee, with supporting data and evidence, letters of support from Franklin Local Board and surrounding primary schools, and a written petition signed by 3,600 people, to highlight the need for a new secondary school for the Pōhutukawa Coast, Auckland.
- 5 The petitioners had commissioned a report; *“Kahawairahi College: a new secondary school in Wairoa”* in July 2021 which details the community led campaign and various metrics around education facilities in the Wairoa subdivision of the Franklin Local Board. The Ministry of Education broadly agrees with the information presented in this report.
- 6 The petition states that to meet Auckland's housing shortage, the Pōhutukawa Coast was up zoned under the Auckland Unitary Plan 2016 and may be close to 20,000 population by 2031. The Pōhutukawa Coast growth area includes Whitford, Beachlands, Maraetai, Clevedon and Kawakawa Bay. It states that currently, there is no high school for this growing community and high school students must bus up to 20km along high-speed rural roads with high crash rates. The petition calls for the Ministry of Education to build a high school to serve the Pōhutukawa Coast.

Ministry of Education analysis

- 7 The National Education Growth Plan (NEGP) outlines the Ministry’s programme to manage, maintain and grow the schooling network to meet increasing school age population forecasts across New Zealand in high growth areas to 2030. Auckland is New Zealand’s fastest-growing region with its population likely to reach 2 million in the next 10 to 15 years. The NEGP is a flexible, dynamic and live document that forecasts demand for student places based on regional

analysis and catchment modelling. The modelling is regularly updated and refined as forecasts change, growth patterns emerge and as key input data (rolls, enrolment patterns, population projections and large-scale developments) is updated. This allows us to dynamically adjust the required expected timing of, and forecast demand for, additional student places.

Short to medium term

- 8 The Ministry of Education has been monitoring growth across this network and has carried out a demand analysis looking at population projections out to 2043. There are currently 917 secondary age students from the Wairoa subdivision attending a range of state schools; the 5 top destination schools being Howick College, Rosehill College, Pukekohe High School, Botany Downs Secondary College and Hauraki Plains College. The largest destination by far is Howick College. A further 249 students attend state integrated schools, and 258 students attend private schools. These numbers indicate that any new secondary school at Beachlands would have a healthy starting roll given the existing student base.
- 9 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.
- 10 It should be noted that there is no budget approved or allocated for the new school sought through the petition. We have an existing long-term strategic land acquisition pipeline, to purchase sites for new schools, outlined in the NEGP, which includes the Auckland Education Growth Plan.

Long term

- 11 With the recent purchase of the Formosa Golf Course and adjoining land by NZ Superfund, this could potentially see this land developed into residential housing. A large-scale residential development on the site, and additional developments at Clevedon, may trigger the need for a new secondary school in the future. This would also require an assessment of appropriate education pathways and enrolment schemes.
- 12 In the longer term and if there is large scale development at the Formosa Golf Course site, there could be sufficient secondary age students to support a new secondary school. 3,000 additional dwellings at Formosa could generate over 550 additional year 9-13 students. In addition, there a proposed development at Clevedon that could deliver 1,500 dwellings and over 300 additional secondary students.
- 13 The Ministry's modelling indicates that under these circumstances, a new secondary school would be needed around 2030, and sooner if additional capacity is not delivered at Howick College.

- 14 The Ministry is currently investigating the need for a new primary and a new secondary school in Beachlands, although this is contingent on the large scale residential development proceeding.
- 15 The Ministry have met several times with the development consortium, including NZ Superfund, to align our planning. The developers have provisionally allocated space in their structure plan for both a primary and secondary school.
- 16 The Ministry of Education notes there are challenges with infrastructure including issues with transport and water (involving Auckland Transport, Watercare and other agencies), given the rural nature of the area. However, the development consortium advises that they are working through these issues and have proposed solutions to the most critical issues.
- 17 To proceed with the development, a Private Plan Change must be considered by Auckland Council. The development consortium is likely to lodge this plan change prior to the end of 2021 and there would then be a submission and decision period. The Ministry of Education will monitor this process.

Transport

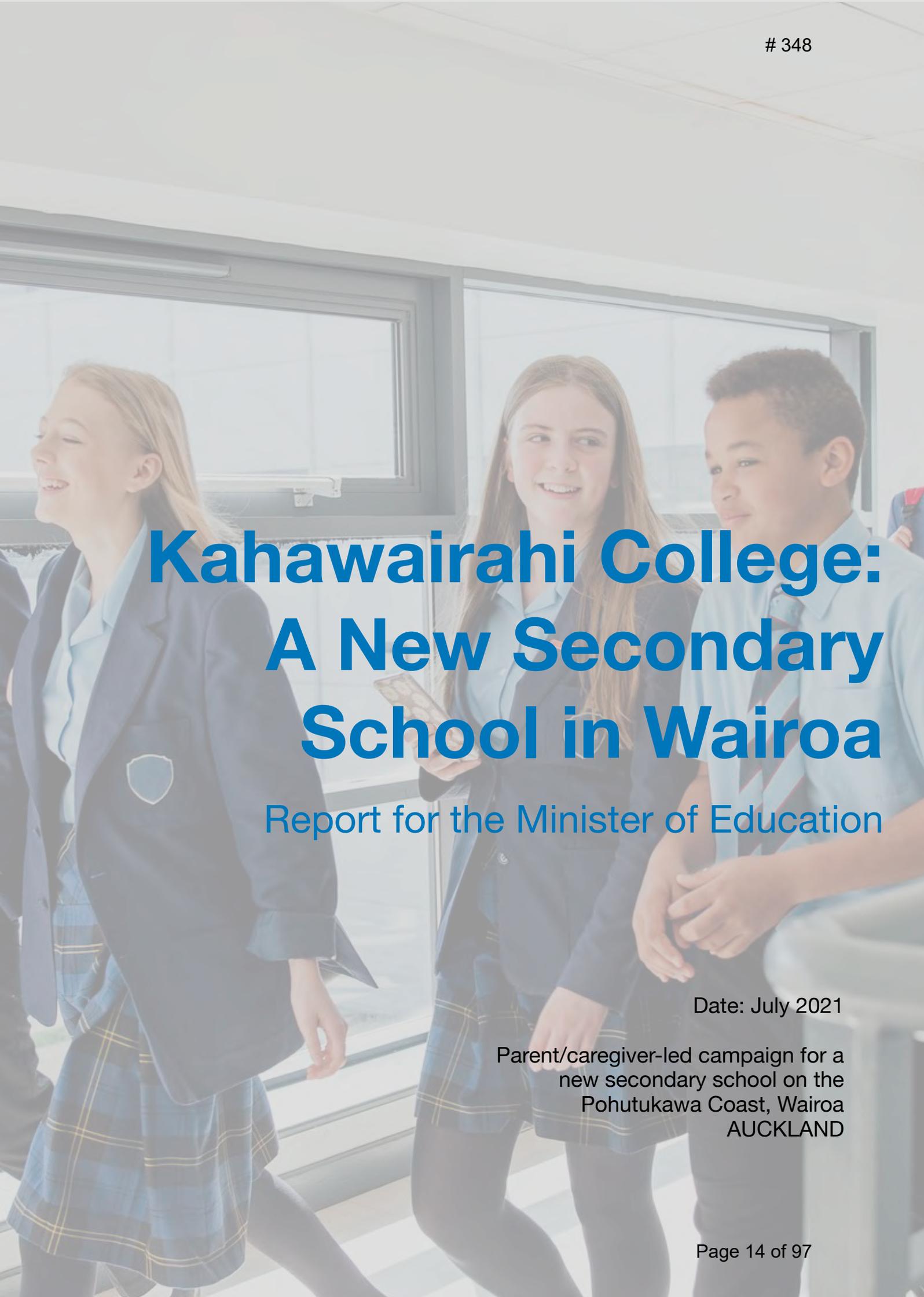
- 18 The petitioners noted that students must travel long distances on rural bus routes to access secondary school. The Ministry of Education provides free school bus services for the Beachlands and Maraetai areas to and from Howick College, comparable to other services around the country. The Ministry notes that if a new secondary school is provided, much of the Pōhutukawa Coast and Wairoa sub-division is rural and school bus services would still be required.

Ministry engagement with petitioners

- 19 On 12 August 2021, the Ministry met with representatives from the Petitioning group, Franklin Local Board and Beachlands School.
- 20 Just prior to this meeting the Ministry took the opportunity to meet with representatives of the development consortium at the Formosa Golf Course. Potential sites for future schools were discussed along with the plans for residential development that could realise over 3,000 homes over time. Russell Group, one of the development parties, has indicated it expects to start development on site by 2024. Development would be staged and subject to addressing challenges around infrastructure.
- 21 The Ministry advised the community representatives that a business case for a new secondary school would be contingent on the Formosa development proceeding. If it does, then the Ministry would be looking at establishing a secondary school in around 8 years-time, 5 years from site designation.
- 22 The meeting concluded with the community aware that the Ministry's progression of a secondary school is contingent on large scale development at the Formosa site.
- 23 In the meantime, the Ministry continues to work closely with Auckland Council, NZ Superfund, Auckland Transport and other regional agencies to share information on urban planning and development in the area.

Conclusion

- 24 The government recognises the potential for a future new secondary school in the Pōhutukawa Coast area, subject to potential residential developments. The Ministry of Education will monitor these developments and undertake planning for future schooling as need indicates.

A photograph of three students in school uniforms walking in a hallway. The student on the left is a girl with blonde hair, wearing a blue blazer and a plaid skirt, smiling. The student in the middle is a girl with long brown hair, wearing a blue blazer and a plaid skirt, holding a smartphone. The student on the right is a boy with short dark hair, wearing a light blue shirt and a striped tie, looking towards the other students. The background shows large windows and a modern school interior.

Kahawairahi College: A New Secondary School in Wairoa

Report for the Minister of Education

Date: July 2021

Parent/caregiver-led campaign for a
new secondary school on the
Pohutukawa Coast, Wairoa
AUCKLAND

TABLE OF CONTENTS

1. EXECUTIVE SUMMARY	3
2. OUR HIGH SCHOOL CAMPAIGN	6
A. Where it all started	6
B. Contact with Ministry of Education staff and Members of Parliament	7
3. THE WAIROA COMMUNITY	10
A. Wairoa Today	10
B. Public Transport and Community Facilities	11
C. Wairoa in 2031	12
5. WAIROA'S EARLY CHILDHOOD & PRIMARY SCHOOL FACILITIES	14
A. Early Childhood Education	14
B. Primary Schools in Wairoa	14
C. Forecast Roll to 2027	17
4. CURRENT HIGH SCHOOL ATTENDANCE	19
A. Communities of Learning / Kāhui Aho	20
B. Other Auckland State Schools	21
C. Private Secondary Schools	21
D. Home Schooling & Options out of the Auckland Region	21
E. Growth in Other High School Catchments	23
7. TRAVELLING TO HIGH SCHOOL	24
A. Vehicle Miles Travelled	24
B. Safety of School Travel	25
8. STUDENT WELL BEING	27
A. Opportunity Cost due to Long Travel Distance	27
B. Student Mental Well-Being	29
D. A School at the Community's Heart	29
9. SUPPORT FOR LOCAL HIGH SCHOOL	31
A. Petition for a Secondary School	31
B. Community Meetings	31
C. Support from Wairoa's Primary School Principals	32
D. Support from Franklin Local Board & Franklin Youth Advisory Board	32
F. Support from other local community groups	32
10. CONCLUSION & NEXT STEPS	34
A. Preparing for a New High School	34
B. A call to action	36

List of Appendices

- A: Official Information Act 1982 letter from Ministry of Education (1 Nov 2019)
- B. Letters from Members of Parliament for Papakura
- C: Primary school and ECE roll numbers
- D. Student high school attendance by Census Area Unit (2018)
- E: Community meeting minutes
- F: Letters of support from Principals
- G: Letters of support from Franklin Local Board
- H: Letters of support from community organisations

List of Tables

- Table 1: Population growth in the Wairoa Area.....p10
- Table 2: Wairoa Primary Schools.....p15
- Table 3: Wairoa Primary School Roll Projections to 2027.....p18
- Table 4: Student High School Attendance by Census Area Unit (CAU) 2018.....p22
- Table 5: Participation in Extra-Curricular Activities.....p27

List of Figures

- Figure 1: Map of Auckland Region, showing Pohutukawa Coast / Wairoa Area.....p6
- Figure 2 Labour MP Anahila Kanongata'a Suisuiki, NZ Parliament House, 03/06/21....p8
- Figure 3: 30% Population Growth from 2013 - 2018 in Beachlands.....p11
- Figure 4: Locations of Secondary Schools attended by Wairoa residents.....p18
- Figure 5: Leaving Clevedon for schooling.....p21
- Figure 6: Case Study of Student Bus Travel.....p24
- Figure 7: Police statement of support for secondary school.....p25
- Figure 8: Quotations from Franklin Youth Board survey (2019).....p28

1. EXECUTIVE SUMMARY

We are asking the Minister of Education to:

1. Include Clevedon, Whitford and surrounding villages in the same school catchment as Pohutukawa Coast Schools Beachlands and Maraetai, to be known as the Kahawairahi College Community of Learning (KCC)
2. Re-assess the 2031 population projections for the Kahawairahi College catchment based on school roll forecasts and forecast development, not just census data.
3. Consider the well-being of KCC school children, including their mental health, sense of community as well as their safety on the Whitford-Maraetai and Whitford Roads
4. Identify potential sites based on known development plans and work with Auckland Council to re-zone the preferred site for secondary education
5. Secure the preferred site and identify a delivery model for construction and operation of the secondary school facility

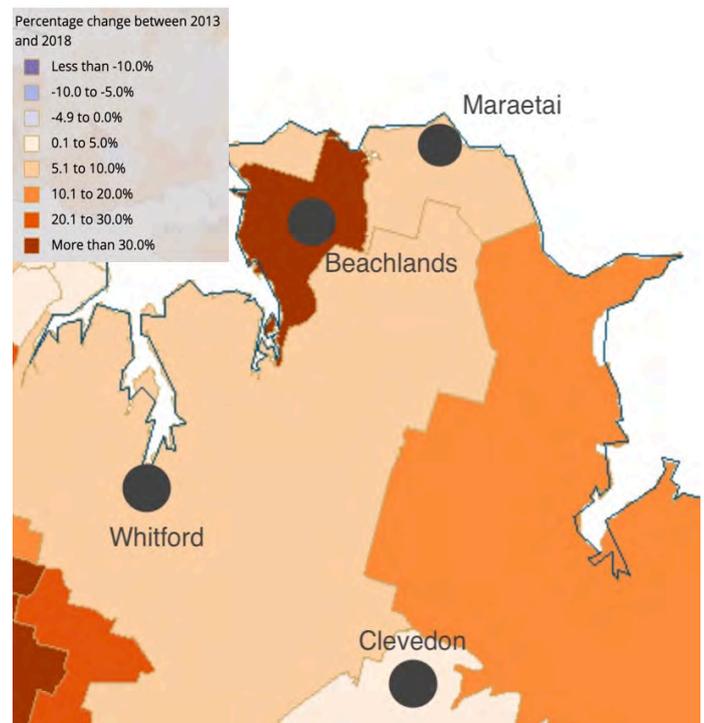
Population Projections Need to be Re-assessed

Since 2013, following up-zoning by the Auckland Unitary Plan (AUP), we estimate 1,075 dwellings have been built in the Pohutukawa Coast / Wairoa area, increasing local population by over 2,100 residents.

There are future developments in the planning phase, which potentially add another 4,000 - 4,500 additional dwellings over the next ten years:

- Beachlands and Maraetai infill development
- Clevedon Plan Change 32
- NZ Super Fund and parties associated with the Russell Property Group: recent purchase of 255 hectares adjacent to Beachlands

With this future development, an additional 11,000 - 12,500 new people could move to the Wairoa area bringing the local population to around 22,500 residents by 2031.



Source: LINZ Census Data: Wairoa population increase 2013 - 2018

Assuming 8% of this population are high school age, we estimate over 1,700 high school age children will live in the Kahawairahi catchment / Pohutukawa Coast, Wairoa by 2031.

This forecast is backed up by 2020 primary school roll numbers that show, without any population growth, the secondary student population in WSC will reach 1,305 by 2025/6 and 1,570 by 2027/8.

Our analysis of 2013 and 2018 census data also shows a population of secondary school age in Papakura / Takanini / Alfriston of almost 6,000 by 2023. Albeit slower, population growth from infill development around the Howick Peninsula is also predicted. This means high schools in Howick and Papakura are unlikely to have sufficient room to accommodate students from the outlying and rapidly growing Wairoa area.

As development brings more people into Wairoa at a faster rate than the 30% population growth trends indicated by the Census data, **the Pohutukawa Coast / Wairoa Area will need a high school before the Ministry of Education's current planned development program.**

Student Well-Being: Sense of Community and Road Safety

Currently, approximately 900 high school students from Wairoa travel to school up to two hours return on rural roads, many in a standing position. Given population projections, these numbers will almost double by 2031, with over 1,700 high school students traveling out of the Wairoa area every day.

The Whitford-Maraetai and Whitford Roads have current average vehicle movements of approximately 15,000 to 17,000 per day. Auckland Transport has designated several Wairoa roads 'High Crash Areas'.¹ As the number of road users grow, the number of accidents on these roads is likely to increase, including the risk of school bus accidents.

Spending up to two hours per day travelling to school on a bus, reduces the time a student has for extra-curricular activities, like sports, the school production, etc., and increases their time spent with no parent / whanau care or teacher supervision. This is negatively impacting on education outcomes and student well-being.

A local high school will allow students to walk or bike to school, or take shorter vehicle trips. It will reduce traffic congestion along the Whitford-Maraetai and Whitford Roads and the associated carbon emissions that contribute to climate change, in line with the government's recent policy goal of zero-carbon to 2050. Rather than being bussed over 20km out of their neighbourhood every day, being able to attend a local high school will enhance students' sense of well-being, as children's social and academic success is directly influenced by their connection with whanau / family and their direct engagement between school and the local community.

¹ *Crash number drop after 80kmh limit imposed by Auckland Transport, 24 August 2018, Pohutukawa Coast Times, page 6*

Possible Sites for a Secondary School

As well as providing much-needed high school education, a new secondary college would create economic stimulus and generate additional employment within the local area.

Franklin Local Board members have identified a number of potential sites for a new secondary school. For example, the Associate Minister of Education Jan Tinetti and the Labour MP for Papakura, Anahila Kanongata'a-Suisuiki, recently met with the NZ Super Fund and parties associated with the Russell Property Group, who presented their evolving master plan for Beachlands South. This master plan includes a secondary school campus, as well as other community facilities located adjacent to the Beachlands township.

We urge the Minister to be forward-thinking, engage with the Franklin Local Board members and Auckland Council to re-zone a preferred site for secondary education with a view to securing land and/or a delivery model with the landowner(s).

TABLE 1: 2020/21 CURRENT YEAR 1-5 ROLL NUMBERS & FUTURE HIGH SCHOOL AGE POPULATION AT 2027/8 (ASSUMES NO POPULATION GROWTH)

Year	Beachlands	Maraetai	Clevedon	Hunua	Orere	Ardmore	Paparimu	Brookby	Total
0	54	25	20	9	3	20	-	-	131
1	85	67	48	17	6	48	6	23	300
2	95	58	44	26	5	44	5	17	294
3	78	73	49	20	6	49	2	16	293
4	92	54	44	20	2	44	5	12	273
5	78	47	56	15	6	56	6	15	279
6	92	56	66	15	6	66	6	15	322
7	59	38	42	16	6	42	1	14	218
8	64	40	37	12	9	37	2	12	213
Yr 4-8									<u>1,305</u>
Yr 1-5	482	324	261	107	28	261	24	83	<u>1,570</u>
Total	697	458	406	150	49	406	33	124	2323

2. OUR HIGH SCHOOL CAMPAIGN

A. Where it all started

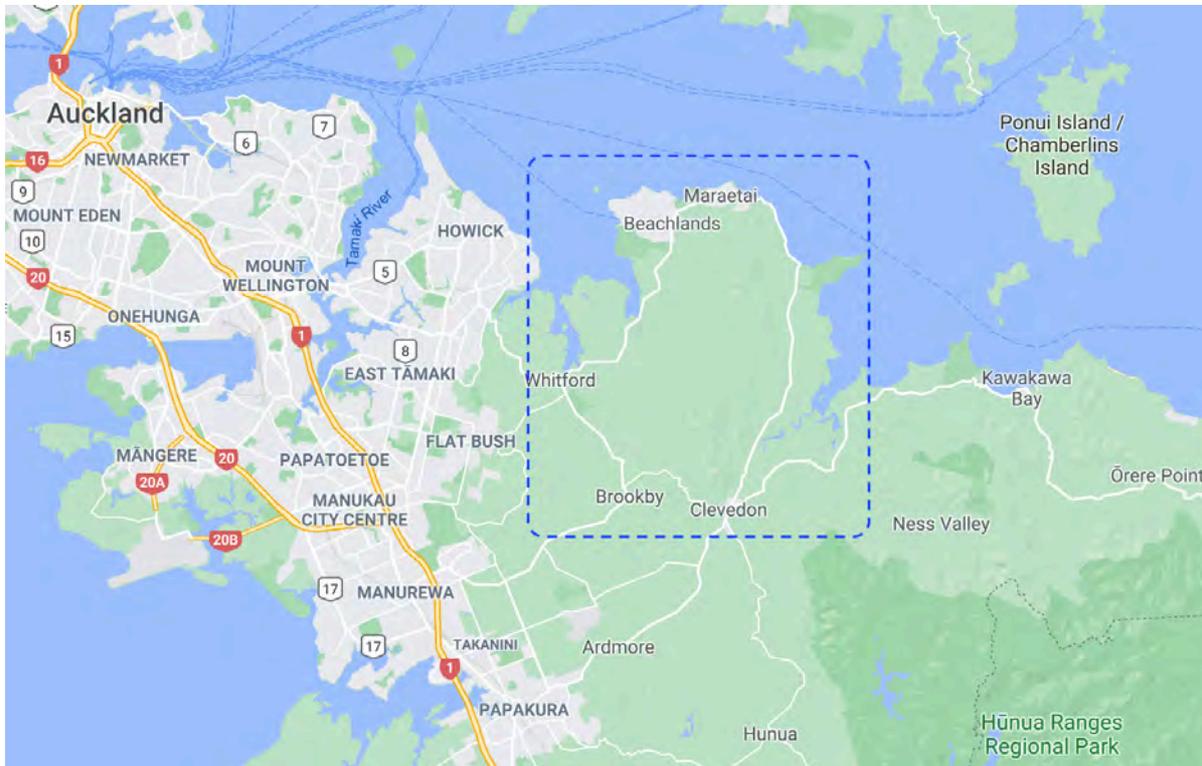


Figure 1: Map of Auckland Region, showing Pohutukawa Coast / Wairoa Area
Source: Google Maps (2021), downloaded 02 May 2021

Since 2015, the Wairoa community has campaigned for a local high school, supported by the Franklin Local Board and 1,000s of concerned parents and caregivers.

In November 2019, the Wairoa township of Maraetai hosted local and other MPs at the time at a ‘meet and greet’ with local residents. Over 125 concerned parents and caregivers attended that event and voiced concerns about a lack of a local high school and the long, dangerous bus rides to school.

Parents were advised to raise awareness of this issue with the Minister of Education and staff at the Ministry of Education.

As a result, Franklin Local Board members Malcolm Bell and Angela Fulljames, and local resident, Angie Mason, along with several concerned parents/caregivers are coordinating a grassroots community campaign to build a local high school.

The 2020 Franklin Local Board Three Year Plan (Auckland Council) now includes an advocacy mandate to support this community-led effort for improved access to secondary education.

Over the past three years, with growing population around the region, the out-of-zone high-school applications from many Wairoa families are being rejected. Some

families are making six or seven applications for high school places.

Other families with wealth mobility are choosing to move away from Wairoa, to neighbourhoods that have suitable high school in-zone.

This has a ramification on students' and families well-being, and sense of inclusion within their community.

B. Contact with Ministry of Education staff and Members of Parliament

As part of our campaign, we have been in contact with staff at the Ministry of Education and local Members of Parliament for the Papakura electorate, including:

Request under the Official Information Act 1982 (OIA)

On 1 November 2019, Coralanne Child, Deputy Secretary: Sector Enablement and Support wrote to Angie Mason in response to an OIA request made on 5 September 2019. In this letter, Ms Child advised:

- The number of high school age children from Beachlands, Maraetai and Clevedon that attend schools out of the local area, and at which high schools these students are currently enrolled
- How the current zone boundaries for the Howick College and Papakura College catchments are established
- That the Ministry does not forecast individual schools rolls into the future - for network planning purposes, demand pressure is considered more accurate and assesses age appropriate population change and the combined future demand

for groups of schools serving the same geographical area.

A copy of this OIA letter can be found at Appendix A.

Meeting with Hon Jan Tinetti, Associate Minister of Education

On 1 April 2021, the Associate Minister of Education Jan Tinetti met with the Labour List MP for Papakura, Anahila Kanongata'a-Suisuiki, Franklin Local Board Members Angela Fulljames and Malcolm Bell, and Angie Mason. This meeting contained commercially sensitive information so media were excluded.²

During their presentation at this meeting, Ms Fulljames, Mr Bell and Ms Mason requested that Ms Tinetti review the very same issues contained in this report.

² Associate Minister of Education visits the coast, Pohutukawa Coast Times, page 3, Issue 1383, 9 April 2021, downloaded from: <https://www.pctimes.co.nz/files/9.4.21.pdf> on 3 July 2021.

Representatives from the NZ Super Fund and parties associated with the Russell Property Group, presented their evolving master plan for Beachlands South as a 'world class urban environment incorporating the Formosa Golf Resort and adjoining Ahuareka Farm sites.'³ This master plan currently includes space for a secondary school campus, as well as other community facilities. Ms Tinetti was given a copy of the Beachlands South Master Plan.

A representative from Ngāi Tai ki Tāmaki, Zaelene Maxwell-Butler, also attended. Ms Butler agreed that there is a need for a local secondary college in the local area, but did not express a view on the Beachlands South Master Plan.

Ms Maxwell-Butler requests that the Ngāi Tai ki Tāmaki be meaningfully involved in the establishment of the high school and formally requests that the school be named 'Kahawairahi College.'

Meeting with Hon Anahila Kanongata'a-Suisuiki, Labour List MP for Papakura

Local Board Members, Ms Fulljames and Mr Bell, and Angie Mason have met with the Labour List MP for Papakura, Anahila Kanongata'a-Suisuiki, and/or her Communications and Policy Research Officer, Sophie Parish on several occasions since January 2021.

Ms Kanongata'a-Suisuiki presented the petition by Angela Mason 'We Need a High School on the Pohutukawa Coast, Auckland' to NZ Parliament on 3 June 2021.⁴

Ms Kanongata'a-Suisuiki has visited several locations along the Pohutukawa Coast /

Wairoa area, including Beachlands and Orere Point Primary Schools.

After raising the high school question, Ms Kanongata'a-Suisuiki obtained a Rapid Response from Ministry of Education staff (Metis Number 1241709) that states:

NZ Superannuation has purchased a significant part of the Formosa Golf Resort. If this becomes [a] large scale residential development a new secondary school will likely be required. The timing of the secondary school would be dependent on the speed and scale of any residential development.

A copy of the Rapid Response (Metis Number 1241709) and Ms Kanongata'a-Suisuiki's letter can be found at Appendix B.



Figure 2 Labour MP Anahila Kanongata'a Suisuiki on the steps of NZ Parliament House, 3 June 2021

³ Presentation to Hon. Jan Tinetti by John Dobrowolski, Program Director, Russell Property Group, 1 April 2021

⁴ *High School for the Coast petition reaches parliament*, Pohutukawa Coast Times, page 11, Issue 1393, 18 June 2021, downloaded from: <https://www.pctimes.co.nz/files/18.6.21.pdf> on 3 July 2021.

Meeting with Hon Judith Collins, Elected MP for Papakura

On 26 May 2021, Franklin Local Board Members, Angela Fulljames and Malcolm Bell, and Angie Mason met with the elected Member of Parliament for Papakura, Hon Judith Collins regarding the need for a secondary school.

In response, Ms Collins drafted a letter to the Minister of Education, Hon Chris Hipkins, describing the population growth around the Pohutukawa Coast / Wairoa Area and asking what are the Minister's plans to establish a secondary school for this area.

Appendix B also contains Hon Ms Collins' letter to the Minister of Education.

3. THE WAIROA COMMUNITY

A. Wairoa Today

Located on the east side of the Auckland Region, approximately 45 minutes drive to the CBD (outside peak drive times), Wairoa / Pohutukawa Coast is made up of the townships known as Beachlands, Maraetai, Whitford, Brookby, Hunua and Clevedon.

The catchment area for a new Wairoa High School could span as far south as Ardmore and Hunua, as far east as Whitford, as far west as Kawakawa Bay and Orere Point, and as far south as Clevedon and Hunua.

The Pohutukawa Coast / Wairoa townships within which future secondary student populations reside, include Beachlands, Maraetai, Whitford, and Clevedon.

For this Report, the population estimates below include the following Stats NZ Statistical Area 2 (SA2) 2021 datasets:

- Clevedon (SA2 Code: 162900)
- Maraetai (SA2 Code: 157400)
- Sunkist Bay (SA2: 155000)
- Te Puru (SA2 Code: 156400)
- Turanga (SA2 Code: 157100)

While the Wairoa community is rural-residential in character across many parts of the area, there are large population clusters in various townships.

Wairoa's main shopping and retail hub in Beachlands/Maraetai, where there are two primary schools, the Pohutukawa Coast shopping centre and various employment generating opportunities.

Population data taken from the national censuses conducted in 2013 and 2018 shows that population across the Wairoa region grew by over 2,100 residents.

Table 1: Population Growth in the Wairoa Area

Township / SA2 Dataset	2006 Census Population	2013 Census Population	Increase 2006 - 2013	2018 Census Population	Increase 2013 - 2018
Beachlands (Te Puru)	648	1,587	939	3,054	1,467
Beachlands(Sunkist Bay)	2,769	2,979	210	3,207	228
Brookby/Whitford (Turanga)	2,511	2,802	291	3,015	213
Clevedon	1,344	1,452	108	1,515	63
Maraetai	1,863	2,199	336	2,346	147
TOTAL	9135	11,019	1884	13,137	2,118

Source: Stats NZ, Geographic Boundary Viewer, Statistical Area 2 2021, downloaded 28 March 2021

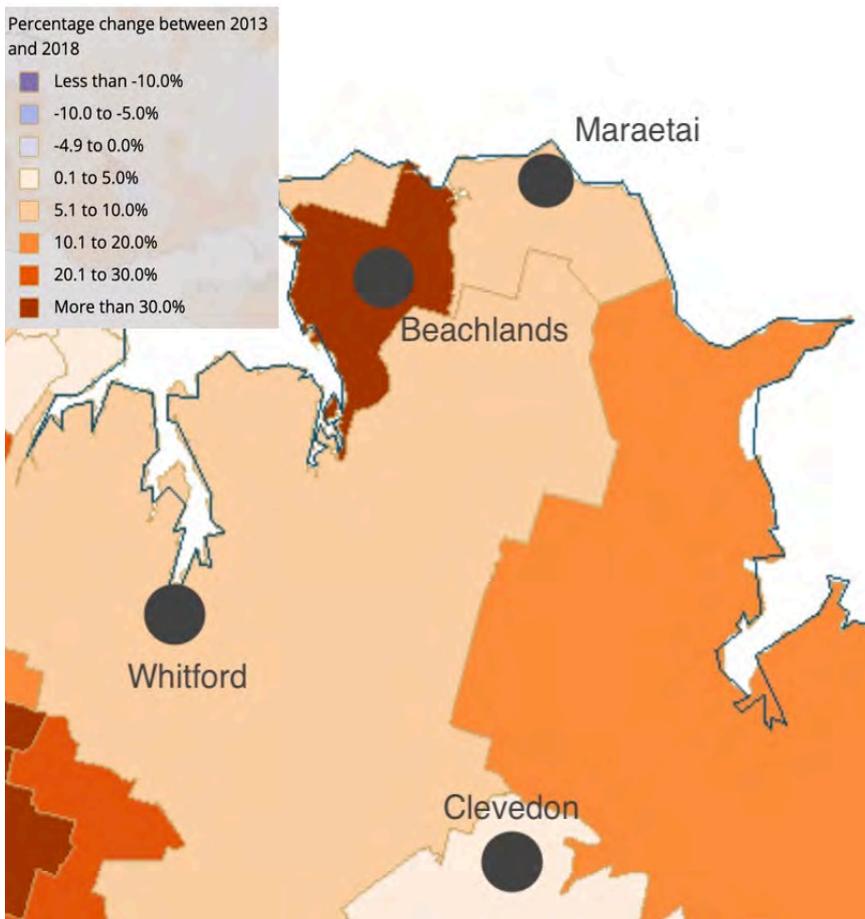


Figure 3: 30% Population Growth from 2013 - 2018 in Beachlands
Source: LINZ Census Data: Wairoa population increase 2013 - 2018

Beachlands / Maraetai are the fastest growing areas in Wairoa. Beachlands grew over 30% between the 2013 and 2018 census count.

B. Public Transport and Community Facilities

Public transport services connect Wairoa to key regional hubs, including Botany Town Centre, Papakura and Manukau. The Pine Harbour Ferry provides commute services into Auckland Central Business District.

Despite Wairoa having limited community facilities, especially for high school age

students, many local residents are active in sports and recreational activities.

Te Puru Sports Centre is the area’s main sports facility, with a large sports field, indoor gymnasium, rugby club rooms, dance studios and private sports training offered. The Te Puru touch rugby club is the largest in

NZ; soccer, cricket, badminton and horse riding are all popular activities and many of Auckland's mountain biking, triathlons and running races are held locally.

While all townships in Wairoa have local community halls, many of the activities offered cater to younger children or adults /

retirees and do not offer many activities for teenagers.⁵ Local community halls offer a range of children's and recreational classes, including ballet, yoga, hula-hooping, art / painting. These Community Halls provide a place to meet and host many events, such as the Beachlands Hall free monthly lunches and food parcel support.

C. Wairoa in 2031

Several areas in Wairoa have been up-zoned under the Auckland Unitary Plan 2016, anticipating a significant population growth and more households within the area.

Since 2013, following up-zoning by the Auckland Unitary Plan (AUP), we estimate 1,175 units have been built in the Pohutukawa Coast / Wairoa area, increasing local population by over 2,100 residents.

Beachlands/Maraetai Up-Zoning

Beachlands/Maraetai has undergone two Unitary Plan changes, firstly to provide for a larger retail and local service centre, including an 'anchor' large format supermarket (Countdown).

Secondly, approximately 100 hectares of low-production farmland has been up-zoned from rural-residential to allow higher densities, from standalone four- and five-bedroom family dwellings, to multi-story apartment blocks located near the Pine Harbour ferry terminal.

Future Development

There is more future development in the planning phase, which potentially adds another 4,000 - 4,500 additional dwellings:

- Additional Beachlands and Maraetai infill development (under AUP up-zoning): 350 new dwellings
- Clevedon Plan Change 32: 1,500 new dwellings
- NZ Super Fund together with parties associated with the Russell Property Group recently purchased 255 hectares adjacent to Beachlands

Clevedon Plan Change 32

Clevedon's Plan Change allows for 1,500 new dwellings, both standalone family dwellings, and terraced housing development. While growth is constrained by flooding, the town centre is expanded to include low-rise, small scale commercial units containing retail and rural services. Following extensive construction works, Clevedon will be connected to reticulated potable and waste water utilities by 2022.

⁵ Source: *Connecting young people in rural south-east Auckland: A survey of youth and parents/guardians in the Wairoa subdivision (August 2019)* downloaded 11 April 2021 from <https://www.aucklandcouncil.govt.nz/have-your-say/topics-you-can-have-your-say-on/connecting-young-people-in-rural-south-east-auckland/Documents/connecting-young-people-rural-south-east.pdf>

Formosa Golf Resort

The New Zealand Super Fund together with parties associated with the Russell Property Group have purchased 255 hectares of land located on the southwest boundary of Beachlands' urban edge. Led by the Russell Property Group, this site could be developed with a range of new residential dwelling typologies, with additional supporting retail, education, commercial and light industry, an innovation centre, hotel and retirement village and medical uses included.

Total Population in 2031

We estimate that with this future development, an additional 11,000 - 12,500 new people could move to the Wairoa area⁶ bringing the local population to around 22,500 residents by 2031.

Looking 10 years to the future, with 8% of this population being of high school age, we estimate over 1,700 high school age children will live in Pohutukawa Coast / Wairoa by 2031.

⁶ 2.7 is average household size for Beachlands/Maraetai, 2018 Census, downloaded from: <https://www.stats.govt.nz/tools/2018-census-place-summaries/te-puru>, 1 April 2020

5. WAIROA'S EARLY CHILDHOOD & PRIMARY SCHOOL FACILITIES

Wairoa is fortunate to enjoy a high standard of early childhood and primary school education. The teachers at each local early childhood education centre and primary school are passionate and professional, and many live in the local area.

Appendix C contains roll attendance data for all primary schools and ECE centres in Wairoa.

A. Early Childhood Education

In the Pohutukawa Coast / Wairoa area, there are 13 Early Childhood Education (ECE) centres licensed to cater for a total of 770 children, each day, across all 13 centres.

As some of the children only attend two or three days per week, we estimate that the actual number of children of pre-school age in the Wairoa area attending is actually 130% higher than this 770 figure.

We estimate, there are over 1,000 pre-school aged children in the Wairoa area.

There are three centres in Clevedon, one in Maraetai, six in Beachlands and three in Whitford. Consent has been granted for another daycare to be built in Beachlands licensed for 86 children. There are also in-home carers in the Wairoa region and some children attend ECE centres outside of the area.

B. Primary Schools in Wairoa

The Wairoa area has eight primary schools, which all offer classes from Year 0 to Year 8.

Communities of Learning / Kahui Ako

The primary schools in Wairoa fall into four Communities of Learning / Kahui Ako:

- Howick Coast / Howick College
- Papakura High School
- Pukekohe High School
- Hauraki Plains College

Two primary schools, Beachlands and Hunua, are not in a Community of Learning / Kahui Ako.

The Communities of Learning, current roll numbers and the distance to Beachlands for each contributing primary school in the Pohutukawa Coast / Wairoa are shown in Table 1.

The Principal of each primary school in Wairoa has supplied the roll numbers for Year 2020, shown below.

Note, the roll numbers supplied by Wairoa Principals differ from the roll numbers contained in the Ministry of Education's 'Student Rolls by School 2010 - 2020' data sheet.

Table 2: Wairoa Primary Schools

School Name	Kahui Ako / COL	Year Group	Roll 2020
Ardmore	Papakura	0 to 8	406
Brookby	Howick Coast	0 to 8	124
Beachlands	None	0 to 8	697
Clevedon	Howick Coast	0 to 8	406
Hunua	None	0 to 8	150
Maraetai Beach	Howick Coast	0 to 8	458
Orere	Hauraki	0 to 8	49
Paparimu	Pukekohe	0 to 8	33

1. Ardmore School (School ID: 1208)

Ardmore is a semi-rural state school in close proximity to a major urban centre, Papakura. Ardmore School is a co-educational, full primary school, Decile 6, and offers classes from Year 0 to Year 8. Ardmore has a roll of 406 and a staff of 12 teachers (MoE roll 2020: 343).

Ardmore student roll trend: steady growth

2. Brookby School (School ID: 1236)

Founded in 1874, Brookby School is a co-educational, full primary school situated in Brookby Valley, 13km from Manukau City and 15km from Botany Town Centre. Brookby is a state school, Decile 5, with classes from Year 0 to Year 8. Brookby has a roll of 124 and a staff of 25 teachers and teacher aides (MoE Roll 2020: 122).

Brookby student roll trend: steady growth

3. Beachlands Primary (School ID: 1224)

Beachlands School is a co-educational primary school on Bell Road, 20km from Botany Town Centre and 18km from Howick College. Beachlands is a State school, Decile 10, with classes from Year 0 to Year 8. Beachlands School has seen the addition of 10 new classrooms since 2018 and this primary school has a roll of 697, with a staff of 51 teachers and teacher aides (MoE Roll 2020: 663).

Beachlands student roll trend: rapid growth

4. Clevedon Primary School (School ID: 1249)

Founded over 150 years ago, Clevedon School is a co-educational, State school situated approximately 15km from Manukau City. Clevedon is a Decile 9 school with classes from Year 0 to Year 8. This primary school has a roll of 406 and a staff of 37

teachers and teacher aides (MoE Roll 2020: 385).

Clevedon student roll trend: steady

5. Hunua School (School ID: 1321)

Hunua School is a co-educational, State school situated approximately 27km from Manukau City, nestled in the foothills of the Hunua Ranges. Hunua is a Decile 9 school with classes from Year 0 to Year 8. This full primary school has a roll of 150 and a staff of 12 teachers and teacher aides (MoE Roll 2020: 145).

Hunua student roll trend: steady

6. Maraetai Beach School (School ID: 1337)

With views over the Hauraki Strait, Maraetai Beach is a co-educational, State school situated approximately 20km from Botany Town Centre and 20km from Howick College. Maraetai is a Decile 10 school with classes from Year 0 to Year 8. This full primary school has a roll of 458 and a staff of 45 teachers and teacher aides (MoE Roll 2020: 436)

Maraetai Beach student roll trend: rapid growth

7. Orere Point School (School ID: 1405)

A small rural school, Orere Point is a full primary, co-educational school located approximately 46km from Manukau Centre and 52km from Hauraki Plains College in Ngatea. Orere Point is a Decile 3 school with classes from Year 0 to Year 8. This school has a roll of 49 and a staff of 9 teachers and teacher aides (MoE Roll 2020: 46)

Ardmore student roll trend: steady

8. Paparimu School (School ID: 1425)

Established 1899, Paparimu is a full primary, co-educational school located approximately 40km from Manukau Centre and 25km from Pukekohe High School. Paparimu is a Decile 10 school with classes from Year 0 to Year 8. This school has a roll of 33 and a staff of 12 teachers and teacher aides (MoE Roll 2020: 31)

Paparimu student roll trend: steady growth

C. Forecast Roll to 2027

Based on these primary-age student rolls, it is reasonable to estimate the minimum number of students in Wairoa who will be of high school age in 2025/27 and 2027/28.

Using 2020 primary school roll numbers for Years 4 to 8 indicates a secondary population of 1,305 by 2025/6 without growth.

Using 2020 primary school roll data for Years 1 to 5 indicates a secondary population of 1,570 by 2027/8.

Note, these roll-based forecasts align fairly well with the 2031 population projections, which use the Census data (see Section 4.C, above).

These figures assume no increase in current population. While most of the Wairoa primary schools have a steady roll, three schools are undergoing or about to undergo, significant roll growth due to up-zoning and/or pending Auckland Unitary Plan Changes.

- Beachlands Primary
- Clevedon School
- Maraetai Beach School

It is reasonable to assume that these schools will experience growth in student numbers due to this new development. As such, we conclude that the roll forecasts above are conservative and are likely to be exceeded, should this development go ahead as planned.

Table 3 below contains primary school roll projections.

Table 3: Wairoa Primary School Roll Projections to 2027

YEAR	Ardmore	Beachlands	Brookby	Clevedon	Hunua	Maratai Beach	Orere	Paparimu	TOTAL
0	20	54	0	20	9	25	3	0	131
1	48	85	23	48	17	67	6	6	300
2	44	95	17	44	26	58	5	5	294
3	49	78	16	49	20	73	6	2	293
4	44	92	12	44	20	54	2	5	273
5	56	78	15	56	15	47	6	6	279
6	66	92	15	66	15	56	6	6	322
7	42	59	14	42	16	38	6	1	218
8	37	64	12	37	12	40	9	2	213
YEAR 0/1 TO 5	261	482	83	261	107	324	28	24	1570
YEAR 0/1 TO 8	406	697	124	406	150	458	49	33	2323

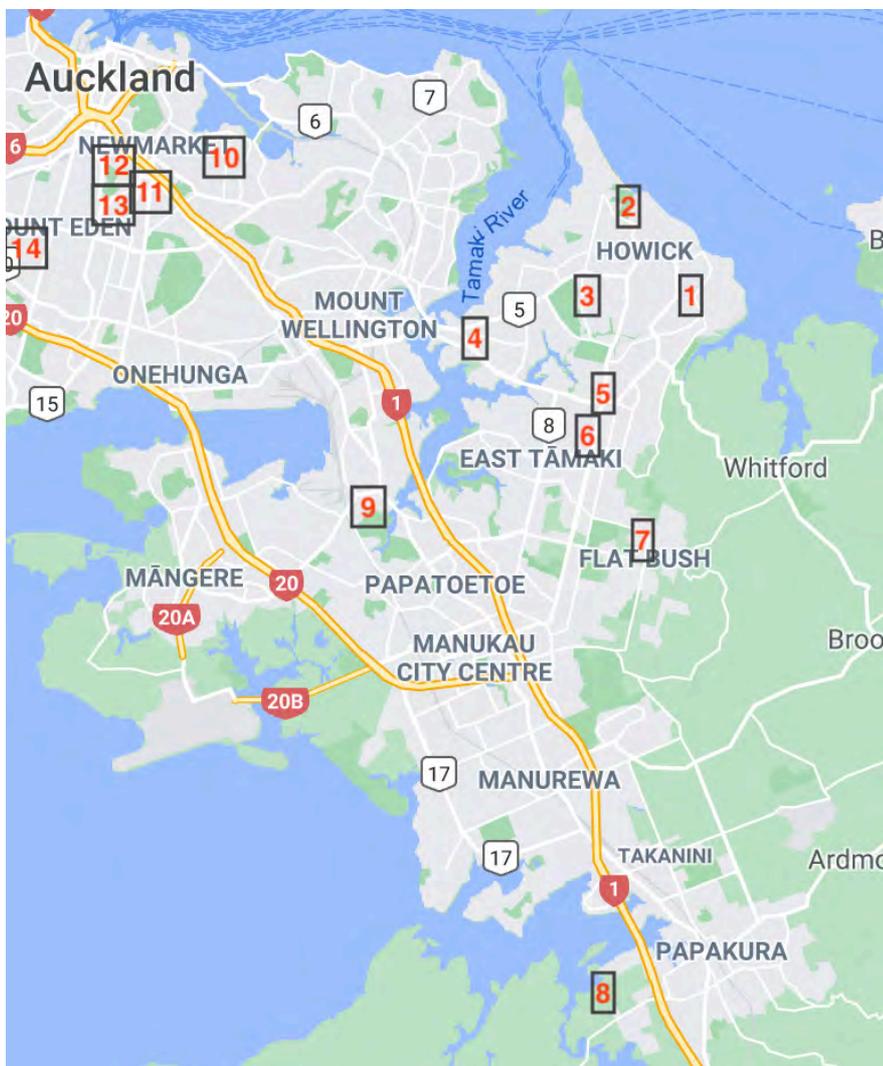
4. CURRENT HIGH SCHOOL ATTENDANCE

Wairoa / Pohutukawa Coast is one of the largest communities in NZ without a high school.

As with many rural-residential communities, local schools form the heart of all Wairoa’s townships.

Wairoa is one of the largest communities in NZ without a high school.

Over 40% of high school age students from Wairoa attend private schools.



KEY

1. Howick College
2. Macleans College
3. Pakuranga College
4. Saint Kentigern College
5. Botany Downs Secondary College
6. Sancta Maria College
7. Ormiston Junior & Senior Colleges
8. Strathallen College
9. Kings College
10. Baradine College
11. Diocesan School for Girls
12. Auckland Grammar
13. Epsom Girls Grammar
14. Mt Albert Grammar

Figure 4: Locations of Secondary Schools attended by Wairoa residents Source: Google Maps (2021) downloaded 2 May 2021

A. Communities of Learning / Kāhui Aho

There are two main Communities of Learning that serve the Wairoa area:

1. Howick Coast Kāhui Aho / Howick College

Howick College has a current roll of approximately 2,150 students

Howick College COL includes the following primary and intermediate schools, which feed into this secondary school:

School ID	School Name	School Type	School Authority
1235	Botany Downs School	Contributing	State: Not integrated
1236	Brookby School	Full Primary	State: Not integrated
1249	Clevedon School	Full Primary	State: Not integrated
87	Howick College	Secondary (Year 9-15)	State: Not integrated
1318	Howick Intermediate	Intermediate	State: Not integrated
1319	Howick Primary School	Contributing	State: Not integrated
1357	Maraetai Beach School	Full Primary	State: Not integrated

2. Kāhui Ako ki Papakura / Papakura High School

Papakura High School has a current roll of approximately 940 students

Papakura High COL includes the following primary schools, which feed into this secondary school:

School ID	School Name	School Type	School Authority
1208	Ardmore School	Full Primary	State: Not integrated
1267	Edmund Hillary School	Full Primary	State: Not integrated
1332	Kelvin Road School	Contributing	State: Not integrated
1424	Kereru Park Campus	Full Primary	State: Not integrated
101	Papakura High School	Secondary (Year 9-15)	State: Not integrated
1422	Papakura Intermediate	Intermediate	State: Not integrated
1459	Redhill School	Full Primary	State: Not integrated

B. Other Auckland State Schools

Due to the lack of places within their first school of choice, parents from Wairoa / Pohutukawa Coast are likely to apply for their child to attend another public school within Auckland, including:

- Botany Downs Secondary College
- Macleans College
- Pakuranga College
- Ormiston Junior College
- Ormiston Senior College
- Auckland Grammar School (day and boarding)
- Epsom Girls Grammar School (day and boarding)
- Mt Albert Grammar School (boarding)
- Private High Schools

C. Private Secondary Schools

Currently, approximately 40% of high school students from Wairoa attend private high schools.

These private high schools include:

- Sancta Maria College
- Saint Kentigern College
- Strathallen College
- Baradine College
- Diocesan School for Girls
- Kings College

D. Home Schooling & Options out of the Auckland Region

Facing difficulties accessing secondary school education, some parents have elected to educate their high school aged children via online learning.

“We are leaving Clevedon for schooling”

We moved to Clevedon in 2008 when we started a family and now have 3 girls aged 6, 10 and 12. We always thought we would have to send our kids to St Kents but when we realised financially this was not possible, at the same time zoning was closed down to Howick College for Clevedon residents due to the extra pressure from Beachlands developments.

Papakura high was not an option due to ... subject offerings.

So we felt we had no choice but to move to Mellons bay to access appropriate schooling for our children’s future, i.e., Mellons Bay Primary, BBI then McLeans College.

Other friends of ours moved to Hauraki plains for the same reason.

Figure 5: Leaving for schooling (Source: email correspondence, FW: Leaving Clevedon for schooling, from Anthony Hunt, Dentist, Clevedon, to Angela Mason, dated 25 Nov 2020)

Other parents have chosen to send their children to Hauraki Plains College, a one-way bus ride of over one hour.

Other parents are choosing to move out of the area, to obtain high school education of their choice and to better suit their child.

Table 4 (below) shows where students from the Wairoa area attend high school, as of 2019. All of these high schools are outside Wairoa and require students to take a bus or private motor vehicle.

Table 4: Student High School Attendance by Census Area Unit (CAU) 2019

Census Area Unit (CAU)	School Authority	Number of Students that live in the CAU
Te Puru / Sunkist Bay / Maraetai (Beachlands / Maraetai)	State* Total:	416
	State Integrated**Total:	134
	Private Fully Registered*** Total:	46
Beachlands / Maraetai Total		596
Clevedon	State Total:	83
	State Integrated Total:	30
	Private Fully Registered Total:	53
Clevedon Total:		166
Turanga	State Total:	93
	State Integrated Total:	20
	Private Fully Registered Total:	63
Turanga Total		176
Beachlands / Maraetai / Clevedon / Turanga Total		938

Source: Ministry of Education (1 Nov 2019), Letter to Angela Mason, Request under the Official Information Act: School Zoning in Southeast Auckland

* State schools referenced in Table 4 include Howick College, Botany Downs Secondary College, Pakuranga College, Macleans College, Auckland Grammar, nine other state schools in Auckland and two state schools in the Waikato Region

** State Integrated schools in Table 4 include Baradene College, Sancta Maria College and seven other integrated schools in Auckland and one integrated school in the Waikato

*** Private secondary schools include Saint Kentigerns and Kings College and five other private schools, including one in the Waikato.

Additional detail on high school student placement can be found at Appendix D.

E. Growth in Other High School Catchments

Our analysis of 2013 and 2018 census data also shows a population of secondary school age in Papakura / Takanini / Alfriston of almost 6,000 by 2023.

Although slower, population growth around the Howick Peninsula is also predicted.

This means high schools in Howick and Papakura are unlikely to have sufficient room to accommodate students from the outlying and rapidly growing Wairoa area.

As new residential development brings more people into Wairoa at a faster rate than the 30% population growth trends indicated by the Census data, the Pohutukawa Coast / Wairoa Area will need a high school before the Ministry of Education's current planned development program.

7. TRAVELLING TO HIGH SCHOOL

A. Vehicle Miles Travelled

Currently, almost all of the high school aged children in Wairoa are bussed out of their communities.

Data from a Ministry of Education Official Information Act request (1 Nov 2019), students from Beachlands, Clevedon, and Maraetai currently attend approximately 25 different high schools, around the east Auckland region plus three high schools outside Auckland.

Over 900 Wairoa students per day are bussed, shuttled or driven to school, and back home again every day.

Currently, approximately 650 high school students travel to school up to 20km by bus on the Whitford-Maraetai Road many in a standing position. Assuming 60 students per bus, this equates to 24 bus movements per day. Given population projections, these numbers will more than double to 2031, with over 1,700 high school students traveling and over 55 bus movements per day along the Whitford-Maraetai Road. These figures exclude the daily students/bus movements to and from Clevedon and surrounding villages also travelling on increasingly busy rural roads.

A student from Beachlands will take two busses to get to Howick College, a 40 minute trip to her in-zone secondary school. Students travel from Clevedon to Hauraki Plains College, a return trip over 135km. Many parents drive their children, or carpool with other parents, or have arranged private shuttle transport at their own cost.

CASE STUDY: Riding the bus to Howick College

My name is Isabella Rose and I am a member of the Franklin Youth Advisory Board. Being a Howick College Student bussing from Beachlands was always anxiety inducing. The buses were always over crowded with no seat belts and plenty of students left to pack in like sardines and stand.

During summer it would be incredibly hot and during winter, very cold, as no aircon worked. The trip would take 30 or so minutes, depending on how bad the traffic was, so standing for that long with no aircon on a hot day was awful.

On Wednesday, the seniors end school an hour earlier, and buses are meant to be available for all students, however several times the buses were too full and many students had to stay the extra hour and hope for a seat. It was not a pleasant time.

I lived in Beachlands for two years and found that there was no sense of community for children of school age - we had no place to hang out and entertain ourselves. Schools provide a lot for a community - sporting facilities, extra activities etc. and I felt the lack of high schools around the area only made the distance between students and their community worse.

**-Isabella Rose,
Franklin Youth Advisory Board**

Figure 6: Case Study of Student Bus Travel

B. Safety of School Travel

Many of Wairoa's college-age students travel to school on roads that Auckland Transport has designated 'high crash risk' routes. Many of the local roads carry a significant number of heavy truck vehicles, due to quarrying, water tankering, construction and other industrial activities around the region.

The NZ Police note that the number of busses and shuttles traveling out of the area every day put pressure on local road infrastructure and cause increased congestion at peak times.

Choke points include Whitford village and the approaches to the roundabout at Somerville. Local Police state that actual usage of the main arterial routes is significantly higher than the Auckland Transport estimates – this is based on Police traffic camera and ANPR data. This data can be provided, if required.

Local Police also state that road safety and congestion place a significant demand on police resources relating to road use. The effect of this increased road use and congestion affects all other road users in the region, not just students.

Crash Data

In the 2019 calendar year, through to March 2020 (lock-down) there were 174 incidents of traffic offending and 50 vehicle collisions dealt with by Police.

In the 3 years between February 2017 and February 2020 there were 175 crashes reported between Beachlands/Maraetai and Howick. Of these, 20 were in Howick itself so 155 occurred between the two suburbs. The area's most frequently affected were the

The NZ Police support the establishment of a secondary college in the Beachlands/Maraetai area for several reasons:

- A school serves as a community hub for any community. It provides a focus for academic and sporting achievement and builds social networks for students and families – this builds stronger, more connected and safer communities. A college could also develop and reflect the local character by building on the existing environmental and cultural strengths which are initiated at the primary level.
- The existing population and the forecasted growth would support the investment by MOE. The population already places heavy demand on both Beachlands and Maraetai Beach schools. A secondary college could enable the existing schools to focus on primary education with a purpose built facility to support intermediate and secondary students
- A secondary college would ease the demand on other Colleges such as Howick, Ormiston, McLeans, Pakuranga. If the proposal extended to an intermediate school, this would ease demand on Somerville, BBI, Howick and others
- A local secondary college could discourage families from leaving the area to gain access to preferred colleges elsewhere

Figure 7: Police statement of support for secondary school, Inspector Wendy Spiller, Area Commander Counties Manukau East, email correspondence: 'RE: [External] Secondary College in Beachlands,' from Colin Higson, Inspector, Area Prevention Manager, Counties Manukau East, dated 12 April 2021

'gorge', Whitford/Maraetai Road near Henson Road and in the vicinity of Whitford village. The crashes ranged in severity from very minor non-injury crashes through to serious injury and fatal collisions.

Serious collisions on the main arterial routes can cause significant delays to road users as there are few alternative detour options.

Safety of public bus service

The safety of the transport options available to Wairoa students is variable and there have been anecdotal reports of insufficient seating for students on buses, which presents a

safety risk. Road safety and the lack of bus seating has featured in local media reporting.

Students in the busses provided by the Ministry of Education do not wear seat belts. Many students are required to stand. Sometimes, the bus is full and is not able to collect all students en-route. While traveling, students are unsupervised and there have been occasional reports of bullying or drug taking on the bus as well as of students fainting due to the heat inside the bus.

A key aspect of the NZ Police support for a local secondary college is the significant improvement to road safety between Beachlands /Maraetai and Howick.

8. STUDENT WELL BEING

A. Opportunity Cost due to Long Travel Distance

Extra-curricular activities

As they travel home via a lengthy bus ride, many students miss out on extra-curricular activities, such as being in the school production or playing on a school sports team.

Many of these activities involve rehearsals or practices that occur after school so students have to miss their only return bus home and are reliant on parents or friends to collect them. If parents / caregivers are unable to collect a student after school, for example, due to work commitments or not owning a car, this student faces an additional barrier to participating in extra-curricular activities.

Spending time with friends after school

Wairoa students can find it difficult to spend time after school or weekends with high school friends, if these friends live near to the school campus. Wairoa students, again, are

reliant on family or friends to travel to see high school friends that do not live in their community. For example, a student who plays weekend sport for a school team in Epsom is wholly reliant on parents for travel to games on the weekend.

Reduction in student physical activities

The increased time spent on the bus for Wairoa students results in less time being active after school. This can result in lower physical health and fitness for these students.

Limited opportunities to play sports in high school mean students have to look elsewhere for sports – which may not exist or may cost more money. Often there is an additional lack of access to adequate playing facilities near their homes that makes it more difficult for students to engage in sports.

Table 5: Participation in Extra-Curricular Activities

Activity	Attend school in local community	Travel out of community to attend school	Difference
Participate in environmental volunteer work	55%	18%	-37%
Spend time at a community centre	26%	9%	-17%
Visit a swimming pool	21%	4%	-17%
Participate in a visual arts group/activity	17%	0%	-17%
Other after school activities	62%	9%	-53%

Source: *Connecting young people in rural South-East Auckland, Franklin Youth Advisory Board (2019)*

Through sports, young people learn important life skills such as teamwork, leadership and confidence and research shows that students active in sports during adolescence and young adulthood are 20% less likely to get serious illnesses, like cancer, or have weight issues later in life.

Lack of transport options

A survey *Connecting young people in rural South-East Auckland* was published in August 2019 by the Franklin Youth Advisory Board.⁷ In this survey, limited transport

options was a major concern raised by Wairoa students. The school bus is many students' only method of transport, as parents are unable to drive the students to school and the distance to school is too far to cycle or walk. Students are frustrated by the amount of time that is wasted on the bus, as well as the difficulty getting to the bus in time before it leaves after school. Missing the bus can present a significant problem, as students then need to wait for a parent to pick them up as there is often no other readily available way to get home.

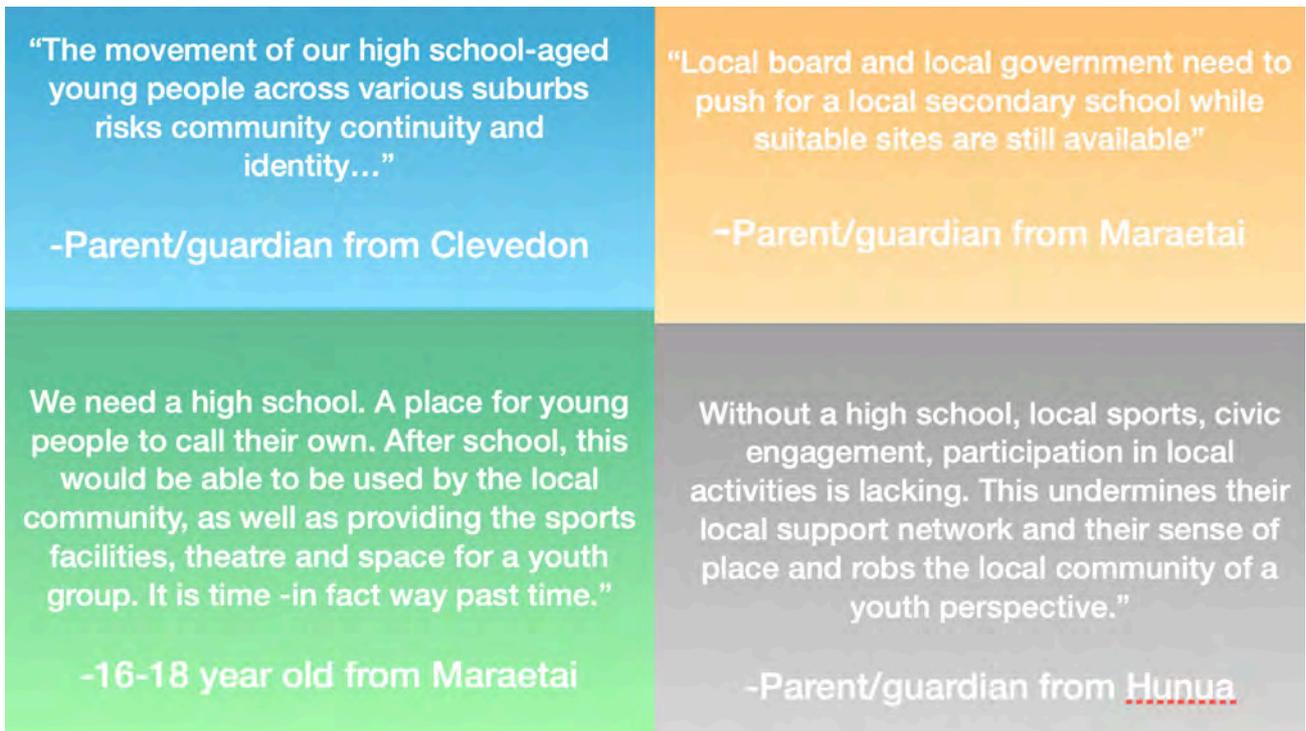


Figure 8: Quotations from Franklin Local Board survey (2019)

⁷ Franklin Youth Advisory Board (Aug 2019) *Connecting young people in rural South-East Auckland*, downloaded 11 April 2021 from: <https://www.aucklandcouncil.govt.nz/have-your-say/topics-you-can-have-your-say-on/connecting-young-people-in-rural-south-east-auckland/Documents/connecting-young-people-rural-south-east.pdf>

B. Student Mental Well-Being

Not being able to partake in extra curricular activities or a lack of high school friends that are not close by, can have detrimental effects on student mental health and well-being, particularly in terms of feeling connected to their community.

The Franklin Youth Advisory Board's survey *Connecting young people in rural South-East Auckland (ibid)* included responses from youth and examined how to better connect young people in southeast Auckland with their local communities.

Out of the 12 to 18 year olds surveyed, 54% attend school outside their local area and 39% attend within their local area.

Comments indicated that many see this as problematic, contributing to a loss of connection within their local area.

When asked 'What activities or facilities would make the most difference for young people in their local area, so they could hang out and do the things they like to do within their local area?' a high school was mentioned by 19% of respondents.

The survey also compared contribution and participation in their community between the who were able to attend school in their local area, and those students who had to travel out of their community to attend school. Results show that all students who attend school in their local area are more likely to participate in extra-curricular activities, as shown in Table 4 above.

D. A School at the Community's Heart

A school is the heart of the community. During their child's teenage years, an important and sensitive time of growing up, parents and caregivers want their children to be connected and involved within their whanau and their community.

As the needs of our young people are becoming more complex, the traditional view of schools and other educational institutions as the sole providers of education for learners becomes less relevant. Public schools are the heart of the community because they are the nexus that ties everyone in the community together. Schools today are moving to accommodate a wider range of services that may be needed, in one place. When social services, sports and

cultural activities, as well as the educational curriculum, can be accessed at school, students get the broader social and emotional support they need.

Connecting the school within the community recognises that learning is transferred into and out of the school setting. Everyone knows either a child who attends or an adult who works in public schools; people attend school sporting events, plays, and concerts. Public schools are the vital organ that produce active and engaged citizens, and we must do everything we can to keep them and our country productive and healthy.

Students remaining in the local area can improve a sense of community and would be an asset to Wairoa.

Current Government Policies on Education

Children and young people spend a large amount of their lives in education; the education sector and the Ministry have an important role in promoting, supporting and improving the wellbeing of all learners. Current education policies play an essential part in supporting all outcomes of the Labour Government's *Child and Youth Wellbeing Strategy*.⁸

Quality education gives learners the knowledge, skills, competencies and experiences to succeed in life in ways that matter to them. When children and young people have a strong sense of wellbeing, they can engage meaningfully in learning.

The Ministry of Education's Kōrero Mātauranga | Education Conversation, found that New Zealanders want to see:

- teachers, families, whānau, and communities working in partnership to support children and young people's wellbeing
- education free from racism, discrimination and bullying, and,
- learners with disabilities or learning support needs accessing to the support they need.

Community engagement is one of eight principles in The New Zealand Curriculum that provide a foundation for schools' decision making. Community engagement is

about establishing strong home-school partnerships where parents, whānau, and communities are involved in and support learning.

This requires deliberate action to build relationships with community groups, and designing learning experiences with them that have impact in the community, for example, working together on community action projects such as planting in conservation areas.

Difficulties of gaining entry to high school

Currently, many Wairoa parents / caregivers are experiencing difficulties and anxiety over obtaining suitable high school education for their children.

Many families, especially in the areas Clevedon, Kawakawa Bay and Hunua, are making multiple submissions for admission to numerous high schools.

Often, these applications are rejected as these high schools are already full and are no longer taking out-of-zone students.

Not knowing that your child has a guaranteed place at high school is a major cause of distress and anxiety for families with children in Years 7 and 8. Some families are choosing to move out of the area to obtain suitable high school education.

This concern was raised at every school meeting and is an issue recognised by primary school Principals in Wairoa.

⁸ Source: Ministry of Education / Te Tahuu o Te Matauranga, *Wellbeing in Education*, downloaded on 12 April 2021: <https://www.education.govt.nz/our-work/overall-strategies-and-policies/wellbeing-in-education/#Education>

9. SUPPORT FOR LOCAL HIGH SCHOOL

A. Petition for a Secondary School

Following meetings back in August 2019, at which over 150 concerned parents / caregivers attended, we were determined to give these families / whanau a platform through which they could express their urgency for a new high school.

An online petition was set up in October 2019 and has gathered over 3,000 signatures.

In addition, over 600 hard copy signatures were obtained at two signing events in Beachlands. More hard copy signatures could have been obtained but campaign efforts were constrained due to Covid-19 restrictions.

Along with this report, the petition for a new high school on the Pohutukawa Coast will be presented to NZ Parliament by local MPs from both major parties.

This petition and report is to be presented to Parliaments' Petitions Committee. We expect this Committee will call for the Ministry of Education to conduct a review of the need for a local high in Wairoa / Pohutukawa Coast.

The petition can be viewed here:

https://www.parliament.nz/en/pb/petitions/document/PET_89684/petition-of-angela-mason-we-need-a-high-school-on-the

B. Community Meetings

Following the 'meet and greet' with local MPs, the Franklin Local Board and concerned parents held a series of meetings at local area primary schools.

Common concerns raised across all meetings include:

- Need for students to travel over 20km on dangerous roads
- Lack of local high school bus service
- Parents unable to enrol their high-school age students

- High school children unable to attend after school activities or sports clubs
- Separation of children's friend groups after primary school finishes

Minutes from all Community Meetings can be found in Appendix E.

Meeting 1:

Rosa's Cafe, Beachlands: 12 September 2019, seven attendees

Meeting 2:

Rowan Muir Meeting Hall, Maraetai Beach: 10 October 2019, 15 attendees

Meeting 3:

Clevedon Primary School: 28 November 2019, 40 attendees

Meeting 4:

The Church, Brookby School: 05 March 2020, 45 attendees

Meeting 5:

Hunua Primary School: 19 November 2020, 40 attendees

Meeting 6:

Beachlands School: 09 December 2020, 45 attendees

C. Support from Wairoa's Primary School Principals

As part of our community outreach, we have met with the Principals and senior staff at all the primary schools in Wairoa.

The campaign to build a local high school has support from all the primary school

Principals in the Wairoa area. All Principals support the construction of a new high school in the Wairoa area, most likely in or near the Beachlands community.

Appendix F contains Principals' letters of support.

D. Support from Franklin Local Board & Franklin Youth Advisory Board

As part of its Three Year Local Board Plan 2020, the Franklin Local Board has identified securing better access for secondary

education as a key advocacy item for Wairoa constituents.

The Franklin Local Board's letter of support can be found at Appendix G

F. Support from other local community groups

Local Wairoa community organisations have written to support our request to the Minister for a secondary school, including:

- Pohutukawa Coast Community Association
- Clevedon Community and Business Association

- Te Puru Community Centre
- Chair of the Whitford Residents and Ratepayers Association wrote an editorial in the Pohutukawa Coast Times expressing support for a local high school, to reduce traffic congestion in Whitford

village (*Guest Editorial by Whitford Residents and Ratepayers Association chair Darin Watts, Pohutukawa Coast Times, Issue 1381, 26 March 2021, page 2, downloaded from: <https://www.pctimes.co.nz/files/26.3.21.pdf> on 4 July 2021*).

Appendix H includes these letters of support

10. CONCLUSION & NEXT STEPS

A. Preparing for a New High School

Public school is preferred

Based on the school meetings we have held around Wairoa, the preference is for a public high school, rather than an integrated or private school. Parents / caregivers raised concerns around equity and affordability, wanting a high school to be accessible for all families, regardless of household income or background.

Option for separate Junior and Senior High School

The option of a separate Junior and Senior High School model was raised at several school meetings, and by various Wairoa Principals. This option would reduce the current pressure on local Primary Schools by relocating their intermediate students to a Junior High School, which would allow these Primary Schools to continue to take more students without needing additional classrooms.

A Junior / Senior High School model would also allow building the school campuses to be phased over time, with the Junior High being constructed first and occupied, while the Senior High is under construction. Once completed, intermediate age students from the local primary schools could be relocated to the new Junior High, ensuring that this campus had a full cohort across Years 7 to 10.

Phasing in this manner would ensure that the Senior High would have a full cohort of Year 11 students when it first opens, with Years 11, 12 and 13 able to be accommodated should local students wish to attend the new school.

Beachlands / Maraetai preferred location

Local residents also indicated a preference for Beachlands/Maraetai to be the high school's location, as this urban area has already experienced significant growth, has an active retail centre and is reasonably well-connected via the road network and the Pine Harbour ferry.

Te Puru, the main recreation facility on the Pohutukawa Coast, is located between Beachlands and Maraetai. Ministry staff could look at the option of shared sports and recreation facilities available at this sports field, including:

- Rugby and soccer fields
- Cricket nets
- Tennis courts
- Gymnasium
- Community-led fitness classes
- Function rooms

Co-locating community facilities

With two primary schools, Beachlands/ Maraetai also allows efficiencies to be gained from sharing resources within and between

schools, including staffing expertise, governance expertise as well as curriculum resources. With the increasing demand for space and rising costs for land and buildings, schools are also becoming meeting and networking places for wider community groups.

We recommend exploring options to co-locate facilities for the wider Wairoa community, which may include:

- Social and mental health clinic
- Public library and WiFi-enabled workspace
- Swimming pool and sports facilities
- Auditorium / small performance venue
- Maori language classes

Co-locating a range of facilities onsite would enhance connections between the community and the school, and would improve the accessibility of recreational and cultural activities for young people across Wairoa.

Financing through Public Private Partnerships

Various delivery and financial models are available to fund the cost of a new high school, such as the Public-Private-Partnership initiative that helped deliver new schools in Ormiston and Hobsonville Point. This 'lease-to-own' model reduces the Ministry's upfront expenditure, allowing building, development and operational costs to be spread over longer period, for example 25-years.

Learning from the Covid-19 pandemic

With the recent Covid-19 pandemic, local Wairoa students were perhaps more affected than their peers, due to the distance between their place of residence and their high school. While most students have access to internet around Wairoa, internet speeds are not as good as parts of urban Auckland and some students require 'hard copy' learning packs.

A local high school would enable students improved access learning, should the country experience similar lock downs in the future.

Work with Franklin Local Board

Providing advocacy and support to securing better access to secondary education is a key deliverable in the Franklin Local Board Plan (pages 14 and 42).⁹

Franklin Local Board members have identified a number of potential sites for a new secondary school. As well as providing much-needed high school education, a new secondary college would create economic stimulus and generate additional employment within the local area.

We urge the Minister to future proof for the imminent growth, by engaging with the Franklin Board and Deputy Mayor on potential school sites.

⁹ Source: *Te Mahere A-Rohe o Franklin 2020 / Franklin Local Board Plan 2020* downloaded on 12 April 2021 from: <https://www.aucklandcouncil.govt.nz/about-auckland-council/how-auckland-council-works/local-boards/all-local-boards/franklin-local-board/Documents/franklin-local-board-plan-2020-english.pdf>

Work with Auckland Council for a Notice of Requirement

One of the first steps to establishing a school site is securing the correct zoning. Under the Resource Management Act 1991, the Ministry of Education has designation

powers, enabling a select piece of land to be designation for school use.

Once a site has been selected, we urge the Notice of Requirement process begin to change the zoning designation and enable construction of the new high school.

B. A call to action

We are asking the Minister of Education to:

- 1. Include Clevedon, Whitford and surrounding villages in the same school catchment as Pohutukawa Coast Schools Beachlands and Maraetai, to be known as the Wairoa School Community (WSC)**
- 2. Re-assess the forecast 2031 population projections for the WSC catchment based on school roll forecasts and forecast development, not just census data.**
- 3. Consider the well-being of WSC school children, including their mental health, sense of community as well as their safety on the Whitford-Maraetai and Whitford Roads**
- 4. Identify potential sites based on known development plans and work with Auckland Council to re-zone the preferred site for secondary education**
- 5. Secure the preferred site and identify a delivery model for construction and operation of the secondary school facility**

APPENDIX A

Official Information Act 1982 letter from Ministry of Education
(1 Nov 2019)



1 NOV 2019

Angela Mason
angie.cameron@gmail.com

Dear Angela

Thank you for emailing the Ministry of Education on 5 September to request information on school zoning in the South East area of Auckland.

Your request has been considered under the Official Information Act 1982 (the Act).

- 1. To understand better where students from Beachlands, Maraetai and Clevedon are attending high school, can MOE please provide post code data for students currently enrolled at Howick College, Papakura College, Alfriston College, Ormiston Junior College and Ormiston Senior College. If this information is not readily available, please advise which high school students from Beachlands, Maraetai and Clevedon currently attend and how many students are attending per school?*

I have attached Area-Unit information for students in the requested areas with the corresponding schools and number of students to this letter. We have used the Census Area Units (CAU) of Beachlands-Maraetai and Clevedon because they are specifically mentioned in the request. We have also included the Turanga CAU as it sits partially between the other two areas. The student counts relate to the July 2018 roll return and include only those students in years 9 to 13 whose addresses had successfully geo-coded within the three CAUs.

- 2. How are the zone boundaries for Howick Coast Kāhui Ako Community of Learning established (ID 99119)?*
- 3. How are the zone boundaries for Papakura Community of Learning established (ID 99152)?*

The main purpose of an enrolment scheme is to avoid overcrowding or the likelihood of overcrowding at a school.

When drawing up a home zone, legislation requires that a board has to be able to ensure that all students have a reasonably convenient school that they can attend. At the same time the scheme must promote best use of the network of state schools in the area. The location and capacity of all schools in the network have to be considered – including those of schools without enrolment schemes.

A reasonably convenient school means a state school that a person living in the area in which the school is situated would judge to be reasonably convenient for a particular student. Factors that are considered include the age of the student, the distance to be travelled, the time likely to be spent in travel, the available modes of travel, common public transport routes, and relevant traffic hazards.

Communities of Learning (CoL)/Kāhui Ako are groups of education providers and their communities working in collaboration to maximise the learning potential of all learners. Wherever possible we will work with schools so that school catchments and zones provide clear and consistent pathways within

each CoL / Kāhui Ako. As classroom capacities and school rolls can vary greatly between schools, it is not always possible to align zone boundaries and catchments with CoL / Kāhui Ako.

Enrolment scheme home zone boundaries were and are defined largely independently of CoL / Kāhui Ako as they serve a different purpose, that of enabling the school to manage its roll.

The zoning in Howick and Papakura was established in 1999 (with an amendment in 2009) prior to the 2015 introduction of CoL / Kāhui Ako in Auckland. The zoning is based on the requirements of the Education Act 1989 in terms of reasonably convenient and available capacity.

4. *Can you please provide the population data that MOE uses to predict future roll numbers to the Census year 2026 for the high schools located in these two Community of Learning areas?*

We use Statistics New Zealand area unit population projections to forecast future rolls. As such, I am refusing this part of your request under section 18(d) of the Act, as this information is publicly available directly from the Statistics New Zealand website here: http://archive.stats.govt.nz/browse_for_stats/population/estimates_and_projections/area-unit-population-projections.aspx#tables.

It should be noted that we do not forecast individual school rolls into the long term. For network planning purposes we forecast *demand pressure*, which is distinctly different and does not necessarily indicate particular rolls.

Forecast demand pressure varies with age appropriate population change while assuming all other variables remain unchanged. It is most accurate when used to assess the combined future demand of groups of similar schools serving geographically close areas, rather than individual schools. In this way the influence of errors due to changes in the many other variables over time is minimised. Roll forecasts for individual schools are dependent on many more variables than population change, such as change of principal and other teachers. The assumptions and related margins of error make this forecasting unsuitable.

5. *Can you please provide any property management reports or school campus master planning documents used to assess future high school facility needs for these two Community of Learning areas?*

I am refusing this part of your request under section 18(e) of the Act, as the information does not exist or, despite reasonable efforts to locate it, cannot be found. We do however suggest that you read the National Education growth Plan (NEGP) which incorporates the Auckland Education Growth Plan. The NEGP is designed to address the complexity and transformation required across all of New Zealand's high growth regions to ensure that sufficient capacity is delivered nationwide in the right place at the right time. The NEGP is available online at the following link: education.govt.nz/assets/Documents/Ministry/Budgets/Budget2019/NEGP/AucklandTaiTokerauplans.pdf.

6. *What other factors, other than population pressure, does the MOE assess when determining the need for a local high school?*

As communities change, so too do the schooling needs of their children and young people. We manage school infrastructure by planning for growth and population shifts both in the short-term and long-term.

To do this, we complete demand analysis for school networks across the Auckland region to inform a range of options to deal with growth. We consider population projections, local council information, enrolment data and how well schools are utilised. This determines whether new schools are required for a particular area.

Other considerations include:

- when forecast demand pressure will exceed the ability of the existing local schools to accommodate student numbers. This needs to be a sufficient margin to justify another school
- no existing local school that has capacity is reasonably convenient
- availability and suitability of school sites
- environmental considerations
- compatibility with other government and infrastructure programmes and priorities, such as The Auckland Plan
- availability of Treasury funding.

7. *Will Labour's proposed school Hub model change the existing geographic boundaries / catchment area for the Howick Coast Kāhui Ako (ID99119) or the Papakura Community of Learning (ID99152)? If yes, how are these geographic catchments likely to change?*

The Tomorrows Schools report is still being considered by Government. Therefore no decisions have been made on changes to school networks based on the outcomes of the review. I am refusing this information under section 18(e), as the information does not exist.

8. *Has MOE identified any sites for suitable for education use in or within 10km of Beachlands, Maraetai, Clevedon or Whitford?*

We have not identified any sites at this point. I am therefore refusing this part of your request under section 18(e) of the Act. We will continue to monitor growth from housing developments in this area to ensure the schooling network is well managed and able to meet the demand they create. Suitable sites will be determined as the demand requires.

Thank you again for your email. You have the right to ask an Ombudsman to review this decision. You can do this by writing to info@ombudsman.parliament.nz or Office of the Ombudsman, PO Box 10152, Wellington 6143.

Yours sincerely



Coralanne Child
Deputy Secretary
Sector Enablement and Support



Secondary aged students (years 9 to 13)

Area Unit	School Authority	School Name	Number of Students that live within the named CAU
Beachlands-Maraetai	State	Howick College	346
		Botany Downs Secondary College	24
		Pakuranga College	17
		Macleans College	10
		One of 11 other state secondary schools (2 outside Auckland)	19
	State Total		416
	State : Integrated	Sancta Maria College	63
		Elim Christian College	60
		One of 3 other integrated schools in Auckland	11
	State : Integrated Total		134
	Private : Fully Registered	Saint Kentigern College	37
		One of 5 other private schools (1 outside Auckland)	9
	Private : Fully Registered Total		46
	Beachlands-Maraetai Total		596

Turanga	State	Botany Downs Secondary College	51
		Howick College	26
		One of 5 other state secondary schools in Auckland	16
	State Total		93
	Private : Fully Registered	Saint Kentigern College	56
		One of 3 other private schools in Auckland	7
	Private : Fully Registered Total		63
	State : Integrated	Sancta Maria College	13
		One of 3 other integrated schools in Auckland	7
	State : Integrated Total		20
Turanga Total			176
Clevedon	State	Howick College	46
		Auckland Grammar	11
		One of 8 other state schools in Auckland	26
	State Total		83
	Private : Fully Registered	Saint Kentigern College	38
		King's College	11
		One of 3 other private schools in Auckland	4
	Private : Fully Registered Total		53
	State : Integrated	Baradene College	11
		One of 8 other integrated schools (1 outside Auckland)	19
State : Integrated Total		30	
Clevedon Total			166
Grand Total			938

APPENDIX B

Letters from Members of Parliament for Papakura

Anahila Kanongata'a-Suisuiki

List MP based in Papakura and Tāmaki



December 10, 2020

+64 27 513 8399

@ anahila.kanongata'a-suisuiki@parliament.govt.nz

Dear Malcolm, Angela and the Local Board team,

Thank you for the opportunity to tour Beachlands, Maraetai, Orere Point and Hunua communities. It was great to hear about the opening of the new Formosa Golf course, plans for a High School nearby and the numerous projects the Local Board has been working on to improve the area.

Meeting Principal Kerry Forse and staff from Orere Primary and learning about how the Urgent Response Fund has been used to create their sensory garden and improve facilities was a highlight.

We note the need for safer intersections at Monument and Tourist Roads and Paraparamu and Paparata Roads which require give way signs and further work to this corner. The locations of school bus stop areas along the rural roads also need review.

The priority for a High School to service 1600 students in the near future and connectivity have been highlighted as the two highest priorities for the Papakura electorate. All families should have equal access to the internet, regardless of where they live so they can participate in online learning and learning about their area and environment. We look forward to elevating these needs to Members of Parliament in 2021.

Our office and team wish you all a very Merry Christmas and a Happy New Year. We look forward to continuing to support the Local Board and the community.

Yours sincerely,

Anahila Kanongata'a-Suisuiki

List MP based in Papakura



RAPID RESPONSE

Drafter: Ken White
 Metis Number: 1241709
 File Reference: IM60/104/53/3
 Date: 24 September 2020

Request:

Request for information on new ECEs, schools and roll growth classrooms planned over the next five years in the new Papakura electorate.

Response:**Planning process:**

The National Education Growth Plan (NEGP), has been developed to identify the anticipated location and patterns of growth in school-aged children, as well as identifying measures that the Government may need to consider in order to meet the growth in the period through to 2030. The Papakura electorate is covered by the Papakura/Rosehill/Drury and Howick/Botany/Pakuranga catchments of the NEGP. The NEGP is attached as Annex A or can be viewed here <https://www.education.govt.nz/our-work/publications/budget-2019/negp/>.

The Ministry manages school infrastructure by planning for growth and population shifts both in the short-term and the long-term. To do this, the Ministry considers population projections, local council information, enrolment data and how well schools are utilised.

The Ministry of Education completes detailed demand analysis for school networks across the Auckland region to inform a range of options to deal with growth. This determines the new schools, expansions and roll growth classrooms required for a particular area.

Announced new schools in the Papakura electorate:

Location	Name	Address	School Type	Opening date
Drury	Drury West School	Burberry Road	Full Primary (Year 1-8)	Estimated 2022
Drury	St Ignatius of Loyola Catholic College	Burt Road	State Integrated (Year 7-15)	2023
Papakura	Hingaia South School	200-252 Park Estate Road	Contributing (Year 1-6)	Estimated 2022

Growth areas:

Drury - Drury is a fast growing area of Auckland. More schools are planned, but the timing and location of the schools will be dependent on the speed and uptake of the residential developments.

Beachlands/Maraetai – We anticipate the need for a new primary school for the area by 2030. Timing of delivery will be dependent on land acquisition and funding approval. In addition, NZ Superannuation has purchased a significant part of the Formosa Golf Resort. If this becomes large scale residential development a new secondary school will likely be required. The timing of the new secondary school would be dependent on the speed and scale of any residential development.

Roll Growth Classrooms

In addition to the new schools noted above, the Ministry is delivering additional capacity at schools through Roll Growth projects within the Papakura electorate.

Through these projects the Ministry will deliver 82 teaching spaces over the next 5 years, and nine short term Roll Growth teaching spaces over the next year for those prioritised as having the most immediate roll growth pressure.

Early Childhood Services

All early learning service providers operate independently of the Ministry, either as commercial businesses or one of various types of not-for-profit organisations. This independence means the government is not actively involved in planning or managing the early learning network.

The Ministry does from time to time seek interest from the market to invest in areas where child participation trends, child enrolments or wait time data shows children are not participating in early childhood education.

The current participation data for the Papakura territorial authority is 98.7%, which is higher than the national average. Attendance and waiting time data indicates there is sufficiently available child places for parents and whānau in Papakura.

Attachment: Annex A: NEGP Papakura / Rosehill / Drury and Howick / Botany / Pakuranga catchments

Hon Judith Collins
Member of Parliament for Papakura

26 May 2021

Hon Chris Hipkins
Minister for Education
c.hipkins@ministers.govt.nz

Dear Minister Hipkins

Re: Secondary School – Required in Beachlands

The Beachlands/Maraetai area of the Papakura Electorate is experiencing rapid population growth. Both Beachlands Primary and Maraetai Beach Primary have had to have 6 new classrooms to cope with expanding roles.

Presently, secondary students are able to bus to Howick College – which takes around 40 minutes and which travels along a very dangerous Whitford Road. Howick's roll is at 2,200 and is unlikely to be able to expand.

In addition, Clevedon which currently has a population of approximately 400, is due, following Plan Change 32, to expand to close to 5,000 residents.

Estimates from the Local Board and residents indicate that a new Beachlands/Maraetai/Clevedon Secondary School would have a population of 1,600 to start.

There is an opportunity for the Ministry to secure land for a site – the current Formosa Resort and neighbouring Ahurareka Farm comprises 250 hectares and would be well able to support a school with around 3,000 sections plus apartments likely.

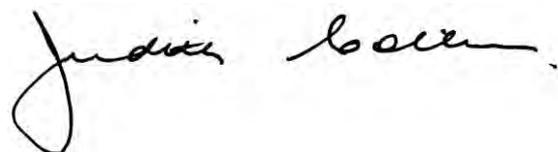
The Local Board is very supportive of this and has approached me with a local resident, Angela Mason who is a planner and therefore, well versed in these matters.

Could you please advise what plans the Ministry has for the establishment of a secondary school based at Beachlands and the time frame?

This is a very fast growing area, and it makes sense for a secondary school to be built in the area.

Enclosed is a comprehensive summary showing the need for a new school.

Yours sincerely



Hon Judith Collins

Cc: amasonhome@icloud.com
Cc: angela.fulljames@aucklandcouncil.govt.nz
Cc: Malcolm.bell@aucklandcouncil.govt.nz

Enclosure

Parliament Office:
Private Bag 18041, Wellington 6160
+ 64 4 817 9879
Judith.collins@parliament.govt.nz



Electorate Office
98 Great South Road Papakura
+ 64 09 299 7426
Judith.CollinsPapakura@parliament.govt.nz

Authorised by Hon Judith Collins MP, Roselands Shopping Centre, 98 Great South Road, Papakura

APPENDIX C

Primary school and ECE roll numbers

Primary Schools Actual Roll Numbers 2020									
	Beachlands	Maraetai	Clevedon	Hunua	Orere	Ardmore	Paparimu	Brookby	Total
0	54	25	20	9	3	20			131
1	85	67	48	17	6	48	6	23	300
2	95	58	44	26	5	44	5	17	294
3	78	73	49	20	6	49	2	16	293
4	92	54	44	20	2	44	5	12	273
5	78	47	56	15	6	56	6	15	279
6	92	56	66	15	6	66	6	15	322
7	59	38	42	16	6	42	1	14	218
8	64	40	37	12	9	37	2	12	213
Yr 1 to 5	482	324	261	107	28	261	24	83	1570
Total	697	458	406	150	49	406	33	124	2323

Wairoa ECE Rolls

Maraetai Beachland Kindergarten	40		
Nurture Early Learning	73		
Beststart Coastal	62		
Beststart Shelley Bay Road	80		
Early Connections Childcare	60		
Pikopiko Preschool	50		
Bumblebees Whitford Childcare Centre	79		
Small Fries Christian Childcare Centre	40		
Pohutukawa Kidz	69		
Whitford Early Learning Centre	107		
Clevedon Kidz Early Childhood Centre	30		
Clevedon Kidz	50		
Clevedon Kindergarten	30		
	770		

APPENDIX D

Student high school attendance by Census Area Unit (2018)

Appendix D: Student High School Attendance by Census Area Unit (CAU) 2018

Census Area Unit (CAU)	School Authority	School Name	Number of Students that live in the CAU
Te Puru / Sunkist Bay / Maraetai (Beachlands / Maraetai)	State	Howick College	346
		Botany Downs Secondary College	24
		Pakuranga College	17
		Macleans College	10
		One of 11 other state secondary schools (2 outside Auckland)	19
State Total:			416
State Integrated	State Integrated	Sancta Maria College	63
		Elim Christian College	60
		One of 3 other integrated schools in Auckland	11
State Integrated Total:			134
Private Fully Registered	Private Fully Registered	Saint Kentigern College	37
		One of 5 other private schools, 1 outside Auckland	9
Private Fully Registered Total:			46
Beachlands / Maraetai Total			596
Clevedon	State	Howick College	46
		Auckland Grammar	11
		One of 8 other state schools in Auckland	26
State Total:			83
State Integrated	State Integrated	Baradene College	11
		One of 8 other integrated schools in Auckland, 1 outside Auckland	19
State Integrated Total:			30
Private Fully Registered	Private Fully Registered	Saint Kentigern College	38
		King's College	11
		One of 3 other private schools in Auckland	4
Private Fully Registered Total:			53

Clevedon Total:			166
Turanga	State	Botany Downs Secondary College	51
		Howick College	26
		One of 5 other state secondary schools	16
State Total:			93
	State Integrated	Sancta Maria College	13
		One of 3 other integrated schools in Auckland	7
State Integrated Total:			20
	Private Fully Registered	Saint Kentigern College	56
		One of 3 other private schools in Auckland	7
Private Fully Registered Total:			63
Turanga Total			176
Beachlands / Maraetai / Clevedon / Turanga Total			938

APPENDIX E

Community meeting minutes

Community Meeting Minutes

Copies of the minutes for the following community meetings can be downloaded at:

Meeting 3

Thursday 28th November 2019 at 7.30pm Venue: Room 2, Clevedon Primary School, 15-17 North Road, Clevedon, AKL

https://gallery.mailchimp.com/9198e40e301ed6dd046ee549a/files/c76a7594-77ea-4b1e-aefc-8fe2d2550176/PCHS_Meeting_3_28.11.19.pdf

Meeting 4

Thursday 5th March 2020 at 7.30pm
Venue: The Church, Brookby School, 359 Brookby Road, Brookby, Auckland 2576L

https://mcusercontent.com/9198e40e301ed6dd046ee549a/files/cdcc857c-86ce-441d-a4cd-c1ad351efff0/PCHS_Meeting_4_05.03.20.pdf

Meeting 5

Thursday 19th November 2020 at 7.30pm
Venue: Hunua School, Lockwood Road, Hunua, Auckland 2583

https://mcusercontent.com/9198e40e301ed6dd046ee549a/files/c0bb00de-84dd-4899-874d-9d4ceee17008/PCHS_Meeting_5_19.11.20.pdf

Minutes for Meetings 1 and 2 are attached below.



New Pohutukawa Coast High School (PCHS)

Meeting #1

Thursday 12th September 2019 at 7.30pm

Venue: Rosa's Cafe/Shop, 43 Wakelin Road, Beachlands, AKL 2018

In Attendance: Malcolm Bell (MB), Jesse Cleave (JC), Lance Gedge (LG), Tim Grimley (TG), Amanda Hopkins (AH), Angie Mason (AM), Ani Stace (AS)

Apologies: Lesley Crawshaw, Rachel Gu, Mark Keenan, Anthony Noble-Campbell, Rebecca Rose, Julie Schumacher

MINUTES

1. Introduction

As this is the inaugural meeting, those in attendance introduced themselves.

2. Background / History of Previous Efforts (2015)

As local Board Member, MB has been involved in previous efforts to build a PCHS and summarised these as follows:

- Previous efforts occurred in 2015
- Local MP, Andrew Bayly, (National Party) was involved. Mr Bayly originates from the Karaka area
- The Pohutukawa Coast Community Association (PCCA) also involved
- Hekia Parata, then Min. Of Education (National Party) visited
- Then Deputy Min. Of Education Nikki Kaye (National Party) visited
- PCCA introduced potential PCHS developers
- Report produced in 2015 forecast population growth to be more than has eventuated
- Various sites were studied but no sites were acquired or re-zoned for education use

MB also noted that MOE may be using 2013 Census data and that the 2018 Census figures were still due to be released, although these may not be reliable due to the way census forms were collected.

3. Current High School Arrangements

MB gave an update on the current high school arrangements:

- Students from Clevedon now not able to go to Howick College as the 'out of zone' enrolment spaces have significantly reduced
- Several Clevedon students are traveling up to 70km one way to high school. Including Hauraki Plains College, one hour drive each way.
- MOE is looking to increase number of Clevedon students at Papakura High School
- Papakura High School does not have an enrolment zone
- Significant new residential development is occurring around Papakura, which is likely to increase local intake to Papakura High School in mid- to long-term
- Rosehill College is currently full, due to increase in local residential development
- Drury population is also set to significantly increase to over 60,000 with one or two new high schools planned for the Drury community
- From the Maraetai / Beachlands area, 600 - 700 high school students take the bus to high school every day

4. 2019 Local School Roll Numbers (Years 0 - 6)

MB has collated roll numbers for local primary schools. A summary sheet is attached (Attachment 1).

This table shows 819 high school age children in 2027 from Beachlands and Maraetai schools. This number rises to 924 if Brookby School is added and 1669 with all local schools in the area.

MB advised that primary school roll numbers are the main source of 'head count' data that the Ministry of Education (MOE) use when assessing the need for a new high school.

Currently, the facilities at Beachlands and Maraetai are at capacity and MOE is building new classrooms at these schools in anticipation of significant population growth.

5. Recent PCHS Efforts (2019)

AM advised of other recent PCHS efforts including:

- Online petition on the NZ Parliament website:
https://www.parliament.nz/en/pb/petitions/document/PET_89684/petition-of-angela-mason-we-need-a-high-school-on-the

(At date of writing, there are 1,112 signatures)

- An Official Information Act 1982 (OIA) request has been submitted to MOE and is attached (Attachment 2)
- An article was published in the Pohutukawa Coast Times (Sep 12, 2019) calling for potential sites to be made available for the PCHS

6. Online Petition & PCHS Report

AM advised that the aim is to get 2000 - 3000 signatures on the online petition. As local MP, Andrew Bayly, is likely to present this petition to Parliament, which would then be sent for review by the Education Select Committee.

TG noted the option of providing a tablet to circulate around pre-schools, primary schools and other community events to gather signatures. AM advised that any paper copy of the petition needs approval from the New Zealand Parliamentary Office or it could be ruled invalid.

AM also advised that she is collating a report summarising the PCHS issues (population projections, suitable sites, bus safety issues, etc) to be submitted alongside the petition. The OIA request would form a part of this report as well as a list of suitable sites.

AS noted that information on the 'soft' issues, such as lack of local student support services, bus ride experiences, etc. should be included in the report. Students give negative feed back about these busses and parents have reported drug and bullying problems.

Action:

- *AM to send AS a list of questions for high school students to describe their experiences riding the local high school buses. These case studies to be incorporated into the report to parliament.*
- *TG to investigate option of tablet to supply for collecting signatures.*
- *AM to seek approval from Parliamentary Office for paper version of petition*

7. Search for a Suitable Site

Attendees recognised the need to identify three or four suitable sites that could be acquired and/or re-zoned for the PCHS.

A site of 10ha+ is needed with ready sewer connection available.

AM asked all attendees to 'put the word out' for a suitable site and to report to the attendees if any landowner is interested to discuss.

Action: all attendees to ask around their contacts for ideas regarding suitable sites

8. Site Acquisition & Financing

AH advised that Te Puru had been set up by a local community trust, which did extensive fundraising to get Te Puru completed, and advised that this model could be repeated for the PCHS. MB noted that the then Manukau Council part-financed the project.

JC raised the option of finding a private education provider, like the AGE private community school in Takapuna. All were generally in favour, although concerns were raised about the affordability of private school fees for local families (approx. \$20,000 per year per student).

MB noted that a Catholic Church had been interested in building a high school but found the start up cost too high. AM advised that, if a site could be gifted, this would significantly reduce start up costs.

AS stated that, if a site could not be donated, a community trust could fundraise to purchase a site, similar to the Te Puru Trust .

Action:

- *AM to speak with Peter Brinkley, original Te Puru Trust founder to understand how Te Puru was set up*
- *JC to review the AGE school model to understand how this was set up*
- *Where possible, all attendees to identify other private education providers to understand other options for setting up a high school*

The meeting was adjourned at 9:15pm

Next Meeting

Date: October 10, 2019 at 7:30pm (Thurs)

Venue: TBD

	Beachlands	Maraetai	Brookby	Clevedon	Hunnua	Paparimu	Ardmore	Total
1	88	60	24	48	30	5	53	308
2	86	58	18	48	18	1	56	285
3	85	60	11	46	24	5	48	279
4	74	50	15	61	14	5	54	273
5	88	58	17	62	15	5	38	283
6	67	45	20	53	19	1	36	241
7	61	50	13	43	19	3	27	216
8	66	38	9	42	20	3	22	200
Yr 1 to 6	488	331	105	403	120	22	285	1669
Total	615	419	127	403	159	28	334	2085
	B & M	819		924 B,M & B				

1669 13 to 18 year olds in 2027

Attachment 2

Angela Mason
13 Mahutonga Avenue
Beachlands, Auckland 2018

**Ministry of Education
Official Information Act 1892 Request
PO Box 1666, Wellington 6140
New Zealand**

05 September 2019

To whom it may concern:

RE: NEW HIGH SCHOOL ON THE POHUTUKAWA COAST, AUCKLAND

As a young family living in the fast-growing community of Beachlands, Auckland, we are concerned that there isn't a high school for our community's children. To help mitigate Auckland's housing shortage, Beachlands and the surrounding towns, Maraetai, Clevedon and Whitford, have been recently up-zoned under the Auckland Unitary Plan 2016, triggering a significant increase in residential development.

Together, these towns are known as the Pohutukawa Coast region.

While the Ministry of Education (MOE) has planned for significant roll increases, and is building additional classrooms, at the local primary schools (Beachlands, Maraetai and Clevedon Schools), there seems to be no planning for a local high school. As such, we are interested to learn whether MOE has completed any population forecasts or master plan studies around the need for a new high school on the Pohutukawa Coast.

I have the following Official Information Act requests:

1. To understand better where students from Beachlands, Maraetai and Clevedon are attending high school, can MOE please provide post code data for students currently enrolled at Howick College, Papakura College, Alfriston College, Ormiston Junior College and Ormiston Senior College.

If this information is not readily available, please advise which high school students from Beachlands, Maraetai and Clevedon currently attend and how many students are attending per school.

2. How are the zone boundaries for Howick Coast Kāhui Ako Community of Learning established (ID 99119)?

3. How are the zone boundaries for Papakura Community of Learning established (ID 99152)?

4. Can you please provide the population data that MOE uses to predict future roll numbers to the Census year 2026 for the high schools located in these two Community of Learning areas?

5. Can you please provide any property management reports or school campus master planning documents used to assess future high school facility needs for these two Community of Learning areas?

6. What other factors, other than population pressure, does the MOE assess when determining the need for a local high school, such as:

- Travel distance to nearest alternative high schools?
- Cost to provide student bus transport?
- Availability of a suitable site(s) and land use zoning?
- Availability of social support infrastructure for young people already in the area, such as after school programs, drug counselling, youth groups, etc.

7. Will Labour's proposed school Hub model change the existing geographic boundaries / catchment area for the Howick Coast Kāhui Ako (ID99119) or the Papakura Community of Learning (ID99152)? If yes, how are these geographic catchments likely to change?

8. Has MOE identified any sites for suitable for education use in or within 10km of Beachlands, Maraetai, Clevedon or Whitford?

Thank you for your time and consideration and I look forward to hearing from the Ministry staff.

Best wishes,



Angela Mason
027.542.1922



New Pohutukawa Coast High School (PCHS)

Meeting #2

Thursday 10th October 2019 at 7.30pm

Venue: Rowan Muir Hall, 211 Maraetai Dr, Maraetai, AKL 2018

In Attendance: Malcolm Bell (MB), Jesse Cleave (JC), Angela Fulljames (AF), Tim Grimley (TG), Amanda Hopkins (AH), Angela Johnson (AJ), Shane Jones (SJ), Angie Mason (AM), Ani Stace (AS), Peter Smith (PS)

Apologies: Lesley Crawshaw, Rachel Gu, Mark Keenan, Anthony Noble-Campbell, Rebecca Rose, Julie Schumacher, Lance Gedge

MINUTES

1. Introduction

New attendees added their names to the email mailing list.

2. 2018 Census Update

MB gave an update on the 2018 Census figures and population projections for the Pohutukawa Coast, Papakura and Howick.

Census data shows from 2013 to 2018, **Papakura** has had up to 30% population increase in some suburbs with the construction of many new residential subdivisions/dwellings in the area. Conversely, **Howick** has seen fairly small population increase, with low numbers of housing infill.

On the Pohutukawa Coast, Beachlands (15%), Clevedon (15%) and Kawakawa Bay (30%) show highest growth rates. If similar population trends continue, **total high school population on the Pohutukawa Coast is forecast to be just over 1600 by 2023.**

See ATTACHMENT 1

3. Review of High School Petition

AM advised that the NZ Parliament Office of the Clerk had approved the hard copy / written version of the petition and this is now available to circulate. SEE ATTACHMENT 2. Beachlands School has sent the weblink to parents. TG has loaded the petition website onto an iPad for circulation around the area. This is currently at Rosa's Cafe with AS.

Action:

The following people to check whether schools have emailed the online petition link:

- AM - Maraetai School
- AS - Brooky School
- AF - Clevedon School, Hunua School

*AS to take petition iPad for Wednesday lunch, Beachlands Hall & Beachlands Comm. Picnic
TG to move iPad to new location in Wakelin Rd shops*

4. Potential High School Sites

AM proposed creating a working list of possible high school sites. MB tabled a copy of previous high school site assessment completed with Andrew Bayly, MP, in 2015. MB advised that the Beachlands Pony Club site had recently sold for \$30 million.

AS advised that talks with Formosa Golf Resort had begun with a view to setting aside a part of the golf course for a high school within the overall site re-development.

Action:

AM to draft table showing potential PCHS sites

MB to email AM PCHS site study (DONE)

AS to contact Formosa to request a meeting

5. Whether to Set Up a PCHS Charitable Organisation?

AM proposed establishing a charitable organisation with a view to fundraising and/or site acquisition. The consensus was that charitable organisations take some time to set up and would need a clear mandate. Preference at this stage to review other communities' efforts, namely Kumeu, west Auckland, to determine whether a charitable organisation is needed.

'Auckland community calls for new high school, but ministry says no' from Stuff.co.nz

<https://www.stuff.co.nz/auckland/local-news/nor-west-news/102124505/auckland-community-calls-for-new-high-school-but-ministry-says-no>

'Kaipara College to be zoned, residents demand a new high school' from Stuff.co.nz

<https://www.stuff.co.nz/auckland/auckland-top-stories/115129958/kaipara-college-to-be-zoned-residents-demand-a-new-high-school>

Action:

AM and AJ to review Kumeu's efforts to establish a high school

6. Public Relations Campaign / 'Eco-School'

PS asked whether a more active PR campaign would help, especially finding a local persona behind whom support could focus and grow. With its unique location, the PCHS could be an innovative eco-school offering courses in outdoor education and sustainable development in addition to the standard secondary school curriculum. All were in favour of the 'eco-school' idea. AM noted that, if a site could be acquired, it would remove a major barrier to an education provider setting up such a school on the Coast.

7. Speaking with High School Students

Action: AM & AS to develop list of questions for local high school students to describe their experience taking the bus to Howick College.

8. Submission to Franklin Local Board Plan

AF advised the group to make a submission to the Franklin Local Board to make the PCHS an advocacy project. Then, the Board can request RIMU and other Council agencies to act, e.g. provide population projections, resource consent approvals, etc.

The Local Board develops its plan around February / March 2020.

The meeting was adjourned at 9:15pm

Next Meeting

Date: November 28, 2019 at 7:30pm (Thurs)

Venue: Clevedon Primary School

Population and Growth in Pohutukawa Coast Area, Howick and Papakura

ATTACHMENT 1										
Place	Population	% Growth 13 to 2018	Population 2023	8% Population		Place	Population	% Growth 13 to 20118	Population 2023	8% Population
Whitford	3015	7.5	3241	259		Takanini W	2826	15	3250	260
Beachlands	6261	15	7200	576		Takanini S	4347	30	5651	452
Maraetai	2346	7.5	2522	202		Takanini SE	1458	30	1895	152
KKB Orere	1992	15	2291	183		Takanini C	1161	7.5	1248	100
Clevedon	1515	30	1970	158		Takanini N	2475	25	3094	248
Ardmore	1386	7.5	1490	119		Papakura N	4185	7.5	4499	360
Hunua	1353	15	1556	124		Papakura NE	2535	25	3169	254
Coast Total			20269	1622		Papakura East	3204	30	4165	333
						Papakura W	1788	7.5	1922	154
						Red Hill	2796	15	3215	257
						Papakura Kelvin	4515	15	5192	415
						Papakura Massey	2862	15	3291	263
						Papakura Centra	3207	25	4009	321
						Opaheke	2868	15	3298	264
						Karaka lakes	2166	30	2816	225
						Hingaia	2202	30	2863	229
						Conifer grove	2232	7.5	2399	192
						Conifer Grove W	2478	0	2478	198
						Randwick Park w	3618	0.25	3708	297
						Randwick Park E	2532	15	2912	233
						Alfriston	3807	7.5	4093	327
						Papakura Total	59262		69168	5533

Assumptions

Future growth will be in the same range as growth for 2013 to 2018 and will be at the Median % for the stated range in the 2018 Census with the exception of Clevedon which under plan change 32 is likely to considerably exceed previous lack of growth and calculated at only 30%.
 8% of population will be 13 to 18 years of age (MoE assumptions)

To the House of Representatives...

That the House of Representatives urge the Ministry of Education to
build a new high school to serve the growing community
on the Pohutukawa Coast, Auckland Region.

Petition reason

To meet Auckland's housing shortage, the Pohutukawa Coast was up-zoned under the Auckland Unitary Plan 2016 and may be close to 20,000 population by 2031. The Pohutukawa Coast growth area includes Whitford, Beachlands, Maraetai, Clevedon and Kawakawa Bay. Currently, there is no high school for this growing community and high-school students must bus up to 20km along high-speed rural roads with high crash rates. The Ministry of Education needs to build a high school to serve the Pohutukawa Coast.

Closing date: 21 Aug 2020 NZ Time

No.	Name	Address	Signature
1			
2			
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7			
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10			



APPENDIX F

Letters of support from Principals



Beachlands School

Everyday Learning & Growing Together - Me mātau Ra

1st April 2021

The Honourable Jan Tinetti
Associate Minister, Education
Private Bag 18888
Parliament Buildings
WELLINGTON 6160

Tēnā koe Jan,

Thank you for taking time out of your very busy schedule to visit Beachlands School today. I hope during your visit you experienced our FERN values and got an appreciation of our approaches to a local curriculum, coupled with how we are strengthening our understanding and practices of Te Ao Māori.

In your role as Associate Minister Education, I would like to add my support for the establishment of a secondary school that serves the communities that lie within our beautiful Pohutukawa Coast.

Up until this point, the Ministry of Education has confirmed Beachlands School master plan which includes the current construction of a 10-classroom block. Seven classrooms are for roll growth and the other three are for replacement classrooms. Stage Two and Stage Three of our master plan will be dealing with a school roll of over 900 students.

Within education there is a common saying 'it takes a community to raise a child'. What better opportunity is there for the establishment of a secondary school within the embrace of all those living within our Pohutukawa Coast area.

Benefits include:

1. A seamless education pathway from early childhood, to primary, then onto secondary. A Pohutukawa Coast educational pathway that would ensure:
 - (a) in depth collaboration between iwi / board of trustees / teachers / educators / parents whānau and knowledgeable others across the pathway.
 - (b) a shared vision of a graduate learner profile with each sector adding to and being accountable for outcomes relating to that profile.
 - (c) teacher knowledge would be shared within the pathway that ensured high levels of programme delivery and learning experiences leading to high levels of student progress and achievement across the pathway.
 - (d) a move away from the traditional model of my school to our schools. A move from my school resources to our schools' resources. A move away from my school community to our Pohutukawa Coast community.
 - (e) opportunities for the practice of tuakana/teina being applied across the education pathway.

2. Opportunities for our tamariki to be more fully involved and contribute to our Pohutukawa Coast community.
 - (a) the development of a local curriculum that is applied across the education pathway that responds to authentic challenges. Increasingly what the world cares about is not what you know but what you can do with what you know. In this way tamariki see the results of their learning having real impact.
 - (b) the community providing the support, nurturing, encouragement and guidance of our young adolescence/teenagers as they travel through their secondary schooling. Connecting with our youth in meaningful ways via youth programmes, youth forum and youth facilities where they can express themselves, act appropriately and give back, would sit within the education pathway outcomes.
3. Reduction in travel time that would enable more localised learning/skill-based time.

Currently our tamariki travel to Howick College. If they need to attend any before or after school programmes/activities, this places huge pressure on families in terms of transportation including road congestion that results in the loss of family time and local community involvement time. In establishing a Pohutukawa Coast Secondary School this time and distance issue would not be such a critical issue as it is now and the benefits to our Pohutukawa Coast Education Pathway would be significant.

In conclusion, I ask that the Government acknowledge the rapid roll growth being experienced in learning centres and schools in our area at this time and commit to the building of a secondary school.

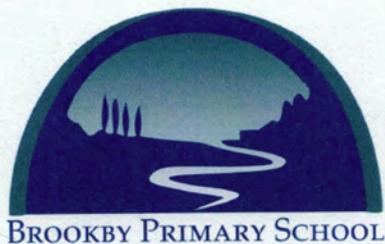
While our schools master plan reacts to the immediate rapid roll growth situation we find ourselves in, that is, just provide more classrooms, it does not resolve the education gap that can be resolved through the building of a secondary school.

Thank you for considering the point raised and I would be happy for you to stay in contact with me as this need for a secondary school gathers momentum along with the Pohutukawa Coast community expectation, that it is built and built soon.

Ngā mihi nui,



Anthony Noble-Campbell
Principal



16th May 2021

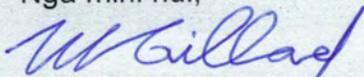
I write this letter in full support of a new secondary school for the Pohutukawa Coast / Wairoa area. My support comes from my role as the Principal of Brookby School but also as a resident of 20 years in the Beachlands and Maraetai region. Before becoming Principal of Brookby School I was the Deputy Principal of Maraetai Beach School and so have a good understanding of the rapid growth in the local schools and this region. The question I have been asked the most in these roles over a number of years is 'when is there going to be a secondary school for this area?'

From a Brookby School perspective our students split up after Year 8 and attend a number of secondary schools. I know parents would love their children to continue with friendships by staying together into the next step of their education. There are also strong connections with other local schools with sports and other events. The students know each other in this area and connect with extra-curricular activities either school or club organised. This area needs a central hub where connections are maintained and strengthened after primary / intermediate education. As we all know through recent covid events the value of well being is essential and for students one of the key aspects is 'friendships'. The importance of a smooth transition from primary to the end of secondary school can not be underestimated.

As previously stated the growth of this pohutukawa coast region has been massive. The volume of cars, buses and trucks on the roads is now a major issue. Parents continually worry about their children travelling to and from all the various high schools. Certainly a high school would limit traffic on these roads and this can only be a positive aspect. As the area continues to grow it means more traffic and a greater strain on the secondary schools that are taking more and more students each and every year.

I advocate for a proactive response instead of waiting until everything reaches a crisis point with the land, resources and time to build a new secondary school. Please consider the petition and letters of support from the local principals as we are in full agreement going forward.

Ngā mihi nui,



Wayne Gillard
Principal

CLEVEDON SCHOOL

Clevedon kids living and learning with PRIDE



10 May 2021

The Honourable Jan Tinetti
Associate Minister, Education
Private Bag 18888
Parliament Buildings
WELLINGTON 6160

Kia ora Jan

It was a pleasure to meet you at Papakura High School last month. Thank you for making the time to connect to our communities and our local schools.

At this meeting you asked what was an issue being faced by our school community and I write to reiterate, and add my support for the need of a high school for the children in the Pohutukawa Coast community. I write this letter on behalf of myself and our Clevedon School Board.

This has been an ongoing issue for our school for many years without a more localised pathway for our children once they leave us at year eight. Last year alone, our children attended 20 different high schools. Although our school is in zone for Papakura High, we are part of the Howick Coast Kāhui Ako, due to the pathway our children take to Howick College. We have a strong principals' cluster with the schools in the Pohutukawa Coast and our iwi, with which we have strong ties, is based in Umupuia near Maraetai.

The schools in the Pohutukawa Coast naturally collaborate with each other and we have a strong sense of identity and community as a collective. We share knowledge, expertise and work together towards common goals for the benefit of our students. A local high school would ensure we establish a clear pathway for our tamariki and continue our collaboration as leaders, teachers and boards, and with our iwi.

This is a major issue facing our community and having a direct impact on families and students. Currently many of our children face long travel times daily to attend school or many attend boarding schools to mitigate the travel time, due to our location. The family impact of this is huge as is the impact on our children's wellbeing. We know that support for a Pohutukawa Coast high school is high amongst our whānau and that the numbers will be there for it.

The schools in this area, including ours, are set to experience a lot of growth in the near future. This will bring an even stronger need to build a high school in this community and close the gap that exists.

I appreciate how busy you are and thank you for the wonderful job you do for all the children of Aotearoa. Thank you for considering our needs in this beautiful part of Tāmaki Makaurau.

Ngā mihi maiaho



Edeh Sullivan
Principal



Summer Deverell
Clevedon School Board (presiding member)



31.5.2021

To Whom It May Concern:

On behalf of the Maraetai Beach School community, including staff, students and whanau, I am writing this letter of support for the establishment of a local secondary school on the Pohutukawa Coast.

Maraetai Beach School is a full primary (Year 1-8) which has a rapidly growing roll. To accommodate this, we currently have a multi storey 11 classroom new build under construction. In the last two years we have had 7 classrooms relocated onto the school site to accommodate the growth. Our current master plan has the school roll growing to between 600-650 students. This includes a growing intermediate department and number of year 8 students. Currently all our year 8 students attend a number of different secondary schools outside the local area once they leave Maraetai Beach School.

The establishment of a new and local secondary school on the Pohutukawa Coast will have many benefits, including, but not limited to:

- A clear pathway and seamless transition from local primary schools to the high school.
- Stronger connections between youth and the local communities that they live in.
- Students will no longer need to be transported out of the area to attend secondary school which results in a loss of family time and community involvement.

The establishment of a local secondary school is strongly supported by our Board of Trustees, teachers and whanau who want to see their tamariki educated and supported in the local area.

Kind Regards

A handwritten signature in black ink, appearing to read 'M. W. Keenan', is written over a light blue background.

Mark Keenan
Principal

APPENDIX G

Letter of support from Franklin Local Board

31 May 2021

Hon Chris Hipkins
Minister of Education
New Zealand Government

Dear Minister

On behalf of the Franklin Local Board of Auckland Council, I wish to add our complete support for the establishment of a secondary school in the Beachlands area.

As the evidence provided shows, there is significant development and associated population growth in the area we know as the Pohutukawa Coast. We have seen over the years a constant increase in the number of secondary school children moving from their homes in this area to a wide range of secondary schools across Auckland.

The issues surrounding the requirement to transport these children not only include poor outcomes environmentally and in terms of traffic on the roading network but also socially whereby we have a vast number of teenagers living in a community who do not know each other, who play sport and socialise elsewhere in Auckland and thus have limited opportunities to generate or be part of a thriving community spirit. This was confirmed to us by a youth survey we conducted prior to the formation of our three year Local Board plan. As such, we have a specific advocacy initiative included in our plan to support community-led advocacy for improved access to secondary education for Pohutukawa Coast communities.

We unanimously endorse the community driven request for an urgent commitment to establish a secondary school and applaud the initiative and passion of those in the community driving this.

Yours faithfully



Andrew Baker
Chair

APPENDIX H

Letters of support from community organisations



From: Victoria Richards victoria@nessvalleynuts.co.nz
Subject: Letter in support of a new secondary school in Wairoa from Clevedon CBA
Date: 31 May 2021 at 4:32 PM
To: amasonhome@icloud.com

The Honourable Chris Hipkins
Minister for Education
Private Bag 18 888
Parliament Buildings
Wellington 6160

Dear Minister,

We write to express our strong support for the provision of a new local high school for the Wairoa area, as justified in "A New Secondary School in Wairoa. Report for the Minister of Education".

The Clevedon Community and Business Association's (Clevedon CBA's) vision is "A connected community with heart, character and spirit in which lives are enriched and businesses thrive". Clevedon is currently well served by an excellent primary school that continues to Year 8. The school is instrumental in providing the strong sense of community for which Clevedon is famed. Bonds are built between not only students but also their families and the wider community.

Regrettably, this comes to an abrupt halt at the conclusion of year 8. Clevedon School is part of the Howick Coast Kahui Ako / COL and in recent years there has been a well-trodden path to Howick College. However full roles and closure of out of zone enrolments means that the path to secondary school is no longer clear for our youth. Many local families can attest to the great stress of Year 8 as multiple submissions for admission are made to numerous high schools across the region. The emotional cost of unsuccessful applications weighs heavily upon these families and is a central discussion point amongst families throughout our community.

The report demonstrates how Clevedon adolescents eventually disperse across a myriad of schools between Waikato and central Auckland, with travel times for many exceeding one hour each way. We are also observing families moving away from Clevedon in order to gain access to preferred secondary school zoning.

As a result, the interest, involvement and investment of these families is redirected outside of our community and the strong bonds within our community fracture. The report explicitly demonstrates the negative consequences of these fractures in terms of student well-being.

And this is the situation today. Alas, Clevedon Village sits on the precipice of great growth with an Auckland Council Plan Change unlocking anticipated population growth of nearly 500%.

In Clevedon we have watched as Auckland's fringes have extended south-east and communities have been swallowed up with little integrated investment into

.....
schooling, roads, public transport and other infrastructure. Too often we have witnessed the “ambulance at the bottom of the cliff”, when property values have increased and the solution becomes considerably more expensive and difficult to implement.

The Clevedon CBA has been working alongside our community to draw the attention of the relevant authorities to the significant issues that remain unresolved and to advocate for integrated planning and investment into critical community services and infrastructure. The data provided to you in this very comprehensive report presents a compelling case: The time to invest in a new secondary school in the Wairoa / Pohutukawa Coast area is **now**, when land is available and Plan Change applications are underway.

Yours sincerely,

Victoria Richards
Chair
Clevedon CBA

20th May 2021

To Whom it May Concern

I am writing this letter as Te Puru Community Charitable Trust (TPCCT) wish to show support for the 'New Secondary School in Wairoa' submission.

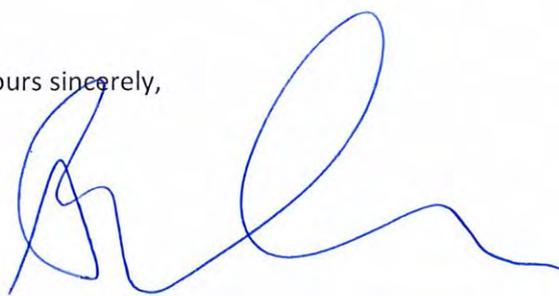
TPCCT is a community centre which is the hub of the greater Wairoa area in regards to sport and recreation. We cater for numerous activities seven days a week.

TPCCT caters for all ages of the community with a key focus on girls in sport and children in sport for ages 10-18 years old. Which aligns with Auckland Council KPIs and surrounding sporting bodies. There is a noticeable drop off in teens/youth sport within the area due to these children having to commute back to the area after school. And not being able to commit to a club that some may have grown up with and supported as a family.

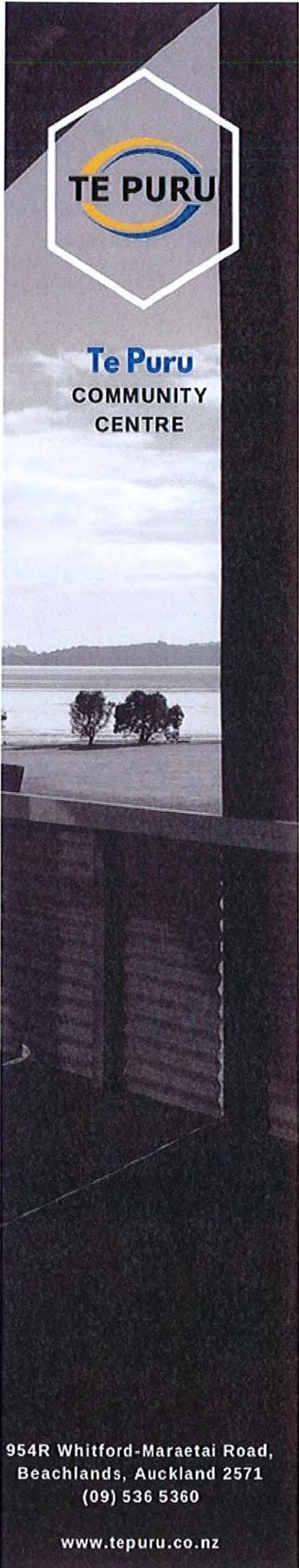
As a community centre we recruit many young locals from the area to be employed or volunteer in our programmes – gymnastics, holiday programme, customer care etc. This becomes increasingly more difficult each year with no high school in the area. Thus placing restrictions on who we can hire and how we support the community families.

As you will be aware, recreation and sport play an important role in youth in regards to mental health and life skills (just to name a few). The benefits of having a high school in the area can only be an asset to the community.

Yours sincerely,



Adele Jarraud
Centre Manager
Te Puru Community Charitable Trust



954R Whitford-Maraetai Road,
Beachlands, Auckland 2571
(09) 536 5360

www.tepuru.co.nz



Pohutukawa Coast Community Association
Te Puru Sports Centre
954 Whitford Maraetai Road
Beachlands 1705
Auckland

28 May 2021

The Honourable Jan Tinetti
Associate Minister, Education
Private Bag 18888
Parliament Buildings
Wellington 6160

Dear Ms Tinetti,

We were delighted to hear you have recently visited Beachlands School and had the opportunity to see firsthand how quickly our local community is growing and developing as well as our neighbouring communities along the Pohutukawa Coast.

Since 2015 we have been very concerned that our local infrastructure has not kept pace with continuous development and the disparity between our actual population statistics and those being used by Auckland Council's Research and Evaluation Unit, RIMU.

We wholeheartedly support the establishment of a secondary school to benefit all the communities along the Pohutukawa Coast. In particular we see three key benefits:

1. to allow the school and students to remain connected to their local area and have the time and opportunities to contribute and participate in local community initiatives and activities,
2. to reduce traffic and congestion along the very busy Whitford Maraetai Road which is not being adequately maintained and renewed to take account of the increase in traffic as a result of increased development, and
3. to address the lack of facilities for teenagers in our local area as a secondary school could provide much needed extra curricular support.

We thank you for your time and the interest you are taking in this very pressing matter for the Pohutukawa Coast.

Yours sincerely

Two handwritten signatures in black ink. The first signature is 'Judith Clarke' and the second is 'Emily May'. Both are written in a cursive, flowing style.

Judith Clarke & Emily May
Co-Chairs
Pohutukawa Coast Community Association
secretary@pcca.nz

To Whom it may Concern:

My involvement with the Pohutukawa Coast commenced over 45 years ago in 1975, when I commenced practice as a family doctor in Beachlands. Over the years the practice gradually grew, along with the expanding population, from the initial solo general practice, to an integrated medical centre comprising eight doctors & ancillary staff, from which I retired just over two years ago.

In those early days Maraetai & Beachlands comprised predominantly weekend baches, with a fairly modest resident population which expanded several-fold over Xmas, Easter, & long weekends. The primary schools in Beachlands & Maraetai were small & coped well with the resident population. Post-primary education was of course out-of-area, requiring teenagers to commute mainly to Howick College. It is not unfair to say that our commuting offspring in those days had a reputation for ill-discipline & the bus trip was frequently shambolic. This alarmed many parents, to the extent that some arranged private transport for their children, & a considerable number chose to move into the city when their children reached high school age, in order to obtain a sounder education and avoid the bus commute.

Over the years I have seen this area steadily change from a holiday outpost to a city suburb, complete with most of the facilities one would find in town. We are now well supplied with recreational facilities, & our local shops & offices mean that it is seldom necessary to have to travel out of the area to source the requirements of daily life. Personally I think the area has developed very nicely, & while there are some who may yearn for the old days it seems clear that Auckland has to expand & we have to share that expansion; it could have happened in a much less agreeable way than what we have ended up with to date.

So, there is but one glaring anomaly in this otherwise happy picture, & that is of course that our high school students are still herded onto buses to make the trip out of area to secondary school. This has always been problematical, but in former days it was unavoidable as the population quite clearly could not sustain establishing a secondary school on the coast. Those days have however gone, & the argument for a local high school is obviously more than valid. I have read through Antony Noble-Campbell's submission as to the many benefits of a local school: I agree entirely with him, & have avoided repetition in my submission.

It is time to face reality & get this moving.

Barry Claridge.

22nd May, 2021.



Pakuranga
Counselling
Centre
Not for Profit Charitable Trust

17 May 2021

I write in support of the investment and building of a College for the youth of the Pohutukawa Coast. Currently there are over 600 students transported out of the area for their collegial education.

Executive Summary

A high school is even more important, as the Pohutukawa Coast needs a hub to wrap round its youth now. We know mental health is an issue for young people and the problem has increased tenfold. A community needs its youth to share its knowledge, mentors, and opportunities. To take away one of these stakeholders from a community, can only and is undermining the health of that young person and the community, in the short term and the long term.

Previous to the Covid Pandemic, transferring youth to another community was already causing major issues to young people and their families. At an age when youth are starting to pull away from their families in order to develop their independent self, they may be experimenting in harmful behaviours to themselves and others. Taking them away from their community during this vulnerable stage of teenager, has always been seen a dangerous exercise. Teenagers need positive mentors and support around them that have an emotional connection to the individual during this time. The community they grew up in, is well placed to provide this. Displacing them to another larger community during this susceptible time, increases the odds of youth having serious issues, and little resources to turn to.

Add to this, the impact of the pandemic, the youth are now the casualties of this invisible war. The Lockdown imposed has had monumental effects on the mental wellbeing of youth. At a time when they are expected to explore self, they have been returned to their childhood homes, and held in the holding patten of child, not emerging adult. Two major issues that have surfaced are gender identity and drug/alcohol use, topics that often cannot be talked with parents. In addition, there has been a lack of connection for young people, and the mental health issues seen by health providers is unprecedented.

Speaking on behalf of the Pakuranga Counselling Centre, suicide ideation and anxiety are issues that are being seen in unparalleled numbers when seeing young clients. Secondary issues are the impact of job insecurity of their parents, the increase in parental relationship break ups and general economic stresses of the last year.

Young people are struggling to socialise. To connect. To be a teenager.

Kind regards

JENNY CARTER
Manager

Confidential, Professional and Affordable Counselling Services for Adults, Adolescents and Families

207 Ti Rakau Drive, Pakuranga - P O Box 64-309, Botany, Manukau 2163
Website: www.pakcc.org.nz - Email: manager@pakcc.org.nz - Telephone: 09 576 4248

Operated by the Pakuranga Inter-Church Charitable Trust

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 88 - Geraldine Shelley
Date: Friday, 10 March 2023 3:01:03 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Geraldine Shelley

Organisation name:

Agent's full name:

Email address: gshelley3@outlook.com

Contact phone number:

Postal address:
gshelley3@outlook.com
Beachlands
Auckland 1061

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 Plan change request

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

There is no plan for added infrastructure and services, rather the developer is relying on existing resources to service the extra load created by the new housing plan i.e. Roading, Water, Wastewater, Medical Services, Emergency Services which is only adequate at best in its current state.

This plan would also impact outer suburbs such as Whitford, Botany, Howick, Meadowlands and Flatbush with extra resource and planning required.

I'm not opposed to new housing, rather the lack of additional infrastructure and services required to maintain the growth and size of the population in this area.

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

Submission date: 10 March 2023

349.1

Attend a hearing

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

Declaration

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

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

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

No

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

[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 - Pamela Mary Gallagher
Date: Friday, 10 March 2023 3:01:05 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Pamela Mary Gallagher

Organisation name:

Agent's full name:

Email address: ppgallagher@xtra.co.nz

Contact phone number:

Postal address:
45 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:
The whole private plan change submission

Property address: As described in private plan change 88

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

I'm not against development as such if it makes sense and is viable. Now more than ever its crucial to get future land/housing developments right and I can't see how this project could work. Infrastrure of course is a huge concern but transport in and out of Beachlands is perhaps the biggest stumbling block and who will pay for it all. With the type of housing proposed, most people will be traveling south to their workplaces, therefore by car. Larger ferries and all it involves isn't any kind of solution as they only go between Beachlands and CBD. Let's make sanity and sense the drivers in stopping this development instead of money and influence letting it go ahead, when everything points to it being a future disaster.

350.1

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.

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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