From: Unitary Plan
To: Unitary Plan

Subject: Unitary Plan Publicly Notified Submission - Plan Change 88 - Beachlands South Limited Partnership

Date: Friday, 10 March 2023 3:16:10 pm

Attachments: BSLP PC88 Submission Final for Submission.pdf

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Beachlands South Limited Partnership

Organisation name:

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Postal address: PO Box 91562 Victoria Street Auckland Auckland 1142

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:

Refer attached submission

Property address: Refer attached submission

Map or maps: Refer attached submission

Other provisions:

Refer attached submission

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:

See attached submission

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

Details of amendments: Refer attached submission

Submission date: 10 March 2023

Supporting documents

BSLP PC88 Submission_Final for Submission.pdf

Attend a hearing

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

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

Declaration

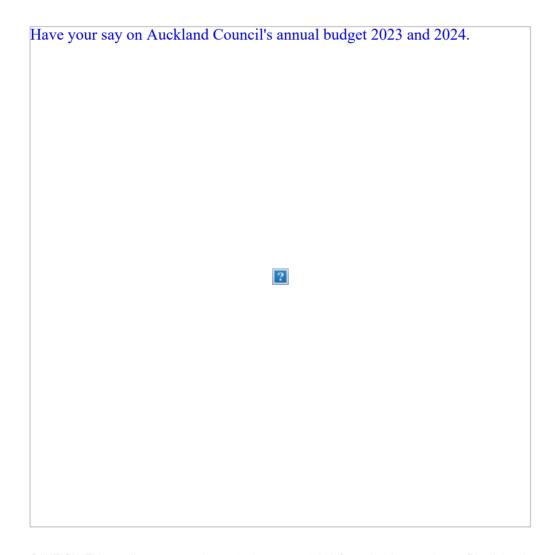
Could you gain an advantage in trade competition through this submission? No

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

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

Yes

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



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Submission on Proposed Private Plan Change 88 – Beachlands South Precinct to the Auckland Unitary Plan (Operative in Part)

Clause 6 of the Schedule 1, Resource Management Act 1991 (Form 5)

To: Auckland Council

Name of Submitter: Beachlands South Limited Partnership (BSLP)

1. SUBMITTER DETAILS

- a. This is a submission on Proposed Private Plan Change 88 (PC88) to the Auckland Unitary Plan Operative in Part (AUP) by BSLP.
- b. BSLP is the applicant for PC88 and could not gain an advantage in trade competition through this submission.

2. SCOPE OF SUBMISSION

- a. This submission is in support of PC88 in its entirety, incorporating the amendments specified below.
- b. Specific aspects and provisions of PC88 that this submission relates to are:
 - Update the proposed zoning over the PC88 area to reflect the reduction of Terrace Housing and Apartment Building (THAB) zoning in the Marina Point and Coastal sub-precincts supplied with the Clause 23 response;
 - ii. Update Precinct Plan 4 Cultural Landscape of the precinct provisions to reflect the updated plan supplied with the Clause 23 response correcting minor errors to the location of indicative archaeological sites;
 - iii. Update standard I.7.3 Staging of Development with Transport Upgrades to reflect changes the ferry service times in Column 2 of Table 2 Threshold for Subdivision and Development as shown on Beachlands South: Precinct Plan 6 supplied with the Clause 23 response
 - iv. Incorporate separate and/or additional standards for transport upgrades relating to the timing and delivery of the primary and/or secondary school planned in the Community sub-precinct;
 - v. Update standards I.7.5 Riparian Margins and I.7.6 Ecological Protected Area Network to reflect amendments supplied in the Clause 23 response that any riparian planting proposed within the riparian yard setback can be considered as part of any ecological offsetting or compensation package;
 - vi. Include a new special information requirement in the precinct provisions requiring the provision of a Travel Management Plan for the development of commercial activities greater than 500m²;
 - vii. Update Precinct Plan 2 Natural Features and mapping of indicative natural wetlands based on the revised definition of 'natural inland wetland' to

- incorporate recent amendments to this definition that took effect from 5 January 2023; and
- viii. Updating standard I.7.14 Residential Density Standards of the proposed Beachlands South Precinct provisions ("precinct provisions") to reflect the Medium Density Residential Standards (MDRS) in alignment with the Council's Intensification Plan Change 78 (PC78) and any other consequential changes in relation to standard I.7.14;

3. BACKGROUND

- a. BSLP comprises a partnership between the New Zealand Government Crown entity, the Guardians of New Zealand Superannuation Fund (NZSF), and parties associated with the Russell Property Group, Ngai Tai ki Tāmaki (as mana whenua) Hapai Development Limited Partnership (which includes Ngāi Tai ki Tāmaki and six other iwi groups). The Russell Property Group has been appointed the manager for the landholding and its future re-zoning. The Guardians of the NZSF are charged with managing, administering, and growing the NZSF for the future benefit of all New Zealanders. The Guardians of NZSF believe that environmental, social and governance factors are material to long-term returns.
- b. BSLP owns and has full control over the three Auckland coastal properties at 110 Jack Lachlan Drive and 620 and 712 Whitford-Maraetai Road, which is a collective landholding of approximately 255 hectares. BSLP is proposing to undertake a high quality and large-scale urban development project to extend the coastal town of Beachlands through PC88 (as provided for through the objectives and policies of Chapter B2.6 of the Operative Auckland Regional Policy Statement (RPS)).
- c. Consistent with other greenfield precincts within the AUP, PC88 incorporates a Beachlands South precinct which include bespoke place-based provisions that create a spatial framework for development. The precinct provisions are appropriately focussed on the layout of development necessary to achieve the objectives of the AUP, including:
 - i. Achieving an appropriate urban layout;
 - ii. Providing an integrated and connected street network;
 - iii. Providing a network of open space which integrates with the natural features of the area;
 - iv. Enhancing riparian margins and freshwater quality; and
 - v. Requiring development to be integrated and coordinate with required transport infrastructure upgrades and public transport.
- d. In addition to the precinct, the Auckland-wide stormwater quality and Stormwater Management Area Flow 1 (SMA F1) provisions will apply within the area subject to PC88 which will manage sediment and contaminant runoff which could make its way into the freshwater and coastal receiving environment.
- e. Since notification of PC88, BSLP has identified particular aspects of the precinct provisions which have either not captured amendments supplied with Clause 23

responses provided to the Council, or warrant review and amendment for the sustainable management of natural and physical resources.

4. SUBMISSION AND DECISION SOUGHT

- a. BSLP seek the amendments to PC88 as set out in Attachment A of this submission.
- b. Approve the Beachlands South precinct with the amendments as set out in **Attachment** A of the submission.
- c. Any further or alternative relief that may be required to address the matters raised in this submission.
- d. BSLP wishes to be heard in support of its submission.

Dated: 10 March 2023

Beachlands South Limited Partnership

By their duly authorised agents

UNIO Environmental Ltd

Address for service of Submitter:

Unio Environmental PO Box 91562 Victoria Street Auckland 1142

Email: vijay.lala@unioenvironmental.co.nz / nick.roberts@unioenvironmental.co.nz

Attachment A

Submission Point	Reasons	Relief Sought	
THAB zoning in Marina Point and Coastal sub- precincts	The extent of THAB zoning proposed in the Marina Point and Coastal sub-precincts of PC88 was reduced in the Clause 23 responses supplied to council in comparison to the extent of THAB zoning originally proposed at the time of lodgement.	Update the proposed zoning plan and any other consequential plans of PC88 to reflect the reduction of THAB zoning in the Marina Point and Coastal subprecincts as per the plan included as Attachment B .	3
	This reduction of THAB zoning was a deliberate decision of BSLP following further analysis of the potential landscape and visual effects, and potential built form outcomes, which prompted this change to the proposed zoning.		
2. Precinct Plan 4 – Cultural Landscape	An updated Precinct Plan 4 was supplied to council as part of the Clause 23 responses to reconcile the indicative location of archaeological sites shown on Precinct Plan 4 and the relevant figures contained within the Archaeological Assessment provided as Appendix 27 to PC88. The updated Precinct Plan 4 simply corrects minor errors to the indicative location of archaeological sites shown on this plan for consistency with other documents provided with PC88.	Update Precinct Plan 4 – Cultural Landscape to reflect the corrected version supplied to council in BSLP's clause 23 responses included as Attachment C .	35
3. Update standard I.7.3 Staging of Development with Transport Upgrades	The ferry strategy and patronage contained within Appendix 11 — Integrated Transport Assessment (ITA) of the PC88 application was revised as part of the Clause 23 responses which resulted in minor consequential amendments to the ferry passenger figures and peak periods in Table 2: Threshold for Subdivision and Development as shown on Beachlands South Precinct Plan 6. The minor amendments to Table 2 of standard I.7.3 Staging of Development with Transport Upgrades have not been captured in the notification material for PC88.	Update I.7.3 Staging of Development with Transport Upgrades and Table 2: Threshold for Subdivision and Development as shown on Beachlands South Precinct Plan 6 to reflect changes to ferry passenger numbers and peak periods in Attachment D .	3
 Separate and/or additional standards for transport upgrades 	The traffic modelling attached to Appendix 11 of the application has informed the transport infrastructure upgrades required to support rezoning of the land in PC88. In particular, this has informed the development of standard I.7.3 Staging of Development with Transport Upgrades to support the subdivision and development of land within PC88.	Incorporate separate and/or additional transport infrastructure upgrades in the PC88 precinct provisions relating to the timing and delivery of the primary and/or secondary school planned in the Community sub-precinct.	
	The traffic modelling includes planning and assumptions for a primary and/or secondary school within the PC88 area which has influenced the transport upgrades required for specific land uses and development figures within the plan change area, presented in Table 2 of this standard. Whilst the Ministry of Education have expressed broad support and interest to BSLP for the development of a primary and/or secondary school within the area provided for in PC88, the timing of the school(s) is not confirmed at this stage. It is considered that separate and/or additional transport upgrades relative to the timing and delivery of the primary and/or secondary school planned in the Community sub-precinct may be required to support subdivision and development within the PC88 area.		
5. Standards I.7.5 Riparian Margins and I.7.6 Ecological Protected Area Network	In response to concerns raised by council in the clause 23 request, BSLP amended standard I.7.5(2) so that the riparian yard setback was not required to be planted as a standard. Planting could however still be proposed within the riparian yard setback and this would enable any proposed planting to be included as part of any ecological offsetting or compensative package. The purpose of the standard was also clarified and improved to contribute to addressing residual ecological effects too. The proposed changes to standard I.7.6 Ecological Protected Area Network are consequential to the changes made to the riparian margin standard described above.	Amend the purpose and standard I.7.5(2) Riparian Margins to read as <u>follows:</u> Purpose: Contribute to improvements to water quality, habitat, biodiversity and contribute to addressing residual ecological effects. Standard I.7.5(2) Any riparian planting proposed within the riparian yard setback required in Standard I.7.5(1) as part of any ecological offsetting or compensation package must be native species and vested in Council, or protected and maintained in perpetuity by an appropriate legal mechanism.	
		Amend the purpose and standard I.7.6(3)(a) Ecological Protected Area Network to read as follows:	

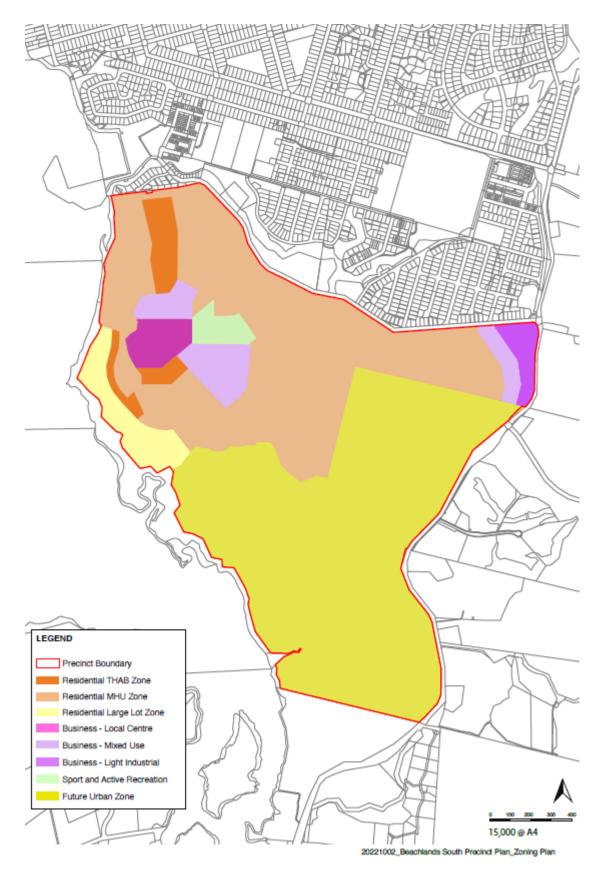
		Purpose: To protect and enhance identified significant terrestrial vegetation/habitat types and significant ecological areas from subdivision and development and contribute to addressing residual ecological effects. Standard I.7.6(3) Any application for subdivision within the precinct must include the following on the subdivision scheme plan, as identified on Precinct Plan 2: (a) Areas subject to the EPAN and proposed to be planted as part of any ecological offsetting or compensation package;	351.6 c
6. Special Information Requirement - Travel Management Plan	The PC88 precinct provisions was updated in the Clause 23 responses supplied to council to include the requirement for a Travel Management Plan (TMP) as a special information requirement for the development of commercial activities greater than 500m² in the PC88 area. This follows one of the sustainability initiatives of contained in Appendix 7 – Beachlands South Sustainability Strategy provided with the application to support modal shift. Providing a TMP is considered to be consistent with best practice for reducing private vehicle use in commercial activities and will further strengthen the sustainability initiatives of PC88 which encourages and promotes modal shift. The requirement to provide a TMP is considered to support a reduction in car dependency, promote modal shift and give effect to the sustainability initiatives of PC88.	Information Requirement in the PC88 provisions, as follows: A Travel Management Plan (TMP) is required for commercial activities greater than 500m² within this precinct. A TMP must be prepared by a suitably qualified and experienced person and include: (a) Operational measures to be established on-site to encourage reduced vehicle trips;	351.7
7. Precinct Plan 2 – Natural Features	Precinct Plan 2 includes the spatial location of indicative natural wetlands across the PC88 area. Since PC88 was lodged in March 2022 with supporting ecological assessments (Appendices 15-20), the Government has since updated the Essential Freshwater 2020 regulations. In particular, the definition of 'natural inland wetland' under the National Environmental Standards for Freshwater Regulations (NES-F) and National Policy Statement for Freshwater Management (NPS-FM) was recently amended by the Minister for the Environment under section 53(1) of the Resource Management Act 1991 and notified in the New Zealand Gazette on 8 December 2022 as the National Policy Statement for Freshwater Management 2020 Amendment No 1.¹ Those amendments have since taken effect from 5 January 2023. The indicative natural wetlands shown on Precinct Plan 2 were identified based on the previous definition of 'natural wetland', prior to recent amendments to the NES-F and NPS-FM. Therefore, because the definition of 'natural inland wetland' has now changed, it is considered that the indicative natural wetlands currently mapped on Precinct Plan 2 may not actually be NPS-FM qualifying natural wetlands.		351.8
8. Standard I.7.14 Residential Density Standards	The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act (Amendment Act) was passed into law on 20 December 2021. This Amendment Act requires Auckland Council as a tier 1 territorial authority to apply the MDRS to most of the existing residential area as part of the AUP from August 2022. Under the Amendment Act, a private plan		351.9

¹ Note that on 5 January 2023 additional amendments to the NES-F by the Resource Management (National Environmental Standards for Freshwater) Amendment Regulations (No 2) 2022 also took effect.

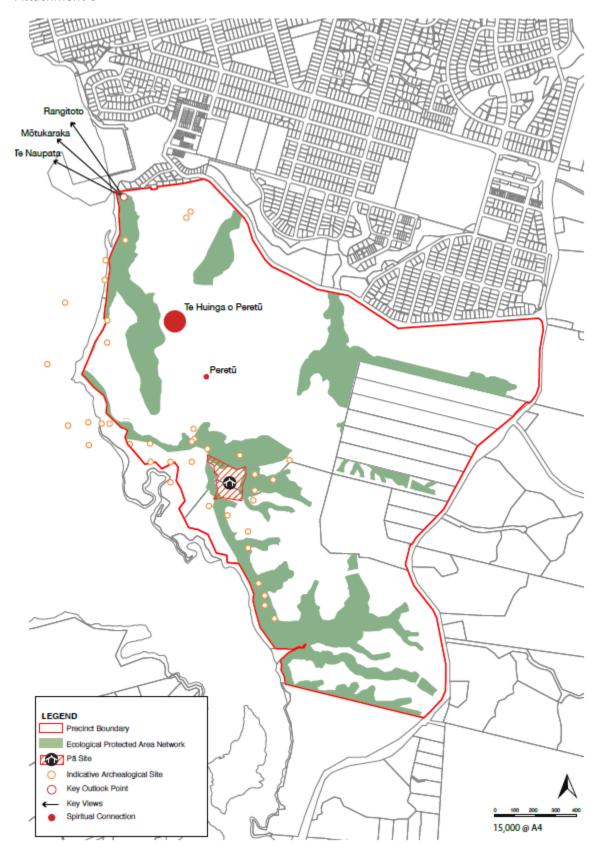
change must either adopt the existing (unamended) residential zone provisions or be in accordance with the MDRS. BSLP has elected to take the latter the option and PC88 was therefore prepared on this basis with the MDRS included as standard I.7.14 Residential Density Standards in the precinct provisions as well as related assessment criteria.

Auckland Council notified Plan Change 78 (PC78) Intensification on 18 August 2022 which incorporates the MDRS in relevant residential zones in urban Auckland, along with a suite of other consequential changes to the relevant objectives, policies and assessment criteria of the relevant residential zones. At the time of preparing this submission, the pre-hearing conferences for PC78 (and PC79 and PC80) have commenced as of 6th March 2023 with hearings occurring in mid to late-2023 and decisions not expected until 31 March 2024. Therefore, between now and the decisions for PC78 being notified, it is expected that there will be changes to the relevant urban residential zoning provisions of the AUP which PC88 may not be consistent with. Accordingly, it is considered that standard I.7.14 and any other consequential provisions of PC88 should be updated to reflect the MDRS and align with the development of PC78.

Attachment B



Attachment C



Attachment D

Table 2: Threshold for Subdivision and Development as shown on Beachlands South: Precinct Plan 6

	enabled within the area on Precinct Plan 6 by transport ure in column 2,	Column 2 Transport infrastructure required to enable activities or subdivision in column 1
(a)	Up to a maximum of 250 dwellings and/or residential lots	Site (A) on Precinct Plan 6: Upgrade of Whitford Maraetai Road / Jack Lachlan Drive intersection to traffic signals; and Site (D) on Precinct Plan 6: Upgrade of Whitford Park Road / Whitford Road / Whitford Maraetai Road roundabout to a double roundabout.
(b)	A provision of: i. More than 250 and up to 550 dwellings or residential lots; and ii. Up to 3,500m² light industrial GFA;	Provision for an additional capacity of 98 ferry passengers (total capacity of 592 passengers) from Pine Harbour during the two-hour peak period between 0630 -0830 on weekdays; and
(c)	A provision of: i. More than 550 and up to 820 dwellings or residential lots; ii. More than 3,500m² and up to 5,700m² light industrial GFA; iii. Up to 400m² retail GFA; and iv. Up to 1,100m² commercial GFA.	Provision for an additional capacity of 198 ferry passengers (total capacity of 692 passengers) from Pine Harbour Ferry Terminal during the two-hour peak period between 0630 -0830 on weekdays; and Site (B) on Precinct Plan 6: Provision of an additional 30m left-turn approach lane on the northbound approach to the Whitford Park Road / Saleyard Road / Sandstone Road roundabout.
(d)	A provision of: i. More than 820 and up to 1,900 dwellings or residential lots; ii. More than 5,700m² and up to 12,300m² light industrial GFA; iii. More than 400m² and up to 2,100m² retail GFA; and	Provision for an additional capacity of 458 ferry passengers (total capacity of 952 passengers) from Pine Harbour during the two-hour peak period between 0630 -0830 on weekdays; and Site (C) on Precinct Plan 6: Upgrade to Trig Road (south) intersection.

	iv. More than 1,100m² and up 3,300m² commercial GFA.	
(e)	A provision of: i. More than 1,900 and up to 2,918 dwellings or residential lots; ii. More than 12,300m² and up to 18,000m² light industrial GFA; iii. More than 2,100m² and up to 5,700m² retail GFA; and iv. More than 3,300m² and up to 5,100m² commercial GFA.	Provision for an additional capacity of 730 passengers (total capacity of 1224 passengers) from Pine Harbour during the two-hour peak period between 0630 -0830 on weekdays.

SUBMISSION ON PROPOSED PLAN CHANGE 88 TO THE AUCKLAND UNITARY PLAN (OPERATIVE IN PART)

To: Auckland Council

Name of submitter: Manukau Quarries Limited Partnership

Address for service: c/- Aidan Cameron

Bankside Chambers

Level 22, 88 Shortland Street

AUCKLAND 1010

T 021 0437 482

E aidan@bankside.co.nz

This is a submission on Proposed Plan Change 88 to the Auckland Unitary Plan (Operative in Part) – Beachlands South ("**Proposed Plan Change 88**").

Manukau Quarries Limited Partnership could not gain an advantage in trade competition through this submission.

Manukau Quarries Limited Partnership wishes to be heard in support of its submission.

If others make a similar submission, Manukau Quarries Limited Partnership would consider presenting a joint case with them at any hearing.

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Scope of submission

1. This submission relates to Proposed Plan Change 88 in its entirety.

Nature of submission

2. Manukau Quarries Limited Partnership ("**MQLP**") strongly supports Plan Change 88, subject to the amendments sought in this submission.

Reasons for submission

- 3. MQLP's primary reasons for this submission are that Proposed Plan Change 88 (as proposed to be amended by this submission) will:
 - a. promote the sustainable management of natural and physical resources, and therefore will achieve the purpose and principles of the Resource Management Act 1991 ("RMA");
 - b. meet the reasonably foreseeable needs of future generations;
 - c. enable the social, economic and cultural well-being of the Auckland community to be met;
 - d. be consistent with the purposes and provisions of the relevant planning documents, including the Unitary Plan and the Regional Policy Statement ("RPS");
 - e. be consistent with Part 2 and other provisions of the RMA, including sections 74 and 75, including the functions of Auckland Council ("**Council**") under s 31; and
 - f. represents the most appropriate way to achieve the objectives of the proposal or the Unitary Plan, in terms of section 32 of the RMA, in relation to the subject land.
- 4. Without limiting the generality of the above, additional specific reasons for supporting Proposed Plan Change 88 with amendments are set out below.

Manukau Quarries Limited Partnership

- 5. MQLP owns the land at 867 Whitford-Maraetai Road, Beachlands (legally described as Section 2 Survey Office Plan 487740) and 885 Whitford-Maraetai Road, Beachlands (legally described as Lot 2 DP 54701 and Lot 2 DP 202389) (together the MQLP Quarry land).
- 6. The MQLP Quarry land includes a working quarry, which has operated for the last 50 years providing greywacke rock for aggregate supply. The MQLP Quarry land also operates as a clean and managed fill site.

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7. The MQLP Quarry land is zoned Rural Countryside Living and Quarry, as shown below:

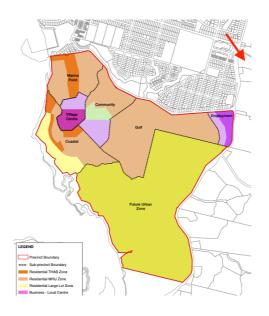


Zoning of MQLP landholdings

- 8. Access to the MQLP Quarry Land is via the accessway shown in grey above, which connects (via a slip lane) to the roundabout intersection between Whitford-Maraetai Road, Beachlands Road, and Kouka Road.
- 9. MQLP has been working towards future planning for the site as rehabilitation works associated with the quarry will be completed within the coming years.
- 10. As such, MQLP is concerned to ensure that development in the Beachlands area does not inhibit its current operations; and preserves the ability for its land to be comprehensively redeveloped in the future.
- 11. In addition, MQLP forms part of the wider group of entities falling under the "umbrella" of the Nakhle Group. Other entities within the wider group have a specific interest in residential, industrial and commercial development.

Proposed Plan Change 88

12. The MQLP Quarry land is located approximately 800m northeast of the northern-most boundary of the land subject to Proposed Plan Change 88, as shown by the red arrow in the figure below:



Zoning Plan

13. Accordingly, MQLP has a particular interest in the proposed traffic generation from Proposed Plan Change 88, and potential impacts upon the roundabout intersection it relies upon. It is also particularly interested in any transport-related provisions which arise as a result of Proposed Plan Change 88, to the extent that they may be relevant to future plan changes in the area (including for the MQLP Quarry land, should a plan change be pursued).

Standard I.7.3 – Staging of Development with Transport Upgrades (Table 2)

14. Standard I.7.3 seeks to manage the adverse effects of traffic generation on the safety and efficiency of the surrounding network by ensuring subdivision and development is coordinated with infrastructure upgrades. That Standard is important to MQLP, given its reliance upon the surrounding roading network and the potential consequences that provisions in the Beachlands South precinct could have for the development of its own land.

Inclusion of light industrial activities within I.7.3(2)(b)-(e)

15. I.7.3(2) provides that subdivision and development within the precinct must not exceed the thresholds in Table 2 until such time that the infrastructure upgrades described in Column 2 of Table 2 and as shown on Precinct Plan 6 are constructed and operational. Failure to comply with Standard I.7.3 requires resource consent as a discretionary activity, so it is important that the triggers in the standard are set at appropriate levels.

16. I.7.3(2) provides (relevantly) as follows:

(IL)	A consistence of	
(b)	A provision of: i. More than 250 and up to 550 dwellings or residential lots; and ii. Up to 3,500m² light industrial GFA;	Provision for an additional capacity of 100 ferry passengers (total capacity of 600 passengers) from Pine Harbour during the two-hour peak period between 0645 -0845 on weekdays; and
(c)	A provision of: i. More than 550 and up to 820 dwellings or residential lots; ii. More than 3,500m² and up to 5,700m² light industrial GFA; iii. Up to 400m² retail GFA; and iv. Up to 1,100m² commercial GFA.	Provision for an additional capacity of 200 ferry passengers (total capacity of 700 passengers) from Pine Harbour Ferry Terminal during the two-hour peak period between 0645-0845 on weekdays; and Site (B) on Precinct Plan 6: Provision of an additional 30m left-turn approach lane on the northbound approach to the Whitford Park Road / Saleyard Road / Sandstone Road roundabout.
(d)	A provision of: i. More than 820 and up to 1,900 dwellings or residential lots; ii. More than 5,700m² and up to 12,300m² light industrial GFA; iii. More than 400m² and up to 2,100m² retail GFA; and iv. More than 1,100m² and up 3,300m² commercial GFA.	Provision for an additional capacity of 400 ferry passengers (total capacity of 900 passengers) from Pine Harbour during the two-hour peak period between 0645 -0845 on weekdays; and Site (C) on Precinct Plan 6: Upgrade to Trig Road (south) intersection.
(e)	A provision of: i. More than 1,900 and up to 2,918 dwellings or residential lots; ii. More than 12,300m² and up to 18,000m² light industrial GFA;	Provision for an additional capacity of 650 passengers (total capacity of 1150 passengers) from Pine Harbour during the two-hour peak period between 0645 -0845 on weekdays.
	iii. More than 2,100m² and up to 5,700m² retail GFA; and iv. More than 3,300m² and up to 5,100m² commercial GFA.	

- 17. MQLP is concerned that no light industrial, retail or commercial GFA can be provided within the plan change area until such time as additional ferry capacity is provided. The additional ferry capacity appears to be solely related to the residential triggers, given the apparent need for ferry capacity to mitigate the additional traffic generated by the residential activities.
- 18. The proposed Precinct Description for Sub-Precinct F (titled Employment, and with a combination of Business Mixed Use and Business Light Industry zoning) notes that it is intended to be highly accessible to the existing Beachlands-Maraetai community and "will provide a local employment source". Proposed Objective 29 and Policy 35 seek to provide local employment opportunities in a quality built environment, through the development of commercial, light industrial and employment activities in a manner that supports the Village Centre and the wider Beachlands community.
- 19. Given the emphasis on provision of local employment opportunities for local residents, it is inevitable that much of the traffic generated by the proposed light industrial, retail and commercial uses will be local traffic, within the Beachlands area, if not the area of the Plan Change itself. The ITA provided by the plan change proponents notes that employment trips make up only 2% (at 2031) and 7% (at 2038) of the total external trip generation (ie trip generation external to the plan change area) created by the plan change. Many of the movements outside the plan change area will nonetheless come from the wider Beachlands settlement. The major contributors to trip generation are residential activities (80-90%) and education (14-27%).
- 20. MQLP seeks deletion of (b)(ii), (c)(ii, iii, iv), (d)(ii, iii, iv) and (e)(ii, iii, iv) from Table 2, so that there is no trigger for non-residential activities. Triggers will then focus on residential activities which are those that lead to an increase in traffic generation external to the plan change area and ultimately the wider Beachlands/Maraetai community.

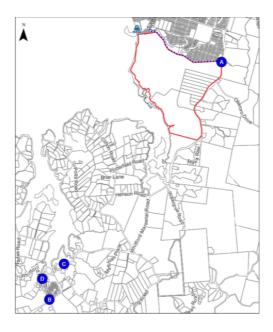
Lack of a clear connection between triggers and the ITA

21. Further to the above, there is no clear connection between the trigger thresholds and requirements in I.7.3(2) (Table 2) and the predicted traffic generation in the ITA. The ITA focusses on assessments in 2024, 2031, and 2038, which appear to have no correlation to the triggers set out in Table 2. MQLP understands that there is likely to be evidence to support these triggers, and would welcome further detail being provided as to the relationship between the ITA and the trigger thresholds through evidence. The triggers in Table 2 must clearly relate to unacceptable anticipated adverse effects of the generated traffic on the roading network and the required measures that are expected to efficiently and effectively avoid, remedy or mitigate to an acceptable level those effects.

Other points to note in relation to the Precinct Plans

22. Precinct Plan 6 (also shown below) indicates the area in which Standard I.7.3 referred to above applies.

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Precinct Plan 6 - Transport Staging and Upgrades

- 23. The proposed area covered by I.7.3 includes both the live zoned area shown in the zoning map above, as well as the Future Urban zoned land located in the south of the site. The ITA provided with the plan change assesses upgrades beyond that listed in Standard I.7.3 (Table 2), including specifically an upgrade to the Whitford-Maraetai Road / Beachlands Road intersection which MQLP's site connects into. However, the proposed upgrade to that roundabout is not included within the infrastructure upgrades in Table 2.
- 24. To resolve this issue, MQLP submits that the size of the area in Precinct Plan 6 which is subject to Standard I.7.3 should be reduced to reflect what the Standard currently captures, being the live zoned component only (and for which transport impacts have been assessed).

Other matters

- 25. MQLP is concerned in terms of a wider "precedent" due to the proposed Employment Precinct requiring restricted discretionary activity for new industrial buildings and additions/alterations to any building (Table Rules IX.4.1 (A34) and (A35)), compared to the underlying AUP "permitted" status. Restricted discretionary activity status is not explicitly justified by the objectives and policies or the section 32 assessments in a way that makes it clear that this activity status is related to matters relevant to only PC88. MQLP submits that the default permitted activity status is adopted for industrial activities within the Precinct.
- 26. MQLP has further concerns as to the need and use of extensive building setbacks and planted buffers (Rule I.7.2 and as identified on Precinct Plan 1) to block views from public places onto industrial buildings, which is not explicitly justified by the objectives and policies or section 32 assessments in a way that is clear that this activity is related to matters relevant to only PC88. The buffers significantly reduce land available for employment generating activities, as well as having the potential to reduce visibility of tenants present within the development (and thus having the potential to undermine the commercial attractiveness and economic benefits that could be derived from being "visible"). Notably, other areas of Auckland, including recent Plan Changes involving industrial land, have not required buffers between other zones and industrial activities.

27. MQLP submits that:

- a. the requirements for setbacks and buffers be deleted; or
- b. the building setbacks be reduced and the landscaping be significantly reduced in width and plant density; or
- c. if this requirement is retained, that the objectives, policies and matters of discretion more specifically refine the resource management effects (as relevant to this Precinct compared to the rest of Auckland) to be mitigated through the use of setbacks and planted buffers.
- 28. Finally, MQLP is strongly supportive of the provision for a primary and secondary school, promoted through proposed Objectives 23 and 24 of the proposed plan change.

Decision sought

- 29. MQLP seeks that Proposed Plan Change 88 be approved, subject to the following amendments:
 - a. deletion of (b)(ii), (c)(ii, iii, iv), (d)(ii, iii, iv) and (e)(ii, iii, iv) from Standard I.7.3(2) (Table 2), so that there is no trigger for non-residential activities;
 - b. a reduction in the size of the area in Precinct Plan 6 which is subject to Standard I.7.3 to include only the live zoned component, and not the land which is proposed to remain Future Urban:
 - c. the default permitted activity status is adopted for industrial activities within the Employment Precinct, as opposed to restricted discretionary activity status;
 - d. the triggers in Table 2:
 - i. must clearly relate to unacceptable anticipated adverse effects of the generated traffic on the roading network; and
 - ii. the required measures must efficiently and effectively avoid, remedy or mitigate those effects to an acceptable level; and
 - e. in relation to building setbacks and planted buffers, that:
 - i. the requirements for setbacks and planted buffers be deleted; or
 - ii. the building setbacks be reduced and the landscaping be significantly reduced in width and plant density; or
 - iii. if this requirement is retained, that the objectives, policies and matters of discretion more specifically refine the resource management effects (as relevant

352.1

352.2

352.3

352.4

352.5

to this Precinct compared to the rest of Auckland) to be mitigated through the use of setbacks and planted buffers.

Signature:

Manukau Quarries Limited Partnership, by its authorised

agent, Aidan Cameron

Date: 10 March 2023

Address for Service: c/- Aidan Cameron

Bankside Chambers

Level 22, 88 Shortland Street

AUCKLAND 1010

Telephone: 021 0437 482

Email: aidan@bankside.co.nz

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	o <u>unitaryplan@aı</u>	ucklandcouncil.govt.nz	or post to :	For office use only	
Attn: Planning Technician				Submission No:	
Auckland Council Level 24, 135 Albert Stre Private Bag 92300	eet			Receipt Date:	
Auckland 1142					
Submitter details					
Full Name or Name of	Agent (if application	able)			
Mr/Mrs/Miss/Ms(Full		·			
Name)	Tracy Joy Bull				
Organisation Name (if	submission is	made on behalf of Or	ganisation)		
Address for service of	Submitter				
18 Third View Avenue Beachlan	nds Auckland 2018				
Telephone: 2018	3	Fax/Email:	tracyjbull@gm	nail.com	
Contact Person: (Name	and designation	, if applicable)			
Scope of submissi	on				
This is a submission o		proposed plan chang	je / variation to	an existing plan:	
Plan Change/Vai	riation Number	PC 88 (Private)			
Plan Change/Va	riation Name	Beachlands South			
The specific provision (Please identify the specific			variation)		
Plan provision(s) Rezor	ning of 307Ha South of Bear	chlands Village in the area of Formosa	Golf Course from Rural to f	future Urban Residential etc	
Or					
Property Address					
<i>Or</i> 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	# 353	
I oppose the specific provisions identified above		
I wish to have the provisions identified above amended Yes 🗵 No 🔲		
The reasons for my views are: ransport- in and out of the area…cont'd. Footpaths in place in a timely manner… c	ont'd	
Vaste water - health and safety cont'd. Water supply, cont'd		353.1
Medical - health and safety concern cont'd.		
(continue on a separat	te sheet if nec	essary
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.	×	
ransport, overpasses in place and 4 lane roads		
Medical, investment		
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	\boxtimes	
Tracy J Bull 02/26/2023		
Signature of Submitter (or person authorised to sign on behalf of submitter) Date		
Notes to person making submission:		
If you are making a submission to the Environmental Protection Authority, you should use Form 16	В.	
Please note that your address is required to be made publicly available under the Resource Manag 1991, as any further submission supporting or opposing this submission is required to be forwarded as the Council.		well

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:

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

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

FORM 5



			Faratta and a
Send your submission to unitaryplan@au		ucklandcouncil.govt.nz or post to :	For office use only
Attn: Planning Tech Auckland Council Level 24, 135 Alber Private Bag 92300 Auckland 1142			Submission No: Receipt Date:
Submitter detai	<u>ls</u>		
Full Name or Name	e of Agent (if applica	able)	
Mr/Mrs/Miss/Ms(Ful Name)	II		
Organisation Name	e (if submission is	made on behalf of Organisation)	
Address for service	e of Submitter		
Telephone:		Fax/Email:	
Contact Person: (Na	Contact Person: (Name and designation, if applicable)		
Scope of subm	<u>ission</u>		
This is a submissi	on on the following	proposed plan change / variation t	o an existing plan:
Plan Change	e/Variation Number	PC 88 (Private)	
Plan Change/Variation Name		Beachlands South	
		ission relates to are: proposed plan change / variation)	
Plan provision(s)	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			
<i>Or</i> Map			
Or Other (specify)	L		

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	# 353
I oppose the specific provisions identified above	
I wish to have the provisions identified above amended Yes ☒ No ☐	
The reasons for my views are:	
(continue on a separa	te 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.	X
I wish to be heard in support of my submission	
I do not wish to be heard in support of my submission	
If others make a similar submission, I will consider presenting a joint case with them at a hearing	
Signature of Submitter (or person authorised to sign on behalf of submitter) Date	
Notes to person making submission:	
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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 <u>could</u> gain an advantage in trade competition through this submission please complete the following:

I am \square / am not \square 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.



Watercare Services Limited

73 Remuera Road, Newmarket Auckland 1023, New Zealand Private Bag 92521 Wellesley Street, Auckland 1141

> Telephone +64 9 539 7300 Facsimile +64 9 539 7334 www.watercare.co.nz

Auckland Council

Level 24, 135 Albert Street

Private Bag 92300

Auckland 1142

Attn.: Planning Technician

unitaryplan@aucklandcouncil.govt.nz

TO: Auckland Council

SUBMISSION ON: Plan Change 88 (Private): Jack Lachlan Drive; and 620,

680, 682, 702, 712, 722, 732, 740, 746, 770 Whitford-

Maraetai Road, Beachlands

FROM: Watercare Services Limited

ADDRESS FOR SERVICE: Mark.lszard@water.co.nz

DATE: 20 February 2023

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

1. INTRODUCTION

1.1. Watercare's purpose and mission

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

Watercare provides integrated water and wastewater services to approximately 1.6 million people in Auckland. Watercare collects, treats, and distributes drinking water from 11 dams, 26 bores and springs, and four river sources. A total of 330 million litres of water is treated

2

each day at 15 water treatment plants and distributed via 89 reservoirs and 90 pump stations to 450,000 households, hospitals, schools, commercial and industrial properties.

Watercare's water distribution network includes more than 9,000 km of pipes. The wastewater network collects, treats and disposes of wastewater at 18 treatment plants and includes 7,900 km of sewers.

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

2. SUBMISSION

2.1. General

This is a submission on a change proposed by Beachlands South Limited Partnership ("**Applicant**") to the Auckland Unitary Plan (Operative in Part) that was publicly notified on 26 January 2023 ("**Plan Change**").

The Applicant proposes to rezone 307 hectares of land south of the existing Beachlands township and specifically requests to:

- Rezone land from Rural Countryside Living zone to a mix of Future Urban,
 Residential Mixed Housing Urban, Business Local Centre, Business Light
 Industry, Business Mixed Use and Open Space zone.
- Introduce a new precinct to replace the existing Whitford Precinct (and sub-precinct) provisions; and
- Extend the Stormwater Management Area Flow 1 control over the proposed plan change area.

The purpose of this submission is to address the technical feasibility of the proposed water and wastewater servicing arrangement to ensure that the effects on Watercare's existing and planned water and wastewater networks are appropriately considered and managed in accordance with the Resource Management Act 1991.

In making its submission, Watercare has considered the relevant provisions of the Auckland Plan 2050, Te Tahua Taungahuru Te Mahere Taungahuru 2018 – 2028/The 10-year Budget Long-term Plan 2018 – 2028, the Auckland Future Urban Land Supply Strategy 2015 and 2017, the Water Supply and Wastewater Network Bylaw 2015, the Water and Wastewater

_

Local Government (Auckland Council) Act 2009, s58.

3

Code of Practice for Land Development and Subdivision and the Watercare Asset Management Plan 2022 - 2042 It has also considered the relevant RMA documents including the Auckland Unitary Plan (Operative in Part) and the National Policy Statement on Urban Development 2020 which (among other matters) requires local authorities to ensure that at any one time there is sufficient housing and business development capacity which:

- (a) in the short term, is feasible, zoned and has adequate existing development infrastructure (including water and wastewater);
- (b) in the medium term, is feasible, zoned and either:
 - (i) serviced with development infrastructure, or
 - the funding for the development infrastructure required to service that development capacity must be identified in a long-term plan required under s93 of the Local Government Act 2002; and
- (c) in the long term, is feasible, identified in relevant plans and strategies by the local authority for future urban use or urban intensification, and the development infrastructure required to service it is identified in the relevant authority's infrastructure strategy required under the Local Government Act 2002.²

2.2. Specific parts of the Plan Change

The specific parts of the Plan Change that this submission relates to are:

- (a) the effects of the Plan Change on Watercare's Beachlands Wastewater Servicing Scheme; and
- (b) the proposed water and wastewater servicing arrangements.

Watercare has reviewed the Plan Change and considers that:

- (a) the proposed water and wastewater capacity and servicing requirements have been assessed as part of the Proposal.
- (b) Water supply will be sourced to enable staged development across the Plan Change Area, as outlined in the Application (as notified). The Applicant has identified groundwater as the primary supply source, comprising of the following:
 - a. Increased supply from the existing private water supply at Pine Harbour Holdings Limited (PHLL).

National Policy Statement on Urban Development 2020, subpart 1, 3.2 to 3.4.

- b. obtaining new groundwater supply from 3 new bores within the southern bore field (Whitford and Beachlands Waitemata aquifers);
 and
- c. Rainwater collection systems, on site, enabling reduction in water use (at source).

To achieve adequate supply, the following is necessary:

- Resource Consents will need to be obtained by the Applicant to increase water-take from the PHLL bore and secure the additional new supply from the Southern bore field.
- A Water Treatment Plant will be required to ensure the water supply meets relevant Drinking Water Standards.
- Reservoirs will be placed within the development to ensure fire-fighting supply standards are also met.

The Applicant has presented a technically feasible solution and Watercare will continue to work with the Applicant through resource consent stages.

- (c) Wastewater cannot be serviced by the existing Beachlands' Wastewater Treatment Plant under the existing resource consent conditions, which imposes a maximum discharge volume unable to cater for the proposed plan change. The Application has presented technically feasible solution for wastewater servicing, which seeks to construct and operate a wastewater treatment plant and obtain the necessary discharge consents privately. This allows the Plan Change Area to develop without the reliance on Watercare's existing wastewater scheme.
 - A technically feasible solution for wastewater reticulation within the Plan Change area has been identified and will be further defined at resource consent stage.
- (d) The matters raised by Watercare in this submission must be addressed to ensure any adverse effects of the Proposal on Watercare's existing and planned and wastewater infrastructure network will be appropriately managed.

2.3. Beachlands Wastewater Scheme

In 2022, Watercare commenced developing the Beachlands Servicing Strategy and is due to complete this Strategy in mid-2023. The Servicing Strategy considers a broad range of environmental factors i.e. climate change and sensitive environments, economic and sustainability factors over the next 70-90 years. A strategy for water and wastewater servicing within the Whitford, Beachlands & Maraetai is being developed to respond to these factors.

This strategy confirms/acknowledges that capacity upgrades to the WWTP are necessary to support new growth in Beachlands and ensure the WWTP is compliant with current consent discharge limits (conditions). A new discharge permit will be necessary for any increased discharge volume from the WWTP, replacing the existing consented discharge that will expire in 2025.

The WWTP currently services a maximum of 10,000 people, which is a condition of the existing discharge consent. The WWTP is currently not able to meet its discharge limits, during wet weather events, largely due to stormwater infiltration occurring in the network and at the WWTP. The existing WWTP discharge is to the Te Puru Stream.

Limited funding has been allocated within the Long-Term Plan (FY24), for the options development process and minor electrical upgrades occurring in FY25. Any significant upgrades to the WWTP, necessary to accommodate significant growth and future requirements of a new resource consent, will have budgetary implications for Watercare in its future Long-Term Planning process.

2.4. Water and Wastewater Servicing for the Plan Change Area

2.4.1. Water supply servicing for the Plan Change Area

The Plan Change Area is not currently serviced by a reticulated water supply.

Watercare currently do supply water in Beachlands to the existing Beachlands area. Water supply is sourced via an existing (consented) water take by Pine Harbour Holdings Limited (PHHL).

The Applicant has identified a technically feasible solution to service the Plan Change area and defined this in the Application (as notified). On the basis the water supply will be sourced and managed by the Applicant privately, Watercare have no reason to oppose the proposals solution to supply water to the Plan Change area.

Watercare agree with the Applicants proposal for water supply servicing and anticipate that we will continue to work with the Applicant to confirm the final design and ownership arrangements of the proposed water and wastewater scheme.

2.4.2. Wastewater

The Plan Change Area is not currently serviced by a wastewater network.

The Application states that the wastewater network will be serviced via a new low pressure sewer system (private network) and a new centralised WWTP will be constructed (MBR Plant) with the discharge to land or a permanent stream (via polishing wetland), subsequently to the Coastal Marine Area (CMA). An alternative solution is also considered by the Applicant, which utilises the Beachlands WWTP, noting in the Application that this requires further negotiation between the Applicant and Watercare.

6

On the basis the Applicant can deliver a technically feasible solution privately, where the Applicant will design, construct and operate all network and production (treatment and discharge) infrastructure necessary to service the Plan Change Area privately, Watercare have no reason to oppose this Plan Change.

Watercare do see an opportunity to work with the Applicant to coordinate the delivery of the Watercare infrastructure with the delivery of the Applicant's development, to enable the efficient and more cost-effective delivery of infrastructure overall. As part of Watercare's Servicing Strategy development and capacity upgrades (now underway), the proposed Plan Change can be considered as part of the additional growth within these technical studies.

The timing of the Servicing Strategy being complete in mid-2023 and will be followed by initial design and lodgement of resource consent application for the proposed upgrades, before the existing consent has expired in 2025. Upon granting of resource consent, which may take 12-24 months, construction of the consented upgrades will be completed within 5 years of granting the resource consent. Watercare would not be able to support connecting new development until such time these upgrades are completed and adequate capacity within the network and WWTP is available to accommodate PC88.

Should negotiations progress between Watercare and the Applicant, consider connecting to Watercare's wastewater network and WWTP, Watercare's Code of Practice requires network infrastructure that is installed ahead of future development, and will service that future development within the catchment, must be appropriately sized to do so. This requirement is applicable to the proposed network and pump stations (if required). Timing of development and connection to the Beachlands WWTP and network, will need to occur only once the necessary resource consents obtained for increased flows and essential upgrades are completed at the WWTP.

2.3 DECISION SOUGHT

Watercare considers there are no water reasons to decline the Plan Change.

354.1

Watercare have concerns for wastewater servicing on the basis that connecting PC88 to Watercare's wastewater network is not feasible until the Beachlands WWTP is re-consented and essential capacity upgrades are completed (5 years after granting consent). The Application currently proposes a private solution that can be achieved, however Watercare consider the opportunities to complete a centralised wastewater scheme for Beachlands will have greater benefits to the Beachlands community.

354.2

Watercare considers the wastewater servicing can be achieved through modification of the proposed solution and appropriate provisions are included within the Plan Change to address timing to connect to the Beachlands WWTP or allow for interim solutions before the Beachlands WWTP upgrade has been completed.

354.3

3. HEARING

Watercare wishes to be heard in support of its submission.

20 February 2023

Mark Iszard

Mark Iszard Head of Major Developments Watercare Services Limited

Address for Service:
Mark Iszard
Head of Major Developments
Watercare Services Limited
Private Bag 92 521
Wellesley Street
Auckland 1141

Phone: +64 21 913 296

Email: mark.iszard@water.co.nz

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

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

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

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

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

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

FORM 5



Send your submission to unitaryplan@a	ucklandcouncil.govt.nz or post to :	For office use only
Attn: Planning Technician Auckland Council		Submission No:
Level 24, 135 Albert Street		Receipt Date:
Private Bag 92300 Auckland 1142		
Submitter details		
Full Name or Name of Agent (if applic	able)	
Mr/Mrs/Miss/Ms(Full	and Many Cardiff	
Name) Kathlyn Marg. Organisation Name (if submission is	aret Mary Cardiff made on behalf of Organisation)	
N/A	made on behalf of Organisation,	
Address for service of Submitter		
62 Porterfield Road, Whitford, Auckland 2571		
Telephone: 210586828	Fax/Email: kathycardiff@	hotmail.com_
Contact Person: (Name and designation	, if applicable)	
Scope of submission		
This is a submission on the following	proposed plan change / variation to	an existing plan:
Plan Change/Variation Number	PC 88 (Private)	
	D 11 10 11	
Plan Change/Variation Name	Beachlands South	
The specific provisions that my subm	nission relates to are:	
(Please identify the specific parts of the		
Plan provision(s)		
Or		
Property Address		
Or Map		Ĭ
Or Other (coesife)		
Other (specify) Transport: Heavy and light vehicular traffic flows on Whitford-Maraet	ai Roads past Clifton Road intersection and through Whitford Villa	age and beyond.
Transport: Heavy and light vehicular traffic flows on Whitford-Maraeta	ai Roads past Clifton Road intersection and through Whitford Villa	age and beyond.

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)

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#	.5	ລ	ŗ

I support the specific provisions identified above	π 000
I oppose the specific provisions identified above	
I wish to have the provisions identified above amended Yes No	
The reasons for my views are:	
Any development at Beachlands must consider developing the by-pass road around Whitford. Traffic volumes h	nave increased significantly
over time and council and developer must consider traffic volumes onto Whitford Park Road, Sandstone Road	and Whitford Road (Sommerville).
Recent significant housing developments at Drury, Paerata, Ara Hills, Millwater, Hobsonville and Whenuapai ar	re serviced by rail or motorway.
(continue	e 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.	X
Upgrade to roading in the area, specifically completing the Whitford Bypass, roundabout	at Clifton/ Whitford
Maraetai Road intersection, fixing Sandstone Road (has been single lane up for 6 years)	, fixing the Ara Kotinga/
Whitford Park Road intersection, a major choke on traffic into and out of the area as this	is used by Papakura traffic
and beyond to access the Northern Motorway.	
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	a hearing
Kathy Cardiff 10/03/2023	
Signature of Submitter Date	<u> </u>
(or person authorised to sign on behalf of submitter)	
Notes to person making submission:	
If you are making a submission to the Environmental Protection Authority, you should us	se Form 16B.
Please note that your address is required to be made publicly available under the Resout 1991, as any further submission supporting or opposing this submission is required to be as the Council.	
If you are a person who could gain an advantage in trade competition through the submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Mana	
I could ☐ /could not 区 gain an advantage in trade competition through this subn	
If you <u>could</u> gain an advantage in trade competition through this submiss following:	ion please complete the
I am ☐ / am not ☐ directly affected by an effect of the subject matter of the subm	ission that:
(a) adversely affects the environment; and	
(b) does not relate to trade competition or the effects of trade competition.	

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

FORM 5



0	: t:t				For office use only		
Send your submission to unitaryplan@aucklandcouncil.c			<u>incii.govt.nz</u>	or post to :	Submission No:		
Attn: Planning Technician Auckland Council Level 24, 135 Albert Street Private Bag 92300 Auckland 1142					Receipt Date:		
Submitter detai	<u>ils</u>						
Full Name or Name of Agent (if applicable)							
Mr/Mrs/Miss/Ms(Fu Name)	II Fraser Brent E	Bull					
Organisation Name (if submission is made on behalf of Organisation)							
Address for service of Submitter							
18 Third View Avenue Beachland Auckland 2018							
Telephone:	0278014044		Fax/Email:	bullfraser@gm	nail.com		
Contact Person: (N	ame and designation	, if applicab	ole)				
Scope of submission							
This is a submissi	on on the following	proposed	plan chang	ge / variation to	an existing plan:		
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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 fron						
Or Property Address							
Or							
Мар							
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	# 356						
I oppose the specific provisions identified above							
I wish to have the provisions identified above amended Yes 🗹 No 🔲							
The reasons for my views are:							
Parking around Pine Harbour for residential and communters is in very short supply							
Getting into the medical center can take over a week							
Traffic is backed up from Whitford from all the residents of Maraetai and Beachlands							
·	rate 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.	V						
Houses that have more than one car park on site of each development.							
development of a new medical center and incentive to bring in more doctors.							
3 or 4 lane road into the Beachlands and Maraitai area, under and over passes or dedicated passing lanes							
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	\boxtimes						
Fraser Bull 10 March 2023							
Signature of Submitter (or person authorised to sign on behalf of submitter) Date							
Notes to person making submission:							
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I could ☐ /could not ☑ gain an advantage in trade competition through this submission.

does not relate to trade competition or the effects of trade competition.

adversely affects the environment; and

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

following:

(a)

(b)

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





FORM 5

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

> To: **Auckland Council**

Name of submitter: Te Tāhuhu o Te Mātauranga (Ministry of Education, 'the

Ministry')

Address for service: C/- Beca Ltd

> PO Box 6345 Welleslev Auckland 1141

Attention: Krupa Patel

Phone: 09 301 3772

Email: krupa.patel@beca.com

This is a submission on the Proposed Plan Change 88 (Private) Beachlands South

Background

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

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

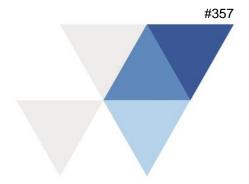
The Ministry of Education's submission is:

Future school network impacts

The Proposed Plan Change 88 (PPC) is seeking to rezone a significant area of land (approximately 307 ha) in Beachlands, East Auckland (the PCA) from Coastal - General Coastal Marine Zone and Rural -Countryside Living Zone to a combination of:

- Residential Terrace Housing and Apartment Building;
- Residential Mixed Housing Urban Zone;
- Residential Large Lot;
- Business Local Centre;
- Business Light Industry;
- Open Space Sport and Active Recreation Zone; and





Future Urban Zone

The PPC also seeks to apply a new precinct – the Beachlands South Precinct (with six sub-precincts) across the PCA. The PPC aims to guide residential, commercial, recreational and educational development and would replace the existing Whitford Precinct (and sub-precinct) provisions. The PPC would enable urban growth at densities that are greater than currently enabled, thereby increasing the demand on the local school network in Beachlands.

If accepted, the total PCA is projected to enable potentially 4,000 dwellings. Within this, the proposed live zoned areas will enable approximately 2,900 new dwellings. The change in zoning has not been anticipated within the Ministry's catchment planning and the increase in residential dwellings will trigger the need for at least one new school (likely more) in Beachlands to support the PCA.

Within the proposed precinct provisions, the Applicant has enabled educational facilities as a permitted activity within Sub-Precinct C with supporting objectives and policies. We acknowledge and appreciate the Applicant's willingness to enable educational facilities within the PCA to ensure the wider plan change area can be supported by a school or schools in the future.

Walking and cycling provisions

The Ministry supports the proposed walking and cycling provisions through the PPC area, as they provide safe, efficient links in and throughout the area. Quality pedestrian and cycle connections to schools and through neighbourhoods have health and safety benefits for children and reduce traffic generation at pick up and drop off times. All future schools should be well serviced by safe and accessible pedestrian and cycling links and it is considered that the proposed provisions would require adequate consideration of walking and cycling provisions.

This includes connections back to the existing Beachlands area, to ensure that the site covered by the PCA is well integrated into the existing urban structure. The Ministry requests that the applicant ensure these linkages can be secured (including land acquisition and / or easements) and delivered as key transport infrastructure along with the other transport upgrades identified in the plan change.

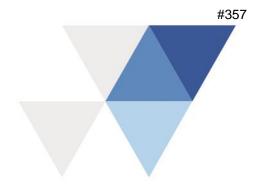
The Ministry's position on the Proposed Plan Change

The Ministry is neutral on the PPC if the provisions outlined below are accepted. The Ministry acknowledges that the PPC will contribute to providing additional housing within the wider Auckland Region. This will, however, require additional capacity in the existing local school network to cater for this growth as the area develops and likely drive the need for a new school(s) in the community.

The Ministry understands that the Council must meet the requirements under the National Policy Statement on Urban Development 2020 (NPS-UD) to provide development capacity for housing and business. The Ministry wishes to highlight that Policy 10 of the NPS-UD states that local authorities should engage with providers of development infrastructure and additional infrastructure (schools are considered additional infrastructure) to achieve integrated land use and infrastructure planning. In addition to this, subpart 3.5 of the NPS-UD states that local authorities must be satisfied that the additional infrastructure to service the development capacity is likely to be available.

Growth as a result of the PPC and wider urban growth will require careful planning and communication between the Applicant, Auckland Council and the Ministry to meet community demand for educational





facilities. The Ministry's requested relief will ensure a school (or schools) can be located in an appropriate site that can service the residential catchments and be connected to the town centres.

The Ministry therefore has an ongoing interest in:

- How development is planned and sequenced, particularly in terms of infrastructure provision such as roading as this will impact where and when schools can be established.
- Ensuring the relevant Precinct provisions specifically acknowledge and provide for schools. This
 is critical given schools are an essential piece of social and community infrastructure. An absence
 of supportive provisions can place obstacles in the way of the establishment of education facilities
 in future years.
- How safe walking and cycling infrastructure will be planned and delivered.
- The urban form and amenity provided through connectivity and usable areas of public open space.

The Ministry broadly supports provisions in the plan change that seek to put in place a framework that will deliver integrated communities with a street and block pattern that supports the concepts of liveable, walkable and connected neighbourhoods. This includes a transport network that is easy and safe to use for pedestrians and cyclists and is well connected to public transport, shops, schools, employment, open spaces and other amenities.

Decision sought

Overall, the Ministry is neutral on the PPC in its current form if the following relief and consequential amendments can be accepted.

357.1

The Ministry's requested relief on PC88 is outlined in Appendix 1 to this submission. The Ministry's requested amendments are shown in red. Additions are shown as <u>underlined</u> and deletions as <u>strikeouts</u>.

Given the level of increase in housing provision in Beachlands as a result of this PPC, the Ministry requests regularly engagement with Auckland Council and the Applicant to keep up to date with the housing typologies being proposed, staging and timing of this development so that the potential impact of the plan change on the local school network can be planned for. The key Ministry contact email is Resource.Management@education.govt.nz

357.2

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

Krupa Patel

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

Date: 10 March 2023

357.3

357.4

357.5

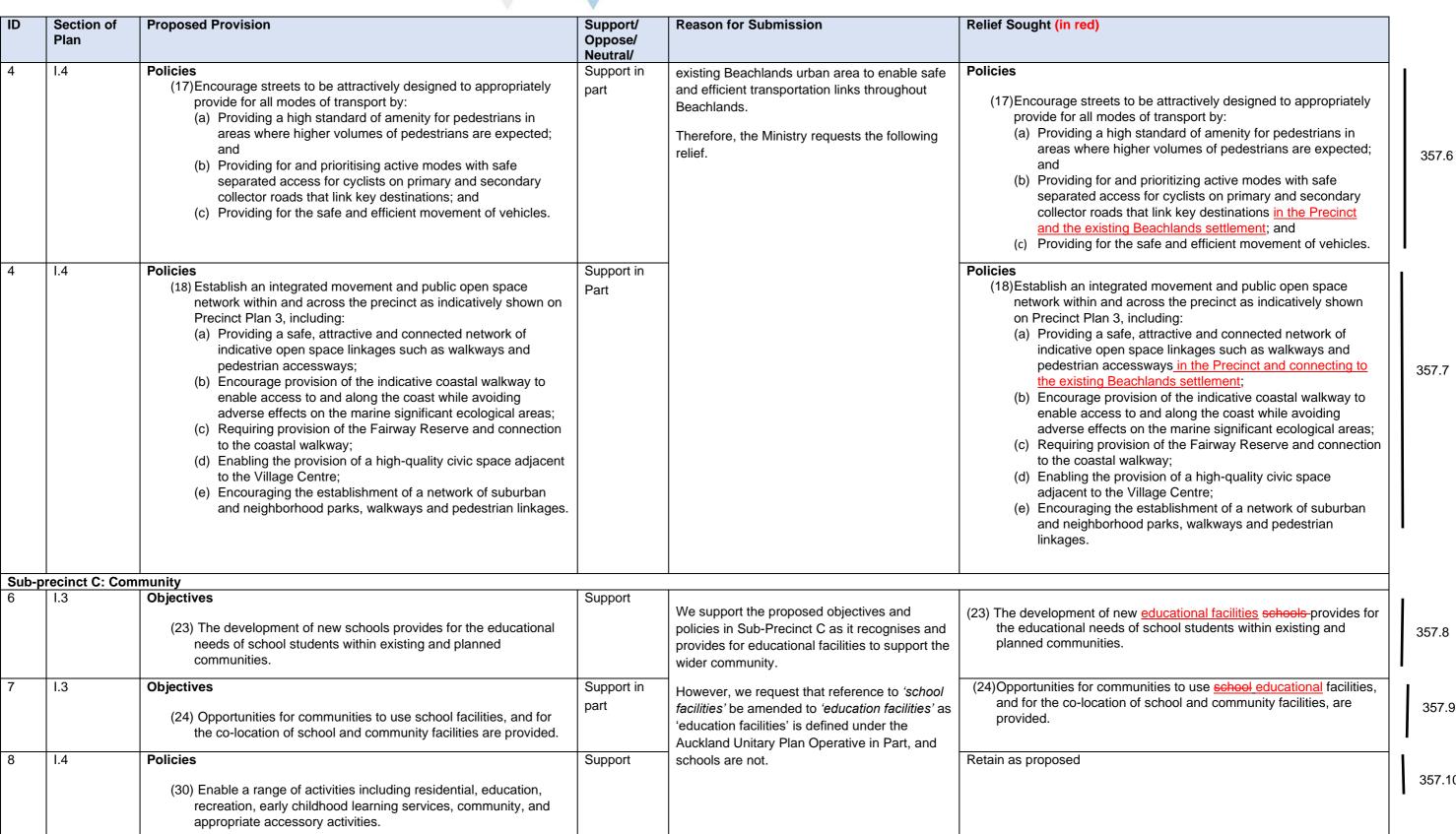




Appendix 1- The Ministry of Education's requested relief on Plan Change 88

ID	Section of Plan	Proposed Provision	Support/ Oppose/ Neutral/	Reason for Submission	Relief Sought (in red)
Preci	nct-wide				
1	1.3.	(3) Beachlands South is a vibrant coastal town that provides for the social and economic needs of the wider Beachlands community with a mix of experiences for all people including residential, retail, community, recreation and employment activities.	Support in part	Council has an obligation under the NPS-UD to ensure sufficient 'additional infrastructure' (which includes educational facilities) is provided in development, and local authorities must be satisfied that additional infrastructure to service the development capacity is likely to be available (see Policy 10 and 3.5 of Subpart 1 of Part 3: Implementation, in particular).	(3) Beachlands South is a vibrant coastal town that provides for the social and economic needs of the wider Beachlands community with a mix of experiences for all people including residential, retail, community, recreation, and employment and education.
2	1.3.	Objectives (9) Beachlands South is a walkable coastal town with a street-based environment that positively contributes to pedestrian amenity, safety and convenience for all active modes. Beachlands South develops and functions in a way that: (a) Results in a significant mode shift to public and active modes of transport including walking and cycling; (b) Provides safe and effective active mode movement between focal points of commercial activity, community facilities, housing, jobs, open spaces and the Pine Harbour Ferry Terminal; and (c) Integrates with, and minimises adverse effects on the safety and efficiency of, the surrounding transport network, including any upgrades to the surrounding network	Support in part	Educational facilities should therefore be enabled in the PPC to service the growth that the plan change will enable. Educational facilities have been provided for under Sub-Precinct C, but the Ministry has not undertaken a detailed site selection investigations to confirm the precise location, the logic of this provision is acknowledged. The Ministry requests educational facilities be included within the precinct wide Objectives to recognise the importance of educational facilities to the functioning of the PPC area. Therefore, the Ministry request the following relief.	Objectives (9) Beachlands South is a walkable coastal town with a street-based environment that positively contributes to pedestrian amenity, safety and convenience for all active modes. Beachlands South develops and functions in a way that: a) Results in a significant mode shift to public and active modes of transport including walking and cycling; b) Provides safe and effective active mode movement between focal points of commercial activity, community facilities, educational facilities, housing, jobs, open spaces and the Pine Harbour Ferry Terminal; and c) Integrates with, and minimises adverse effects on the safety and efficiency of, the surrounding transport network, including any upgrades to the surrounding network.
3	1.4	Policies Transport, Infrastructure and Staging (12) Promote a mode shift to public transport and active modes by: (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 (b) Encouraging streets to be designed to provide safe separated access for cyclists on collector roads.	Support in part	The provisions align with the concepts of a liveable, walkable, safe and connected neighbourhood through supporting public transport, walking and cycling networks. This is particularly vital for providing safe access to a range of activities, including educational facilities in the area. As the PCA is on the outskirts of the Beachlands settlement it is important for the proposed public transport, walking and cycling networks within the PCA to connect to the	Policies Transport, Infrastructure and Staging (12)Promote a mode shift to public transport and active modes by: (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 (b) Encouraging streets to be designed to provide safe separated access for cyclists on collector roads. (c) Ensuring connections and linkages are effectively integrated within the Precinct and into the existing Beachlands settlement.

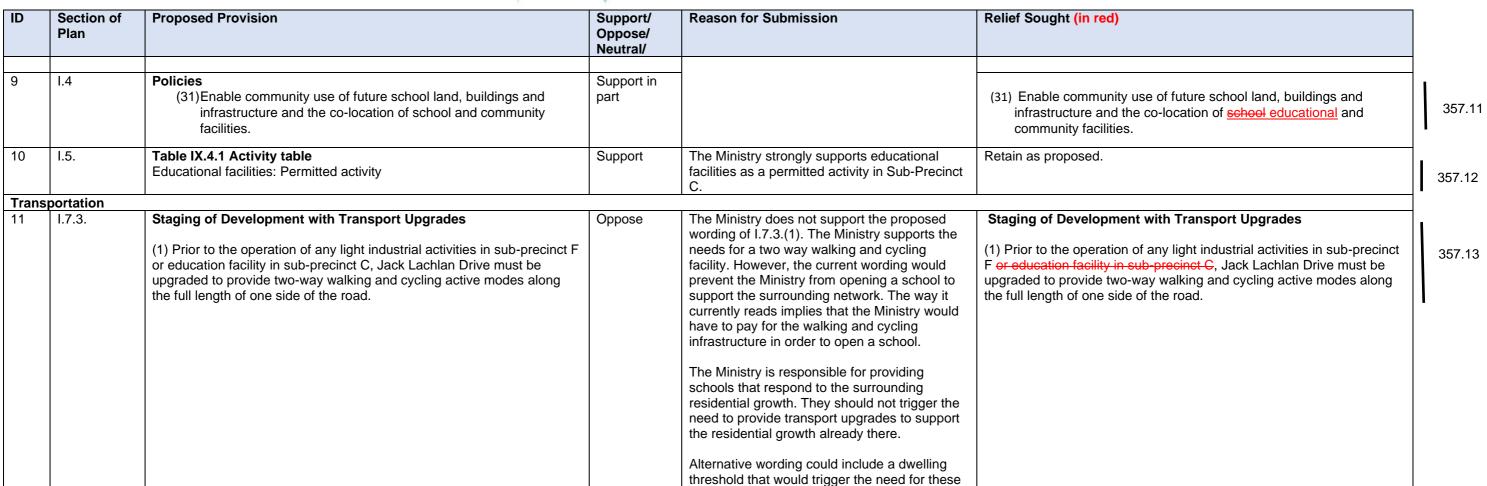




357.9

357.10





have been built.

upgrades once a certain amount of dwelling

357.12

357.13

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

FORM 5

amended and the reasons for your views)



Page 1 of 2

Send your submission to unitaryplan@a	For office use only							
Attn: Planning Technician		Submission No:						
Auckland Council		Receipt Date:						
Level 24, 135 Albert Street Private Bag 92300								
Auckland 1142								
Culomitton dotaile								
Submitter details Full Name of Name of Agent (if applie	abla							
Full Name or Name of Agent (if applic	•							
Name) Shane Hetherington Organisation Name (if submission is made on behalf of Organisation)								
84 Serona Vien F	trenne, Beachland	U 2018						
	,							
Telephone: 02/2665544	Fax/Email: S.r.heth	ingtona hormail. (o. NE						
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 subm	niccion rolatos to aro:							
(Please identify the specific parts of the								
Plan provision(s)								
Or								
Property Address Blackands &	onthe PC 88 Whitford	- Maraela Road. B'chlad						
Or Map								
Or								
Other (specify)								
Submission								

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them

358
of Pie Harbon is a high nie buildings to a balingt be can on a separate sheet if necessary)
nearing
23

I support the specific provisions identified above 🔲					
I oppose the specific provisions identified above					
I wish to have the provisions identified above amended Yes Mo					
The reasons for my views are:					
Roading congestion to a wider area. Draw for ferry at Rice 1.2 m + a 200 seater could not enter marine. High nichtable the skyline. Can only more people on ferry up to a failing times a fregrescy - private maria, (continue on a separa I seek the following decision by Council:	Harbon 5 Rebuildings 1 Linit be catter the sheet if necessary)				
Accept the proposed plan change / variation					
Accept the proposed plan change / variation with amendments as outlined below	<u></u>				
Decline the proposed plan change / variation					
If the proposed plan change / variation is not declined, then amend it as outlined below.					
I wish to be heard in support of my submission					
I do not wish to be heard in support of my submission					
Signature of Submitter (or person authorised to sign on behalf of submitter) General Submitter (or person authorised to sign on behalf of submitter) Date Da					
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, you submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act					
I could /could not gain an advantage in trade competition through this submission.	complete the				
If you <u>could</u> gain an advantage in trade competition through this submission please	complete the				

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

does not relate to trade competition or the effects of trade competition.

adversely affects the environment; and

following:

(a)

(b)

From: Unitary Plan
To: Unitary Plan

Subject: Unitary Plan Publicly Notified Submission - Plan Change 88 - Judith Clarke

Date: Friday, 10 March 2023 4:30:59 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Judith Clarke

Organisation name:

Agent's full name:

Email address: judith@damson.co.nz

Contact phone number: 0278857169

Postal address:

106 Third 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:

Rezoning of 307Ha south of Beachlands Village in the area of Formosa Golf Course from Rural to Future Urban, Residential – Mixed Housing Urban, Business - Local Centre, Business – Light Industry; Business – Mixed Use; and Open Space zones

Property address: All the properties listed

Map or maps: All the maps the submission relates to

Other provisions:

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

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

The reason for my or our views are:

The current population of Beachlands Maraetai is approximately 10,000. We currently have insufficient and substandard infrastructure to cope today. Beachlands South Partnership Limited's (BSPL) proposals do not demonstrate robust and peer reviewed modelling on all the infrastructure issues or offer sufficient infrastructure improvements and contributions to justify significantly increasing the population by developing such a large site.

359.1

Among the many issues I have with their proposals these are the main ones:

- Roads
- Ferries and buses
- Little connectivity to the established Beachlands community

- Provision of school(s)
- Bore water

Roads: BSLP have incorrectly stated that Whitford Maraetai Road 'provides the main vehicular route to / from the Beachlands area'. It is the only route. This road is already heavily used and in a constant state of disrepair. Local commuters have to leave the area before 7am to ensure they can get to work in time. If there is an accident or bad weather Beachlands community and impacted communities along the routes to Whitford, Point View, Howick, Flat Bush, Botany, Pakuranga, Sandstone Road, Murphy's Road, Redoubt Road, Ormiston Town Centre are brought to a halt further increasing commuter times. BSLP have stated they will contribute for an extra lane at Whitford roundabout and a possible roundabout at the top of Jack Lachlan Drive. This will go nowhere near mitigating the further congestion the Beachlands South development will bring. BSPL's proposals use Hobsonville Point as a good comparison with Beachlands. It is not a good comparison as Hobsonville Point is located next to a motorway that quickly disperses their traffic.

359.2

Ferries and Buses: BSPL have made assumptions of how many people would use public transport. Their assumptions do not take into account that the majority of the population do not work in Auckland CBD and our current 739-bus service is not widely used, as it doesn't go to places people want to go, and where it does go it takes so long. BSPL have also advised they propose a larger ferry terminal, but this is not within their gift.

359.3

Little connectivity to the established Beachlands community: based on the maps provided the Formosa development will sit in isolation with little or no connectivity to the rest of Beachlands, particularly active transport options of footpaths, and cycle ways. No connections or extensions to Pohutukawa Coast Trails are proposed. People will need to use their cars to access the wider Beachlands community and facilities.

359.4

School: BSPL communications have misrepresented that they can provide a school. This is not with their gift and recent information received by the community from the Ministry of Education is that the provision of a school will not be reviewed until 2030. Local families with young children have been lead to believe by BSPL that a new school will arrive in the next few years but in reality they will not see any progress on the Ministry of Education even considering building a school for at least the next 10 years.

359.5

Bore water: BSPL are in discussion with Pine Harbour about a bore water supply. The residents that are currently supplied by this bore do not consider the water potable. It is brown, mainly due to iron deposits, and destroys plumbing fittings and appliances. This is the reason that our local Countdown sells so much plastic bottled water, which does not meet any sustainability requirements now or into the future.

BSPL have stated in their public meetings that they are able to solve our current problems of already congested roads, the need for more ferry services and a secondary school but these areas are not in their remit and will be reliant on Auckland Council, Auckland Transport, Watercare and the Ministry of Education to make significant investment and ongoing contribution to our local area. This infrastructure is needed now not after the event once the population has doubled.

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? Yes

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

Declaration

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

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

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

Yes

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

Have your say on Auckland Council's annual budget 2023 and 2024.	

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From: Unitary Plan
To: Unitary Plan

Subject: Unitary Plan Publicly Notified Submission - Plan Change 88 - Lisa Prinsloo

Date: Friday, 10 March 2023 5:16:25 pm

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Lisa Prinsloo

Organisation name: N/A

Agent's full name: N/A

Email address: lisabutchers@gmail.com

Contact phone number:

Postal address: 18B Cadwil Drive Beachlands Auckland 2018

Submission details

This is a submission to:

Plan change number: Plan Change 88

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

My submission relates to

Rule or rules:

PC 88 Beachlands South

Property address: Rydges Formosa Golf Resort, 110 Jack Lachlan Drive, Beachlands 2571

Map or maps: The development as a whole

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:

I am not opposed to more cafe's and restaurants however I am opposed to the proposal. I believe that there are too many properties in the development. I am not happy with the apartments - they are ugly and remind me of the tower blocks in the UK. They do not fit with the residential properties in the area which are mostly single level homes with grey (not brown) exteriors and tiles. I am also very concerned around the infrastructure as it does not currently support this development. The roads are dreadful now and the traffic is congested now at peak travel times. What will it be like with this development. What will be done to improve this - my understanding from reading this is nothing! The ferries are already struggling to deliver on their service and will are frequently at full capacity now. Will you invest in bigger and more frequent reliable ferries? We need a high school now. Our kids are at risk every day now as they travel the road in to Howick on crowded buses having to stand up on dangerous roads. I am still unclear if this is happening. My understanding is this decision sits with Auckland Council not the developer. Is this just about money - you need to consider the impact this will have on the current and future community. I am not opposed to

360.2

360.1

development but this needs to be looked at again with the community in mind not just \$\$\$\$

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

Submission date: 10 March 2023

Attend a hearing

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

Declaration

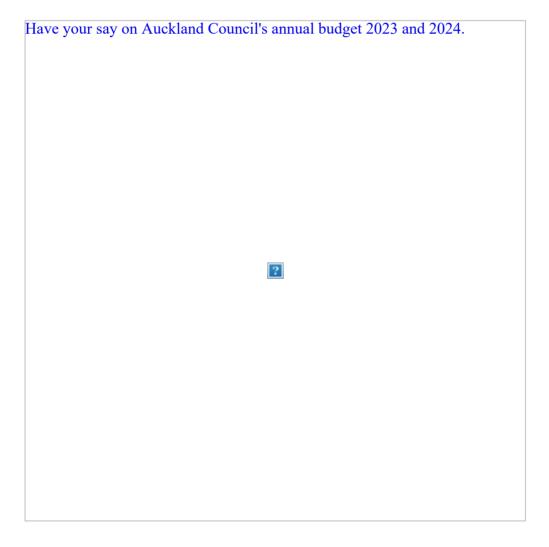
Could you gain an advantage in trade competition through this submission? No

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

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

Yes

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



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