

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Barbara Emerson  
**Date:** Friday, 10 March 2023 5:45:58 pm

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The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Barbara Emerson

Organisation name:

Agent's full name:

Email address: [barbamag@gmail.com](mailto:barbamag@gmail.com)

Contact phone number:

Postal address:  
10 Flaxfield Lane  
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:  
Beachlands South transport / infrastructure

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

Lack of supporting infrastructure development to sustain the growing population.  
Proposed upgrades to Whitford-Marataei road are minimal and will not offset the increased traffic on what is already a busy road.

361.1

Lack of corresponding support in establishing much needed educational facilities is also concerning with increasing numbers of secondary school children required to leave the area for schooling.

361.2

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

Details of amendments: Upgraded roading Whitford roundabout to Beachlands roundabout, investment/development of secondary school

Submission date: 10 March 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Greg and Sarah McKenzie  
**Date:** Friday, 10 March 2023 6:01:00 pm

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The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Greg and Sarah McKenzie

Organisation name:

Agent's full name: Meg Sarah McKenzie

Email address: gandsmckenzie@outlook.com

Contact phone number:

Postal address:  
gandsmckenzie@outlook.com  
Whitford  
Auckland 2571

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

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

**My submission relates to**

Rule or rules:  
The plan to build 3,000 homes in Beachlands South.

Property address: Beachlands South Development

Map or maps: Formosa Golf Course

Other provisions:  
The plan to build 3,000 homes in Beachlands South.

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:

We are very concerned with the growing population in the area and roads remaining unchanged. It is horrendous in the mornings and afternoons in rush hour traffic trying to get from Clifton Road out onto the main Whitford-Maraetai Road and through the Whitford Gorge. With school buses by the dozen travelling to and from Beachlands-Maraetai-Whitford it shows the number of College children that are travelling outside the area. Buses are full and a lot of children are standing in aisles. With a growing number of teenagers on our roads it is a very real concern for us and our children. Please look at the infrastructure and schooling in the area PRIOR to approving PC88 Beachlands South. We understand that development is all part of life and we have to accept that, but doing nothing to support it in the way of roading and schooling not to mention wastewater, is not supporting the population that already live here. Please understand this is only coming from a place of concern for our children growing up and raising their own families and the amount of traffic on our roads on a daily basis. This Development cannot go ahead unless this is all taken into

362.1

consideration. Thank you for your time.

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

Details of amendments: Improve infrastructure (ROADING A HUGE ISSUE) and build a College on the Pohutukawa Coast

362.2

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Eoin Emerson  
**Date:** Friday, 10 March 2023 6:01:06 pm

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The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Eoin Emerson

Organisation name:

Agent's full name:

Email address: emersoneoin@hotmail.com

Contact phone number:

Postal address:  
10 Flaxfield Lane  
Beachlands  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

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

**My submission relates to**

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

Property address: PC 88 (Private): Beachlands South

Map or maps:

Other provisions:  
This private plan change seeks to rezone approximately 307 hectares of land south of the Beachlands township. This includes the properties at 110 Jack Lachlan Drive; and 620, 680, 682, 702, 712, 722, 732, 740, 746, 758 and 770 Whitford-Maraetai Road, Beachlands.

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:  
Insufficient road infrastructure to handle traffic.

363.1

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

Submission date: 10 March 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Ngaire McLeod  
**Date:** Friday, 10 March 2023 6:16:00 pm

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The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Ngaire McLeod

Organisation name:

Agent's full name:

Email address: [ngairemcleodnz@gmail.com](mailto:ngairemcleodnz@gmail.com)

Contact phone number:

Postal address:

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:  
Plan change 88

Property address: Formosa

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

There is not enough infrastructure to support the current population.  
This development at Formosa will make it even worse.

| 364.1

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

Submission date: 10 March 2023

**Attend a hearing**

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

**Declaration**



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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Craig Paddison  
**Date:** Friday, 10 March 2023 8:15:59 pm

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The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Craig Paddison

Organisation name:

Agent's full name:

Email address: cpaddison31@gmail.com

Contact phone number:

Postal address:  
425 Clifton Road  
Whitford  
Auckland 2571

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

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

**My submission relates to**

Rule or rules:

- rezone the northern portion of the land (159.54 hectares) from Rural – Countryside Living zone to a mixture of Future Urban, Residential – Mixed Housing Urban, Business - Local Centre, Business – Light Industry; Business – Mixed Use; and Open Space zones

- rezone the southern portion (147.58 hectares) from Rural – Countryside Living zone to Future Urban Zone, requiring a future plan change to zone the land for development

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

Regarding the Beachlands South proposed zoning change and subdivision plan I am writing to voice my concerns for a number of reasons.

As a Whitford community member, civil engineer and private property developer who has worked on a number of significant infrastructure project in Auckland I am deeply concerned the same mistakes will be made in this intensification project as with many disconnected intensification project have in the past.

Given Auckland has one of if not the most spread-out population densities in the world (population density per km2) we continually make the same mistakes of building communities which are disconnected from the facilities people rely upon for essentials (business opportunities, shopping centers, airports to name a few).

The proposed Beachlands South zoning change would result in the same disappointing outcome.

Having worked on many large scale infrastructure project in Auckland over the past 15 years I understand the difficulty, disruption to communities and cost associated with building essential infrastructure to late and after intensification has already occurred.

365.1

Unless the surrounding roading network is significantly upgraded before any residential development starts, I believe the same issues will occur.

The roading network which feeds Beachlands, Maraetai & Whitford is already under significant strain in terms of failing pavements and congestion especially at peak times would only get significantly worse if the proposed zoning change was approved and the size & population of Beachlands doubles.

Basing assumptions that 80% of commuters will use public transport from Beachlands & Maraetai is flawed and unrealistic given the current statistics.

Whilst I am pro-development given it is my profession, focus needs to be on intensifying central city areas and neighborhoods which are already strategically positions around business hubs, major public transport links and shopping districts. This is the only solutions to Auckland housing, commuting & public transport problems. Aucklands' track record has proven public transport is very low on peoples priorities which is largely linked to the long commuting times and unreliable services. Given our population density is so low it is impossible for this mindset and people's reliance on private vehicles to change.

Upgrading the pine harbor ferry service is not the solution, at best it will only ever be able to service a small number of destinations which won't satisfy the majority of residents.

365.2

Build it and they will come, however without being proactive the same issues that have plagued Auckland for decades will continue to get worse at the expense of all tax payers. Auckland Council and Governments of the day have a proven track records of committing to infrastructure projects and then delaying or scrapping these all together.

Building 3000-4000 new dwellings would also have a significant effect on the surrounding environmental and the construction will almost certainly accelerate the concerning decline and loss of biodiversity on the surrounding coastline.

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

Submission date: 10 March 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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



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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Sonia Ray  
**Date:** Friday, 10 March 2023 8:31:05 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Sonia Ray  
Organisation name:  
Agent's full name:  
Email address: soniaray15@gmail.com  
Contact phone number:  
Postal address:

**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:  
Plan provision(s): Rezoning of 307Ha south of Beachlands Village in the area of Formosa Golf Course from rural to future urban residential

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

I firmly oppose rezoning to future urban residential as the infrastructure to support that simply isn't in place.

In the Beachlands South proposal, there is no provision to upgrade the Whitford Maraetai Road. This road is already congested in peak travel times and seems unable to cope with the volume of traffic currently using it, judging by the reoccurrence of potholes that constantly appear. These potholes cause damage to vehicles and are dangerous for cyclists and motorcyclists. This proposal will effectively double the number of vehicles using the road and will make it extremely dangerous for vehicles trying to pull out into traffic on the road (from both side roads and private properties), and also when they slow down to pull back into the same roads and properties. I have witnessed a few incidents over the past few months when travelling from Whitford towards Maraetai in a long line of traffic with a car stopped to turn right into Waikopua Road. The concertina effect means each car has to brake harder than the one before it, and I have seen some vehicles needing to brake

366.1

very hard to pull up in time. I have grave concerns about this particular spot and believe it is just a matter of time before there will be a serious accident or even death.

Another example of infrastructure that will not cope with this proposal is the regular power cuts in the area due to a transformer constantly blowing. These things need to be addressed before any such proposal is even considered! Residents are constantly being affected, with appliances being damaged, and even local businesses having to close when these power cuts occur.

366.2

I think there should be no high density allowed in our area. We are a coastal community and most people have chosen to live here for a quiet lifestyle and don't want 5-7 storey buildings in our area. Those high density housing options would be much better suited to areas close to public transport. The developer has no agreements in place with Auckland Transport or the Pine Harbour Marina about increased services, so this high density will bring a huge increase of cars on the road.

366.3

366.1

I cannot see how this proposal benefits this community whatsoever. It would only be of benefit if the developer was funding the Whitford Maraetai Road to be expanded to four lanes, if there was a guarantee that the power and water infrastructure was put in place before any proposal was agreed upon (particularly ensuring there would be no negative environmental effect with wastewater), and there was a commitment from Ministry of Education and a timeline of when a secondary school will be built. I believe the proposal should be amended to a majority of low density housing, with some medium density.

366.1

366.4

366.2

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

Details of amendments: Developer must fund the expansion of Whitford Maraetai Road to four lanes, removal of high density housing in the plan.

Submission date: 10 March 2023

**Attend a hearing**

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

**Declaration**

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

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

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

No

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

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



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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Viktoria Hilary Jowers-Wilding  
**Date:** Friday, 10 March 2023 8:46:08 pm  
**Attachments:** [Policy-Highlights-Rethinking-Urban-Sprawl.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Viktoria Hilary Jowers-Wilding

Organisation name:

Agent's full name: Viktoria Hilary Jowers-Wilding

Email address: cadibel1@gmail.com

Contact phone number: 0212177601

Postal address:  
27 Te Puru Drive  
Maraetai  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

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

**My submission relates to**

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

Property address: Beachlands south

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

The road simply isn't suitable for the volume of traffic this development will generate. I travelled the road at 11.30am today - a time when you would think would be quiet - and there was a steady stream of traffic. From about 4pm in the afternoon, the traffic is all backed up the hill before Whitford roundabout and it can take 30 minutes to get through now. With all these extra cars on the road, a 20 minute drive to/from Botany could be up to an hour and a half.

367.1

Furthermore, the developer have put in no provision for the road development. Saying that infrastructure comes after is short-sighted and a way of escaping from their obligations. This development is all about making money with no care for the community or natural environment. There is no kaitiakitanga at all in their plans - or manaakitanga.

367.2



Look at the pdf I have uploaded to support my objection to this urban sprawl: on p12 it says:

Shift the cost of infrastructure provision to developers  
Incentivising developers to cover the cost of providing roads, public transport, water and sanitation in sprawling areas could be effective in curbing sprawl. Such measures would allow housing prices in sprawling areas to better reflect the social cost of urban sprawl.

367.3

Please look at p3, p10 and p11 in particular.

Auckland's development is inevitable but there are many sites already within urban already which are ready for redevelopment. Allowing urban sprawl to destroy green spaces for easy money is unethical and Auckland's footprint will become unwieldy, with empty central spaces and dormitory suburbs, as well as a nightmare traffic commuting problem.

Changes I believe should be made:

1. The development is too large for the local environment to sustain and should be reduced considerably.
2. Roads will need to be upgraded and widened to cope with the volume of traffic. Unfortunately, the planned Whitford bypass, which would have alleviated some of these problems, has been built on - with houses!
3. The road from Botany should have a weight limit imposed on it and all construction traffic forced to travel down Sandstone Road (which also has been waiting 2 years to be fixed!) The Mangemangeroa Bridge is not safe with lots of heavy traffic and needs to be off limits for these heavy construction trucks.

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

Details of amendments: 1. Reduce the size of the development. 2. Ban heavy vehicles, including those involved in building from Botany to the Whitford Roundabout. 3. Insist the developers include some provision for the upgrade of the road.

Submission date: 10 March 2023

Supporting documents  
Policy-Highlights-Rethinking-Urban-Sprawl.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.

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



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# Rethinking Urban Sprawl: Moving Towards Sustainable Cities

**POLICY HIGHLIGHTS**



# Rethinking Urban Sprawl: Moving Towards Sustainable Cities



*How cities develop in the years to come will determine progress on addressing key environmental, economic and social challenges, including climate change and access to affordable housing. This report provides an important step towards assessing the state and implications of urban growth patterns and identifies policies to steer cities towards inclusive and green growth.*

Angel Gurría, OECD Secretary-General



## **Key Messages:**

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- **Urban sprawl, a particular form of urban development, is a driver of several major challenges facing cities. These challenges include greenhouse gas emissions, air pollution, road congestion and lack of affordable housing.**
- **Urban sprawl is a complex phenomenon, which goes beyond average population density. Its different dimensions reflect how population density is distributed across urban space and how fragmented urban land is.**
- **In most of the 29 OECD countries examined, cities have become more fragmented since 1990 and the share of land allocated to very low density areas has increased. While urban areas have become denser on average, today 60% of urban space is sparsely populated.**
- **Urban form is generally evolving in a way that induces higher car dependency and longer commuting distances. Such a development pattern implies more traffic jams, higher greenhouse gas emissions and more air pollution. It also substantially increases the per-user costs of providing public services that are key for well-being, such as water, energy, sanitation and public transport.**
- **Coherent and targeted policy action is urgently needed from different levels of government to steer urban development towards more sustainable pathways. This is also pivotal for achieving the goals of the Paris Climate Agreement and the UN Sustainable Development Goals.**
- **Policy action should focus on appropriately pricing car travel and parking, as well as investing in infrastructure for public and non-motorised transport. Parallel efforts are required to reform land-use policies which fuel urban sprawl. Policy makers should reconsider maximum density restrictions, revisit the design of urban containment policies and develop new market-based instruments to promote densification where it is most needed.**
- **With 7 in 10 people forecast to live in cities by 2050, we must act today to build better cities for better lives.**

# 1 Contribution of this report

## 22%

Between 1990 and 2014 the **total population of urban areas** included in the study increased by 22.4%

## 28%

Between 1990 and 2014 the **total artificial land in urban areas** included in the study increased by 27.7%.

The report contributes to a better understanding of urban development patterns in a number of novel ways. It provides:

- An operational definition of urban sprawl which disentangles the phenomenon from its causes and consequences.
- Seven indicators of urban sprawl, computed for more than 1100 urban areas in 29 OECD countries and for three time points: 1990, 2000 and 2014.
- A detailed assessment of the causes and consequences of urban sprawl.
- A menu of policy options grounded in the theoretical and empirical literature to shift urban development towards more sustainable trajectories.

This enables:

- Monitoring the evolution of urban sprawl over time and space.
- Retrospective analysis of the causes and effects of different dimensions of urban sprawl in a country-specific, cross-country or cross-city context.
- More informed decisions about whether policy action is needed to steer cities towards economic growth, environmental sustainability and social inclusion.

# 2 Measuring urban sprawl

Urban sprawl is an elusive concept. The report defines sprawl as an urban development pattern characterised by low population density that can manifest itself in multiple ways.

The different dimensions of urban sprawl are measured by the seven indicators described in Table 1.

Urban sprawl may even exist in urban areas where average population density is relatively high, if those areas contain large amounts of land where density is very low.

The phenomenon is also manifested in development that is discontinuous, scattered and decentralised, for instance in cities where a substantial part of the population lives in a large number of unconnected pieces of urban land.

Table 1. **Seven indicators of urban sprawl**

Indicator	Description
Average urban population density	The average number of inhabitants in a km <sup>2</sup> of land of an urban area.
Population-to-density allocation	The share of population living in areas where population density is below a certain threshold (e.g. 1 500 inhabitants/km <sup>2</sup> ).
Land-to-density allocation	The share of urban footprint of areas where population density lies below a certain threshold (e.g. 1 500 inhabitants/km <sup>2</sup> ).
Variation of urban population density	The degree to which population density varies across the city.
Fragmentation	The number fragments of urban fabric per km <sup>2</sup> of built-up area.
Polycentricity	The number of high-density peaks in an urban area.
Decentralisation	The percentage of population residing outside the high-density peaks of an urban area.

# 3 Have cities in OECD countries been sprawling?

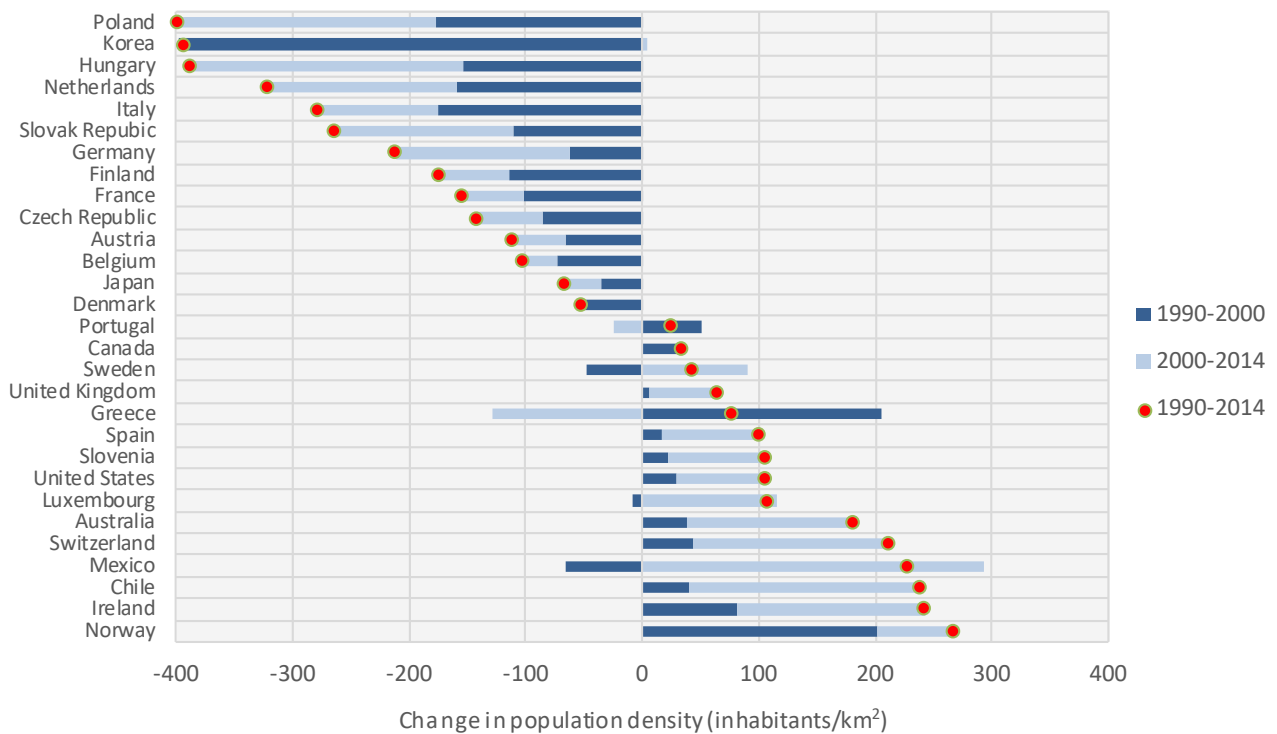


Cities in most of the 29 OECD countries included in the study are increasingly fragmented and more people are moving to the suburbs where density is low. While average urban population density has declined in 14 of the examined countries, fragmentation of urban land has increased in 18 and the share of urban land containing areas of very low density levels has grown in 20 countries.

- In certain countries, such as Greece, Ireland, Spain, Sweden and the United Kingdom, the growth in the percentage of urban land containing areas of very low density has been accompanied by increases in average urban population density. This means that in several urban areas of these countries, suburbanisation co-exists with densification.
- Urban areas in other countries, such as Austria, Canada, Slovenia and the United States, rank relatively high in multiple dimensions of sprawl. This implies that it may be worth monitoring urban development patterns more closely in these countries.
- Closer monitoring may also be justified in cities in Denmark, France and several Central European countries, such as Czech Republic, Hungary, Poland and Slovak Republic, as in the period 1990-2014 they have sprawled along most of the dimensions examined in the report.

Figure 1. **Cities have become less dense in some OECD countries and more dense in others**

Notes: Red dots represent the total change in average urban population density in the period 1990-2014. The bars decompose the total change into changes occurring during the periods 1990-2000 (darker blue) and 2000-2014 (lighter blue).

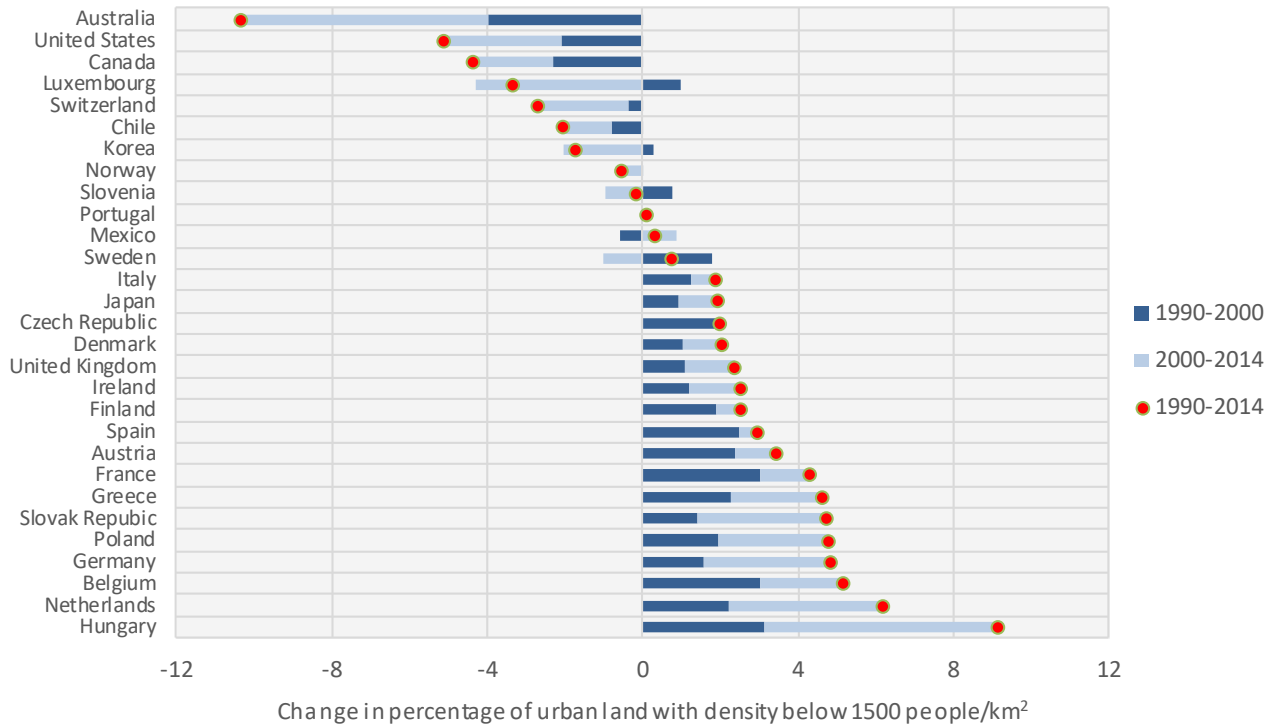


Source: Own calculations, based on GHS built-area data (Pesaresi et al., 2015), GHS population data (European Commission, Joint Research Centre (JRC) and Columbia University, Center for International Earth Science Information Network - CIESIN, 2015) and FUA delimitations (OECD, 2012).



Figure 2. **The share of urban land allocated to low population density areas has grown**

Notes: Red dots represent the total change in the share of urban footprint with density of 150-1500 inhabitants/km<sup>2</sup> in the period 1990-2014. The bars decompose the total change into changes occurring during the periods 1990-2000 (darker blue) and 2000-2014 (lighter blue).



Source: Own calculations, based on GHS built-area data (Pesaresi et al., 2015), GHS population data (European Commission, Joint Research Centre (JRC) and Columbia University, Center for International Earth Science Information Network - CIESIN, 2015) and FUA delimitations (OECD, 2012).



# 4 Comparing urban sprawl indicators across OECD cities



## Portland (Oregon), USA

Portland has a low average population density (706 inhabitants per km<sup>2</sup>) and only 21% of the population reside in areas where population density lies below 1 500 inhabitants per km<sup>2</sup>.

## Ottawa, CANADA

Ottawa is relatively centralised (only 26% of population reside outside high density peaks) but the city's average population density is among the lowest in the OECD (18 inhabitants per km<sup>2</sup>).

## Bergen, NORWAY

In Bergen, a very high share of the population (42%) live in areas where the population density is below 1 500 inhabitants per km<sup>2</sup> but the city is only moderately fragmented (10.5 fragments of urban fabric per km<sup>2</sup>).

## Naples, ITALY

Naples has remarkably low levels of fragmentation (1.6 fragments of urban fabric per km<sup>2</sup>) and has a high population density (2 596 inhabitants per km<sup>2</sup>).

## Santiago, CHILE

Santiago is moderately fragmented (11.5 fragments of urban fabric per km<sup>2</sup>) but the city's population density is among the highest in the OECD (5 730 inhabitants per km<sup>2</sup>).



**Graz, AUSTRIA**

A very high share of the urban area (80%) of Graz has a population density below 1 500 inhabitants per km<sup>2</sup> and the city is highly decentralised (37% of population reside outside high-density peaks).

**Busan, KOREA**

In Busan, only 5% of the population live in areas below 3 500 inhabitants per km<sup>2</sup>. The city's average population density is the third highest observed (8 888 inhabitants per km<sup>2</sup>).

**Osaka, JAPAN**

Only 20% of Osaka's urban area has density levels below 1 500 inhabitants per km<sup>2</sup>. The city is also among the least fragmented in the OECD (2.4 fragments of urban fabric per km<sup>2</sup>).

**Darwin, AUSTRALIA**

Darwin is among the most fragmented cities in the OECD (27.3 fragments of urban fabric per km<sup>2</sup>). It also has a very low average population density (233 inhabitants per km<sup>2</sup>).

1 156

**CITIES**

*Cities are defined as functional urban areas according to the OECD definition.*

29

**COUNTRIES**

*The dataset spans cities in 29 OECD countries across five continents.*

3

**TIME POINTS**

*Data on urban areas were extracted at three different time points: 1990, 2000, 2014.*

# 5

## Key drivers of urban sprawl

Urban sprawl is driven by demographic, economic, geographic, social and technological factors. These include rising incomes, preferences for living in low-density areas, natural barriers to contiguous urban development and the technological progress in car manufacturing.

Most importantly, sprawl is also policy-driven. Maximum density restrictions, specific zoning regulations, tax systems that are misaligned with the social cost of low-density development, the underpricing of car use externalities and the massive investment in road infrastructure contribute to this phenomenon.

### Preferences for living in low density areas

People often have strong preferences for specific attributes of low density areas. Such attributes include proximity to open spaces and natural amenities, lower noise levels, better air quality, longer exposure to sunlight and better local visibility.

### Land-use regulations

Building height restrictions provide a considerable barrier in the emergence of a compact city, especially when they are too stringent. Urban containment policies, such as urban growth boundaries and greenbelts may appear to contribute to a more compact development pattern. However, they may backfire by causing fragmented, leapfrog development.

### Progress in car manufacturing

Urban sprawl is driven by the technological advances in car manufacturing, as cheaper, faster and more reliable cars have increased the willingness to accept longer commuting distances.

### Low motor fuel taxes

In some OECD countries, motor fuel taxes have been persistently low. Combined with the increasing fuel efficiency of vehicles, the policy has contributed to the emergence of more dispersed development patterns.

### Other policies encouraging car use

Failure to adopt policies that incorporate the social cost of air pollution, climate change and congestion into the private costs of car ownership and use (such as road pricing) may fuel further urban sprawl.

# 6 Consequences of urban sprawl

Urban sprawl has significant environmental, economic and social consequences. It leads to higher emissions from road transport and loss of open space and environmental amenities. It also increases the cost of providing key public services, exerting pressure on local public finance. Finally, it reduces housing affordability as its main drivers limit the supply of housing in key areas.

## Environmental consequences

Sprawled development patterns are characterised by larger distances between residences, jobs and other frequent daily trip destinations. These distances are much more likely to be covered by car, as low density areas are often poorly served by public transport. That translates into more vehicle kilometres travelled, higher air pollution and more greenhouse gas emissions.

A sprawled built environment also implies greater human intervention in a series of key environmental processes, which is likely to affect water quality and increase flood risk.

## Economic and social consequences

Urban sprawl is long known to increase the per-user costs of providing public services of primary importance. Water supply, sanitation, electricity, public transport, waste management, policing and other services that are key for well-being are much more expensive to provide in fragmented areas of low-density. This entails that either the quality of these services will be low or that significant subsidies will be required to cover the costs of provision.

Low-density development contributes to less inclusive cities, as the regulatory mechanisms maintaining it (e.g. building height restrictions) may reduce housing supply, rendering housing less affordable.

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## Did you know?

**Congestion caused 5.5 billion hours of delay in the United States in 2011, a number that corresponds to a total time cost close to 0.9% of the GDP (Schrank et al. 2012).**

# 7 Land use policies as a response to urban sprawl and its consequences

Curbing urban sprawl requires promoting socially desirable levels of population density and reducing urban fragmentation. Reforming land-use regulations and property taxation are key to achieve more sustainable urban development patterns.



## **Relax maximum density restrictions**

Relaxing stringent density regulations will lead to more compact and less car-dependent cities. Such cities could also provide more affordable housing and public services in a cost-effective way.

## **Reform urban containment policies**

Boundaries to urban development may be effective in protecting forestland on the outskirts of cities and designated open space of environmental importance. However, this is not uniformly the case. Existing urban growth boundaries, buffer zones and greenbelts should be periodically reviewed and reformed.

## **Streamline land-use taxation**

Allowing the tax system to account for the social cost of various land uses can promote more desirable development patterns. Removing tax incentives for the development of land on the outskirts of cities can prevent conversion of farmland and forests into urban land.

## **Reform property taxation**

Split rate property taxes, whereby higher tax rates are set on the value of land than on the value of buildings, can promote denser development and give rise to more compact cities.

## **Shift the cost of infrastructure provision to developers**

Incentivising developers to cover the cost of providing roads, public transport, water and sanitation in sprawling areas could be effective in curbing sprawl. Such measures would allow housing prices in sprawling areas to better reflect the social cost of urban sprawl.

# 8

## Transport policies as a response to urban sprawl and its consequences

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Sustainable urban development cannot be achieved without greening urban transport systems and shifting travel demand towards public and non-motorised transport. Several policy changes can lead to less car-dependent cities and mitigate some of the environmental and economic consequences of urban sprawl. Through changing the paradigm of urban mobility, they may also have significant long-term positive effects on the evolution of urban form itself.

### **Introduce road pricing mechanisms**

Streamlined pricing of car use requires that motorists are charged for the negative externalities they cause, such as congestion, greenhouse gas emissions, air pollution and noise. Road pricing is thus key for mitigating the environmental and economic consequences of sprawl in the short run. Permanent road pricing mechanisms may also help control sprawl, as they discourage long distance travel by car. This makes compact development more attractive in the long run.

### **Reform parking policies**

Minimum parking requirements in new developments encourage car ownership and use, as they decrease the total costs of owning a car and making urban car trips. They may also discourage infill development, as they drive up building costs. In many cities, on-street parking charges are too low as they fail to reflect the social cost of parking provision, which includes cruising and loss of open space.

### **Align motor fuel taxes with the external costs of fuel consumption**

Motor fuel taxes are, in many cases, set at relatively low levels, which do not reflect the externalities from fuel consumption. Low motor fuel taxes cause excessive car use and may fuel urban sprawl by promoting a dispersion of jobs, residences and other key points of economic activity. This further increases the importance of setting motor fuel taxes at levels fully accounting for the environmental costs of fuel consumption.

### **Invest in more sustainable forms of transport infrastructure**

Investing less in new urban highways and more in public transport and soft mobility infrastructure, such as cycling paths and pavements, can contribute to reducing car dependency and may deter further urban sprawl.

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The report *Rethinking Urban Sprawl: Moving Towards Sustainable Cities* provides a new perspective to the nature of urban sprawl and its causes and consequences. This perspective, which is based on the multi-dimensionality of urban sprawl, sets the foundations for the construction of new indicators of the phenomenon. The report uses new datasets to compute these indicators for more than 1 100 urban areas in 29 OECD countries over the period 1990-2014. It then relies on cross-city, country-level and cross-country analyses of these indicators to provide insights into the current situation and evolution of urban sprawl. In addition, the report offers a critical assessment of the causes and consequences of the phenomenon and discusses policy options to steer urban development to more sustainable pathways.

For further reading see the following publication on which these Policy Highlights are based:

OECD (2018), *Rethinking Urban Sprawl: Moving Towards Sustainable Cities*, OECD Publishing, Paris.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Beachlands Maraetai Omana Concerned Citizens  
**Date:** Friday, 10 March 2023 9:00:59 pm  
**Attachments:** [BMO submission.pdf](#)

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The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Beachlands Maraetai Omana Concerned Citizens

Organisation name: Beachlands Maraetai Omana Concerned Citizens

Agent's full name:

Email address: middlewichnz@gmail.com

Contact phone number: 021608240

Postal address:  
57 Seventh 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:  
Beachlands South PC88 rezoning application

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:  
Not appropriate for the area in the current developers proposal

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

Details of amendments: Transport, Water, Medical, Other planning considerations

Submission date: 10 March 2023

Supporting documents  
BMO 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

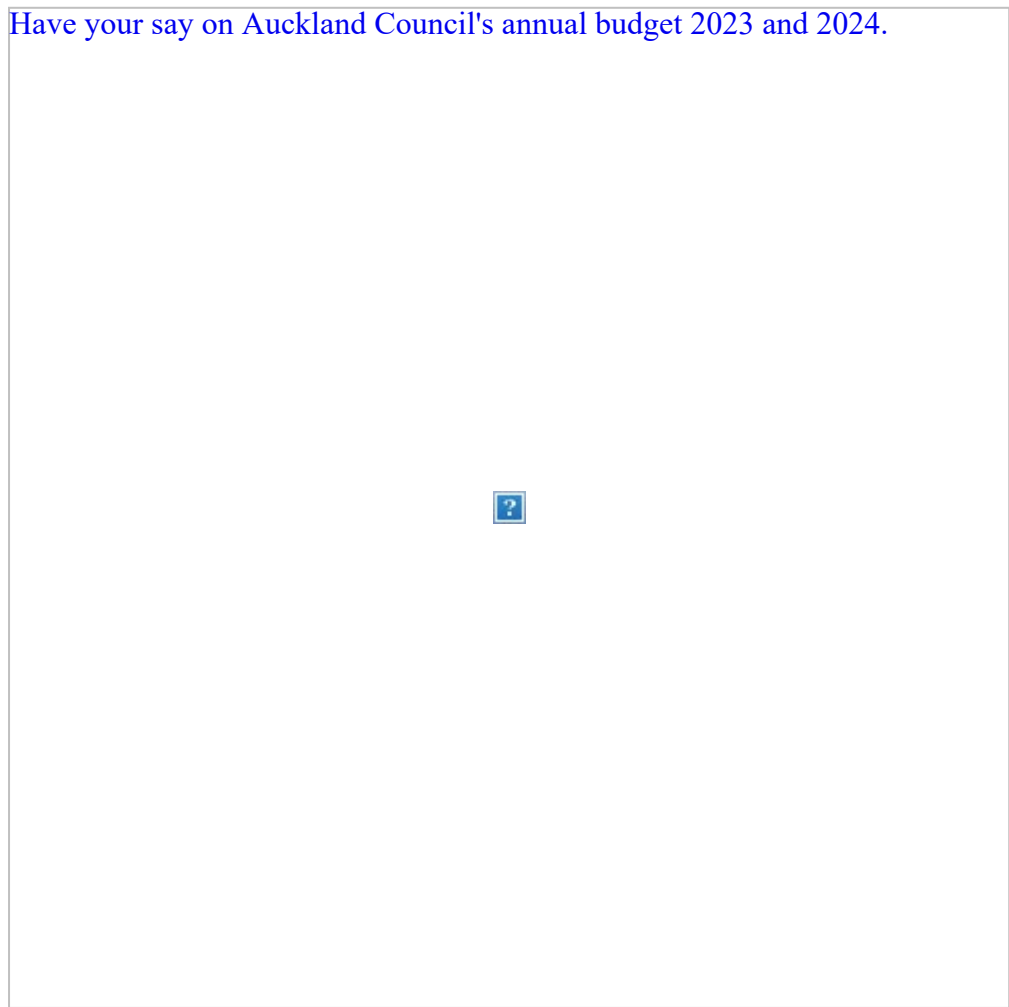
Are you directly affected by an effect of the subject matter of this submission that:

- 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.

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



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### BMO submission PC88-Beachlands - 10<sup>th</sup> March 2023

**Beachlands Maraetai Omana Concerned Residents Group (BMO)** was formed, to generate interest in and invite BMO residents to get involved with and make a submission with respect to the PPC-88 Beachlands South S.32 Request, since its go-ahead could have significant ramifications on everyone living in Beachlands, Maraetai, Omana and other surrounding communities. Membership currently stands at 346 members.

Today is the last day to make submissions and we are aware that many BMO residents and other concerned parties have already made their voice heard in this process by making submissions about the proposal. Some of them will be able to comment with a deep knowledge on the issues that have been thrown up because of this Consultative Process. Others will have more general concerns about how such a development will impact on their daily lives, should it be given the go-ahead.

There are many issues that could be addressed, but probably the most immediate and of greatest concern are those that would affect daily lives:

1. How would such a development affect my daily commute to and from work?
2. What would be the environmental impact of a failure of the proposed on-site wastewater treatment facilities on our coastline and ability to swim in our sea?
3. How would we get our Beachlands kids into primary school and more pertinently, why should Beachlands kids have to travel to Maraetai primary school – whatever happened to young kids being able to walk, cycle and safely scooter unsupervised to school?
4. If we commute by ferry, given the already expensive cost of travel, how will we afford even higher fares, since the ferry operator won't discriminate between current users and newcomer residents?
5. How will I ever get a medical appointment with my GP for my sick kid, when I already have to wait ~7 days for that?
6. How is the power infrastructure going to cope when we already have not infrequent power outages, power poles being knocked down each year as a result of car accidents?

In this submission we will endeavour to comment on several issues that have been brought to our attention.

#### **1. Transport.**

As a general observation **BMO** would draw the Reviewers' attention to the Developer's **Appendix 4 Beachlands South Structure Plan**, which provide information which seriously misrepresents the realities of road travel (*time and distance*) from Beachlands to various destinations – by actual road routes, rather than indicative straight line. For example,

- Botany Town Centre is c. 18km from central Beachlands, not within 10km as

indicated,

- Manukau is c. 22km, not 15km and the
- Panmure major interchange is c. 26km not 13km. (See page 48).

The indicative car transit times (page 51) are similarly understated by ~ 15-25% for standard rush hour journeys in either direction, always assuming there are no traffic hold-ups from road accidents, a not infrequent occurrence.

**BMO** has serious concerns that the Developer’s proposal runs contrary to the fact that as part of the process required to incorporate the Government’s National Policy Statement – Urban Development :

368.2

- i. Auckland Council as part of its **PC78 Planning Intensification** process identified a total of 2,414 sites in Beachlands that were **subject to significant transport infrastructure constraints** that **would not be able to be addressed in the next 10 years.**
- ii. Consequently, Auckland Transport, considered it necessary to register a “**Qualifying Matter**” since it believed that intensification beyond that which could be met by the constrained transport network would generate adverse effects **including:**
  1. *Further exacerbation of the existing accessibility issues* to employment, education, and community services in the local area; and
  2. *without support from sufficient transport infrastructure and significant roading network upgrades, increased traffic congestion and air pollution* as a result on reliance on private vehicle trips.

**2. Bus Service**

- The Bus service 739 is very irregular and many Beachlands residents choose to arrange shuttle buses to ensure timely travel to/from Beachlands or are forced to revert to the car as a more reliable source of transport.
- There is no bus service after 19:00 at Botany terminus, enforcing the requirement for car transport from Beachlands to Botany and beyond for all evening work-related or social activities, unless the weekend ferry is operating for those people city-bound.
- There is no direct public transport link to Howick - the bus trip from Beachlands to Howick via Botany takes over 1hr 15mins compared with a 30-minute run with a car (outside rush hour).
- There is no option for installation of a rapid bus lane on the current Whitford-Maraetai Road or the Whitford Road to Sommerville to enable quicker travel between Beachlands and wider area.
- There are also no plans to increase the frequency of buses and the inclusion of Howick, East Tamaki, Manukau or Auckland Airport as direct routes.

368.3

**3. Ferry**

- There is no evidence that a terminal is planned for the increased number of Pine Harbour (PH) passengers, to offer any shelter from the elements.

368.4

- Accommodating increased car and bicycle parking requirements isn't addressed, but the current arrangements would be inadequate for increased passenger numbers.
- Introducing shuttle buses, as well as increased vehicle movements would be extremely challenging, given the width and condition of the current access road to the carpark.
- Larger ferries would not have the space to manoeuvre in the current marina. The proposal does not address this issue.
- The Developer has orally suggested to BMO representatives that the ferry terminal would be moved to the north-west end of the marina which would mean passengers would have to walk ~10mins from the carpark and must cross through an active marina operating large moving cranes and fork-lift equipment. This would pose an obvious and significant health and safety risk as well as inflict significant disruption upon existing marine haul-out, hull cleaning and re-launching operations.
- Moving the ferry pier to the north-western edge of the marina would also possibly adversely impact on a bird sanctuary.
- The ferry is not a rapid transport mode as the report seems to suggest. Due to the current PH and Auckland Harbour speed restrictions (the former mandated by Maritime NZ – Rules on the Water, the later by Auckland Harbour Board), the suggested time of ~35mins is unlikely to change without a larger impact on CO2 emissions (i.e., faster boat with bigger engines) We understand there are no current plans to electrify the PH ferries.
- There is currently a daily cap on the cost of public transport bus and rail travel within the Auckland area of \$20/day.
- However, Beachlands passengers will currently pay for multi-modal public transport within the Auckland area not only up to \$20 a day but also \$23.20 for the return trip on the PH (PH) ferry. For PH passengers that will be \$43.20 per day if they used additional transport services. To encourage the use of public transport surely the maximum amount paid for public transport on a given day by Auckland residents must be the same across the city irrespective of your starting/finishing point.
- We are concerned that the \$16 million identified by the Developer for financing expansion of the ferry services would likely be wholly inadequate in terms of the relocation costs. The Developer has indicated that it's Development Partner, Crown Infrastructure Partners (CIP) would recover its costs, presumably from the ferry users, by way of a levy. This, on top of an already significant passenger charge would render the option of using a ferry instead of a car too expensive for most users compared to the convenience/relatively cheaper cost of using a car.
- Furthermore, ferry operations remain vulnerable to adverse weather events – high wind, sea state and poor visibility and breakdowns. Cancellation of ferries, which isn't a rare occurrence, could leave ~800-1,000 passengers stranded and unable to either get to work or home via alternative viable public transport means.

368.4  
cont

#### 4. Road

- There is significant concern that installation of a couple of control lights and a dual lane roundabout at Whitford are seriously inadequate to address what are already significant traffic congestion points as these traffic measures will not reduce the number of cars on the road, merely phase their transit.
- This concern has already been recognised by Auckland Transport in it's **PC78 Planning Intensification Evaluation Report**.
- Beachlands is the only area within greater Auckland with a designated Transport Constraint.
- During a recent meeting **BMO** representatives had with the Development group, it was apparent that the developer was still unclear what the solution would be for Jack Lachlan Drive intersection (i.e. signalling or a roundabout).
- It is believed that the Developer's Consultant Stantec has not taken into account the increase in traffic from the ~400 extra houses being built adjacent to the Countdown complex, retirement village and along Jack Lachlan Drive. Also, in a recent meeting the Stantec consultant was unable to state how many cars were forecast to come from the new development in peak hour yet wanted the attendees to believe that current congestion rates would decrease over the coming years.
- Latest census data shows that 30% of car travel is to East Tamaki, Auckland Airport and Penrose. (*Appx 11 Stantec ITA page 18*) None of these areas are easily accessible by public transport. An increasing number of people are commuting to the Waikato region which necessitates a connection to SH1. Connection to SH1 is already difficult when accessing via Redoubt Rd or Takanini, with the planned Mill Lane corridor improvement shelved indefinitely.
- Whitford already has **in excess of 17,000** traffic movements a day at the Whitford roundabout.
- With currently 80% of trips from Beachlands using a car as transport (*Appx 11 Stantec Executive Summary page 4*), an additional 10,000 people in Beachlands South would likely double the traffic on the Whitford-Maraetai Road.
- A doubling of the number of traffic movements would cripple the existing poor transport network.
- Putting the potential situation into context:
  - **30,000 +** daily movements at the Whitford roundabout, the critical pinch point – would mean **~1,250** movements **each hour for 24 hours** of the day.
  - This of course wouldn't occur and realistically you would be looking at **~7,000** vehicles for each morning and peak commuting hour,
  - with efficient traffic flow, control which doesn't exist, that would represent a conservative **116 vehicles navigating the roundabout every minute** or
  - **2 vehicles every second**.

368.5



- **Does that sound realistic or even possible?** And;
- **WHAT ABOUT THE CYCLISTS.** They'd be insane to risk their lives in that environment. How can this fit that into the Government's Net Zero Emissions 2050 strategy?
- Failure to include the construction of the **Whitford Bypass** will condemn commuters to an eternal traffic jam going to and returning from work, and that just starts at Whitford.
- Then there's the knock-on effects of this traffic upon the Sommerville/Howick roundabout and Murphy's Road to contend with, amongst other traffic bottlenecks.
- To put this into context:
  - when a full concrete construction truck "*fell over*" at the Whitford roundabout due to the adverse camber, the road to Beachlands and beyond was closed for a number of hours, to recover the truck and clear the concrete from the road. In that time commuters had to take a 45-50 minute (~40 km) diversion via Clevedon to get home via the coastal road, with heavy traffic precluded from using this route.
  - when a concrete truck toppled over the Mangemangeroa Bridge, traffic was diverted via Sandstone Rd adding an additional ~30mins to the trip. The regular accidents mean the motorists are required to travel via Clevedon and Umupuia causing significant delays.
- And this doesn't even address the fact that the Whitford-Maraetai Road has been constructed to rural standards and literally falls apart every winter, especially after rain.
- Should the development proceed, the road would no doubt also experience the accelerated deterioration witnessed by Brookby Road inflicted by the Brookby Quarry trucks, from the multiple construction trucks to-ing and fro-ing to the Development site.
- Adding the requirement to undertake running repairs to keep the road operational with such significant traffic flows means just one thing.
- ***This Development can't and shouldn't occur until the Whitford Bypass has been constructed.*** This concept is currently unbudgeted and would cost more than \$200 million to introduce.

365.5  
cont

368.5  
cont

**5. General transport observations**

- Beachlands South is a public transport focussed development for high density residential, yet the current roads and future plans for those roads do not include any support for rapid public transport links. Only ~8% of residents in the area work in the central city. With ferries the only other public transport alternative, effective and efficient means of public transport are either non-existent or constrained.
- The **Auckland Plan 2050 Strategic Framework** suggests an integrated transport

365.6

system yet that is not feasible within the current proposal. The **Framework** also suggests:

- access to jobs should improve over time yet has no plans to facilitate that in the Beachlands/Maraetai area.
- the plans show a small area earmarked for light industry yet there are no clear plans what this would look like or how many people this would attract.
- reducing congestion yet has no plans to cater for the increase in traffic not only through Whitford but also through Howick, Ormiston and Manukau and any links to the motorways or rail network.
- increasing the use of public transport, walking or cycling.
  - There are no plans to provide a cycle lane from Beachlands/Maraetai to other areas so how will this be facilitated.
  - Furthermore, given the complexity of the terrain, steep gradients along the whole route and distance involved – the suggestion of cycle ways for commuter transport to Botany, Howick and beyond is not realistic.
  - There is no space for waiting passengers at Pine Harbour, let alone parking for their bikes and cares. Ferries can only accommodate a couple of bikes per trip. Significant and secure bike parking facilities would need to be introduced as well as the possibility to carry extra bikes on the ferries.
- the requirement to lower deaths and injuries from the transport network but has no plans to realise this. Solely introducing further speed reduction measures on a road already operating at or over- capacity cannot be the solution as it goes against other targets such as connectivity to jobs, increased transport choices, lower household transport costs and less congestion. It would also mean more time away from home and family, with associated social pressures.

## 6. Other planning considerations

- There is a substantial Planning and Regulatory framework within which planning decisions are required to be considered.
- Documents such as the:
  - The **National Policy Statement – Urban Development 2020 (NPS-UD)**
  - **Auckland Unitary Plan (Operative in Part) (AUP-OP)**
  - **PPC-78 – Intensification Section 32 and section 77J / 77L new or additional qualifying matter: Infrastructure – Beachlands Transport Constraints Control Evaluation Report**
  - **Regional Policy Statement – including B.2 Tāhuhu whakaruruhau ā-taone (The sheltering ridge pole) Urban Growth and Form**
  - **District and Precinct Plans** - of which **441 Whitford Precinct Plan** addresses and controls the Beachlands area.

- **I403** : Beachlands 1 Precinct Plan
- **Rural Urban Boundary (RUB)** explanatory Fact Sheet
- All these documents, and more, seek to provide the framework within which logical and informed decisions can be made in relation to Requests for Planning Approvals, that respect and satisfy the **Policies** and **Objectives** set out in documents such as the **RPS** and **NPS-UD**.
- We would submit that the Developer’s PPC-88 Request comprehensively fails to satisfy many of those stipulated Policies and Objectives for the following reasons.
  - The **NPS-UD** included the concept of Medium Density Residential Standards (**‘MDRS’**) to enable high density developments adjacent to rapid transit services *“.....any existing or planned frequent, quick, reliable and high-capacity public transport service that operates on a permanent route (road or rail) that is largely separated from other traffic”* .
  - The Beachlands public transport situation clearly doesn’t meet the criterion of a **planned frequent, quick, reliable and high-capacity public transport service** to justify re-zoning to an MDRS environment.
  - Auckland Transport clearly recognised that restricting significant development at Beachlands was:
 

*“necessary to achieve: the overarching objective [Objective 1] of the NPS-UD for well-functioning urban environments which enable people and communities to provide for their social, cultural, economic and environmental wellbeing and health and safety;*
  - *It also clearly fails to satisfy Objective 3 of the NPS-UD which requires that Auckland Council’s Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:*
    - *the area is in or near a centre zone or other area with many employment opportunities*
    - *the area is well-serviced by existing or planned public transport*
    - *there is high demand for housing or for business land in the area, relative to other areas within the urban environment.*
  - The **NPS-UD Objective 8** seeks: *to support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change.* Beachlands is clearly rurally situated, with no meaningful employment opportunities in the township and ~80-85% of commuters driving to work, since public transport doesn’t provide a viable alternative to the multitude of employment destinations that residents commute to.
- The current Auckland Unitary Plan does not include development in the Beachlands area for the next 30 years due to numerous constraints and a qualifying matter that will need addressing prior to any significant development being approved.
- Significant growth is projected along motorway and rail infrastructure of which

368.7

none are present in Beachlands, nor likely to be in the easily foreseeable or distant future.

- Significant infrastructure investment is necessary in the Beachlands area if significant development is to be approved. Auckland Transport has already stated that there are insufficient funds available to consider any works in the Beachlands area for 10-12 years.

368.8

**7. Availability of Water infrastructure**

- Watercare is unable to take waste-water from the new development since its current treatment works at Okaroro Drive is being operated at or near full capacity already.
- **S. 3.5 of the NPS-UD**, requires Auckland Council “.....satisfy itself that the additional infrastructure to service the development capacity **is likely to be available**”.
- Beachlands is a coastal area that would be vulnerable to severe environmental damage should the Developer proposal to treat waste-water on-site prove inadequate. Formosa Golf Club has already been successfully prosecuted for failing to adequately treat its waste-water prior to discharge. Whitford Manor is facing similar difficulties at the moment.
- Leaving the treatment of waste-water to a private entity, from, initially up to 4,000 dwellings and ever more once the requested FUZ land was also developed, is a very high risk strategy.
- For a development of this magnitude, appropriate infrastructure should be in place and controlled by Watercare, with a pipeline over the hill to Mangere. This scenario is not budgeted for by Watercare.

368.9

**8. Medical Services**

- The Beachlands Medical Centre is at capacity, currently short of 2 General Practitioners and has been unable to attract new GPs to join the practice. One aspect of this situation is that, for those residents fortunate enough to be registered with the Practice, it can take a considerable time (5-7 days) to get an appointment to see a GP.
- Since GPs can only effectively provide GP (not emergency) services to a defined number of patients, their lists will be closed to new residents, meaning they will have to seek GP services further afield. This would further add to traffic congestion, increase the timeframe for booking appointments, and have spin-off effects impacting on the communities where neighbouring medical practices are still able to take on new patients.

368.10

**7. Conclusion**

- Beachlands is totally unsuited to become an MDRS /high density residential zone,

at least until adequate infrastructure is in place to support such increased population.

- The absence of critical infrastructure in the Beachlands, Maraetai and Omana area means that approval of this Development would contravene many of the Government's and Auckland Council's Planning Objectives and condemn Beachlands residents to live in a seriously compromised Urban environment – a decision they clearly didn't make when they decided to move out to this beautiful rural/coastal part of Auckland.
- The issues raised in response to this proposal are:
  - Transport, specifically misinformation about road travel
  - Bus and ferry services, and their inadequacy to meet proposed demand
  - Road conditions and constraints
  - Other planning issues – such as failure of Beachlands to meet NPS-UD MDRS criteria
  - Inadequacy of security of proposed water infrastructure arrangements
  - Medical services, or more correctly the future absence of.
- Each of these issues alone should be reason enough for Council to give serious consideration to rejecting this proposal as presented.
- Collectively, they make a very compelling argument that must not be ignored.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - Stephen Jowers-wilding  
**Date:** Friday, 10 March 2023 9:01:09 pm  
**Attachments:** [Policy-Highlights-Rethinking-Urban-Sprawl\\_20230310204944.945.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

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Organisation name:

Agent's full name:

Email address: wilding1967@gmail.com

Contact phone number:

Postal address:  
27 Te Puru Drive  
Maraetai  
Auckland 2018

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 88

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

**My submission relates to**

Rule or rules:

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

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

Road is too busy. Commuting times will become insane with all the extra traffic. And more dangerous. People regularly have accidents on this road and fatalities too. This will increase with more traffic as the road is already struggling to cope with the volume of traffic.

369.1

The housing development must be reduced in size - if not cancelled altogether.

The developers have consistently avoided the question of the road - making comments like 'infrastructure is triggered after development.' This means the bill will become one for the council and the tax payers - while they just make a fast, quick buck.

369.2

If this plan does go ahead, the road MUST be upgraded, and heavy traffic banned from the Botany to Whitford Roundabout as it is just too dangerous - particularly the Mangemangeroa Bridge. there

was already an incident of a cement mixer falling off the bridge! heavy and building traffic should be forced down Sandstone road and a weight limit enforced on the Whitford Road.

Urban sprawl is a negative step in town planning that Auckland city council should be avoiding and instead, regenerating inner city areas.

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

Details of amendments: 1. Reduce the size of the development. 2. Ban heavy vehicles, including those involved in building from Botany to the Whitford Roundabout. 3. Insist the developers include some provision for the upgrade of the road.

Submission date: 10 March 2023

Supporting documents

Policy-Highlights-Rethinking-Urban-Sprawl\_20230310204944.945.pdf

### **Attend a hearing**

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

### **Declaration**

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

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

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

Yes

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

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



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# Rethinking Urban Sprawl: Moving Towards Sustainable Cities

**POLICY HIGHLIGHTS**



# Rethinking Urban Sprawl: Moving Towards Sustainable Cities



*How cities develop in the years to come will determine progress on addressing key environmental, economic and social challenges, including climate change and access to affordable housing. This report provides an important step towards assessing the state and implications of urban growth patterns and identifies policies to steer cities towards inclusive and green growth.*

Angel Gurría, OECD Secretary-General



## ***Key Messages:***

---

- **Urban sprawl, a particular form of urban development, is a driver of several major challenges facing cities. These challenges include greenhouse gas emissions, air pollution, road congestion and lack of affordable housing.**
- **Urban sprawl is a complex phenomenon, which goes beyond average population density. Its different dimensions reflect how population density is distributed across urban space and how fragmented urban land is.**
- **In most of the 29 OECD countries examined, cities have become more fragmented since 1990 and the share of land allocated to very low density areas has increased. While urban areas have become denser on average, today 60% of urban space is sparsely populated.**
- **Urban form is generally evolving in a way that induces higher car dependency and longer commuting distances. Such a development pattern implies more traffic jams, higher greenhouse gas emissions and more air pollution. It also substantially increases the per-user costs of providing public services that are key for well-being, such as water, energy, sanitation and public transport.**
- **Coherent and targeted policy action is urgently needed from different levels of government to steer urban development towards more sustainable pathways. This is also pivotal for achieving the goals of the Paris Climate Agreement and the UN Sustainable Development Goals.**
- **Policy action should focus on appropriately pricing car travel and parking, as well as investing in infrastructure for public and non-motorised transport. Parallel efforts are required to reform land-use policies which fuel urban sprawl. Policy makers should reconsider maximum density restrictions, revisit the design of urban containment policies and develop new market-based instruments to promote densification where it is most needed.**
- **With 7 in 10 people forecast to live in cities by 2050, we must act today to build better cities for better lives.**

# 1 Contribution of this report

## 22%

Between 1990 and 2014 the **total population of urban areas** included in the study increased by 22.4%

## 28%

Between 1990 and 2014 the **total artificial land in urban areas** included in the study increased by 27.7%.

The report contributes to a better understanding of urban development patterns in a number of novel ways. It provides:

- An operational definition of urban sprawl which disentangles the phenomenon from its causes and consequences.
- Seven indicators of urban sprawl, computed for more than 1100 urban areas in 29 OECD countries and for three time points: 1990, 2000 and 2014.
- A detailed assessment of the causes and consequences of urban sprawl.
- A menu of policy options grounded in the theoretical and empirical literature to shift urban development towards more sustainable trajectories.

This enables:

- Monitoring the evolution of urban sprawl over time and space.
- Retrospective analysis of the causes and effects of different dimensions of urban sprawl in a country-specific, cross-country or cross-city context.
- More informed decisions about whether policy action is needed to steer cities towards economic growth, environmental sustainability and social inclusion.

# 2 Measuring urban sprawl

Urban sprawl is an elusive concept. The report defines sprawl as an urban development pattern characterised by low population density that can manifest itself in multiple ways.

The different dimensions of urban sprawl are measured by the seven indicators described in Table 1.

Urban sprawl may even exist in urban areas where average population density is relatively high, if those areas contain large amounts of land where density is very low.

The phenomenon is also manifested in development that is discontinuous, scattered and decentralised, for instance in cities where a substantial part of the population lives in a large number of unconnected pieces of urban land.

Table 1. **Seven indicators of urban sprawl**

Indicator	Description
Average urban population density	The average number of inhabitants in a km <sup>2</sup> of land of an urban area.
Population-to-density allocation	The share of population living in areas where population density is below a certain threshold (e.g. 1 500 inhabitants/km <sup>2</sup> ).
Land-to-density allocation	The share of urban footprint of areas where population density lies below a certain threshold (e.g. 1 500 inhabitants/km <sup>2</sup> ).
Variation of urban population density	The degree to which population density varies across the city.
Fragmentation	The number fragments of urban fabric per km <sup>2</sup> of built-up area.
Polycentricity	The number of high-density peaks in an urban area.
Decentralisation	The percentage of population residing outside the high-density peaks of an urban area.



# 3 Have cities in OECD countries been sprawling?

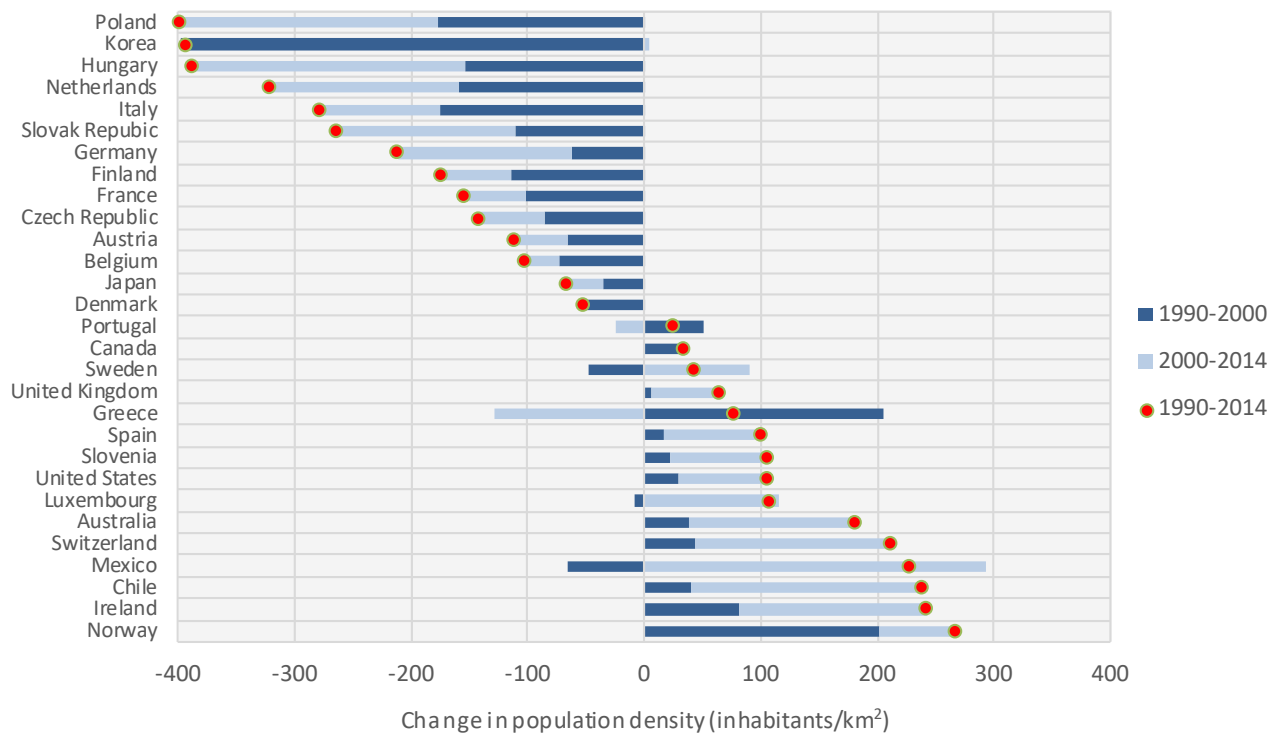


Cities in most of the 29 OECD countries included in the study are increasingly fragmented and more people are moving to the suburbs where density is low. While average urban population density has declined in 14 of the examined countries, fragmentation of urban land has increased in 18 and the share of urban land containing areas of very low density levels has grown in 20 countries.

- In certain countries, such as Greece, Ireland, Spain, Sweden and the United Kingdom, the growth in the percentage of urban land containing areas of very low density has been accompanied by increases in average urban population density. This means that in several urban areas of these countries, suburbanisation co-exists with densification.
- Urban areas in other countries, such as Austria, Canada, Slovenia and the United States, rank relatively high in multiple dimensions of sprawl. This implies that it may be worth monitoring urban development patterns more closely in these countries.
- Closer monitoring may also be justified in cities in Denmark, France and several Central European countries, such as Czech Republic, Hungary, Poland and Slovak Republic, as in the period 1990-2014 they have sprawled along most of the dimensions examined in the report.

Figure 1. **Cities have become less dense in some OECD countries and more dense in others**

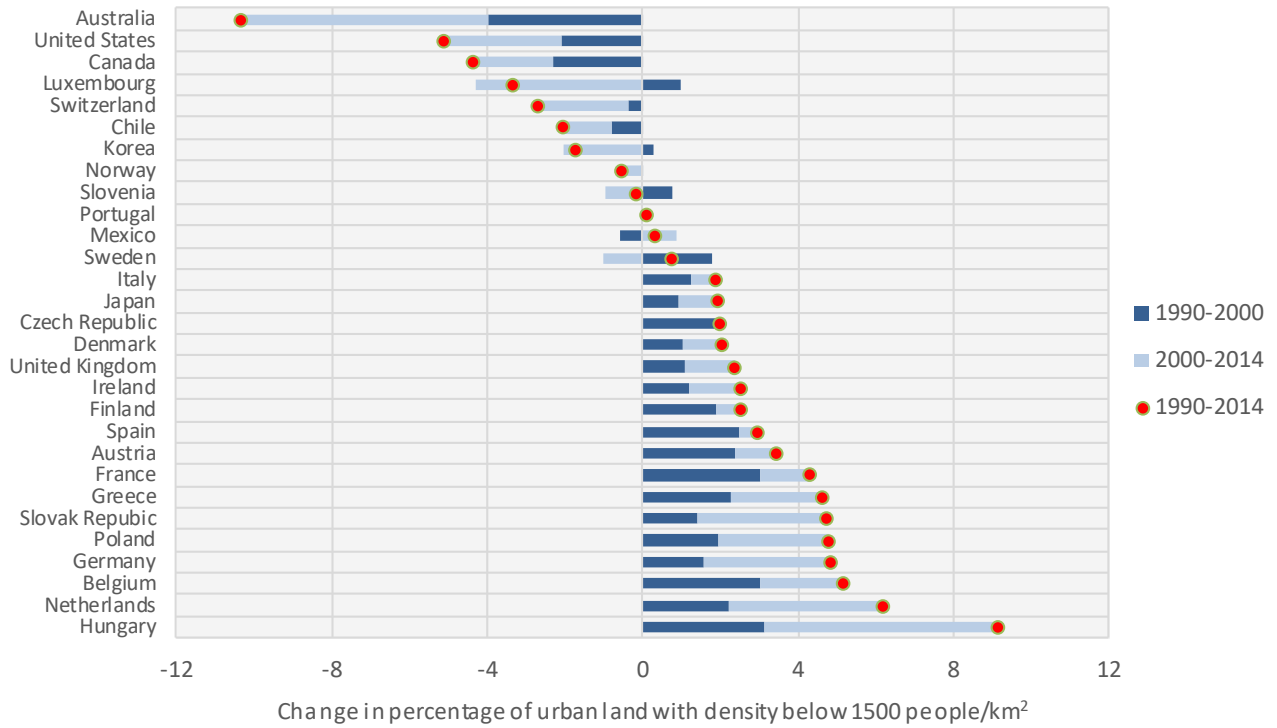
Notes: Red dots represent the total change in average urban population density in the period 1990-2014. The bars decompose the total change into changes occurring during the periods 1990-2000 (darker blue) and 2000-2014 (lighter blue).



Source: Own calculations, based on GHS built-area data (Pesaresi et al., 2015), GHS population data (European Commission, Joint Research Centre (JRC) and Columbia University, Center for International Earth Science Information Network - CIESIN, 2015) and FUA delimitations (OECD, 2012).

Figure 2. **The share of urban land allocated to low population density areas has grown**

Notes: Red dots represent the total change in the share of urban footprint with density of 150-1500 inhabitants/km<sup>2</sup> in the period 1990-2014. The bars decompose the total change into changes occurring during the periods 1990-2000 (darker blue) and 2000-2014 (lighter blue).



Source: Own calculations, based on GHS built-area data (Pesaresi et al., 2015), GHS population data (European Commission, Joint Research Centre (JRC) and Columbia University, Center for International Earth Science Information Network - CIESIN, 2015) and FUA delimitations (OECD, 2012).



# 4 Comparing urban sprawl indicators across OECD cities



## Portland (Oregon), USA

Portland has a low average population density (706 inhabitants per km<sup>2</sup>) and only 21% of the population reside in areas where population density lies below 1 500 inhabitants per km<sup>2</sup>.

## Ottawa, CANADA

Ottawa is relatively centralised (only 26% of population reside outside high density peaks) but the city's average population density is among the lowest in the OECD (18 inhabitants per km<sup>2</sup>).

## Bergen, NORWAY

In Bergen, a very high share of the population (42%) live in areas where the population density is below 1 500 inhabitants per km<sup>2</sup> but the city is only moderately fragmented (10.5 fragments of urban fabric per km<sup>2</sup>).

## Naples, ITALY

Naples has remarkably low levels of fragmentation (1.6 fragments of urban fabric per km<sup>2</sup>) and has a high population density (2 596 inhabitants per km<sup>2</sup>).

## Santiago, CHILE

Santiago is moderately fragmented (11.5 fragments of urban fabric per km<sup>2</sup>) but the city's population density is among the highest in the OECD (5 730 inhabitants per km<sup>2</sup>).





**Graz, AUSTRIA**

A very high share of the urban area (80%) of Graz has a population density below 1 500 inhabitants per km<sup>2</sup> and the city is highly decentralised (37% of population reside outside high-density peaks).

**Busan, KOREA**

In Busan, only 5% of the population live in areas below 3 500 inhabitants per km<sup>2</sup>. The city's average population density is the third highest observed (8 888 inhabitants per km<sup>2</sup>).

**Osaka, JAPAN**

Only 20% of Osaka's urban area has density levels below 1 500 inhabitants per km<sup>2</sup>. The city is also among the least fragmented in the OECD (2.4 fragments of urban fabric per km<sup>2</sup>).

**Darwin, AUSTRALIA**

Darwin is among the most fragmented cities in the OECD (27.3 fragments of urban fabric per km<sup>2</sup>). It also has a very low average population density (233 inhabitants per km<sup>2</sup>).

1 156

**CITIES**

*Cities are defined as functional urban areas according to the OECD definition.*

29

**COUNTRIES**

*The dataset spans cities in 29 OECD countries across five continents.*

3

**TIME POINTS**

*Data on urban areas were extracted at three different time points: 1990, 2000, 2014.*

# 5

## Key drivers of urban sprawl

Urban sprawl is driven by demographic, economic, geographic, social and technological factors. These include rising incomes, preferences for living in low-density areas, natural barriers to contiguous urban development and the technological progress in car manufacturing.

Most importantly, sprawl is also policy-driven. Maximum density restrictions, specific zoning regulations, tax systems that are misaligned with the social cost of low-density development, the underpricing of car use externalities and the massive investment in road infrastructure contribute to this phenomenon.

### Preferences for living in low density areas

People often have strong preferences for specific attributes of low density areas. Such attributes include proximity to open spaces and natural amenities, lower noise levels, better air quality, longer exposure to sunlight and better local visibility.

### Land-use regulations

Building height restrictions provide a considerable barrier in the emergence of a compact city, especially when they are too stringent. Urban containment policies, such as urban growth boundaries and greenbelts may appear to contribute to a more compact development pattern. However, they may backfire by causing fragmented, leapfrog development.

### Progress in car manufacturing

Urban sprawl is driven by the technological advances in car manufacturing, as cheaper, faster and more reliable cars have increased the willingness to accept longer commuting distances.

### Low motor fuel taxes

In some OECD countries, motor fuel taxes have been persistently low. Combined with the increasing fuel efficiency of vehicles, the policy has contributed to the emergence of more dispersed development patterns.

### Other policies encouraging car use

Failure to adopt policies that incorporate the social cost of air pollution, climate change and congestion into the private costs of car ownership and use (such as road pricing) may fuel further urban sprawl.

# 6 Consequences of urban sprawl

Urban sprawl has significant environmental, economic and social consequences. It leads to higher emissions from road transport and loss of open space and environmental amenities. It also increases the cost of providing key public services, exerting pressure on local public finance. Finally, it reduces housing affordability as its main drivers limit the supply of housing in key areas.

## Environmental consequences

Sprawled development patterns are characterised by larger distances between residences, jobs and other frequent daily trip destinations. These distances are much more likely to be covered by car, as low density areas are often poorly served by public transport. That translates into more vehicle kilometres travelled, higher air pollution and more greenhouse gas emissions.

A sprawled built environment also implies greater human intervention in a series of key environmental processes, which is likely to affect water quality and increase flood risk.

## Economic and social consequences

Urban sprawl is long known to increase the per-user costs of providing public services of primary importance. Water supply, sanitation, electricity, public transport, waste management, policing and other services that are key for well-being are much more expensive to provide in fragmented areas of low-density. This entails that either the quality of these services will be low or that significant subsidies will be required to cover the costs of provision.

Low-density development contributes to less inclusive cities, as the regulatory mechanisms maintaining it (e.g. building height restrictions) may reduce housing supply, rendering housing less affordable.

# 369

## Did you know?

**Congestion caused 5.5 billion hours of delay in the United States in 2011, a number that corresponds to a total time cost close to 0.9% of the GDP (Schrank et al. 2012).**

# 7 Land use policies as a response to urban sprawl and its consequences

Curbing urban sprawl requires promoting socially desirable levels of population density and reducing urban fragmentation. Reforming land-use regulations and property taxation are key to achieve more sustainable urban development patterns.



## **Relax maximum density restrictions**

Relaxing stringent density regulations will lead to more compact and less car-dependent cities. Such cities could also provide more affordable housing and public services in a cost-effective way.

## **Reform urban containment policies**

Boundaries to urban development may be effective in protecting forestland on the outskirts of cities and designated open space of environmental importance. However, this is not uniformly the case. Existing urban growth boundaries, buffer zones and greenbelts should be periodically reviewed and reformed.

## **Streamline land-use taxation**

Allowing the tax system to account for the social cost of various land uses can promote more desirable development patterns. Removing tax incentives for the development of land on the outskirts of cities can prevent conversion of farmland and forests into urban land.

## **Reform property taxation**

Split rate property taxes, whereby higher tax rates are set on the value of land than on the value of buildings, can promote denser development and give rise to more compact cities.

## **Shift the cost of infrastructure provision to developers**

Incentivising developers to cover the cost of providing roads, public transport, water and sanitation in sprawling areas could be effective in curbing sprawl. Such measures would allow housing prices in sprawling areas to better reflect the social cost of urban sprawl.

# 8

## Transport policies as a response to urban sprawl and its consequences

Sustainable urban development cannot be achieved without greening urban transport systems and shifting travel demand towards public and non-motorised transport. Several policy changes can lead to less car-dependent cities and mitigate some of the environmental and economic consequences of urban sprawl. Through changing the paradigm of urban mobility, they may also have significant long-term positive effects on the evolution of urban form itself.

### **Introduce road pricing mechanisms**

Streamlined pricing of car use requires that motorists are charged for the negative externalities they cause, such as congestion, greenhouse gas emissions, air pollution and noise. Road pricing is thus key for mitigating the environmental and economic consequences of sprawl in the short run. Permanent road pricing mechanisms may also help control sprawl, as they discourage long distance travel by car. This makes compact development more attractive in the long run.

### **Reform parking policies**

Minimum parking requirements in new developments encourage car ownership and use, as they decrease the total costs of owning a car and making urban car trips. They may also discourage infill development, as they drive up building costs. In many cities, on-street parking charges are too low as they fail to reflect the social cost of parking provision, which includes cruising and loss of open space.

### **Align motor fuel taxes with the external costs of fuel consumption**

Motor fuel taxes are, in many cases, set at relatively low levels, which do not reflect the externalities from fuel consumption. Low motor fuel taxes cause excessive car use and may fuel urban sprawl by promoting a dispersion of jobs, residences and other key points of economic activity. This further increases the importance of setting motor fuel taxes at levels fully accounting for the environmental costs of fuel consumption.

### **Invest in more sustainable forms of transport infrastructure**

Investing less in new urban highways and more in public transport and soft mobility infrastructure, such as cycling paths and pavements, can contribute to reducing car dependency and may deter further urban sprawl.

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## Further reading

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The report *Rethinking Urban Sprawl: Moving Towards Sustainable Cities* provides a new perspective to the nature of urban sprawl and its causes and consequences. This perspective, which is based on the multi-dimensionality of urban sprawl, sets the foundations for the construction of new indicators of the phenomenon. The report uses new datasets to compute these indicators for more than 1 100 urban areas in 29 OECD countries over the period 1990-2014. It then relies on cross-city, country-level and cross-country analyses of these indicators to provide insights into the current situation and evolution of urban sprawl. In addition, the report offers a critical assessment of the causes and consequences of the phenomenon and discusses policy options to steer urban development to more sustainable pathways.

For further reading see the following publication on which these Policy Highlights are based:

OECD (2018), *Rethinking Urban Sprawl: Moving Towards Sustainable Cities*, OECD Publishing, Paris.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 88 - William Austin Hewitt  
**Date:** Friday, 10 March 2023 9:15:57 pm

---

The following customer has submitted a Unitary Plan online submission.

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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:  
Roading, public transport, and schooling

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

This plan is not in keeping with the Auckland unitary plan nor does it align with the public transport improvements that are happening in other parts of Auckland that would better suit development in areas where public transportation and schooling and infrastructure is already being planned to support population growth.

370.1

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

Details of amendments: A smaller development that does not put pressure on infrastructure, transportation or schooling. The proposed size of development is just plain ridiculous for the area.

Submission date: 10 March 2023

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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



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