

I hereby give notice that a hearing by commissioners will be held on:

**Date:** Wednesday 6, Thursday 7, Friday 8, Wednesday 13  
and Thursday 14 November 2019  
**Time:** 9.30am  
**Meeting Room:** Reception Lounge  
**Venue:** Level 2, Auckland Town Hall  
301-303 Queen Street Auckland, Auckland

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## HEARING REPORT

### PLAN CHANGE 21 - 3 BRIGHTSIDE ROAD, 149, 151 AND 153 GILLIES AVENUE, EPSOM SOUTHERN CROSS HOSPITALS LTD

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#### COMMISSIONERS

Chairperson	Kitt Littlejohn
Commissioners	Kim Hardy
	Ian Munro
	Mark Farnsworth

**Kelsey Partridge**  
HEARINGS ADVISOR

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## **WHAT HAPPENS AT A HEARING**

At the start of the hearing, the Chairperson will introduce the commissioners and council staff and will briefly outline the procedure. The Chairperson may then call upon the parties present to introduce themselves to the panel. The Chairperson is addressed as Mr Chairman or Madam Chair.

Any party intending to give written or spoken evidence in Māori or speak in sign language should advise the hearings advisor at least five working days before the hearing so that a qualified interpreter can be provided.

Catering is not provided at the hearing. Please note that the hearing may be audio recorded.

### **Scheduling submitters to be heard**

A timetable will be prepared approximately one week before the hearing for all submitters who have returned their hearing attendance form. Please note that during the course of the hearing changing circumstances may mean the proposed timetable is delayed or brought forward. Submitters wishing to be heard are requested to ensure they are available to attend the hearing and present their evidence when required. The hearings advisor will advise submitters of any changes to the timetable at the earliest possible opportunity.

### **The Hearing Procedure**

The usual hearing procedure (as specified in the Resource Management Act) is:

- **(Private plan change)** The applicant will be called upon to present his/her case. The applicant may be represented by legal counsel or consultants and may call witnesses in support of the application. After the applicant has presented his/her case, members of the hearing panel may ask questions to clarify the information presented.
- Submitters (for and against the application) are then called upon to speak. Submitters may also be represented by legal counsel or consultants and may call witnesses on their behalf. The hearing panel may then question each speaker. The council officer's report will identify any submissions received outside of the submission period. At the hearing, late submitters may be asked to address the panel on why their submission should be accepted. Late submitters can speak only if the hearing panel accepts the late submission.
- Should you wish to present written information (evidence) in support of your application or your submission please ensure you provide the number of copies indicated in the notification letter.
- Only members of the hearing panel can ask questions about submissions or evidence. Attendees may suggest questions for the panel to ask but it does not have to ask them. No cross-examination - either by the applicant or by those who have lodged submissions – is permitted at the hearing.
- After the applicant and submitters have presented their cases, the chairperson may call upon council officers to comment on any matters of fact or clarification.
- When those who have lodged submissions and wish to be heard have completed their presentations, the applicant or his/her representative has the right to summarise the application and reply to matters raised by submitters. Hearing panel members may further question the applicant at this stage.
- The chairperson then generally closes the hearing and the applicant, submitters and their representatives leave the room. The hearing panel will then deliberate "in committee" and make its decision by way of formal resolution. You will be informed in writing of the decision and the reasons for it.



**A NOTIFIED PLAN CHANGE TO THE AUCKLAND COUNCIL UNITARY PLAN BY SOUTHERN CROSS HOSPITALS LTD**

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**Reporting officer:** Panjama Ampanthong

Reporting on proposed private Plan Change 21 to rezone land at 3 Brightside Road and 149, 151 and 153 Gillies Avenue, Epsom from Mixed Housing Suburban and Single House Zones to Special Purpose – Healthcare Facility and Hospital Zone and remove the special character overlays from 149, 151 and 153 Gillies.

**APPLICANT:** SOUTHERN CROSS HOSPITALS LTD

The full submissions have been reproduced under separate cover and can be found [here](#).

**FURTHER SUBMITTERS:**

Page 121	Eden Epsom Residential Protection Society
Page 143	Gemma Allen
Page 145	Heritage New Zealand Pouhere Taonga
Page 151	John Allen

**LOCAL BOARD VIEWS:**

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**Plan Change 21 - 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom**  
**Date: Commencing Wednesday 6 November 2019**

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**Hearing Report for Proposed Plan Change 21: Southern Cross Hospitals Limited to the Auckland Unitary Plan (Operative in Part)**

Section 42A Hearing Report under the Resource Management Act 1991

**Report to:** Hearing Commissioners

**Hearing Date/s:** 6, 7, 8, 13 and 14 November 2019

**File No:** Hearing Report – Proposed Plan Change 21 (PC21)

**File Reference** \\aklc.govt.nz\Shared\CPO\RLP\FC\LUP\UP MODIFICATIONS\PC021-Southern Cross Hospitals Limited\04 Hearings\Hearing Report

**Report Author** Panjama Ampanthong, Principal Planner, Central-South Planning, Plans & Places

**Report Approvers** Fiona Sprott, Team Leader Central-South, Plans & Places

**Report produced** 20 September 2019

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**Summary of Proposed Plan Change 21: Southern Cross Hospitals Limited**

<b>Plan subject to change</b>	Auckland Unitary Plan (Operative in Part), 2016
<b>Number and name of change</b>	Proposed Plan Change 21 – Southern Cross Hospitals Limited to the Auckland Unitary Plan (Operative in Part)
<b>Status of Plan</b>	Operative in part
<b>Type of change</b>	Private plan change
<b>Committee date of approval (or adoption) for notification</b>	5 March 2019
<b>Parts of the Auckland Unitary Plan affected by the proposed plan change</b>	Planning Maps E27 – Transport
<b>Date draft proposed plan change was sent to iwi for feedback</b>	17 September 2018
<b>Date of notification of the proposed plan change and whether it was publicly notified or limited notified</b>	21 March 2019 Full notification

<b>Plan development process used – collaborative, streamlined or normal</b>	Normal
<b>Submissions received (excluding withdrawals)</b>	175
<b>Date summary of submissions notified</b>	30 May 2019
<b>Number of further submissions received (numbers)</b>	11
<b>Legal Effect at Notification</b>	No
<b>Date of site visit</b>	22 March 2019
<b>Main issues or topics emerging from all submissions</b>	<ul style="list-style-type: none"> <li>• Transport</li> <li>• Noise and vibration</li> <li>• Urban design (incompatibility of built form, height and bulk dominance, overlooking and loss of privacy, shading effects)</li> <li>• Visual and landscape amenity</li> <li>• Removal of special character overlay</li> <li>• Non-residential activities and precedent effects</li> <li>• No consideration of alternative sites</li> </ul>

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Appendix 2	Summary of Submissions and Submissions
Appendix 3	Further Submissions and Local Board Views
Appendix 4	<p>Specialists' Assessments</p> <ul style="list-style-type: none"> <li>• Heritage Rebecca Freeman</li> <li>• Urban design Trevor Mackie</li> <li>• Visual and landscape Stephen Brown</li> <li>• Transport Meredith Bates</li> <li>• Acoustic Curt Robinson</li> <li>• Geotechnical Steven Price</li> <li>• Arborist Gavin Donaldson</li> <li>• Heritage Arborist West Fynn</li> </ul>
Appendix 5	List of Healthcare Facilities and Hospitals in the Special Purpose – Healthcare Facility and Hospital Zone
Appendix 6	H25 Healthcare Facility and Hospital Zone Provisions

## Abbreviations

Abbreviation	Meaning
PC21	Proposed Plan Change 21
RMA	Resource Management Act 1991
AUP(OP)	Auckland Unitary Plan (Operative in Part)
PAUP	Proposed Auckland Unitary Plan
SP-HFH	Special Purpose – Healthcare Facility and Hospital
MHS	Residential – Mixed Housing Suburban
SH	Residential – Single House
SCAR	Special Character Areas Overlay - Residential
NPS	National Policy Statements
SCHL	Southern Cross Hospitals Limited
RDA	Restricted Discretionary Activity

### 1. EXECUTIVE SUMMARY

1. Southern Cross Hospitals Limited (SCHL) lodged a private plan change to the Auckland Unitary Plan (Operative in Part) ('**AUP(OP)**') in July 2017. On 5 March 2019 the private plan change was considered and accepted by the Council.
2. Proposed Plan Change 21 ('**PC21**') seeks to rezone land at 3 Brightside Road and 149, 151 and 153 Gillies Avenue, Epsom from Mixed Housing Suburban and Single House Zones to Special Purpose – Healthcare Facility and Hospital Zone (SP-HFH), remove the special character overlays from the sites at 149, 151 and 153 Gillies Avenue and amend transport provisions to specify the parking requirement for the hospital.
3. PC21 was accepted by Council on 5 March 2019 under clause 25(2)(b) of the Schedule 1 of the Resource Management Act (RMA).
4. The purpose of the proposed private plan change is to enable the efficient operation and expansion of the existing hospital on the subject site.
5. Further information was sought from the applicant by the Council in accordance with Clause 23 of Schedule 1 of the RMA on 18 February 2019 on matters relating to visual and landscape effects on adjoining properties to the north, compliance with the volcanic viewshaft overlay controls, unprotected trees, an analysis of values of character buildings on 149, 151 and 153 Gillies Avenue and a consideration of methods to protect features that contribute to the special character values of the subject site.
6. The applicant provided further information in response to the Clause 23 request on visual and landscape and special character above. Council considered the further information provided by the applicant on 8 and 20 March 2019 was satisfied.
7. PC21 was publicly notified by the Council on 21 March 2019. After the closing date of submissions on 18 April 2019, 176 submissions were received. The Council's summary of decisions requested was notified on 30 May 2019, with the period for making further submissions closing on 13 June 2019. 11 further submissions were received.

8. In preparing for hearings on PC21, this hearing report has been prepared in accordance with section 42 of the RMA.
9. This report addresses the merits of PC21, with reference to an assessment of effects on the environment and the issues raised by submissions and further submissions. The discussion and draft recommendations in this report are intended to assist the Hearing Commissioners, and those persons or organisations that lodged submissions on PC21.
10. The recommendations contained within this report are not the decisions of the Hearing Commissioners.
11. This report also forms part of Council's ongoing obligations under section 32 of the RMA, to consider the appropriateness of the proposed objectives and provisions in PC21, as well as the benefits and costs of any policies, rules or other methods, as well as the consideration of issues raised in submissions on PC21.
12. A report in accordance with section 32 of the RMA was prepared by the applicant as part of the private plan change request as required by clause 22(1) of Schedule 1 of the RMA. In accordance with an evaluation under section 32, I consider that the provisions proposed by PC21 are not the most appropriate way of achieving the objectives of the AUP(OP) and the purpose of the RMA.
13. It is recommended that PC21 be declined.

## **2. BACKGROUND AND PLAN PROVISIONS**

### **2.1 Site and Surrounding Area**

14. The site subject to the request comprises four properties and is owned by Southern Cross Hospitals Limited (the subject site). It includes 3 Brightside Road and 149, 151 and 153 Gillies Avenue. The subject site has a total area of 9,273m<sup>2</sup>.
15. 3 Brightside Road has a total land area of 5,245m<sup>2</sup>. It contains an existing hospital, known as Brightside hospital, which has operated since the late 1990s. The site is currently zoned Residential - Mixed Housing Suburban. 149, 151 and 153 Gillies Avenue adjoin 3 Brightside Road to the east. The properties are all zoned Residential – Single House and are subject to the Special Character Areas Overlay – Residential (SCAR) which seeks to retain and manage the special built character values of specific residential areas.
16. 149 Gillies Avenue is square in shape and has a total area of 2,208m<sup>2</sup>. It contains a two-storey building and is currently occupied by the Everdell Guest House. The site adjoins residential properties at 30, 30A, 32A Owens Road and 147 Gillies Avenue to the north.
17. 151 Gillies Avenue has a total area of 971m<sup>2</sup> and is occupied by a two-storey dwelling located towards the rear of the site. 153 Gillies Avenue is the smallest site with a total area of 849m<sup>2</sup>. It is located at the corner of Brightside Road and Gillies Avenue and is also occupied by a two-storey dwelling. Both 151 and 153 Gillies Avenue have an old stone boundary wall interfacing Brightside Road and Gillies Avenue. Dwellings on both properties are currently vacant. They are subject to demolition controls under the SCAR.
18. The surrounding properties to the subject site comprise a mix of residential dwellings with different styles and periods, including older character dwellings, more recent detached houses and a number of multi-unit flats. The area to the south of the subject site, around Shipherds and Marama Avenue, is an established urban area characterised by large mature trees and predominantly occupied by detached dwellings.

- 19. There are a number of healthcare facilities located in the vicinity of the subject site, including medical facilities and specialists at 160, 162, 148 and 183 Gillies Avenue. Epsom Girls Grammar School is located around 300m north east of the subject site on Gillies Avenue.
- 20. Brightside Road is a short local road that runs between Gillies Avenue and Owens Road. It provides access to residential properties on Brightside Road and Shiphers Avenue. Gillies Avenue is an arterial road that connects Epsom to Newmarket and the City Centre.
- 21. There are two notable trees located on 3 Brightside Road; a Pohutukawa located on the eastern side of the property near the road and an Australian Frangipani located near 32A Owens Road. These trees are listed in the Schedule 10 Notable Tree of the Auckland Unitary Plan (reference number - ID213).
- 22. The subject site is affected by the volcanic viewshafts and height sensitive area overlays. Viewshafts E14 (to Mount Eden) impose height restrictions between 12.5m on the western portion of 3 Brightside Road and up to 40m on Gillies Avenue properties (see **Figure 3** below). The underlying Single House and Mixed Housing Suburban Zones permit building heights of 8m.









**Figure 1: Locality Plan - 3 Brightside Road, 149, 151 and 153 Gillies Avenue and surroundings**





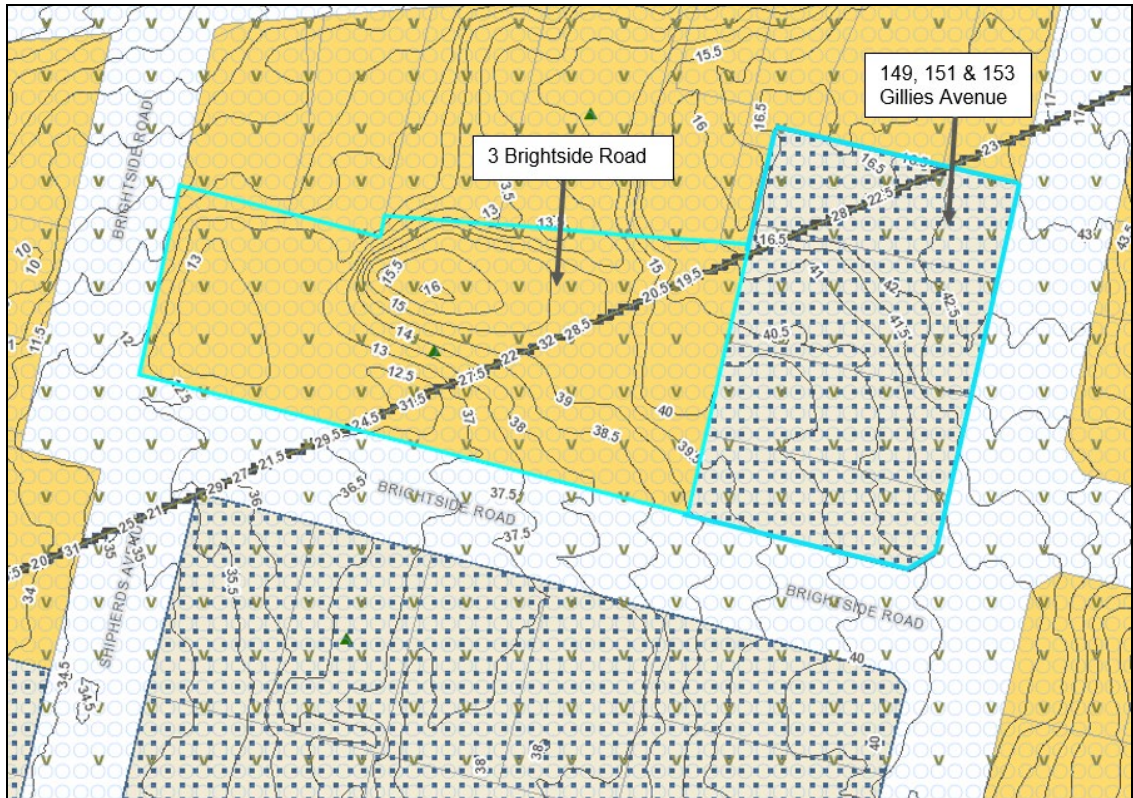
**Figure 2: Existing zoning of 3 Brightside Road, 149, 151 and 153 Gillies Avenue and the surroundings under the Auckland Unitary Plan (operative in part)**



-  Boundary of subject site
-  Residential – Single House Zone
-  Residential – Mixed Housing Suburban Zone
-  Residential – Mixed Housing Urban Zone
-  Residential – Terrace Housing and Apartment Buildings Zone
-  Business – Mixed Use Zone
-  Special Character Overlay – Residential
-  Notable Trees Overlay



**Figure 3: 3 Brightside Road, 149, 151 and 153 Gillies Avenue and Mount Eden and Mount Wellington viewshafts that apply on the subject site**



**Figure 4: Existing Brightside Hospital viewed from Brightside Road**





**Figure 5: Parking at the back of the hospital and the retaining wall adjoins Owens Road residential properties to the north**



**Figure 6: 151 and 153 Gillies Avenue viewed from the eastern side of Gillies Avenue**





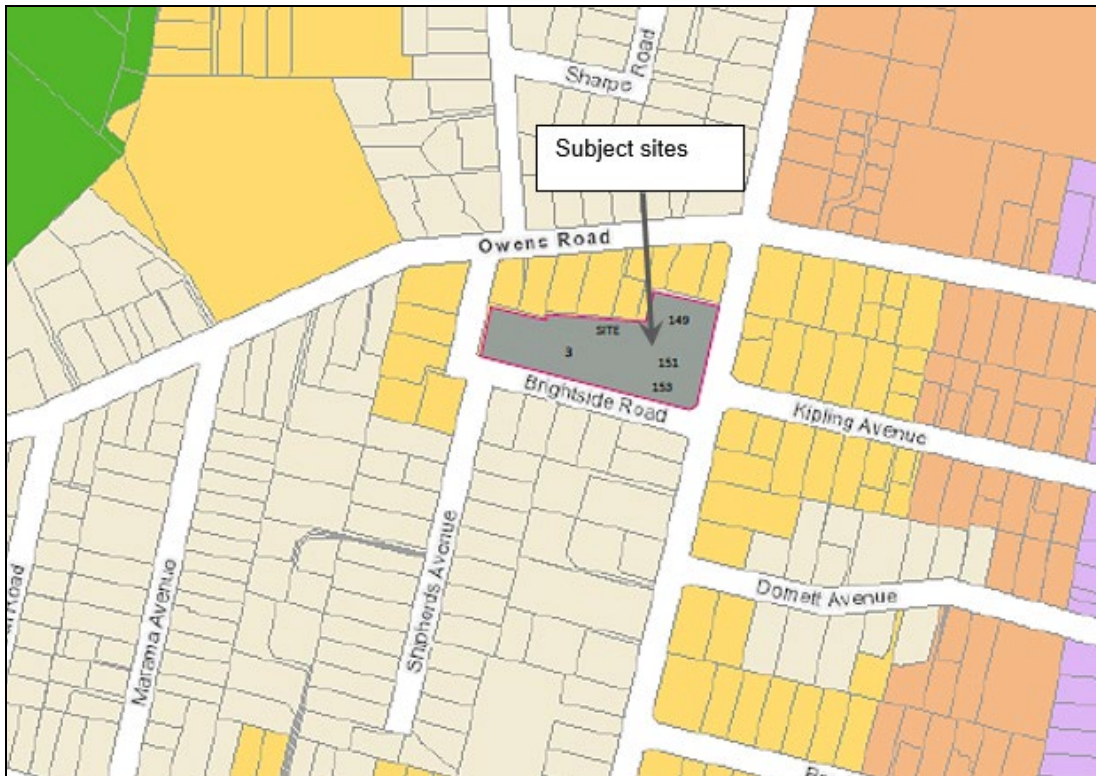
**Figure 7: 149 Gillies Avenue viewed from the entry to the property on Gillies Avenue**



## **2.2 Proposed Private Plan Change Request**

23. On 1 February 2019 Council received a private plan change request (PC21) from Southern Cross Hospitals Limited. The proposed plan change seeks:
- to rezone 3 Brightside Road from Residential – Mixed Housing Suburban to Special Purpose – Healthcare Facility and Hospital Zone
  - to rezone 149, 151 and 153 Gillies Avenue from Residential - Single House Zone to Special Purpose – Healthcare Facility and Hospital Zone
  - to remove the special character overlays from 149, 151 and 153 Gillies Avenue
  - to apply the parking variation control on the subject site and amend Table E27.6.2.4 in Chapter E27 specifying the minimum parking rate of 1 space per 64m<sup>2</sup> for the Brightside hospital
24. The purpose of the private plan change request is to enable the efficient operation and expansion of the existing hospital on the subject site. **Figure 8** below shows the proposed rezoning to Special Purpose – Healthcare Facility and Hospital on the subject site.

**Figure 8: Proposed zoning - Special Purpose – Healthcare Facility and Hospital Zone 3 on Brightside Road, 149, 151 and 153 Gillies Avenue**



Special Purpose – Healthcare Facility and Hospital Zone

25. Southern Cross Hospitals Limited has provided the following specialists' documents to support their private plan change application.

Document	Specialist	Date
Private plan change request and assessment of effects	SFH Consultants Ltd	January 2019
Brightside Hospital Growth Analysis	Ernst Young	27 November 2018
Design statement and permitted development plans	Archimedia	January 2019
Traffic assessment	Flow Transport	December 2019
Civil engineering assessment	Babbage	1 February 2019
Visual effects assessment	LA4 Landscape Architects	January 2019
Urban design assessment	Motu Design	22 January 2019
Special character assessment	Lifescapes	January 2019
Acoustic assessment	Earcon Acoustics	January 2019
Further information on Visual Landscape Assessment (Trees)	Peers Brown Miller Ltd	27 February 2019
Further information on special character assessment	Lifescapes	28 February 2019

Further information on visual effects assessment	LA4 Landscape Architects	5 March 2019
Further information on volcanic viewshaft controls assessment	Archimedia	20 March 2019

### 2.3 Clause 23 requests for further information

26. Prior to accepting PC21 for notification, on 18 February 2019 the Council requested that the applicant provide further information under Clause 23 of Schedule 1 of the RMA. This request is attached as **Appendix 1** to this report. The purpose of the further information request was to enable Council to better understand the effects of PC21 on the environment and the ways in which adverse effects may be mitigated. The key information sought from the request relate to the following matters:

- Visual and landscape
  - a further analysis and/or graphic depiction of the visual/landscape effects experienced by residents living at 30-38 Owens Road
  - clarification on whether photo simulations provided by the applicant comply with the volcanic viewshaft overlay controls
  - an analysis of the degree to which the existing trees and other vegetation on the subject site could be expected to survive with the development under the SP-HFH Zone.
  - an analysis of visual amenity effects experienced by local residents
- Special character
  - an analysis of the values of those character houses on 149, 151 and 153 Gillies Avenue and options for their retention, reuse or relocation
  - a consideration of protection measures of the landscape features that contribute to the special character

27. On 8 and 20 March 2019 the applicant provided the following materials in response to the Clause 23 further information request. These materials are included in **Appendix 1** to this report.

- Visual Landscape Assessment (Trees) by Peers Brown Miller Ltd dated 27 February 2019
- Special Character Assessment by Lifescapes dated 28 February 2019
- Visual Effects Assessment by LA4 Landscape Architects dated 5 March 2019
- Volcanic Viewshaft Controls Assessment by Archimedia dated 20 March 2019

28. Council considered the further information provided by the applicant was sufficient to enable Council to assess the private plan change request.

## 3. HEARINGS AND DECISION MAKING CONSIDERATIONS

29. Clause 8B (read together with Clause 29) of Schedule 1 of RMA requires that a local authority shall hold a hearing into submissions on a proposed plan change.

30. The Regulatory Committee has delegated to the Hearings Commissioners authority to determine Council's decisions on submissions on PC21, under section 34 of the RMA. Hearing Commissioners will not be recommending a decision to the Council, but will be making the decision directly on PC21.

31. This report summarises and discusses submissions received on PC21. It makes recommendations on whether to accept, in full or in part; or reject, in full or in part; each

submission. Any conclusions or recommendations in this report are not binding on the Hearing Commissioners.

32. The Hearing Commissioners will consider all the information in submissions together with evidence presented at the hearing.
33. This report has been prepared by the following author and draws on technical advice provided by the following technical experts:

Author	Panjama Ampanthong
Technical Experts:	
Heritage	Rebecca Freeman
Urban design	Trevor Mackie
Visual and landscape	Stephen Brown
Transport	Meredith Bates
Acoustic	Curt Robinson
Geotechnical	Steven Price
Arborist	Gavin Donaldson
Heritage Arborist	West Fynn

34. The technical reports provided by the above experts are attached in **Appendix 4** of this report.

#### 4. STATUTORY AND POLICY FRAMEWORK

##### 4.1 Resource Management Act 1991

35. The key directions of the RMA with regard to consideration of private plan changes is set out below.

RMA Section	Matters
Part 2	Purpose and intent of the Act
Section 30	Functions of regional Councils in giving effect to the RMA
Section 31	Functions of territorial authorities in giving effect to the RMA
Section 32	Requirements preparing and publishing evaluation reports. This section requires councils to consider the alternatives, costs and benefits of the proposal.
Section 67	Sets out the requirements for regional plan provisions, including what the regional plan must give effect to, and what it must not be inconsistent with.
Section 68	Sets out the purpose and considerations of rules in regional plans (regional rules)
Section 72	Sets out that the purpose of district plans is to assist territorial authorities to carry out their functions in order to achieve the purpose of the RMA.
Section 73	Sets out Schedule 1 of the RMA as the process to prepare or change a district plan.
Section 74	Matters to be considered by a territorial authority when preparing a

RMA Section	Matters
	change to its district plan. This includes its functions under section 31, Part 2 of the RMA, national policy statement, other regulations and other matter.
Section 75	Sets out the requirements for district plan provisions, including what the district plan must give effect to, and what it must not be inconsistent with.
Section 76	Outlines the purpose of district rules, which is to carry out the functions of the RMA and achieve the objective and policies set out in the district plan. A district rule also requires the territorial authority to have regard to the actual or potential effect (including adverse effects), of activities in the proposal, on the environment.
Schedule 1	Sets out the process for preparation and change of policy statements and plans by local authorities. It also sets out the process for private plan change applications.

## 4.2 Relevant Planning Documents

### 4.2.1 National Policy Statements

36. The relevant national policy statements ('NPS') must be given effect to in the preparation of the proposed plan change, and in considering submissions. **Table 4** below summarises the NPS that apply to PC21.

**Table 1: National Policy Statements relevant to PC21 – National Policy Statement on Urban Development Capacity 2016**

Section	Matters
Objective Group A Outcomes for planning decisions	OA1: Provide efficient urban environments that enable people and communities and future generations to provide for their social, economic, cultural and environmental wellbeing.
Objective Group C Responsive planning	OC1: Planning decisions should enable urban development that provides for the social, economic, cultural and environmental wellbeing of people and communities and future generations in the short, medium and long term.
Objective Group D Coordinated planning evidence and decision making	OD1: Provide for urban environments where land use, development, development infrastructure and other infrastructure <sup>1</sup> are integrated with each other.
Policies Outcomes for planning decisions	PA2: Ensure that other infrastructure required to support urban development are available.

<sup>1</sup> Other infrastructure includes social infrastructure such as schools and healthcare (interpretation section, page 8)



	PA3: Provide for the social, economic, cultural and environmental wellbeing of people and communities and future generations, whilst having regard to: (b) promoting the efficient use of urban land and development infrastructure and other infrastructure.
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37. It is considered that PC21 is consistent with the National Policy Statements in relation to provisions of infrastructure to support urban development and to provide for the social, economic, cultural and environmental wellbeing of people and communities.

#### 4.2.2 Auckland Unitary Plan

38. For a plan change, the relevant policy statements and plans must be considered in the preparation of the plan change and in the consideration of submissions.

**Table 2: Relevant Regional Policy Statements and District Provisions in AUP (OP)**

Relevant Policy/Plan	Section	Matters
Regional Policy Statement	B2.2	Urban growth and form
Regional Policy Statement	B2.3	A quality built environment
Regional Policy Statement	B2.4	Residential growth
Regional Policy Statement	B2.8	Social facilities
Regional Policy Statement	B3.3	Transport
Regional Policy Statement	B5.3	Special character
District provisions	H25	Special Purpose – Healthcare Facility and Hospital Zone
District provisions	D18	Special Character Overlay – Residential and Business
District provisions	E27	Transport
District provisions	E25	Noise and vibration

39. The assessment against the Auckland Unitary Plan provisions and regional policy statement (RPS) objectives and policies is as follows:

40. PC21 is in part consistent with the RPS for the following reasons:

- will provide social facilities that meet the needs of people and communities, including enabling them to provide for their social economic and cultural well-being and their health and safety (B2.8 – objective B2.8.1)
- will enable medium-scale social facilities to be located with easy access to city, metropolitan and town centres and on corridors (B2.8 – policy B2.8.2(1)(b)).
- will enable the provision of social facilities to meet the diverse demographic and cultural needs of people and communities (B2.8 – policy B2.8.2(2)).
- will enable the efficient use of existing social facilities and provides for new social facilities (B2.1 (4) Issue)

41. However, PC21 is in part not consistent with the RPS for the following reasons:
- Development under the SP-HFH Zone will not respond to the intrinsic qualities and physical characteristics of the site and surrounding area, including its setting (B2.3.1(1)(a) – objective A quality built environment).
  - The form and scale of development enabled by the SP-HFH Zone is unlikely to be consistent with its surroundings, including landscape and heritage.
  - The removal of the special character overlay is not consistent with the objective under B5.3.1 which seeks to protect character and amenity values of the sites identified as a 'special character area' be maintained and enhanced. The plan change will not maintain or enhance the special character of the area.

#### 4.3 Other Plans

##### 4.3.1 The Auckland Plan 2050

42. In considering a plan change, a territorial authority must have regard to plans and strategies prepared under other Acts. The Auckland Plan, prepared under section 79 of the Local Government (Auckland Council) Act 2009 is a relevant strategy document that Council should have regard to in considering PC21, pursuant to section 74(2)(b) of the RMA.
43. The Auckland Plan 2050 was adopted in June 2018. It is a long-term spatial plan which considers how Auckland will address key challenges over the next 30 years. These include high population growth, shared prosperity, and environmental degradation. Below is a summary of sections of the Auckland Plan 2050 that are relevant to PC21.

**Table 6 - Relevant sections of the Auckland Plan 2050 to PC21.**

Outcomes	Matters
Homes and Places	<p>Direction 1 Develop a quality compact urban form to accommodate Auckland's growth</p> <p>Auckland's population will increase significantly over the next 30 years and its urban form will continue to develop and change as a result. Auckland will follow a quality compact urban form approach to growth to realise the environmental, social and economic benefits and opportunities this approach brings.</p>
Belonging and participation	<p>Focus Area 2 Provide accessible services and social and cultural infrastructure that are responsive in meeting people's evolving needs</p> <p>Population growth and demographic change will put pressure on existing services and facilities. Ageing population will increase and require services and social infrastructure that enable older people to fully participate.</p>
Environment and Cultural Heritage	<p>Direction 1 Ensure Auckland's environment is valued and cared for</p>

	<p>Direction 3 Use Auckland's growth and development to protect and enhance the environment</p> <p>Focus area 2 Focus on restoring environments as Auckland grows</p>
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44. It is my opinion that the proposed plan change will provide social infrastructure and enable healthcare facilities to be established to meet the need of Auckland's population growth.
45. However, the plan change is inconsistent with the directives that seeks to ensure that Auckland's environment is valued and cared for and an opportunity to protect and enhance the environment as the city grows. While the Auckland Plan anticipates that the urban form will continue changing in response to the population growth, the appropriate scale and form of development will need to be considered as it has an impact on the community social and economic wellbeing.

## 5. CONSULTATION

### 5.1 Mana Whenua

46. SCHL engaged the relevant 11 iwi groups within the plan change area (see below). The proposed rezoning information including plans were sent to the iwi group providing opportunity for feedback on 17 September 2018, before the plan change request was lodged with the Council. Ngāi Tai Ki Tāmaki have no objection to the proposal. No responses have been received from other iwi groups.
- Ngāti Pāoa
  - Ngāti Whātua o Kaipara
  - Ngāti Maru
  - Ngāti Tamaoho
  - Ngāti Tamaterā
  - Ngāti Te Ata Waiohua
  - Ngāti Whātua Ōrākei
  - Te Akitai Waiohua
  - Te Rūnanga o Ngāti Whātua
  - Waikato -Tainui
47. No submission was received from any mana whenua on full notification of the plan change.

### 5.2 Local Board

48. SCHL met and provided information of the proposed private plan change request and potential future resource consent application for the hospital development to the Albert-Eden Local Board in October 2018. The local board raised some matters including consideration of alternative sites, traffic, noise, building height and construction effects.
49. After the notification of PC21 on 18 April 2019, feedback was received from the local board opposing the Private Plan Change request in its entirety. The local board submitted that PC21 would allow development that would be incompatible with the character of the neighbouring area and undermine the integrity of the Auckland Unitary Plan. PC21 would enable development that is out of character with the existing neighbourhood and result in major adverse effects on the neighbouring residents in the area.

## 6. NOTIFICATION AND SUBMISSIONS

50. PC21 was publicly notified by the Council on 21 March 2019. 176 submissions were received after the closing date for submissions was on 18 April 2019.
51. 174 submissions including submissions 1, 3-97, 99-107, 109-160, 162-176 seek that PC21 be declined in its entirety. Matters raised by these submissions include adverse effects on amenity and character, incompatibility of built form, transport, construction effects (traffic, noise and vibration), special character, non-residential activities in the residential area and no consideration of alternative sites.
52. Submission 98 by Auckland Transport seeks that PC21 is approved if transport related matters are resolved.
53. Submission 108 by Housing New Zealand Corporation seeks that the private plan change does not remove the SCAR from 149, 151 and 153 Gillies Avenue. The Corporation does not state whether they support or oppose the plan change.
54. Submission 161 by Heritage New Zealand Pouhere Taonga (HNZPT) states that the plan change could be supported if it includes provisions to ensure protection of the heritage and special character features in perpetuity.
55. A summary of decisions requested and matters raised in the submissions is attached in **Appendix 2** of this report.

### 6.1 Further Submissions

56. The Council's summary of decisions requested was notified on 30 May 2019, with the period for making further submissions closing on 13 June 2019. 11 further submissions were received from Eden Epsom Residential Protection Society Inc, Gemma Allen, Heritage New Zealand Pouhere and John Allen.
57. A full copy of the original submissions and further submissions is contained in **Appendices 2 and 3**.

### 6.2 Withdrawn Submission

58. Stuart King submitted his request through a further submission process seeking to withdraw his primary submission (submission 2) on 10 June 2019.

## 7. ASSESSMENT OF ENVIRONMENTAL EFFECTS

59. The following sections assess environmental effects relevant to the proposed private plan change:
  - Transport
  - Noise and vibration
  - Urban design (incompatibility of built form, height and bulk dominance, overlooking and loss of privacy, shading effects)
  - Visual and landscape amenity
  - Removal of special character overlay
  - Non-residential activities in residential zones

## 8. TRANSPORT

### 8.1 Parking

60. The applicant proposes to apply a Parking Variation Control Overlay on the subject site and include a minimum parking rate at 1 per 64m<sup>2</sup> gross floor area (GFA) with no maximum rate in Table E27.6.2.4 Parking rates – area 2 in Chapter E27 Transport as per below (in red with underlined)

**Table E27.6.2.4 Parking rates – area 2**

Activity			Applies to zones and locations specified in Standard E27.6.2(5)	
			Minimum rate	Maximum rate
(T67)	Medical facilities	Hospitals not shown on the Parking Variation Control planning maps	1 per 50m <sup>2</sup> GFA	No maximum
(T68)		Grafton Hospital 2 Park Road, Grafton	No minimum	1 per 50m <sup>2</sup>
(T69)		Greenlane Clinical Centre 210 Green Lane West, Epsom	1 per 55m <sup>2</sup> GFA	No maximum
(T70)		Mt Albert, 50 Carrington Road, Mt Albert	1 per 60m <sup>2</sup> GFA	No maximum
(T71)		Mercy Hospital, 98 Mountain Road, Epsom	1 per 40m <sup>2</sup> GFA	No maximum
<u>(T71A)</u>		<u>Brightside Hospital</u> <u>3 Brightside Road and 149, 151</u> <u>and 153 Gillies Avenue</u>	<u>1 per 64m<sup>2</sup> GFA</u>	<u>No maximum</u>

61. The applicant states the proposed parking rate reflects an actual parking demand of the hospital facilities and is based on a parking demand survey undertaken by Flow Transportation Specialists in August 2017. This survey records the demand for on-site parking between 6am to 6pm within the Brightside hospital as well as on-street parking on the adjacent streets of Brightside Road and Shiphers Avenue.
62. Between eight and twelve hours, the peak parking demand for the existing hospital was 50 cars and on-street parking on Brightside Road and Shiphers Avenue was 31 cars. In total 81 car parks would be required during the peak demand. Based on the existing GFA of the Brightside Hospital of 5,196m<sup>2</sup>, the peak parking demand rate for the site is 1 parking space per 64m<sup>2</sup>.
63. Flow's transport assessment indicates that a new extension to the hospital on 149, 151 and 153 Gillies Avenue would result in development with an estimate total of 5,500m<sup>2</sup> GFA. It suggests that the general parking requirement (1 per 50m<sup>2</sup> GFA) specified in Table E27.6.2.4 reflects parking demands for larger public hospitals. Smaller private hospitals such as Brightside Hospital do not require a greater number of onsite parking. The parking requirement will result in an oversupply of onsite parking for the hospital.
64. Submission by Eden Epsom Residential Protection Society and its pro-forma submissions raise that there is an undersupply of on-site parking of the existing hospital resulting in an over-demand of on-site and on-street parking of the neighbourhood area.
65. Submission by Auckland Transport raises various concerns in relation to parking, including whether the parking rate proposed by PC21 will be acceptable. It also suggests an

appropriate mechanism to ensure that on-street parking be monitored by the applicant after the hospital is established.

66. Council's transport specialist, Meredith Bates, concurs with Flow's assessment above. She agrees that the proposed parking rate will provide sufficient parking and reduce the demand of on-street parking in the neighbourhood. She also agrees that the general parking rate for the hospital will provide an unnecessary oversupply of parking.
67. In response to the submission by Auckland Transport, Ms Bates considers that the proposed parking rate incorporates the demand of staff and visitor parking. New parking demand as a result of the hospital expansion will be able to be accommodated by on-site parking. She suggests that the parking demand issues could also be addressed by alternative sustainable transport options suggested by the applicant. These options include public transport and an implementation of a staff travel plan. Ms Bates suggests that the provision for a staff travel plan be included in a resource consent application for the new hospital development. Ms Bates's detailed response to the submission by Auckland Transport and other submissions is included in her report (see **Appendix 4**).
68. I agree with Ms Bates' comments and consider the proposed changes to the parking requirement for the Brightside hospital are appropriate.

## **8.2 Traffic generation**

69. Flow's traffic generation survey (undertaken in April 2017) shows a total 41 peak hour trips entered and exited the Brightside hospital during the peak hour between 2.15pm and 3.45pm. It calculates that for the realistic development of 10,700m<sup>2</sup> (existing 5,196m<sup>2</sup> and new extension 5,500m<sup>2</sup>), there would be around 84 traffic trips within that peak hour.
70. Flow concludes that the effects of the proposed increase in vehicle trips resulting from a permitted development enabled by PC21 are considered to be acceptable, with the existing roads and intersections being capable of accommodating the additional traffic without resulting in adverse traffic effects.
71. Ms Bates agrees that hospital development enabled by PC21 could potentially result in increased traffic movements. She concurs with the applicant that if the new extension of the hospital involves an area of 5,500m<sup>2</sup>, the overall trip generation for the subject site will be within the permitted standard of E27.6.1 of the AUP(OP) which limit 100 vehicles per hour for this type of land use activity. She agrees that the existing roads and intersections are capable of accommodating the additional traffic without resulting in adverse traffic effects on the surrounding network.
72. The rezoning of the site to SP-HFH Zone could potentially enable greater development capacity given the zone height and bulk and location standards. Ms Bates considers that if hospital development exceeds the specified combined area of 10,700m<sup>2</sup>, as indicated by Flow above, there could be potential adverse effects from additional traffic movements causing congestion. She suggests that if this is the case, the revised transport assessment, would be required, and traffic movement effects be reassessed to ensure the proposed hospital development will not have an impact on the roading network.
73. Ms Bates concludes that the level of the trip generation as a result of development enabled by PC21 can be accommodated within the road network. I concur with this conclusion.

## **8.3 Access and road safety**

74. Gillies Avenue is classified as an arterial road in the AUP(OP). Flow suggests that if a development proposal enabled by PC21 considers a left in and left out only access on Gillies Avenue, there would be negligible effect from the operation of this access on the operation of Gillies Avenue. Any vehicle access proposed from Gillies Avenue, as part of the

development, will also be subject to the standards under Chapter E27 and will require a restricted discretionary consent under E27.6.4.1 (2) and E27.6.4.1 (3) where a vehicle access restriction will apply to Gillies Avenue.

75. Flow concludes that there would be negligible effect on the operation of Gillies Avenue given measures such as access design and restrictions could be used and considered at a resource consent stage.
76. Auckland Transport, in its submissions, recommends that the applicant considers a mechanism to limit vehicle turning movements from any new vehicle access off Gillies Avenue. Ms Bates agrees with this suggestion and suggests that new access to Gillies Avenue is restricted to a single access only and the main entrance to the hospital remains on Brightside Road to minimise the effects on the surrounding road network.
77. In response to some concerns raised by submissions regarding pedestrian and cyclist safety, Ms Bates comments that the increased traffic movements and new access for the future hospital development are unlikely to have an impact on pedestrians and cyclists. The level of traffic movements anticipated for the development is likely to be acceptable.
78. Ms Bates concurs with Flow that any new access on Gillies Avenue will be subject to a restricted discretionary assessment and the appropriate measures such as speed humps, markings, signage can be incorporated in the access design to ensure pedestrian and cyclist safety. These measures would ensure that any effects as a result of new vehicle access as part of the future development proposal can be minimised or mitigated.
79. I concur with Ms Bates' conclusion above that through a resource consent application and assessment, any effects as a result of new vehicle access as part of the future development proposal can be minimised or mitigated.

#### **8.4 Construction traffic**

80. Many pro-forma submissions on the plan change also raise concerns on public safety and increased congestion from construction traffic such as truck/vehicle movements during a construction of the new hospital development.
81. Matters raised are more relevant to a resource consent application as construction traffic effects could be addressed appropriately by the construction methodology. Ms Bates considers a Construction Traffic Management Plan (CTMP) is an appropriate mechanism to ensure construction has a minimum impact on the safety and efficiency of the adjacent transport network. The details of the CTMP should be considered as part of a resource consent application for development.

#### **8.5 Conclusion**

82. Given the assessment of transport matters above, Ms Bates concludes that:

- The proposed Parking Variation Control on the subject site with a parking rate of 1 per 64m<sup>2</sup> GFA is supported.
- The level of trip generation anticipated for the rezoning to enable the indicative development of 10,700m<sup>2</sup> can be accommodated within the road network.
- Effects associated with vehicle access on the roading network can be minimised by restricting a single access only onto Gillies Avenue and retention of the main entrance to the hospital remains on Brightside Road.
- The proposed rezoning is unlikely to exacerbate any existing or create new safety issues.
- The provision of a construction management plan is an appropriate mechanism to ensure construction effects are mitigated.

83. I agree with Ms Bates' conclusion above and consider that any transport effects from the proposed plan change can be avoided, remedied or mitigated through a future resource consent application for development.

## 9. NOISE AND VIBRATION

84. Submissions raise that hospital development enabled by PC21 will result in adverse noise effects from activities such as traffic movements and operation of mechanical plant. Many submissions also raise concerns about construction noise, in particular in relation to an excavation of a basement if the hospital development incorporates basement car parking spaces.

### 9.1 Operation noise effects

85. Chapter E25 Noise and Vibration specifies the following noise standards for noise generated in Residential and SP-HFH Zones (see table below). Rule E25.6.22 states that where noise generated by an activity in one zone is received on a site in a different zone, the activity generating the noise shall comply with the noise limits and standards of the receiving zone. This means the more stringent Residential Zones noise limit will apply to any activity on the subject site under PC21.

Time	Noise level Residential Zones (Table E25.6.2.1)	Noise level Special Purpose – Healthcare Facilities and Hospital (Table E25.6.13)
Monday to Saturday 7am-10pm	50dB L <sub>Aeq</sub>	55dB L <sub>Aeq</sub>
Sunday 9am-6pm		
All other times	40dB L <sub>Aeq</sub> 75dB L <sub>Amax</sub>	45dB L <sub>Aeq</sub> 75dB L <sub>Amax</sub>

86. The applicant's acoustic assessment by Earcon Acoustics considers that the potential traffic and mechanical plant noise associated with the hospital activities would be able to comply with the above permitted standards in Chapter E25 of AUP(OP). This means that the AUP has already considered this level of effects and found them to be acceptable.
87. Council's noise specialist, Curt Robinson agrees with Earcon and considers that the potential noise effects associated with the hospital activities could be minimised if the development proposal incorporates a design to ensure compliance with the noise standards. The necessary acoustic mitigation would be assessed as part of a resource consent application for the development of the site. He considers that the acoustic effects on the adjoining site would be reasonable.
88. With regard to potential noise effects from vehicle movements, Mr Robinson comments that Earcon has not considered these effects on nearby residential properties. The subject hospital site is adjoining properties on Owens Road to the north which contain two storey dwellings with upper storey windows. He comments that if the new hospital is designed to accommodate no more than 49 movements during the peak hour traffic and 12 movements per hour at night, the acoustic effect is likely to be acceptable. Given Mr Robinson's comments, in my view vehicle movements exceeding this threshold are likely to generate adverse noise effects on adjoining residents. These effects would need to be assessed through a resource consent application to ensure mitigation measures are used to minimise effects on adjoining properties.



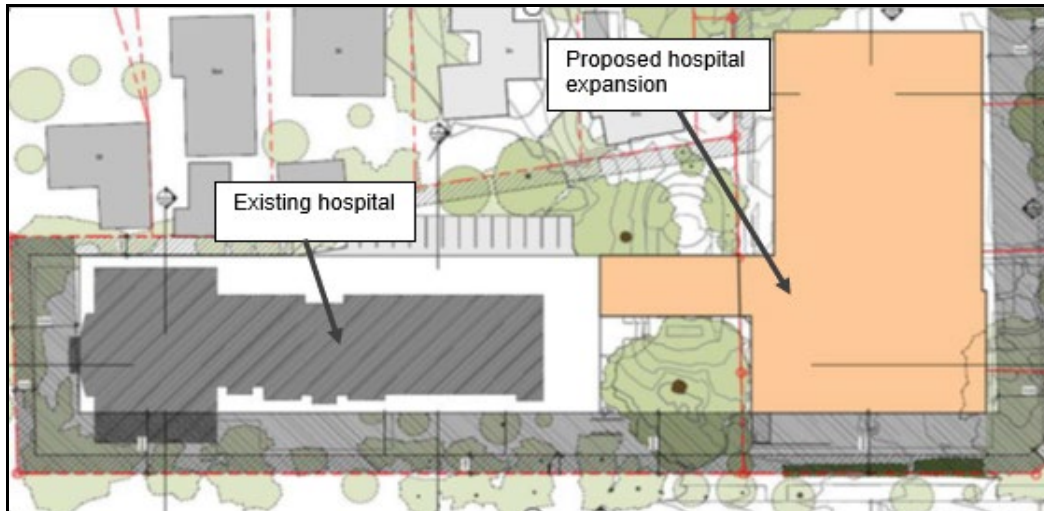
## 9.2 Noise and vibration in relation to blasting

89. Earcon acoustic report also indicates that the expansion of the hospital will include a basement level of car parking spaces. The applicant's Civil Engineering report by Babbage also suggests that any earthworks for the future hospital are likely to be on basalt and, therefore, some form of rock breaking would be required to excavate and prepare foundations.
90. Mr Robinson considers that the excavation to enable hospital development on the subject site is unlikely to comply with the noise and vibration limits. Potentially, the neighbouring residential properties (receiving environment) would be significantly impacted by noise and vibration during the construction period. He suggests that mitigation measures such as a method of blasting to fracture the rock quickly and efficiently be used to reduce the long term noise impact. Noise effects during the construction period are a compromise between short-term effect and enabling works to be undertaken and should be assessed at a resource consent stage.
91. Submission by the Eden Epsom Residential Protection Society and its pro-formal submissions raise concerns about the potential adverse effects from blasting to enable hospital development with basement carparking. In particular adverse effects in relation to health and safety and noise and vibration on the adjacent residential properties in the neighbourhood. Some of these submissions refer to adverse effects they experienced from rock blasting during the construction of the existing Brightside Hospital in the 1990s.
92. The applicant's Civil Engineering report by Babbage provides general information on earthworks and excavation anticipated for hospital development enabled by the rezoning. Unlike a resource consent application, a detailed geotechnical report assessing effects from earthworks and excavation does not form part of the private plan change request. However, to enable Council to assess the matters raised by submissions and to ensure the rezoning would enable the realistic development on the site (as a large scale of excavation required for a hospital building), Steven Price, geotechnical specialist, has been engaged to provide his opinions on the effects associated with excavation and blasting. His comments are as follows:

## 9.3 Scale of excavation

93. Mr Price considers that some excavation of rock would be required to form foundations to support a new hospital building given the potential building mass allowed by the new zone. Any excavation for the building foundation will be minor. However, if basement parking is incorporated in the building design, excavation of basalt rock will be necessary to form a useable basement.
94. Mr Price has reviewed the applicant's drawings for the indicative hospital building footprint (refer to **Figure 9** below) and calculated that a volume of approximately 23,000m<sup>3</sup> would be required if the excavation occurs over the entire footprint of the total site (excluding the existing hospital basement). If the excavation is specific to the eastern portion (the Gillies Avenue frontage) the estimated volume is likely to be around 9,500m<sup>3</sup> to 10,000m<sup>3</sup>.

**Figure 9: Footprint of the existing hospital and the area indicated for expansion**



95. Mr Price suggests that the volume estimates do not allow for blasting outside the footprint. According to his experience on the recent basalt excavation blasting for a similar type of project, a minimum of 400mm excavation outside the proposed basement wall will also be required.
96. It is concluded that hospital development enabled by PC21 is likely to require extensive excavation of basalt rock to form usable basement parking and foundations to support the development structure.

#### **9.4 Noise and vibration effects from blasting**

97. Rule E25.6.30. Vibration of AUP(OP) specifies limits of vibration for construction activities. It ensures that vibration from activities does not exceed the limits set out in German Industrial Standard DIN 4150-3 (1999). Mr Price suggests that this is a common standard applied throughout the Auckland urban area. In his view, if blasting is of a small scale with appropriate monitoring in place, the vibration limits could be complied with.
98. Mr Price identifies that the vibration effects on the surrounding environment are likely to be from rock breaking and the subsequent excavation of rock following the blasting. The effects can be minimised if neighbouring structures or dwellings are sufficiently distant. While blasting could be felt by neighbouring residents, in his view, it does not detrimentally affect structures or dwellings.
99. He concludes that from his experience, construction of basements from excavation of basalt rock using a blasting methodology has successfully been undertaken in Auckland where sites are adjacent to neighbouring residential and commercial properties. Any noise and vibration effects can be addressed as part of a land use consent application with mitigation measures.

#### **9.5 Duration of blasting and potential road closure**

100. Many submissions have raised that Brightside Road and Gillies Avenue could potentially be closed due to the extended period of blasting required for development.
101. Mr Price considers it is likely the blasting would require an extended period of excavation over many months because the blasting would need to comply with the noise and vibration limits to minimise the effects on the residential environment. In his opinion, temporary closures of Brightside Road and Gillies Avenue may be required for short periods during

each blast. However, when blasting is on the far side of the site away from the roads, road closure would unlikely be required.

102. In my view, any road closure due to excavation and rock blasting for construction of the hospital would need to be considered and assessed at a resource consent stage. An appropriate mechanism such as the Construction Traffic Management Plan (CTMP) would ensure the effects on the transport network from the potential road closure are minimised.

## 9.6 Conclusion

103. Mr Robinson concludes that noise effects associated with the operation of the hospital would be at an acceptable level depending on building design and noise mitigation measures. Construction noise effects are consent matters that would be considered during a resource consent application stage.
104. Mr Price is of the opinion that the hospital development with basement carparking enabled by PC21 is likely to require an extensive area of earthworks and blasting given the nature of geotechnical conditions of the site. However, there are methodologies that could be employed to carry out work while avoiding significant effects on neighbouring properties. Whilst vibration and noise effects related to blasting are not avoidable and could result in amenity effects to neighbours, these effects are of temporary nature and could be addressed as part of a resource consent application.
105. I concur with the conclusions made by Mr Robinson and Mr Price above.

## 10. URBAN DESIGN AND VISUAL/LANDSCAPE AMENITY

### 10.1 Building height and incompatibility of built form

106. The Eden Epsom Residential Protection Society (submission 94) and its pro-forma submissions express concerns about the potential amenity effects in relation to building height and bulk enabled by development controls under the SP-HFH Zone. They raise that any new buildings are likely to be incompatible with built form of the area and will generate adverse amenity effects such as loss of privacy, shading and visual dominance.
107. The subject site is currently zoned Mixed Housing Suburban and Single House (with the SCAR Overlay). The proposed plan change will allow development with a different bulk and location with a permitted building height up to 16m and 25m as a restricted discretionary activity. There are no matters of discretion listed in the SP-HFH Zone provisions for building height exceeding 16m when the building is within 10m of a public road or an open space zone (refer to **Table 7** below). Therefore, the assessment of any new buildings that exceed 16m would be made against the zone objectives and policies and any relevant effects from the additional height in accordance with Chapter C: General, Rules C1.8(1).

**Table 7 – Activities and Building Height Standards under SP-HFH Zone**

Activity		Activity Status
(A18)	Buildings, alterations, additions and demolition unless otherwise specified below	Permitted
(A20)	New buildings or additions to existing buildings that increase the building footprint by more than 20 per cent, that are visible from and located within 10m of a public road or an open space zone	Restricted Discretionary Activity

<b>Building Heights</b>			
<b>Site area</b>	<b>Permitted activity standard</b>	<b>Restricted discretionary activity standard</b>	<b>Discretionary activity standard</b>
Sites with a total site area up to 4ha	Up to 16m	Between 16m and up to 25m	Greater than 25m

108. To understand the effects from the rezoning, below is a comparison of some development standards under Single House (with SCAR) and Mixed Housing Suburban Zones with SP-HFH Zone.

**Table 8 - Development standards under Single House (with SCAR) and Mixed Housing Suburban Zones with SP-HFH Zone**

<b>Development Standards</b>	<b>Residential Zones</b>		<b>Special Purpose – Healthcare Facilities and Hospital (SP-HFH Zone)</b>
	<b>Single House (Special Character Areas Overlay – Residential) Gillies Ave Sites</b>	<b>Mixed Housing Suburban 3 Brightside Road</b>	
Building height (permitted)	8m	8m	16m
Height in relation to boundary	45-degree recession plane measured from a point 2.5m	45-degree recession plane measured from a point 2.5m	45-degree recession plane measured from a point 2.5m
Front yard	3m	3m	3m
Side yard	1m	1m	3m
Rear yard	3	1m	3m
Maximum impervious area	60% of site area	60% of site area	80% of site area
Building coverage	35% 25% (combined total area of SCAR)	40%	No requirements
Landscape area	40% net	40%	No requirements
	At least 50% of the area of front yard must comprise landscaped area	At least 50% of the area of front yard must comprise landscaped area	

***Permitted building and height***

109. The main differences of the standards between the residential zones and SP-HFH Zone are permitted building height (from 8 to 16m), the requirement for building coverage and landscape area. It is also noted that under the SP-HFH Zone, any new buildings that are located more than 10m away from the road frontage that comply with the development standards such as yard and height in relation to boundary requirements are permitted. Any

effects in relation to building bulk and design on the boundaries of the site cannot be assessed.

110. The SP-HFH Zone (H25.6.1) specifies permitted building heights up to 16m on sites with a total site area up to 4ha. This height limit applies to the subject site which is close to 1ha in size. Any new buildings located within 10m of a public road or an open space zone would require a restricted discretionary activity (RDA) consent and would be assessed against the criteria under H25.8. Matters of discretion that Council will restrict to when assessing the RDA application for buildings within 10m of a public road or an open space are the effects of the building design and external appearance on the adjoining streetscape and open space. These are as follows:

**H25.8.1. Matters of discretion**

- (2) *New buildings or additions to buildings that increase the building footprint by more than 20 per cent, that are visible from and located within 10m of a public road or an open space zone:*
- (a) *the effects of the building design and external appearance on the adjoining streetscape and adjoining land zoned open space.*

111. H25.5.2 list the following assessment criteria for new buildings or additions to buildings that increase the building footprint by more than 20 per cent, that are visible from and located within 10m of a public road or an open space zone.

- (a) *the extent to which design features can be used to break up the bulk of the building by, for example varying building elevations, setting parts of the building back, and the use of architectural features without compromising the functional requirements of the use of the building;*
- (b) *the extent to which the visual effects of the building can be softened by landscaping; and*
- (c) *the extent to which any service elements (roof plant, exhaust and intake units and roof equipment) that could be viewed from the road or public open space zone can be integrated as part of the façade or roof of the building.*

112. The assessment criteria above address the external design elements and the visual effects of any new buildings within 10m of a public road or an open space zone. They are not explicit in addressing effects in relation to overshadowing, visual dominance or loss of privacy on the adjacent properties. Only objective H25.2(3) and policies H25.3(3) and (4) address these amenity effects (see below).

**H25.2. Objectives**

- (3) *The adverse effects of hospital and healthcare activities, buildings and infrastructure, and accessory buildings and activities on adjacent areas are avoided, remedied or mitigated.*

**H25.3. Policies**

- (3) *Minimise the effects of supporting activities and services on the amenity values of the adjacent land.*
- (4) *Minimise significant adverse effects of overshadowing, visual dominance and loss of visual privacy on adjacent properties by use of graduated building heights and by locating higher buildings away from the zone boundary.*

113. The applicant states the increased height from 8m to 16m is not uncommon because this transition in heights happens throughout the Auckland urban area where zones such as Mixed Use and Terrace Housing and Apartment Buildings adjoin the Mixed Housing Suburban zone. The bulk and dominance effects from the increased height can be managed by the height in relation to boundary control which ensures taller areas of buildings are located further away from boundaries. This control also ensures a reasonable level of sunlight access to adjacent properties.

114. Council's urban design specialist, Trevor Mackie has reviewed the proposed plan change, the applicant's urban design assessment and matters raised in submissions. He considers the height in relation to boundary control is partly protective in dealing with bulk and dominance effects. In his view, there will be greater levels of adverse effects of bulk and dominance through the use of the permitted standards of the SP-HFH Zone. He suggests that a 16m building would largely not be compatible with the existing scale and built form of the neighbourhood. Mr Mackie considers a building scale similar to the existing Brightside hospital (2-3 storeys) would be more compatible with the heights of the surrounding residential dwellings.
115. Policy H25.3(4) of the SP-HFH Zone seeks that adverse effects in relation to overshadowing, visual dominance and loss of visual privacy are minimised by use of graduated building heights and by locating higher buildings away from the zone boundary. Mr Mackie is of the view that the subject site is not large enough to be able to reduce visual and bulk dominance of the 16m building height on the adjoining properties. Given the close proximity of the subject site to its immediate neighbours, the higher part of the 16m building would need to be well setback from the boundaries to reduce visual and bulk dominance.
116. I note that of 20 healthcare facilities and hospitals under the SP-HFH Zone, only two facilities have an area less than 1ha, namely Warkworth Birthing Centre (4,042m<sup>2</sup>) on 56 View Road, Warkworth and Hibiscus Coast Community Health Centre (4,322m<sup>2</sup>) on 136 Whangaparaoa Road, Red Beach (refer to **Appendix 5** of this report). The surrounding context of these sites is different from the subject site. These facilities are located with a greater distance from the nearest residential neighbours and their surrounding residential area does not have the identified special character, unlike the subject site and its surroundings.
117. As raised by many submitters, not all hospitals and healthcare facilities are zoned SH-HFH. Mr Mackie indicates that the zone may not be appropriate for the subject site given significant boundary effects such as visual and bulk dominance (as stated above) are unable to be absorbed within its site. The zone and its standards are appropriate for large hospitals or large sites that could internalise these effects.
118. I agree with Mr Mackie's urban design assessment above. The SP-HFH Zone is an enabling zone and its standards are intended for large hospital sites that could appropriately manage visual and bulk dominance of the permitted building height on the adjoining properties. I concur that a 16m building on the subject site which is less than 1ha in size would not be consistent with the existing scale and context of the residential neighbourhood and is likely to be contrary to Policy H25(3)4 which seeks to minimise effects in relation to visual and bulk dominance.

#### ***Building height over 16m and up to 25m***

119. Many submissions raise concerns that if the rezoning is accepted, hospital development could be constructed up to 25m as a restricted discretionary activity. An application that exceeds the permitted 16m building height would be assessed as a restricted discretionary activity under standard H25.6.1 of the SH-HFH Zone.
120. Unlike other zones that enable taller buildings such as in THAB or Mixed Use zones (up to four storeys or 16m), there is no criterion in the SP-HFH Zone requiring the consideration of effects of greater building height on the surrounding residential area. As there are no matters of discretion listed for building height exceeding 16m, the assessment of height infringement would be made against the objectives and policies of the zone in accordance with Chapter C: General, Rules C1.8(1). Policy H25.3(5) provides for additional building height as long as it does not result in significant adverse effects on adjacent properties.

*H25.3(5) Provide for additional building height in identified locations, where it:*



- (a) enables the efficient operation of the hospital or healthcare facility; and
- (b) can be accommodated without significant adverse effects on adjacent properties.

121. Mr Mackie comments that while there are other buildings on Gillies Avenue which are of a height around 16m or greater, these buildings are not located within the vicinity of the subject site. He considers that a building between 16m and 25m in height (five to seven storeys) on the subject site would be significantly out of scale with the existing neighbourhood. As mentioned above, in his view, a building of a similar scale to the existing Brightside hospital is considered more appropriate in this location.
122. I agree with Mr Mackie's comments above that any building over 16m up to 25m on the subject site would be out of scale in its setting. In my view, additional building height is intended for larger SP-HFH zoned sites with greater intensity as they could comfortably accommodate more height with internalised effects.

## 10.2 Dominance, overlooking and loss of privacy

123. Many submissions raise concerns that hospital development enabled by PC21 would result in adverse effects in relation to overlooking and loss of privacy.
124. Submissions 10 and 11 by Marinda and Stuart Rabone, owners of 36 Owens Road immediate neighbours to the subject site to the north raise that there will be a loss in privacy in their backyard as a result of tall buildings under PC21.
125. Submissions by Gemma Allen (131) and John Allen (142) also raise concerns about dominance and visual privacy effects on their property, 32A Owens Road. Their property is adjoining the subject site to the north. The submissions also request that the applicant provide photomontages of the building bulk enabled by PC21 from their property. **Figure 10** below shows the subject site in relation to their property.

**Figure 10: The subject site and adjoining residential properties, 32A and 36 Owens Road**



126. Through the request for further information, the applicant's LA4 Landscape Architects has provided comments in relation to visual privacy effects on the adjoining residential properties. LA4 Architects states:
- The existing mature trees within the Southern Cross site will provide a good buffer and screening towards parts of development enabled by the plan change. Additionally, there are trees within the neighbouring properties in Owens Road. The Owens Road properties are generally orientated north towards the sunlight and not south towards the site. The rear yards of these properties, facing the site are typically service and access yards within associated garaging.*
127. I note that the applicant has not indicated the potential additions to the existing Brightside hospital if the subject site is rezoned. The expansion seems to be focused only on the Gillies Avenue frontage. PC21 could enable the additions on the northern part of the hospital building currently used for car parking. However, the expansion in this location would be restricted by the scheduled tree to the east and the viewshaft controls limiting building height between 14 and 15m.
128. Council's visual/landscape specialist, Stephen Brown has reviewed the applicant's visual landscape assessment by LA4 Landscape Architects above. Mr Brown disagrees with the above statement. He suggests that a building complying with development controls under the SP-HFH Zone has the potential to have an impact on adjoining properties regardless of how much vegetation is retained on the subject site for screening.
129. In responding to the request from Gemma and John Allen (32A Owens Road), and the concerns raised by Marinda and Stuart Rabone (36 Owens Road), the applicant indicated that their experts would produce photomontages and provide them to Council's relevant specialists to understand the visual and privacy effects on these properties. However, there was a delay from the applicant in producing and providing these photomontages. By the time this report was written, Council has not received the information.
130. Regardless of the availability of these photomontages, Mr Brown has undertaken his assessment on the visual dominance and privacy effects on 32A and 36 Owens Road and concluded that both properties would potentially be affected. His assessment suggests that 32A Owens Road is likely to be affected at a greater level.
- *32A Owens Road appears likely to be affected to an even greater degree: it has a courtyard and swimming pool that would be exposed to both that part of the development envelope abutting Gillies Avenue and the main 'wing' aligned parallel with Brightside Road. That same wing would conceivably also offer more fleeting views into the main house, next to the swimming pool and courtyard – both of which currently enjoy a high level of privacy.*
  - *The Plan Change proposal would conceivably have a high, to very high, impact on the occupants of 32A Owens Road – regardless of how much vegetation is retained on the subject site.*
131. Mr Brown comments that 36 Owens Road has an elevated rear deck with a garden area that are exposed to the boundary of the subject site. Some existing trees provide screening to part of the view above, but not all of it. In his opinion, the potential visual and loss of privacy effects on 36 Owens Road will be moderate and less than 32A Owens Road. In his view, the effects on other properties on Brightside Road and Gillies Avenue are moderate or low-moderate.
132. Similarly, Mr Mackie is of the opinion that dominance, overlooking and loss of privacy could be significant adverse effects on 32A Owens Road. He also comments that visual and amenity effects on neighbours could be significantly more adverse if the mature trees are not retained, particularly those trees along the northern boundary of the subject site. In his



opinion, the hospital development under PC21 is likely to have moderate to severe adverse effects in relation to loss of privacy on the adjacent properties to the north.

133. I agree with the assessment made by Mr Brown and Mr Mackie above. I consider that the adjoining properties, in particular 32A and 36 Owens Road are likely to be adversely affected by PC21 in relation to visual dominance, overlooking and loss of privacy. The proposal is unlikely to be consistent with Policy H25(3)4 which seeks to minimise visual dominance and loss of privacy effects on the adjoining properties.

### **10.3 Shading**

134. Many submissions raise that there could be adverse effects in relation to shadowing from development under PC21.
135. The applicant's shading diagrams by Archimedia Architects demonstrate the shading effects on the neighbouring properties and the surrounding area. The shading assessment uses a maximised bulk building allowed by the SP-HFH Zone provisions. Mr Mackie has not raised any concerns relating to shading effects.
136. I agree with the applicant's assessment that the potential shading effects on the adjoining residential properties (from the permitted building of 16m height) are likely to be minor given the hospital development would be located to the south of the adjoining residential properties. I also agree that access to sunlight and daylight for adjoining properties could be maintained.

### **10.4 Streetscape and unprotected trees**

137. Eden Epsom Residential Protection Society's submission raises that the applicant places a considerable reliance on unprotected trees on the subject site to screen the effects of development. The removal of these trees could occur as of right and could have an adverse effect on landscape.
138. The applicant's Urban Design Assessment Report concludes that the provisions of the SP-HFH Zone are adequate in managing potential amenity effects on the streetscape through the restricted discretionary activity resource consent if the building is located within 10m of a street frontage, or by retention of mature trees and additional landscaping if the building is 10m or more from the front boundary. The report recommends that the plan change include a mechanism for retention of mature trees such as a development concept plan, in addition to the zone standards.
139. Mr Mackie comments that the unprotected trees on the Gillies Avenue properties would provide screening of the building height and bulk and there would be a significant adverse effect on streetscape if they were removed.
140. Through a request for further information, the applicant provided an analysis of the extent to which the existing unprotected trees and other vegetation on the subject site could be expected to survive future development enabled by the plan change.
141. The applicant has provided an arborist report by Richard Peers of Peers Brown Miller Ltd which indicates that the unprotected trees could be retained as part of future development. Richard Peers states:

*"I can say with confidence that all the trees shown around the perimeter of the development footprint would be able to be retained if the building footprint were to be established as shown on that plan. Even the large trees near the corner of Brightside Avenue that have the footprint encroaching on their driplines would tolerate any excavation work at or about the distance shown from their bases."*

142. Council's arborist, Gavin Donaldson has reviewed Mr Peers' report and concurs that all unprotected trees are healthy and could be retained if a correct methodology is used for construction of future development. He suggests that the trees need to be afforded protection during the plan change process given the reliance on these trees as mitigation and screening of the 16m building height. This is to ensure any future hospital development is required to take them into consideration at the planning stage. He suggests that a restrictive covenant be placed on these trees through a consent notice on the title prohibiting their damage or removal.
143. The applicant's arborist assessment has not demonstrated if these unprotected trees meet the criteria for protection as notable trees under the AUP. Council's heritage tree specialist, West Fynn has been asked to assess all unprotected trees on the subject site. Mr Fynn confirms that none of the trees qualifies to be scheduled as notable trees. They are not significant species and are unlikely to have heritage relevance to the site.
144. Mr Brown agrees with submitters who raise concerns about tree protection. He concludes that without a mechanism to protect trees and vegetation on the subject site, the visual effects of future development enabled by PC21 could be worse than the anticipated effects stated by the applicant.
145. I concur with the assessment by Mr Mackie and Mr Brown that without mature trees on 149, 151 and 153 Gillies Avenue, adverse effects from development on streetscape could be significant. Without a robust tree protection mechanism offered by the applicant, there is a possibility that these trees would be lost through construction and development. The effects on the streetscape amenity from the loss of these trees would be more than minor.

## **10.5 Landscape Amenity**

146. Mr Brown considers the area's 'pleasantness' and 'aesthetic coherence' are critical of any locality's identity and sense of place. He suggests the Special Character Overlay also needs to be considered in addressing how the proposed new hospital development integrates with its landscape. He states:

*"Collectively, the subject houses at 149-153 Gillies Avenue, together with the wider array of heritage dwellings and mature gardens spread across Mt Eden's volcanic mantle, contribute to perception of a landscape that remains both fundamentally residential in nature and that is imbued with very strong heritage overtones."*

*"The existing hospital is a predominantly two-storey structure that is set well back from both the Brightside Road corridor and adjoining properties off Owens Road. It is enclosed by a mixture of mature trees, other vegetation and stone walls. Activity within the hospital grounds is quite low key and insular, so that there appears to be limited interaction with neighbouring properties, except in relation to related parking within the local street network."*

147. Mr Brown considers it would be very difficult for development under the SP-HFH Zone provisions to protect those same qualities, particularly given the overall scale of the proposed building envelope. In his view, development enabled by the proposed plan change of a 16m permitted height and up to 25m height (restricted discretionary activity) would have streetscape amenity effects that are not anticipated in the neighbourhood.
148. I agree with Mr Brown's comments above that there could be adverse effects in relation to the landscape amenity of the area as a result of PC21.

## **10.6 Character of the area**

149. Many submissions raise that development under PC21 will be incompatible with the built form and character of the residential neighbourhood.

150. Mr Mackie comments that the applicant's Urban Design Assessment and Landscape and Visual Effects reports do not recognise the nuanced character of different parts of Gillies Avenue, in particular the Special Character Area - Residential that applies to the western side of Gillies Avenue near the subject site. This residential character is reflected in the current Single House zoning pattern with the SCAR overlay.
151. Mr Mackie explains the character of the site and its surrounding as follows:
- 'The character of Gillies Avenue is a high varied mix of uses and building types, scale and special residential character, supported in this area for most part by mature trees and substantial boundary walls, many of them stone walls. There is not a homogeneous character to the whole of Gillies Avenue and its surrounding street network.'*
152. Mr Mackie considers the 'special character' is the dominant contribution to urban design setting and development patterns of the subject site and its neighbourhood. He disagrees with the applicant's assessment that the loss of special character houses at 151 and 153 Gillies Avenue does not constitute a significant effect. In his opinion, the loss of special character houses would be a significant adverse effect on the character of the area even though the houses are not highly visible from the street. This loss cannot be mitigated by the retention of the stone frontage walls and mature trees alone.
153. He comments that the applicant's architecture and drawings by *Archimedia* Architects demonstrates an example of a maximum building mass which could occur under the SP-HFH Zone provisions, but which still has greater setbacks than required from the Gillies Avenue frontage and the adjoining northern boundary. In his view, the zone is an enabling zone that will allow a greater level of adverse effects on adjacent residential properties than would be considered acceptable within the residential zone. The urban design relevance of the SP-HFH Zone provisions is intended for a large site to manage relevant effects of large scale and intense hospital development at the site boundaries. The scale of development on the subject site under the SP-HFH Zone is unlikely to be compatible with the neighbourhood character.
154. The objectives and policies of both Residential – Single House and Mixed Housing Suburban Zones provide for non-residential activities but seek that they are in keeping with the scale and intensity of the area, so they do not erode the amenity of the residential neighbourhood. The Single House Zone with the SCAR seeks to maintain and enhance the character of the area.
155. While non-residential activities are enabled in these residential zones, they are controlled by the scale to ensure the residential character and amenity of the area are protected from incompatible large development. In this case, healthcare facilities up to 200m<sup>2</sup> GFA requires a restricted discretionary activity resource consent.
156. As discussed in Mr Mackie's assessment, the SP-HFH Zone is an enabling zone which will allow development that is not consistent with the scale and character of the area. He concludes that PC21 will undermine the residential character and identity of the area. I concur with his assessment. I consider the proposal will compromise the character values of the area.

## **10.7 Conclusion**

157. Mr Mackie concludes that PC21 will undermine the residential character and identity of the area, which is an urban design setting of this locality. The SP-HFH Zone provisions would allow moderate to severe amenity effects on visual and bulk dominance and loss of privacy on adjacent residential properties. I concur with this conclusion.
158. Mr Brown concludes that the landscape environment of the subject site is fundamentally residential in nature with the special character and heritage built environment. Development

enabled by the SP-HFH Zone provisions would result in adverse effects in relation to visual and landscape amenity of the area. I agree with Mr Brown's conclusion.

## 11. SPECIAL CHARACTER OVERLAY

159. The applicant proposes to delete the Special Character Overlay – Residential (**SCAR**) that applies to 149, 151 and 153 Gillies Avenue. Houses on 151 and 153 Gillies Avenue are also subject to the building demolition controls under Chapter D18 - Special Character Areas Overlay – Residential provisions of AUP(OP).

160. Many submissions on PC21 raise issues about the removal of the SCAR. These include:

- Submission 94 by Eden Epsom Residential Protection Society (supported by Jeremy Salmond's report) and its pro-forma submissions oppose the removal of the SCAR.
- Submission 108 by Housing New Zealand seeks that the private plan change does not remove the SCAR from 149, 151 and 153 Gillies Avenue.
- Submission 161 by Heritage New Zealand Pouhere Taonga opposes the removal of the SCAR and seeks to ensure protection of the heritage and special character features as identified in the application in perpetuity.

161. Council's heritage specialist, Ms Rebecca Freeman has reviewed the applicant's specialist assessment on special character and the following submission points raised by Eden Epsom Residential Protection Society and its pro-forma:

*“(d) The subject site lies within an established area of residential zoned land with the Gillies Avenue part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purposes of the overlay.”*

*“(f) Adverse effects from PC21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.”*

*“(h) PC21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.”*

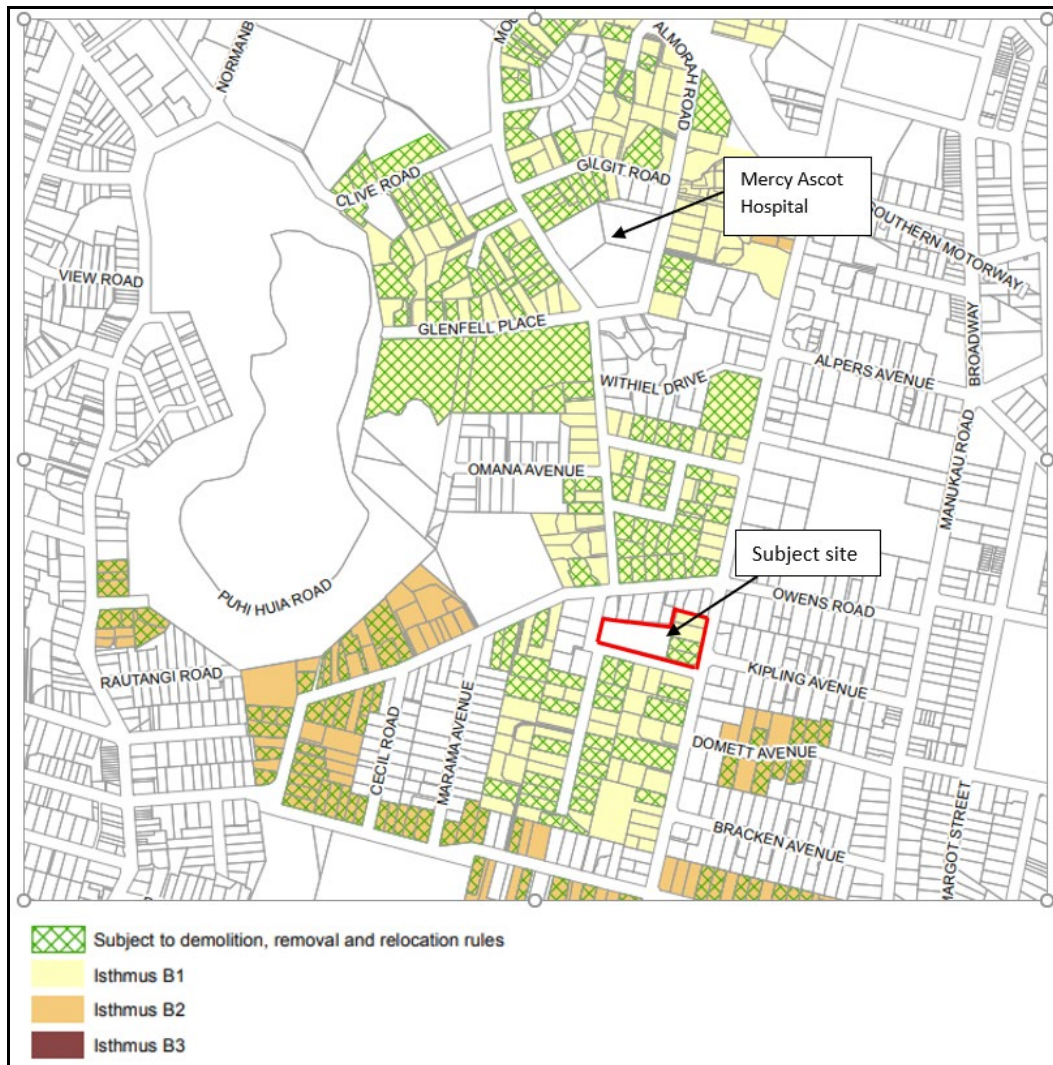
162. Ms Freeman agrees with the matters raised in the submissions above that:

- *removing the special character overlay from the subject sites could result in the degradation of identified character values along this edge of the overlay area*
- *rezoning and removing the overlay off these sites would enable development that could irretrievably alter the residential and historic amenity currently enjoyed in this area of Isthmus B*
- *removing the special character overlay from places that are consistent with the identified values of the overlay area is inconsistent with the objectives and policies of the Regional Policy Statement (RPS), which require the maintenance and*

*enhancement of character values in areas that reflect patterns of settlement, development, building style and/or streetscape quality over time*

163. Mr Salmond, on behalf of Eden Epsom Residential Protection Society raises that the removal of 149-153 Gillies Avenue from the SCAR would have cumulative effects. The loss of these houses would be compounded by the earlier removal of two character buildings that were located on the current hospital site. Ms Freeman agrees that the loss of another three identified character buildings would represent further erosion of special character values in this special character area.
164. PC21 proposes to remove the SCAR from 149, 151 and 153 Gillies Avenue and consequently the building demolition controls that apply to 151 and 153 Gillies Avenue. Schedule 15 Special Character under Chapter L Schedules of the AUP(OP) includes the extent of the Special Character Areas Overlay – Residential: Isthmus B – Mount Eden/Epsom Part A (15.1.7.3.1). The subject site is located within the Special Character Areas Overlay (Isthmus B – Mount Eden/Epsom) and is shown in **Figure 11** below.

**Figure 11: Special Character Areas Overlay – Residential: Isthmus B – Mount Eden/Epsom in relation to the subject site and Mercy Ascot Hospital**



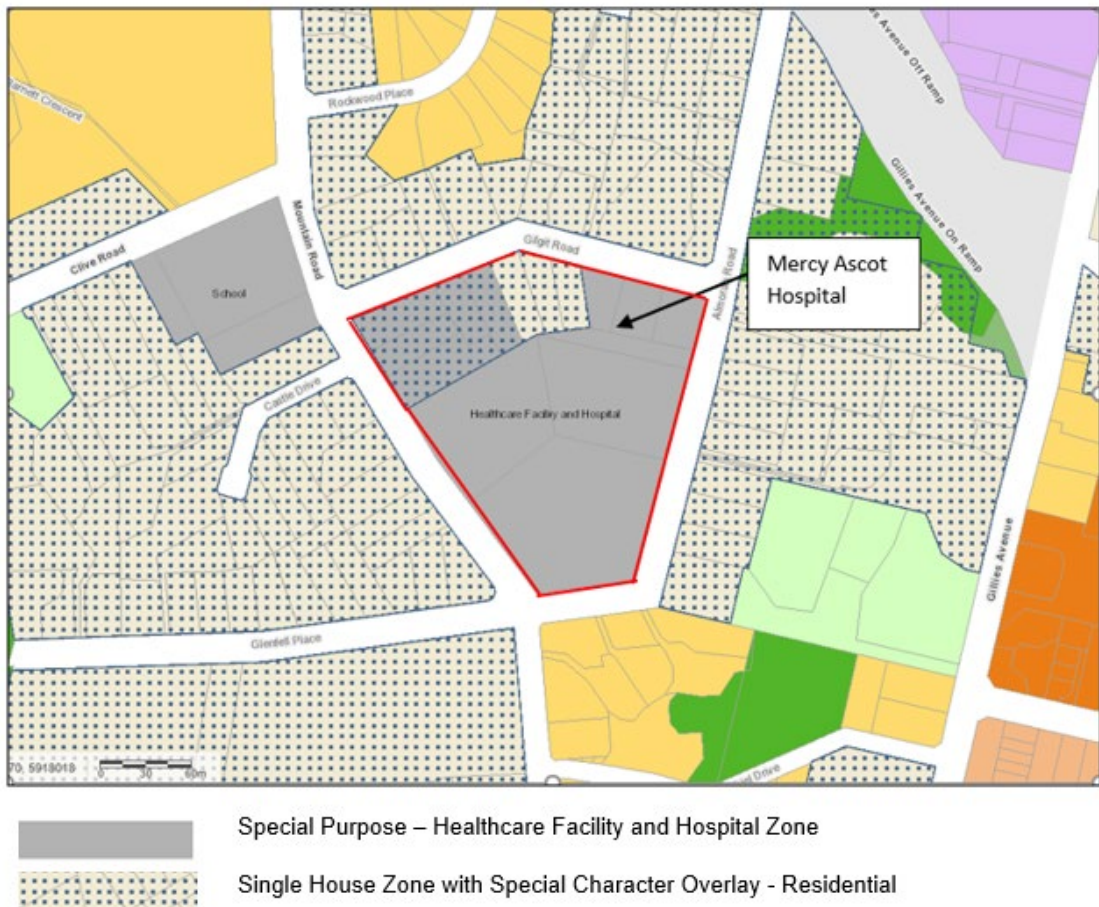
165. PC21 seeks to remove the SCAR from the subject site to enable the expansion of the hospital. Many submissions raise that there could be further loss of character buildings and potential cumulative effects as a result of the plan change. I consider the removal of the SCAR increases the likelihood of buildings on 149, 151 and 153 Gillies Avenue to be



demolished for development under PC21. The proposal, in my view (relying on the evidence of Ms Freeman) would undermine the integrity of Special Character Areas Overlay controls and its objectives and policies which seeks to maintain and enhance the special character values of the area.

166. Many submissions, including from Mr Salmond, on behalf of Eden Epsom Residential Protection Society raise that the removal of the SCAR would result in cumulative effects. Cumulative effects are included in the definition of “effect” in Section 3 of the Resource Management Act 1991 (RMA) as “(d) any cumulative effects which arises over time or in combination with other effects”. While the term is not defined, it encompasses two concepts; being the effects arising over time and effects arising in combination with other effects. In my view, it would be difficult to determine if the removal of the SCAR under PC21 would result in cumulative effects given the effects have to be assessed in combination with other effects from similar applications over time.
167. Ms Freeman indicates in her assessment that if the SCAR is retained on 149, 151 and 153 Gillies Avenue, the SP-HFH Zone could result in a positive outcome. She believes that the design and landscaping of the proposed development under the SCAR provisions would be adequate in addressing the streetscape amenity of the subject site and its surroundings. The SP-HFH Zone with the SCAR overlay approach is reflected on the Mercy Ascot Hospital site in Epsom (refer to **Figure 12** below). In this case, the existing character houses are retained but converted for hospital use. It’s Ms Freeman’s opinion that if the special character overlay remains on 149, 151 and 153 Gillies Avenue, she can support the rezoning of the subject site.

**Figure 12: Mercy Ascot Hospital zoned Special Purpose – Healthcare Facility and Hospital with the Special Character Overlay on both Single House and SP-HFH Zones**



168. The submission by Heritage New Zealand Pouhere Taonga (HNZPT) raises concerns that there will be an impact on the recognised special character of the area. It seeks that the features on 149, 151 and 153 Gillies Avenue are assessed under Schedule 14.1 – historic places and Schedule 10 – notable trees. HNZPT supports the option of a precinct or development outline plan approach to protect trees and stone walls of the subject site. In addition, it recommends that an archaeological assessment be completed prior to works commencing.
169. Ms Freeman agrees with HNZPT that if the SCAR is removed, other options for recognising and managing the identified character values of the three houses should be explored by the applicant. However, the applicant's heritage specialist considers that demolition of these character buildings on the subject site is unavoidable because hospital development would need to occur on this part of the site fronting Gillies Avenue. Ms Freeman disagrees that demolition as a result of the removal of the SCAR is the only option. In her view, alternatives such as introducing additional planning provisions to manage the existing character buildings should be considered to manage the SCAR values.
170. She agrees with the HNZPT's submission that an archaeological assessment of the subject should be undertaken. However, she suggests that this will be more appropriately addressed through conditions of the future resource consent application.
171. In relation to effects from the loss of character buildings if the removal of the SCAR is allowed under this plan change, the applicant states that the loss of the houses on the special character area would be minor. The applicant's special character assessment states *'while the loss of these three buildings would have some erosive effect on the SCA's identified special character values due to the intrinsic value of the (southern houses) architecture, it is considered that this loss is minimal in terms of contribution to the public experience of the area'*.
172. Ms Freeman disagrees with the above conclusion. She comments that if these three properties are removed, either partially or in their entirety, it will represent a loss of character values in this part of the area, and therefore an adverse effect on the identified special character area.

### **11.1 Conclusion**

173. Ms Freeman concludes that the removal of the SCAR on 149-153 Gillies Avenue would have more than minor effects on the surrounding environment because the identified character values of the area would be eroded. The removal of the SCAR is inconsistent with the objectives and policies of the Regional Policy Statement that requires the maintenance and enhancement of character values of the area.
174. I agree with Ms Freeman's conclusion that there would be adverse effects on identified character values of the area if the SCAR overlay controls are removed from the subject site.
175. Ms Freeman's assessment suggests that she can support the rezoning if the SCAR is retained.

## **12. NON-RESIDENTIAL ACTIVITIES AND PRECEDENT EFFECTS**

176. Submissions by Robert Speer (92), Eden Epsom Residential Protection Society (94) Anthony Randerson (79), Susan Speer (93) and other submissions raise concerns relating to non-residential activities as follows:
- Erosion and loss of residential amenity values from non-residential activities (hospital)
  - Cumulative effects from non-residential activities

- Setting a damaging precedent for the integrity of the residential zones by allowing commercial development in the residential area
177. The applicant's urban design assessment suggests that there are large scale non-residential developments located along Gillies Avenue such as Epsom Girls Grammar School. The assessment justifies that large scale development is acceptable when located along arterial roads.
178. Gillies Avenue is an arterial road with many non-residential activities. The western side of Gillies Avenue (surrounding the subject site) is predominantly zoned Single House with the SCAR. The provisions of SHZ and SCAR protect a defined residential character and urban setting of the area. While there are a number of non-residential activities on Gillies Avenue, in particular healthcare facilities within the vicinity of the subject site, they are of a scale and intensity compatible to the surrounding environment.
179. Both Single House Zone (objective H3.2(4)) and Mixed Housing Suburban Zone (objective H4.2(4)) recognise that non-residential activities would provide for the community's social, economic and cultural well-being. They seek that the activities should be in keeping with *"the scale and intensity of development anticipated by the zone so as to contribute to the amenity of the neighbourhood"*.
180. Regional Policy Statement - B2.4.1 Residential growth objective 5 seeks that non-residential activities are provided in residential areas to support the needs of people and communities. However, B2.4.2. Urban Growth and Form policy 10 requires:
- "non-residential activities to be of a scale and form that are in keeping with the existing and planned built character of the area."*
181. As discussed earlier in this report, the future hospital development and activities enabled by the SP-HFH Zone under PC21 would allow non-residential activities that are not compatible with the scale and form of the neighbourhood.
182. Many submissions raise that the proposal will set a precedent by allowing the hospital expansion on the subject site. They have concerns that there could be subsequent applications for similar non-residential activities resulting in precedent effects.
183. I consider that PC21 is unlikely to set a precedent for other applications for commercial or hospital development in the area given the distinctive circumstance where the existing hospital has been already well established on the subject site and the rezoning would allow for the extension on land recently acquired.

## **12.1 Conclusion**

184. In my view, the SP-HFH Zone is an enabling zone that would allow large scale non-residential activities to be established. While there are concerns raised by various submissions about precedent effects as a result of PC21, I consider the proposal is unlikely to set a precedent as discussed above.

## **13. CONSIDERATION OF ALTERNATIVE SITES/OPTIONS CONSIDERED BY PC21**

### **13.1 Alternative sites**

185. Submissions by Robert Speer (92), by Suzanne Speer (93), Eden Epsom Residential Protection Society (94) and its pro-forma submissions raise that PC21 does not provide the necessary justification required under section 32 of the RMA in seeking changes to the operative planning provisions. It has not considered alternatives to the proposal such as



finding a compatible land zone where adverse effects can be managed without neighbourhood disruption.

186. The applicant's growth analysis by Ernst Young indicates that the population growth in Auckland and the wider Northern region will require additional beds and surgical theatres and healthcare specialists. This population growth is placing pressure on the public health sector. The existing Brightside hospital is currently operating at full capacity with demand exceeding available capacity. The expansion of the hospital enabled by PC21 will assist meeting the elective surgery demand that cannot be met by the public health system.
187. The applicant suggests that the need to expand the capacity within the existing facility is important and the current residential zoning provides no certainty for the expansion. In the Private Plan Change Request document by SFH Consultants Ltd (pages 25-46), the applicant has considered alternatives between relocating the hospital elsewhere and retaining and redeveloping the existing hospital and concluded that alternative sites are not acceptable for the following reasons:
- It would be difficult and possibly cost prohibitive to find an alternative site of this scale within this central location.
  - Given the identified catchment for hospital services in central Auckland, the Epsom area is most appropriate due to accessibility for surgeons and other staff, proximity to supporting services, ease of access for patients and its proximity to Auckland and Greenlane Hospitals.
  - Any alternative site would have similar residential concerns raised as is present in the existing location.
  - Industrial locations would not be suitable due to noise, fumes and truck movements incongruous to a hospital.
  - the AUP has not provided alternative vacant SP-HFH Zoned land available for private hospital uses.
188. The applicant states that identifying and securing a location that has the similar advantages to the current site will be very difficult and none have been identified to date.
189. It is my view that the applicant has sufficiently considered alternative sites and I accept that it would be difficult in Epsom to find another suitable residential site that would not have residential character and amenity issues. I accept that industrial land would be inappropriate for a hospital use. I consider that the Mixed Use or the Metropolitan Centre Zones may be an acceptable zone to use for hospital development, acknowledging that a discretionary activity consent would be required. The Newmarket area and the St Marks Rd/Remuera Rd area may contain sites that could accommodate a hospital and provide the same proximity to staff, supporting services and access as the current site. However, as discussed by the applicant above, land fragmentation and prices may result in these areas being unsuitable.

### **13.2 Other alternatives**

190. Having considered the applicant's section 32 analysis for the plan change, it is my view that the applicant has sufficiently considered alternatives/options as required by the RMA to meet its objectives in expanding the hospital on the subject site.
191. The applicant concludes that the proposed rezoning would enable the efficient use and development of the sites for SCHL's hospital activities while managing amenity effects. It indicates that the objectives of the plan change are the most appropriate way to achieve the purpose of the RMA which aims to manage the use, development and protection of natural and physical resources in a way that enables people and communities to provide for their social, cultural and economic well-being and health and safety while avoiding, remedying or mitigating adverse effects on the environment.

192. In my view, the applicant has considered a balancing exercise between enabling people and communities to provide for their social, cultural and economic well-being and health while avoiding, remedying or mitigating adverse effects on the environment (section 5(2)(c) of the RMA) as stated in the application. However, there is not enough evidence that the applicant has considered the matters in relation to the maintenance and enhancement of amenity values (section 7(c)). As assessed by Council's experts, PC21 is likely to have adverse effects on streetscape character and the amenity of neighbourhood properties.

## **14. POSITIVE EFFECTS OF SOCIAL INFRASTRUCTURE**

### **14.1 RPS objectives and policies**

193. The AUP(OP) recognises the importance of social services such as education, healthcare and community facilities. The Regional Policy Statement, B2.8 (Social Facilities) acknowledges that social facilities are important as increasing number of people in a growing city rely on them to meet their needs and to provide for their social, economic and cultural well-being and their health and safety. Below are the objectives and policies of the RPS that are relevant to PC21.

#### **B2.8.1. Objectives**

- (1) *Social facilities that meet the needs of people and communities, including enabling them to provide for their social, economic and cultural well-being and their health and safety.*
- (2) *Social facilities located where they are accessible by an appropriate range of transport modes.*
- (3) *Reverse sensitivity effects between social facilities and neighbouring land uses are avoided, remedied or mitigated.*

#### **B2.8.2. Policies**

- (1) *Enable social facilities that are accessible to people of all ages and abilities to establish in appropriate locations as follows:*
  - (a) *small-scale social facilities are located within or close to their local communities;*
  - (b) *medium-scale social facilities are located with easy access to city, metropolitan and town centres and on corridors;*
  - (c) *large-scale social facilities are located where the transport network (including public transport and walking and cycling routes) has sufficient existing or proposed capacity.*
- (2) *Enable the provision of social facilities to meet the diverse demographic and cultural needs of people and communities.*
- (3) *Enable intensive use and development of existing and new social facility*
- (5) *Enable the efficient and flexible use of social facilities by providing on the same site for:*
  - (a) *activities accessory to the primary function of the site; and*

(b) *in appropriate locations, co-location of complementary residential and commercial activities.*

(6) *Manage the transport effects of high trip-generating social facilities in an integrated manner.*

194. In my view, PC21 is in part consistent with the RPS objectives and policies for social facilities outlined above as it will provide for healthcare facilities in the residential areas to support the needs of people and communities. It will also allow for growth and intensification and consolidation of hospital facilities within the urban environment that is consistent with the policy framework of the AUP(OP).

195. The strategic direction of the AUP(OP) relative to urban design is found in B2 Urban Growth and Form. Objective B2.3.1(1)(a) cascades down to policies in B2.3.2. These provide for the form and design of development to support the planned future environment (B2.3.2(1)(a) and allow for change (B2.3.2(1)(f).

### *B2.3. A quality built environment*

#### *B2.3.1. Objectives (1)*

*A quality built environment where subdivision, use and development do all of the following:*

(a) *respond to the intrinsic qualities and physical characteristics of the site and area, including its setting;*

#### *B2.3.2. Policies (1)*

*Manage the form and design of subdivision, use and development so that it does all of the following:*

(a) *supports the planned future environment, including its shape, landform, outlook, location and relationship to its surroundings, including landscape and heritage;*

(f) *allows for change and enables innovative design and adaptive re-use*

196. The RPS policies on one hand seek to provide a quality of built environment that responds to the intrinsic qualities and physical characteristics of an area and its setting (see B2.3.1(1)(a)) but on the other hand enable intensive use and development of existing and new social facilities (refer to B2.8.2(3) above). In my view, social infrastructure development and its intensification proposed by PC21 would need to consider the intrinsic qualities and physical characteristics of the site area and its setting. To facilitate the proposed zone change to allow development which may be different to the existing environment, an impact on the future planned environment needs to be taken into consideration.

197. The sites are currently zoned residential and therefore the RPS Residential Growth objectives and policies (B2.4) are applicable. They seek to ensure residential areas are attractive, healthy and safe with quality development that is in keeping with the planned built character of the area (B2.4.1(2)) and that non-residential activities are provided in residential areas to support the needs of people and communities (B2.4.1(5).

198. I consider that these objectives provide for non-residential hospitals in residential areas as long as they are in keeping with the planned built character of that area. In this case, the planned built character is Mixed Housing Suburban and Single House Zone. I have discussed above why the Council's experts have concluded that development enabled by the plan change would not be in keeping with this planned built character.

199. The proposed private plan change seeks to remove the residential zones and their relevant objectives and policies so they no longer constrain the development of the site. If the plan change were approved, those residential objectives would therefore no longer apply to the

site. The character and nature of the activities on the site would change to provide for intensification of the permitted hospital uses.

200. The objectives for residential growth would still apply to the neighboring residential sites. But the hospital zoned land would be less fettered. The decision to be made here is whether that is appropriate given the predicted adverse effects on the neighbours and the character of the area.

#### 14.2 Weighting of positive and adverse effects

201. I have weighted the positive effects of a new hospital in this location against the adverse effects on neighbouring amenity (dominance and privacy) and the adverse effects on the streetscape character of the area and concluded that the adverse effects of the proposed plan change outweigh the positive effects.

202. In my view, the proposed plan change will enable hospital development that will not maintain and enhance the amenity values and the quality of the surrounding environment, the matters that are considered important under section 7 of the RMA. The character and amenity values of the subject site and its surrounding environment that are identified as a 'special character area' will not be maintained and enhanced.

#### 14.3 Conclusion

203. I consider the SP-HFH Zone is not an appropriate zone for the subject site. The zone is an enabling zone that would allow larger scale and more intense hospital development. Taking into consideration urban design, visual/landscape and heritage experts, I consider that the plan change could have adverse effects on the amenity of the area enabled by the rezoning and the removal of the SCAR. In my view, unless the amenity of the surrounding area is maintained or potential adverse amenity effects properly managed, the applicant's plan change objectives that will enable the hospital expansion while managing amenity effects on the adjoining properties cannot be met.

### 15. RECOMMENDATION ON SUBMISSIONS

#### 15.1 Transport matters

204. A submission by Auckland Transport seeks that PC21 be approved if transport related matters are resolved. Further submissions 1 and 7 by Eden Epsom Residential Protection Society Inc oppose the submission by Auckland Transport.

No	Further submitter	Oppose/Support	Reasons
1	Eden Epsom Residential Protection Society Inc	Oppose submission 98.1 – Auckland Transport which seeks that PC21 is approved if transport related matters are resolved.	Disagrees with the relief sought that the proposal is accepted if transport matters are resolved.
7	Eden Epsom Residential Protection Society Inc	Oppose submission 98.2 – Auckland Transport which seeks that if Auckland Transport's concerns are not resolved, then the plan change should be declined.	Disagrees with AT's submission. PC21 should be declined whether or not AT's transport concerns are resolved.

205. The following submissions seek that PC21 be declined due to transport related matters including parking, traffic movements, construction traffic effects and pedestrian and cyclist safety.

### **Submissions**

Submissions 3, 4, 5, 7, 9, 12, 17, 18, 20, 22, 23, 24, 25, 26, 29, 31, 32, 33, 34, 35, 36, 37, 38, 43, 44, 45, 46A, 46B, 48, 51, 53, 55, 57, 58, 62, 63, 64, 66, 68, 73, 75, 76, 78, 79, 80, 81, 85, 86, 87, 92, 93, 94, 96, 97, 98, 100, 101, 102, 103, 110, 111, 113, 115, 116, 119, 121, 123, 125, 127, 128, 133, 135, 138, 141, 143, 144, 148, 149, 153, 154, 155, 156, 159, 164, 167, 168, 169, 171, 173, 175 and 176.

### **Further submissions**

A further submission by Eden Epsom Residential Protection Society Inc supports the above submissions which seek to decline the private plan change and opposes the submission by Auckland Transport as shown in the table above.

### **Discussion**

206. As discussed in section 8 of this report, the transport assessment by Council's transport specialist, Meredith Bates concludes that trip generation as a result of development enabled by PC21 can be accommodated within the roading network. Transport effects in relation to parking, vehicle access and road safety from hospital development can be assessed against the transport provisions under E27 to ensure any effects are avoided, remedied or mitigated.
207. Matters raised in relation to construction traffic effects are more relevant to a resource consent application and could be addressed appropriately by the construction methodology as part of a Construction Traffic Management Plan (CTMP). The CTMP is considered an appropriate mechanism to ensure construction has a minimum impact on the safety and efficiency of the adjacent transport network.

### **Recommendation**

208. I recommend that submission 98 by Auckland Transport be **accepted in part**.
209. I recommend that submissions 3, 4, 5, 7, 9, 12, 17, 18, 20, 22, 23, 24, 25, 26, 29, 31, 32, 33, 34, 35, 36, 37, 38, 43, 44, 45, 46A, 46B, 48, 51, 53, 55, 57, 58, 62, 63, 64, 66, 68, 73, 75, 76, 78, 79, 80, 81, 85, 86, 87, 92, 93, 94, 96, 97, 98, 100, 101, 102, 103, 110, 111, 113, 115, 116, 119, 121, 123, 125, 127, 128, 133, 135, 138, 141, 143, 144, 148, 149, 153, 154, 155, 156, 159, 164, 167, 168, 169, 171, 173, 175 and 176 be **rejected in part**.

## **15.2 Noise and vibration**

The following submissions seek that PC21 be declined based on noise and vibration effects from the hospital operation, construction, and rock blasting.

### **Submissions**

Submissions 5, 6, 8, 9, 10, 11, 14, 15, 16, 18, 19, 21, 23, 24, 25, 26, 29, 32, 33, 37, 38, 39, 43, 44, 45, 46A, 46B, 47, 49, 51, 54, 55, 57, 59, 60, 61, 62, 64, 66, 67, 68, 69, 71, 72, 73, 74, 75, 76, 77, 79, 80, 81, 82, 83, 84, 88, 90, 91, 94, 100, 101, 102, 103, 105, 106, 107, 109, 110, 112, 115, 116, 118, 119, 124, 127, 128, 133, 134, 138, 145, 147, 148, 149, 151, 153, 155, 157, 159, 160, 164, 168, 169, 175 and 176

### **Further submissions**

A further submission by Eden Epsom Residential Protection Society Inc supports the above submissions which seek to decline the private plan change.

### Discussion

210. As discussed in section 9 of this report, Council's noise specialist, Curt Robinson considers acoustic effects from the operation of future hospital enabled by PC21 are considered to be at a reasonable level and could be mitigated by building design. These mitigation measures could be considered and assessed as part of a resource consent application.
211. In relation to vibration effects from rock blasting to enable development on the subject site, Council's geotechnical specialist, Steven Price is of the view that there are methodologies that could be used to carry out the excavation and blasting to avoid adverse effects on neighbouring properties. These effects are of temporary nature and could be minimised with mitigation measures considered as part of a resource consent application for development.

### Recommendation

212. I recommend that submissions 5, 6, 8, 9, 10, 11, 14, 15, 16, 18, 19, 21, 23, 24, 25, 26, 29, 32, 33, 37, 38, 39, 43, 44, 45, 46A, 46B, 47, 49, 51, 54, 55, 57, 59, 60, 61, 62, 64, 66, 67, 68, 69, 71, 72, 73, 74, 75, 76, 77, 79, 80, 81, 82, 83, 84, 88, 90, 91, 94, 100, 101, 102, 103, 105, 106, 107, 109, 110, 112, 115, 116, 118, 119, 124, 127, 128, 133, 134, 138, 145, 147, 148, 149, 151, 153, 155, 157, 159, 160, 164, 168, 169, 175 and 176 **be rejected in part**.

### 15.3 Urban design, visual landscape and character

213. The following submissions seek that PC21 be declined because of adverse effects in relation to incompatibility of built form, bulk dominance, overlooking, loss of visual privacy, and effects on the streetscape and character of the residential area.

### Submissions

Submissions 4, 9, 17, 18, 22, 23, 24, 26, 31, 32, 33, 37, 38, 39, 42, 43, 44, 45, 46A, 46B, 51, 52, 53, 55, 56, 57, 58, 59, 60, 61, 63, 64, 65, 66, 68, 69, 71, 73, 74, 75, 77, 79, 80, 82, 86, 87, 88, 90, 91, 92, 93, 94, 96, 97, 100, 101, 103, 105, 107, 109, 111, 112, 115, 116, 117, 118, 120, 121, 122, 123, 124, 125, 126, 128, 129, 130, 133, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 149, 150, 151, 155, 156, 157, 159, 163, 164, 165, 171, 172, 173, 174, 175 and 176

### Further submissions

Further submission 8 by Eden Epsom Residential Protection Society Inc supports the above submissions. Further submission 11 by John Allen supports his own submission. Further submission 10 by Heritage New Zealand Pouhere Taonga supports in part submissions which raise the matters in relation to visual effects on the residential heritage environment.

No	Further submitter	Oppose/Support	Reasons
8	Eden Epsom Residential Protection Society Inc	Support submissions 1, 3-97, 99-107, 109-160, 162-176	Allow the submissions which seek to decline the plan change
10	Heritage New Zealand Pouhere Taonga	Support in part submissions 4, 9, 17, 18, 32, 44, 107, 142	Visual effects on the surrounding residential heritage environment.

		Support in part submission 33 – Michael Lorimer	The zoning of 3 Brightside Road provides for a sympathetic ‘transition zone’ adjacent to the neighbouring SHZ.
		Support in part submission 91 – Gemma Allen	The rezoning would be incongruent with the heritage values of the adjoining residences located in the SCAR.
		Support in part submission 92 – Robert Speer	The scale and bulk of building enabled by PC21 will result in dominance on the low density heritage context of the location.
		Support in part submission 93 – Suzanne Speer	<ul style="list-style-type: none"> <li>• Incompatibility of built form and scale.</li> <li>• Degradation of the heritage environment.</li> <li>• No certainty of protection of substantial trees and landscape elements (walls) and a draft hospital development design</li> </ul>
		Support in part submission 94 – Eden Epsom Residential Protection Society Inc	<ul style="list-style-type: none"> <li>• Incompatibility of the bulk, scale and height of buildings that would replace 149-153 Gillies Avenue.</li> <li>• Reliance of existing trees and stonewalls to mitigate the proposed scale of permitted development and retention of these features has not been offered.</li> <li>• The design and appearance of the draft development plans is unsympathetic to the surrounding heritage neighbourhood.</li> <li>• The proposed zone provides no consideration of effects of new buildings on the surrounding area.</li> </ul>
11	John Allen	Support submission 142 – John Allen	Visual effects on Owens Road properties and the request of photomontages showing the effects on these properties

## Discussion

214. As discussed in section 10 of this report, the urban design assessment by Council’s urban design specialist, Trevor Mackie concludes that development enabled by PC21 will not be compatible with the residential scale and character of the neighbourhood. PC21 would allow development that result in moderate to severe amenity effects in relation to visual and bulk dominance and loss of privacy on adjacent residential properties.
215. Council’s visual and landscape specialist, Stephen Brown concludes that the landscape environment of the subject site is fundamentally residential in nature with the special character and heritage built environment. Development under PC21 will not be compatible with this environment and will result in adverse effects on the visual and landscape amenity of the area.

## Recommendation

216. I recommend that submissions 4, 9, 17, 18, 22, 23, 24, 26, 31, 32, 33, 37, 38, 39, 42, 43, 44, 45, 46A, 46B, 51, 52, 53, 55, 56, 57, 58, 59, 60, 61, 63, 64, 65, 66, 68, 69, 71, 73, 74, 75, 77, 79, 80, 82, 86, 87, 88, 90, 91, 92, 93, 94, 96, 97, 100, 101, 103, 105, 107, 109, 111, 112, 115, 116, 117, 118, 120, 121, 122, 123, 124, 125, 126, 128, 129, 130, 133, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 149, 150, 151, 155, 156, 157, 159, 163, 164, 165, 171, 172, 173, 174, 175 and 176 be **accepted**.

### 15.4 Removal of Special Character Overlay

217. The following submissions seek that PC21 be declined and oppose the removal of the Special Character Overlay.

#### Submissions

Submissions 4, 9, 13, 17, 18, 22, 23, 24, 32, 33, 34, 35, 36, 38, 42, 44, 45, 48, 49, 50, 58, 67, 70, 77, 78, 79, 86, 87, 93, 91, 94, 97, 99, 101, 103, 104, 105, 107, 108, 111, 115, 121, 125, 126, 133, 134, 135, 139, 141, 142, 143, 145, 149, 151, 154, 157, 161, 163, 167, 169, 170, 172, 174, 175 and 176

Submission 108 by Housing New Zealand seeks that the removal of the SCAR part of the plan change be deleted.

Submission 161 by Heritage New Zealand Pouhere Taonga opposes the removal of the SCAR and seeks to ensure protection of the heritage and special character features as identified in the application in perpetuity.

#### Further submissions

A further submission by Eden Epsom Residential Protection Society Inc supports the above submissions which seek to decline the private plan change.

A further submission by Heritage New Zealand Pouhere Taonga supports in part submissions 4, 9, 17, 18, 32, 33, 44, 91, 94, 107 and 142 as per below.

No	Further submitter	Oppose/Support	Reasons
10	Heritage New Zealand Pouhere Taonga	Support in part submissions 4, 9, 17, 18, 32, 44, 107, 142	Visual effects on the surrounding residential heritage environment.
		Support in part submission 33 – Michael Lorimer	The zoning of 3 Brightside Road provides for a sympathetic 'transition zone' adjacent to the neighbouring SHZ.
		Support in part submission 91 – Gemma Allen	The rezoning would be incongruent with the heritage values of the adjoining residences located in the SCAR.
		Support in part submission 94 – Eden Epsom Residential Protection Society Inc	<ul style="list-style-type: none"> <li>Incompatibility of the bulk, scale and height of buildings that would replace 149-153 Gillies Avenue.</li> <li>Reliance of existing trees and stonewalls to mitigate the proposed scale of permitted development and</li> </ul>



			<p>retention of these features has not been offered.</p> <ul style="list-style-type: none"> <li>• The design and appearance of the draft development plans is unsympathetic to the surrounding heritage neighbourhood.</li> <li>• The proposed zone provides no consideration of effects of new buildings on the surrounding area.</li> </ul>
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### Discussion

218. As discussed in section 11 of this report, the assessment on the removal of the special character overlay on 149, 151 and 153 Gillies Avenue by Council’s heritage specialist, Rebecca Freeman concludes that the removal of the SCAR on the site would have more than minor effects on the surrounding environment because the identified character values of the area would be eroded. The removal of the SCAR is inconsistent with the objectives and policies of the Regional Policy Statement that requires the maintenance and enhancement of the character values of the area.

### Recommendation

219. I recommend that submissions 4, 9, 13, 17, 18, 22, 23, 24, 32, 33, 34, 35, 36, 38, 42, 44, 45, 48, 49, 50, 58, 67, 70, 77, 78, 79, 86, 87, 93, 91, 94, 97, 99, 101, 103, 104, 105, 107, 108, 111, 115, 121, 125, 126, 133, 134, 135, 139, 141, 142, 143, 145, 149, 151, 154, 157, 161, 163, 167, 169, 170, 172, 174, 175 and 176 be **accepted**.

## 15.5 Non-residential activities and precedent effects

220. The following submissions oppose PC21 as the proposal will enable non-residential activities that would have adverse effects on the amenity of the residential area. They seek that PC21 be declined.

### Submissions

Submissions 3, 7, 8, 12, 15, 22, 25, 27, 31, 33, 34, 38, 61, 73, 75, 79, 88, 90, 91, 92, 93, 94, 99, 100, 103, 104, 110, 116, 124, 125, 130, 134, 170 and 176

### Further submissions

A further submission by Eden Epsom Residential Protection Society Inc supports the above submissions which seek to decline the private plan change.

A further submission by Gemma Allen (further submission 9) supports her own submission (submission 91) in relation to the operation and waste collection of the existing Brightside Road hospital that have an impact on the residential amenity.

### Discussion

221. As discussed earlier in this report, the SP-HFH Zone is an enabling zone that would allow large scale non-residential activities to be established on the subject site. The scale and intensity of hospital development could potentially generate adverse amenity effects such as noise, traffic and visual dominance on the residential neighbourhood, in particular the adjoining residential properties to the north of the subject site.
222. While I agree that there are potential adverse effects discussed above, I consider that PC21 is unlikely to set a precedent for other applications for commercial or hospital development in

the area given the distinctive circumstance where the existing hospital has been already well established on the subject site.

### **Recommendation**

223. I recommend that submissions 3, 7, 8, 12, 15, 22, 25, 27, 31, 33, 34, 38, 61, 73, 75, 79, 88, 90, 91, 92, 93, 94, 99, 100, 103, 104, 110, 116, 124, 125, 130, 134, 170 and 176 be **rejected in part**.

### **15.6 Consideration of alternative sites**

224. The following submissions seek to decline the private plan change. They state that the applicant has not considered alternative sites and other options to accommodate the expansion of the hospital.

### **Submissions**

Submissions 4, 5, 11, 15, 19, 24, 28, 29, 32, 42, 43, 44, 49, 50, 52, 53, 55, 56, 64, 65, 69, 90, 92, 130, 134, 135, 136, 138, 140, 143, 150, 156, 163, 167 and 176.

### **Further submissions**

A further submission by Eden Epsom Residential Protection Society Inc supports the above submissions which seek to decline the private plan change.

### **Discussion**

225. As discussed in section 14 of this report, the purpose of PC21 is to enable the expansion of the existing hospital facility. The applicant indicates it has considered alternatives between relocating the hospital elsewhere and retaining and redeveloping the existing hospital. It has also considered alternative provisions such as an application of a development outline plan on the SP-HFH Zone and developing a specific Brightside Road Precinct to meet their objectives. The applicant concludes that the proposed plan change is the best available option.
226. In my view, the applicant has demonstrated that it has considered options but preferred the expansion of its facilities within the current site. The applicant has adequately considered alternatives as required under section 32 of the RMA.

### **Recommendation**

227. I recommend that submissions 4, 5, 11, 15, 19, 24, 28, 29, 32, 42, 43, 44, 49, 50, 52, 53, 55, 56, 64, 65, 69, 90, 92, 130, 134, 135, 136, 138, 140, 143, 150, 156, 163, 167 and 176 be **rejected in part**.

## **16. POTENTIAL CHANGES WITHIN THE SCOPE OF SUBMISSIONS**

### **16.1 Retention of the Special Character Overlay – Residential**

228. Submission 108 by Housing New Zealand Corporation seeks that the private plan change does not to remove of the special character overlay from 149, 151 and 153 Gillies Avenue be deleted. The submission does not oppose the rezoning of the subject site from Residential – Single House and Mixed Housing Suburban Zones to the SP-HFH Zone.
229. As stated in section 11 of this report, Council's heritage specialist, Rebecca Freeman could support the rezoning under PC21 only if the SCAR on 149, 151 and 153 Gillies Avenue is retained. The retention of the SCAR will meet the objectives and policies of the Special

Character Overlay and RPS which seek to maintain and enhance the identified special character values of the area.

230. Council's urban design expert, Trevor Mackie advises that his urban design concerns in relation to urban design character, bulk dominance and visual/landscape amenity of development could be addressed if the SCAR Overlay provisions and the demolition controls apply to the subject site. In his view, the SCAR overlay would influence the form and design of new buildings that would be capable of addressing the incompatibility of built form and protecting the streetscape amenity as well as the amenity of the adjoining properties. However, Mr Mackie indicates that he still has concerns in relation to bulk dominance, overlooking and visual and landscape amenity effects on some adjoining properties on Owens Road if further development occurs on the existing Brightside hospital from the rezoning.
231. Stephen Brown, Council's visual/landscape specialist, also provides his opinion about the potential changes to retain the SCAR. He raises concerns that the SP-HFH Zone provisions would still result in effects relating to visual dominance. The provisions will not ensure compatibility with the adjoining residential developments on Owens Road in relation to scale and built form. In his view, the potential visual dominance from the potential redevelopment of the existing Brightside Road site remains an issue. He indicates that the streetscape character and amenity on Brightside Road provided by the current hospital building could be compromised by the rezoning.
232. Mr Brown concludes that under the SP-HFH Zone provisions, redevelopment on the Brightside hospital has the potential to be up to 4 storeys. As such, it has the potential to be both visually dominant on the adjoining Owens Road properties to the north and the residential properties to the south of Brightside Road. He maintains that these matters would not be addressed by the retention of the SCAR overlay on 149, 151 and 153 Gillies Avenue.
233. As stated earlier in this report, I have concluded that the positive effects as a result of PC21 do not outweigh the adverse effects. In my view, even the SCAR overlay were retained over 149, 151 and 153 Gillies Avenue, the adverse effects caused by the rezoning of the Brightside hospital site will lead to a patch of different character in an otherwise cohesive surrounding character.

## **16.2 Application of a precinct plan or a development outline plan**

234. Submission 161 by Heritage New Zealand Pouhere Taonga raises concerns about the potential impact of PC on the recognized special character of the area. It suggests that if the features such as mature trees and basalt boundary walls cannot be included for scheduling in Schedule 41.1 – Historic Heritage and Schedule 10 – Notable trees, a precinct plan or a site-specific development outline plan in the zone could be considered to ensure protection of the character elements.
235. As discussed earlier in my report, the trees on the subject site along the Gillies Avenue frontage have been assessed by Council's heritage tree specialist, West Fynn who confirms that the trees do not meet the criteria for scheduling. I note that the applicant has not offered a mechanism in protecting the mature trees and other features of the subject site.
236. The applicant discusses in its section 32 assessment the option of applying a precinct to the subject site that would identify the site for hospital use, but with specific controls to respond to the specific context of the site. The applicant stated that through its discussion with the Council, this approach is not appropriate as it *'may set a precedent for a proliferation of precincts within the AUP(OP). It would also result in an inconsistent approach to the management of similar activities within the AUP(OP)...*'.
237. As outlined in Chapter A Introduction of the AUP(OP), precincts *'enable local differences to be recognised by providing detailed place-based provisions which can vary the outcomes*

*sought by the zone or Auckland-wide provisions and can be more restrictive or more enabling*'.

238. I consider an application of a precinct on the subject site is not acceptable. The option will result in spot zoning and is an inconsistent approach for management of effects from proposals and activities and will compromise the integrity of the AUP(OP). As the purpose of this plan change is to enable the efficient operation and expansion of the existing hospital, the proposed rezoning of the subject site to the SP-HFH Zone is an option that aligns with the AUP(OP) approach.
239. The applicant also considered an option applying a development outline plan on the subject site in the SP-HFH Zone. This option would allow the applicant to identify the potential building location and mature trees and basalt boundary walls to be protected. The applicant's AEE states *'This would provide certainty for neighbours of the location of the building, provide increased building setbacks, protection of vegetation and significant non-scheduled trees and stone walls. This would better manage amenity effects of hospital development on adjacent properties compared to the standard HFH zone'*.
240. I consider this option is not consistent with the AUP(OP) approach. There are currently no such site-specific development outline plans applied to any specific hospital sites within the SP-HFH Zone. The zone only applies a site-specific control in relation to building height, such as different permitted height controls that applied to the Auckland Hospital.

### **16.3 Conclusion**

241. In my view, potential changes as raised by both submissions by Housing New Zealand Corporation and Heritage New Zealand Pouhere Taonga above are not acceptable for the reasons stated above



## **17. CONCLUSION**

242. Having considered all of the submissions and reviewed all relevant statutory and non-statutory documents and having had regard to all statutory obligations including those under sections 32 and 32AA of the Resource Management Act 1991, I recommend that Proposed Plan Change 21 be declined for the following reasons:
- Based on an assessment of environmental effects and specialist assessments, it is concluded that PC21 is likely to have adverse effects on the environment relating to incompatibility of built form, visual dominance and privacy issues and potential erosion of the residential amenity.
  - Non-residential development enabled by the plan change is likely to be of a scale and intensity that is not in keeping with the existing and planned built character of the area, particularly the special residential character and surrounding built environment.
  - The removal of the special character overlay is considered to have adverse effects on the environment as the identified character values of 149, 151 and 153 Gillies Avenue would be eroded. The removal of the SCAR is inconsistent with the objectives and policies of the Regional Policy Statement that requires the maintenance and enhancement of character values of the area.
  - PC21 will result in positive effects on the environment in terms of provision of healthcare facilities and is in part consistent with the Regional Policy Statement in that it will enable the provision of healthcare facilities to meet the need of people and communities for their social, economic, wellbeing and health and safety. However, I have concluded that these positive effects do not outweigh the adverse effects identified above.

- Hospital development is considered a very important social infrastructure in the urban environment to support population growth. However, the applicant's plan change objectives to enabling the hospital expansion while managing the adverse amenity effects on the environment cannot be met as the rezoning under PC21 will undermine the character and amenity of the area.

## 18. RECOMMENDATIONS

243. I recommend that the Hearing Commissioners accept submissions that seek to decline the proposed plan change 21 and reject submissions (and associated further submissions) that support the plan change as outlined in this report.
244. I recommend that PC21 to the Auckland Unitary Plan be declined based on the reasons stated above.

Name and title of signatories	
Author	Panjama Ampanthong, Principal Planner, Auckland Council  
Reviewer	Celia Davison, Manager, Planning Central – South  





# **ATTACHMENT TWO**

## **Summary of Submissions**



Summary of Decisions Requested							
Sub Number	Sub # point	Submitter Name	Summary	Theme	Address		
1	1.1	Spring Chunchun Xu	Decline the plan modification	Trees	149 Gillies Avenue	Epsom	Auckland 1023
3	3.1	Jianming Huang	Decline the proposed plan change	Setting precedent allowing non-residential use in residential zones	5/4 Brightside Road	Epsom	Auckland 1023
	3.2			Excavation and rock blasting			
	3.3			Construction traffic (traffic volume, noise and safety)			
4	4.1	John Kippenburger	Decline the plan modification.	Operational traffic (traffic generation, noise, safety and parking)	22 Disraeli Street	Mt Eden	Auckland 1024
	4.2			No consideration of alternative sites			
	4.3			Excavation and rock blasting			
	4.4			Visual amenity			
5	5.1	Julie Kippenburger	Decline the plan modification	No consideration of alternative sites	22 Disraeli Street	Mt Eden	Auckland 1024
	5.2			Construction effects (vibration/noise and safety from excavation and rock blasting)			
	5.3			Operational and construction traffic			
	5.4			Visual amenity and residential character			
6	6.1	Tom Lorimer	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)	6 Brightside Road	Epsom	Auckland 1023
	6.2			Trees			
7	7.1	Erica Hussona	Decline the plan modification	Removal of Special Character Overlay	20 Pentland Avenue	Mt Eden	Auckland 1024
	7.2			Re-zoning will set precedent allowing non-residential use in residential zones			
	7.3			Operational and construction traffic			
	7.4			Effects from building height (shadowing & privacy)			
8	8.1	Zhengyu He	Decline the plan modification	Removal of Special Character Overlay	c/-Jianming Huang		
	8.2			Re-zoning will set precedent allowing non-residential use in residential zones			
	8.3			Construction effects (vibration/noise and safety from excavation and rock blasting)			
	8.4			Effects from building height (shadowing & privacy)			
9	9.1	Gregory Towers	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)	187 Gillies Avenue	Epsom	Auckland 1023
	9.2			Operational and construction traffic			
	9.3			Removal of Special Character Overlay			

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address
10	10.1	Miranda Rabone	Decline the proposed plan change	Effects from building height (shadowing & privacy)	PO Box 99732 Newmarket Auckland 1149
	10.2			Trees	
	10.3			Visual amenity and residential character	
	10.4			Construction effects (vibration/noise and safety from excavation and rock blasting)	
11	11.1	Dr Stuart Rabone	Decline the proposed plan change	Visual amenity and residential character	Eden- EpsomResidential PO Box 99732 Newmarket
	11.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	11.3			No consideration of alternative sites	
12	12.1	Janet Wightman	Decline the plan modification	Removal of Special Character Overlay	95 Owens Road Epsom Auckland 1023
	12.2			Visual amenity and residential character	
	12.3			Operational and construction traffic	
	12.4			Re-zoning will set precedent allowing non-residential use in residential zones	
13	13.1	William Lorimer	Decline the plan modification	Removal of Special Character Overlay	6 Brightside Road Epsom Auckland 1023
14	14.1	Shuqin Zhang	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	3 Kingsway Three Kings Auckland
15	15.1	Geoffrey Hinds	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	12/24 Sherbourne Road Mt Eden Auckland 1024
	15.2			No consideration of alternative sites	
	15.3			Re-zoning will set precedent allowing non-residential use in residential zones	
16	16.1	David Ross	Decline the plan modification	No comment	19 Fairview Road Mt Eden Auckland 1024
17	17.1	Hannah Saubrey Ross	Decline the plan modification	Operational and construction traffic	19 Fairview Road Mt Eden Auckland 1024
	17.2			Removal of Special Character Overlay	
18	18.1	Jane Robson	Decline the plan modification	Operational and construction traffic	25 Prospect Terrace Mt Eden Auckland 1024
	18.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	18.3			Removal of Special Character Overlay	
19	19.1	Lisa Phillimore	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)	2a Poronui Street Mt Eden Auckland 1024
	19.2			No consideration of alternative sites	
20	20.1	Elspeth Whitmore	Decline the proposed plan change	Operational and construction traffic	5 Shipherds Avenue Epsom Auckland 1023
21	21.1	Lisa Manks	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)	16A Fairview Road Mt Eden Auckland 1024

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address	
22	22.1	Philip Taylor	Decline the proposed plan change	Visual amenity and residential character	19 Glenfell Place	Epsom Auckland 1023
	22.2			Re-zoning will set precedent allowing non-residential use in residential zones		
	22.3			Removal of Special Character Overlay		
	22.4			Operational and construction traffic		
23	23.1	Janet Taylor	Decline the proposed plan change	Visual amenity and residential character	19 Glenfell Place	Epsom Auckland 1023
	23.2			Removal of Special Character Overlay		
	23.3			Operational and construction traffic		
	23.4			Construction effects (vibration/noise and safety from excavation and rock blasting)		
24	24.1	Norfolk Limited attn: Frederick Knights	Decline the proposed plan change	Visual amenity and residential character	Norfolk Limited	PO Box 9723 Newmarket
	24.2			No consideration of alternative sites		
	24.3			Construction effects (vibration/noise and safety from excavation and rock blasting)		
	24.5			Removal of Special Character Overlay		
	24.6			Operational and construction traffic		
25	25.1	Margaret Knights	Decline the proposed plan change	Operational and construction traffic	PO Box 9723	Newmarket Auckland 1149
	25.2			Construction effects (vibration/noise and safety from excavation and rock blasting)		
	25.3			Effects from building height (shadowing & privacy)		
	25.4			Re-zoning will set precedent allowing non-residential use in residential zones		
26	26.1	David Lim	Decline the plan modification	Visual amenity and residential character	1/15 Shiphards Avenue	Three Kings Auckland 1023
	26.2			Construction effects (vibration/noise and safety from excavation and rock blasting)		
	26.3			Operational and construction traffic		
27	27.1	Harvey White and Janette White	Decline the plan modification	Re-zoning will set precedent allowing non-residential use in residential zones	137 Mountain Road	Epsom Auckland 1023
28	28.1	Karim Hussona	Decline the plan modification	No consideration of alternative sites	20 Pentland Avenue	Mt Eden Auckland 1024
29	29.1	Marion Armstrong	Decline the plan modification	No consideration of alternative sites	37 Owens Road	Epsom Auckland 1023
	29.2			Operational and construction traffic		
	29.3			Construction effects (vibration/noise and safety from excavation and rock blasting)		
30	30.1	Pavneet Grover	Decline the plan modification	No comment	41B Peary Road	Mt Eden Auckland 1024

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address	
31	31.1	Terry Kayes and Marion Kayes	Decline the plan modification	Visual amenity and residential character	19 Essex Road	Mt Eden Auckland 1024
	31.2			Operational and construction traffic		
	31.3			Re-zoning will set precedent allowing non-residential use in residential zones		
32	32.1	Nicola Maling	Decline the plan modification	Visual amenity and residential character	73 Prospect Terrace	Mt Eden Auckland 1024
	32.2			Construction effects (vibration/noise and safety from excavation and rock blasting)		
	32.3			Operational and construction traffic		
	32.4			No consideration of alternative sites		
33	33.1	Michael Lorimer	Decline the plan modification	Re-zoning will set precedent allowing non-residential use in residential zones	6 Brightside Road	Epsom Auckland 1023
	33.2			Visual amenity and residential character		
	33.3			Removal of Special Character Overlay		
	33.4			Operational and construction traffic		
	33.5			Construction effects (vibration/noise and safety from excavation and rock blasting)		
34	34.1	Peter Robson	Decline the plan modification	Operational and construction traffic	25 Prospect Terrace	Mt Eden Auckland 1024
	34.2			Re-zoning will set precedent allowing non-residential use in residential zones		
	34.3			Removal of Special Character Overlay		
35	35.1	Stephanie Watson	Decline the proposed plan change	Removal of Special Character Overlay	3 Shipherds Avenue	Epsom Auckland 1023
	35.2			Operational and construction traffic		
36	36.1	Trevor Watson	Decline the proposed plan change	Operational and construction traffic	3 Shipherds Avenue	Epsom Auckland 1023
	36.2			Removal of Special Character Overlay		
37	37.1	Colin Wightman	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	95 Owens Road	Epsom Auckland 1023
	37.2			Operational and construction traffic		
	37.3			Visual amenity and residential character		
38	38.1	Lynn Huhtala	Decline the proposed plan change	Removal of Special Character Overlay	31 Glenfell Place	Epsom Auckland 1023
	38.2			Visual amenity and residential character		
	38.3			Re-zoning will set precedent allowing non-residential use in residential zones		
	38.4			Operational and construction traffic		



Sub Number	Sub # point	Submitter Name	Summary	Theme	Address		
	38.5			Construction effects (vibration/noise and safety from excavation and rock blasting)			
39	39.1	Cherie Lovatt	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)	8 Liverpool Street	Epsom	Auckland 1023
	39.2			Visual amenity and residential character			
40	40.1	Digby Draper	Decline the plan modification	No comment	PO Box 29017	Epsom	Auckland 1344
41	41.1	Jan Hughes	Decline the plan modification	No comment	17 Albany Avenue	Epsom	Auckland 1023
42	42.1	Heather Golder	Decline the plan modification	Removal of Special Character Overlay	45 St Leonards Road	Mt Eden	Auckland 1024
	42.2			Visual amenity and residential character			
	42.3			No consideration of alternative sites			
43	43.1	Jennifer Lim	Decline the plan modification	Visual amenity and residential character	1/15 Shiphards Avenue	Epsom	Auckland 1023
	43.2			Operational and construction traffic			
	43.3			Construction effects (vibration/noise and safety from excavation and rock blasting)			
	43.4			No consideration of alternative sites			
44	44.1	John Stewart	Decline the plan modification	Removal of Special Character Overlay	5 Omana Avenue	Epsom	Auckland 1023
	44.2			Visual amenity and residential character			
	44.3			Effects from building height (shadowing & privacy)			
	44.4			Construction effects (vibration/noise and safety from excavation and rock blasting)			
	44.5			Operational and construction traffic			
	44.6			No consideration of alternative sites			
45	45.1	Michelle Adams	Decline the plan modification	Removal of Special Character Overlay	6 Brightside Road	Epsom	Auckland 1023
	45.2			Visual amenity and residential character			
	45.3			Construction effects (vibration/noise and safety from excavation and rock blasting)			
	45.4			Operational and construction traffic			
46A	46A.1	Philip Chong	Decline the plan modification	Operational and construction traffic	29 Shiphards Avenue	Epsom	Auckland 1023
	46A.2			Construction effects (vibration/noise and safety from excavation and rock blasting)			
	46A.3			Effects from building height (shadowing & privacy)			
	46A.4			Visual amenity and residential character			

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address
46B	46B.1	Virginia Chong	Decline the plan modification	Operational and construction traffic	29 Shiphards Avenue Epsom Auckland 1023
	46B.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	46B.3			Effects from building height (shadowing & privacy)	
	46B.4			Visual amenity and residential character	
47	47.1	Tobias Lorimer	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)	6 Brightside Road Epsom Auckland 1023
48	48.1	Vanita Dutt	Decline the application in its entirety as indicated [in the submission]	Removal of Special Character Overlay	20 Epsom Avenue Epsom Auckland 1023
	48.2			Operational and construction traffic	
	48.3			Effects from building height (shadowing & privacy)	
49	49.1	Andi He	Decline the proposed plan change	Removal of Special Character Overlay	2/2 Brightside Road Epsom Auckland 1023
	49.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	49.3			No consideration of alternative sites	
50	50.1	Fred Blackley	Decline the plan modification. Please reject this modification for the people of Auckland who need accommodation ad not more private	No consideration of alternative sites	
	50.2			Removal of Special Character Overlay	
51	51.1	Gabriella Amies	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)	37 Owens Road Epsom Auckland 1023
	51.2			Visual amenity and residential character	
	51.3			Operational and construction traffic	
52	52.1	Hugo Blackley	Decline the plan modification	Visual amenity and residential character	
	52.2			No consideration of alternative sites	
53	53.1	Sam Blackley	Decline the plan modification	Visual amenity and residential character	
	53.2			No consideration of alternative sites	
	53.3			Operational and construction traffic	
	53.4			Effects from building height (shadowing & privacy)	
54	54.1	Sophia Amies	Decline the plan modification	Effects from building height (shadowing & privacy)	37 Owens Road Epsom Auckland 1023
	54.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
55	55.1	Ian Kohler	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	PO Box 28718 Remuera

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address
	55.2			No consideration of alternative sites	
	55.3			Visual amenity and residential character	
	55.4			Operational and construction traffic	
56	56.1	Deborah Wade	Decline the proposed plan change	Visual amenity and residential character	Epsom Auckland
	56.2			Effects from building height (shadowing & privacy)	
	56.3			No consideration of alternative sites	
57	57.1	Grace Liu	Decline the proposed plan change	Operational and construction traffic	Epsom Auckland 1023
	57.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	57.3			Visual amenity and residential character	
58	58.1	Eva Ji	Decline the proposed plan change	Removal of Special Character Overlay	Epsom Auckland 1023
	58.2			Visual amenity and residential character	
	58.3			Operational and construction traffic	
59	59.1	Andrew Kohler	Decline the proposed plan change	Visual amenity and residential character	Remuera Auckland 1541
	59.2			Effects from building height (shadowing & privacy)	
	59.3			Construction effects (vibration/noise and safety from excavation and rock blasting)	
60	60.1	Lancia Hicks	Decline the proposed plan change	Visual amenity and residential character	Remuera Auckland 1541
	60.2			Effects from building height (shadowing & privacy)	
	60.3			Construction effects (vibration/noise and safety from excavation and rock blasting)	
61	61.1	Anita Chhita	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	Newmarket Auckland 1149
	61.2			Visual amenity and residential character	
	61.3			Effects from building height (shadowing & privacy)	
	61.4			Re-zoning will set precedent allowing non-residential use in residential zones	
62	62.1	Dinesh Naran	Decline the proposed plan change	Effects from building height (shadowing & privacy)	Newmarket Auckland 1149
	62.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	62.3			Operational and construction traffic	
63	63.1	Naomi Dexter	Decline the proposed plan change	Operational and construction traffic	Epsom Auckland 1023

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address		
	63.2			Visual amenity and residential character			
64	64.1	Sungita Chhita	Decline the proposed plan change	Visual amenity and residential character	PO Box 99150	Newmarket	Auckland 1149
	64.2			Effects from building height (shadowing & privacy)			
	64.3			No consideration of alternative sites			
	64.4			Operational and construction traffic			
	64.5			Construction effects (vibration/noise and safety from excavation and rock blasting)			
65	65.1	Robyn Hawkes	Decline the proposed plan change	Visual amenity and residential character	1/48A Owens Road	Epsom	Auckland 1023
	65.2			No consideration of alternative sites			
66	66.1	Vinay Deobhakta	Decline the proposed plan change	Operational and construction traffic			
	66.2			Construction effects (vibration/noise and safety from excavation and rock blasting)			
	66.3			Visual amenity and residential character			
67	67.1	Richard Hawkes	Decline the proposed plan change	Removal of Special Character Overlay	1/48A Owens Road	Epsom	Auckland 1023
	67.2			Effects from building height (shadowing & privacy)			
	67.3			Construction effects (vibration/noise and safety from excavation and rock blasting)			
68	68.1	Kanan Deobhakta	Decline the proposed plan change	Operational and construction traffic	PO Box 26403	Epsom	Auckland 1023
	68.2			Construction effects (vibration/noise and safety from excavation and rock blasting)			
	68.3			Visual amenity and residential character			
69	69.1	Devendra Patel	Decline the plan modification	Visual amenity and residential character	c/- Jashwanti Ratanji Bhika	155 Mountain Road	Epsom
	69.2			Construction effects (vibration/noise and safety from excavation and rock blasting)			
	69.3			No consideration of alternative sites			
70	70.1	Gillian Anderson	Decline the plan modification	Removal of Special Character Overlay	7 Domett Avenue	Epsom	Auckland 1023
71	71.1	Jashwanti Patel	Decline the plan modification	Visual amenity and residential character	155 Mountain Road	Epsom	Auckland 1023
	71.2			Construction effects (vibration/noise and safety from excavation and rock blasting)			
72	72.1	Victor Rabone	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	PO Box 99732	Newmarket	Auckland 1149
73	73.1	Cheryl Cliffe	Decline the proposed plan change	Visual amenity and residential character	1/2 Brightside Road	Epsom	Auckland 1023
	73.2			Effects from building height (shadowing & privacy)			

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address	
	73.3			Construction effects (vibration/noise and safety from excavation and rock blasting)		
	73.4			Re-zoning will set precedent allowing non-residential use in residential zones		
	73.5			Operational and construction traffic		
74	74.1	Claire Mason	Decline the proposed plan change	Visual amenity and residential character	7/59 Victoria Avenue	Remuera Auckland 1050
	74.2			Construction effects (vibration/noise and safety from excavation and rock blasting)		
75	75.1	Margaret Parker	Decline the proposed plan change	Effects from building height (shadowing & privacy)	11 Glenfell Place	Epsom Auckland 1023
	75.2			Operational and construction traffic		
	75.3			Construction effects (vibration/noise and safety from excavation and rock blasting)		
	75.4			Visual amenity and residential character		
	75.6			Re-zoning will set precedent allowing non-residential use in residential zones		
76	76.1	Aden Leung	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	1/23 Kipling Avenue	Epsom Auckland 1023
	76.2			Operational and construction traffic		
77	77.1	Hyun Chi Cho	Decline the plan modification	Removal of Special Character Overlay	c/- Kenji Cho	168 Gillies Avenue Epsom
	77.2			Visual amenity and residential character		
	77.3			Construction effects (vibration/noise and safety from excavation and rock blasting)		
78	78.1	John Allen	Decline the plan modification	Effects from building height (shadowing & privacy)	32A Owens Road	Epsom Auckland 1023
	78.2			Removal of Special Character Overlay		
	78.3			Operational and construction traffic		
79	79.1	Anthony Randerson	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	7 Shipherds Avenue	Epsom Auckland 1023
	79.2			Operational and construction traffic		
	79.3			Visual amenity and residential character		
	79.4			Removal of Special Character Overlay		
	79.5			Re-zoning will set precedent allowing non-residential use in residential zones		
80	80.1	Glenda Randerson	Decline the proposed plan change	Visual amenity and residential character	7 Shipherds Avenue	Epsom Auckland 1023
	80.2			Operational and construction traffic		
	80.3			Construction effects (vibration/noise and safety from excavation and rock blasting)		

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address	
81	81.1	Ellen Majurey	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	13 Shipherds Avenue	Epsom Auckland 1023
	81.2			Operational and construction traffic		
82	82.1	Savita Mistry, Vinodbhail Mistry, Mukesh Mistry	Decline the proposed plan change	Effects from building height (shadowing & privacy)	144 Gillies Avenue	Epsom Auckland 1023
	82.2			Visual amenity and residential character		
	82.3			Construction effects (vibration/noise and safety from excavation and rock blasting)		
83	83.1	Christina Lucas	Decline the proposed plan change	No comment	8 Shipherds Avenue	Epsom Auckland 1023
84	84.1	Paul Lucas	Decline the proposed plan change	No comment	8 Shipherds Avenue	Epsom Auckland 1023
85	85.1	Gordon McKendry	Decline the proposed plan change	Operational and construction traffic	3 Shipherds Avenue	Auckland 1023
86	86.1	Anne Callinan	Decline the proposed plan change	Removal of Special Character Overlay	2 Shipherds Avenue	Epsom Auckland 1023
	86.2			Visual amenity and residential character		
	86.3			Construction effects (vibration/noise and safety from excavation and rock blasting)		
	86.4			Operational and construction traffic		
	86.5			Effects from building height (shadowing & privacy)		
87	87.1	Richard Poole	Decline the proposed plan change	Removal of Special Character Overlay	2 Shipherds Avenue	Epsom Auckland 1023
	87.2			Visual amenity and residential character		
	87.3			Construction effects (vibration/noise and safety from excavation and rock blasting)		
	87.4			Operational and construction traffic		
	87.5			Effects from building height (shadowing & privacy)		
88	88.1	Nicholas Allen	Decline the proposed plan change	Re-zoning will set precedent allowing non-residential use in residential zones	32A Owens Road	Epsom Auckland 1023
	88.2			Construction effects (vibration/noise and safety from excavation and rock blasting)		
	88.3			Visual amenity and residential character		
	88.4			Effects from building height (shadowing & privacy)		
89	89.1	Mary Crosby	Decline the proposed plan change	No comment	13/53 Bellevue Road	Mt Eden Auckland 1024
90	90.1	Katherine Bulog	Decline the proposed plan change	Effects from building height (shadowing & privacy)	9 Bendall Street	Kensington Melbourne 3031
	90.2			Construction effects (vibration/noise and safety from excavation and rock blasting)		

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address	
	90.3			Visual amenity and residential character		
	90.4			No consideration of alternative sites		
	90.5			Re-zoning will set precedent allowing non-residential use in residential zones		
91	91.1	Gemma Allen	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)	32A Owens Road	Epsom Auckland 1023
	91.2			Visual amenity and residential character		
	91.3			Re-zoning will set precedent allowing non-residential use in residential zones		
	91.4			Effects from building height (shadowing & privacy)		
92	92.1	Robert Speer	Decline the proposed plan change	Operational and construction traffic	3A Shipherds Avenue	Epsom Auckland 1023
	92.2			Re-zoning will set precedent allowing non-residential use in residential zones		
	92.3			Visual amenity and residential character		
	92.4			No consideration of alternative sites		
93	93.1	Suzanne Speer	Decline the proposed plan change	Visual amenity and residential character	3A Shipherds Avenue	Epsom Auckland 1023
	93.2			Operational and construction traffic		
	93.3			Urban design - incompatibility of built form		
	93.4			Removal of Special Character Overlay		
	93.5			Re-zoning will set precedent allowing non-residential use in residential zones		
94	94.1	Eden Epsom Residential Protection Society	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	32A Owens Road	Epsom Auckland 1023
	94.2			Removal of Special Character Overlay		
	94.3			Visual amenity and residential character		
	94.4			Re-zoning will set precedent allowing non-residential use in residential zones		
	94.5			Effects from building height (shadowing & privacy)		
	94.6			Operational and construction traffic		
95	95.1	Kefu Liu	Decline the proposed plan change	No comment	162 Aviemore Drive	Highland Park Auckland
96	96.1	Charles Deane	Decline the proposed plan change	Visual amenity and residential character	163 Gillies Avenue	Epsom Auckland 1023
	96.2			Operational and construction traffic		



Sub Number	Sub # point	Submitter Name	Summary	Theme	Address
97	97.1	Ernest and Gillian Willoughby	Decline the proposed plan change	Visual amenity and residential character	25 Shiphards Avenue Epsom Auckland 1023
	97.2			Operational and construction traffic	
	97.3			Removal of Special Character Overlay	
98	98.1	Auckland Transport- Planning and Investment	That Auckland Council approves PPC21, provided that the transport requirements/concerns raised	Operational and construction traffic	attn: Cynthia Gillespie, Executive General Private Bag 92250 Auckland 1142
	98.2		If ATs concerns are not resolved , then the Plan Change should be declined	Operational and construction traffic	
99	99.1	Simon Jones	Decline the proposed plan change	Removal of Special Character Overlay	11 Epsom Avenue Epsom Auckland 1023
	99.2			Re-zoning will set precedent allowing non-residential use in residential zones	
100	100.1	Carolina Boyle	Decline the proposed plan change	Operational and construction traffic	1/155 Gillies Avenue Epsom Auckland 1023
	100.2			Visual amenity and residential character	
	100.3			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	100.4			Re-zoning will set precedent allowing non-residential use in residential zones	
101	101.1	Prudence Cotter	Decline the proposed plan change	Operational and construction traffic	44B St Georges Bay Road Parnell Auckland 1052
	101.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	101.3			Visual amenity and residential character	
	101.4			Removal of Special Character Overlay	
102	102.1	James Boyle	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	1/155 Gillies Avenue Epsom Auckland 1023
	102.2			Operational and construction traffic	
	102.3			Effects from building height (shadowing & privacy)	
103	103.1	James McLennan	Decline the proposed plan change	Visual amenity and residential character	2/2A Valley Road Mt Eden Auckland 1024
	103.2			Removal of Special Character Overlay	
	103.3			Operational and construction traffic	
	103.4			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	103.5			Re-zoning will set precedent allowing non-residential use in residential zones	
104	104.1	Priya Naran	Decline the proposed plan change	Removal of Special Character Overlay	PO Box 99150 Newmarket Auckland 1149
	104.2			Re-zoning will set precedent allowing non-residential use in residential zones	

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address
	104.3			Effects from building height (shadowing & privacy)	
105	105.1	Ashok Patel	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	PO Box 99150 Newmarket Auckland 1149
	105.2			Visual amenity and residential character	
	105.3			Removal of Special Character Overlay	
106	106.1	Gregory Thwaitte	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	PO Box 6239 Wellesley Street Auckland 1141
	106.2			Effects from building height (shadowing & privacy)	
107	107.1	Peter King	Decline the proposed plan change	Removal of Special Character Overlay	18 Brightside Road Epsom Auckland 1023
	107.2			Visual amenity and residential character	
	107.3			Construction effects (vibration/noise and safety from excavation and rock blasting)	
108	108.1	Housing New Zealand c/- Ellis Gould Lawyers	That the proposed provisions of the Plan Change seeking the proposed removal of the Special Character Area Overlay from three sites at 149, 151 and 153 Gillies Avenue, Epsom, be deleted or amended, so as to provide for the sustainable management of the Region's natural and physical resources and thereby achieve the purpose of the Act.	Removal of Special Character Overlay	PO Box 1509 attn: Dr Claire Kirman and Alex Devine Auckland 1140
	108.2		Such further or other relief, or other consequential or other amendments, as are considered appropriate and necessary to address the concerns set out herein.		
109	109.1	Dhruv Chhita-Patel	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	PO Box 99150 Newmarket Auckland 1149
	109.2			Visual amenity and residential character	
	109.3			Effects from building height (shadowing & privacy)	
110	110.1	Ian Wolfigram	If the proposed plan change is not declined then amend. No relaxing of the parking ratio from 1:50sq.m GFA to 1:64sq.m GFA	Re-zoning will set precedent allowing non-residential use in residential zones	17 Shipherds Avenue Epsom Auckland 1023
	110.2			Operational and construction traffic	
	110.3			Construction effects (vibration/noise and safety from excavation and rock blasting)	
111	111.1	Leonie Deane	Decline the proposed plan change	Removal of Special Character Overlay	163 Gillies Avenue Epsom Auckland 1023
	111.2			Operational and construction traffic	
	111.3			Visual amenity and residential character	

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address	
112	112.1	Christopher Deane	Decline the proposed plan change	Visual amenity and residential character	163 Gillies Avenue	Epsom Auckland 1023
	112.2			Construction effects (vibration/noise and safety from excavation and rock blasting)		
	112.3			Effects from building height (shadowing & privacy)		
113	113.1	Edward Deane	Decline the proposed plan change	Operational and construction traffic	163 Gillies Avenue	Epsom Auckland 1023
114	114.1	Francesca Deane	Decline the proposed plan change	No comment	163 Gillies Avenue	Epsom Auckland 1023
115	115.1	Alison Warren	Decline the plan modification	Operational and construction traffic	11 Ngaruahoe Street	Mt Eden Auckland 1024
	115.2			Visual amenity and residential character		
	115.3			Removal of Special Character Overlay		
	115.4			Effects from building height (shadowing & privacy)		
	115.5			Construction effects (vibration/noise and safety from excavation and rock blasting)		
116	116.1	Margaret Parker	Decline the proposed plan change	Visual amenity and residential character	11 Glenfell Place	Epsom Auckland 1023
	116.2			Effects from building height (shadowing & privacy)		
	116.3			Operational and construction traffic		
	116.4			Construction effects (vibration/noise and safety from excavation and rock blasting)		
	116.5			Re-zoning will set precedent allowing non-residential use in residential zones		
117	117.1	Tara Deobhakta	Decline the proposed plan change	Visual amenity and residential character	27 Donnett Avenue	Epsom Auckland 1023
118	118.1	Carlton Brown	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)	1 Shipherds Close	Epsom Auckland 1023
	118.2			Effects from building height (shadowing & privacy)		
	118.3			Visual amenity and residential character		
119	119.1	Auckland Grammar School Board of Trustees	Decline the plan modification	Urban design - incompatibility of built form	attn: P Gargiolo	Private Bag 99930 Newmarket
	119.2			Effects from building height (shadowing & privacy)		
	119.3			Operational and construction traffic		
	119.4			Construction effects (vibration/noise and safety from excavation and rock blasting)		
120	120.1	Alister Prew	Decline the plan modification	Effects from building height (shadowing & privacy)	63 Epsom Avenue	Epsom Auckland 1023
	120.2			Visual amenity and residential character		

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address
121	121.1	Brent Druskovich	Decline the plan modification	Removal of Special Character Overlay	10A Domett Avenue Epsom Auckland 1023
	121.2			Operational and construction traffic	
	121.3			Visual amenity and residential character	
122	122.1	Charles Stewart	Decline the plan modification	Visual amenity and residential character	20C Kipling Avenue Epsom
	122.2			Effects from building height (shadowing & privacy)	
123	123.1	Chi Wong	Decline the plan modification	Operational and construction traffic	5/2 Brightside Road Epsom Auckland 1023
	123.2			Visual amenity and residential character	
	123.3			Effects from building height (shadowing & privacy)	
124	124.1	Christine Fletcher	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)	7 Bourne Street Mt Eden Auckland 1024
	124.2			Visual amenity and residential character	
	124.3			Re-zoning will set precedent allowing non-residential use in residential zones	
125	125.1	Mt Eden Village Inc	Decline the plan modification	Re-zoning will set precedent allowing non-residential use in residential zones	33a Ellerton Road Mt Eden
	125.2			Visual amenity and residential character	
	125.3			Removal of Special Character Overlay	
	125.4			Operational and construction traffic	
126	126.1	David Jones	Decline the plan modification	Removal of Special Character Overlay	3 Poronui Street Mt Eden Auckland 1024
	126.2			Visual amenity and residential character	
127	127.1	Emma Carr-Smith	Decline the plan modification	Effects from building height (shadowing & privacy)	157 Gillies Avenue Epsom Auckland 1023
	127.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	127.3			Operational and construction traffic	
128	128.1	Eun Rae Cho	Decline the plan modification	Visual amenity and residential character	168 Gillies Avenue Epsom Auckland 1023
	128.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	128.3			Operational and construction traffic	
129	129.1	Fisi Amies	Decline the plan modification	Visual amenity and residential character	
130	130.1	Frances Ioo	Decline the plan modification	No consideration of alternative sites	442 Mt Eden Road Mt Eden Auckland 1024
	130.2			Re-zoning will set precedent allowing non-residential use in residential zones	

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address		
	130.3			Visual amenity and residential character			
131	131.1	Gemma Allen	Decline the plan modification	No comment	32A Owens Road	Epsom	Auckland 1023
132	132.1	Georgina Johnston	Decline the plan modification	Effects from building height (shadowing & privacy)	157 Gillies Avenue	Epsom	Auckland 1023
133	133.1	Glennis Loo	Decline the plan modification	Removal of Special Character Overlay	436 Mt Eden Road	Mt Eden	Auckland 1024
	133.2			Visual amenity and residential character			
	133.3			Operational and construction traffic			
	133.4			Construction effects (vibration/noise and safety from excavation and rock blasting)			
134	134.1	Hamish Wanhill	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)			
	134.2			Re-zoning will set precedent allowing non-residential use in residential zones			
	134.3			Removal of Special Character Overlay			
	134.4			No consideration of alternative sites			
135	135.1	Hugh Blackley	Decline the plan modification	Visual amenity and residential character			
	135.2			Effects from building height (shadowing & privacy)			
	135.3			Removal of Special Character Overlay			
	135.4			Operational and construction traffic			
	135.5			No consideration of alternative sites			
136	136.1	Hyeon Tae Cho	Decline the plan modification	Visual amenity and residential character	168 Gillies Avenue	Epsom	Auckland 1023
	136.2			No consideration of alternative sites			
137	137.1	James Currie	Decline the proposed plan change	Visual amenity and residential character	149 Gillies Avenue	Epsom	Auckland 1023
138	138.1	Hyun Ryang Cho	Decline the plan modification	Visual amenity and residential character	168 Gillies Avenue	Epsom	Auckland 1023
	138.2			Operational and construction traffic			
	138.3			No consideration of alternative sites			
	138.4			Construction effects (vibration/noise and safety from excavation and rock blasting)			
139	139.1	Jennifer Spillane	Decline the plan modification	Visual amenity and residential character	79 Epsom Avenue	Epsom	Auckland 1023
	139.2			Removal of Special Character Overlay			
	139.3			Effects from building height (shadowing & privacy)			

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address
140	140.1	Jennifer Scott	Decline the plan modification	No consideration of alternative sites	49 Mt St John Avenue Epsom Auckland 1051
	140.2			Visual amenity and residential character	
141	141.1	Jennifer Stewart	Decline the plan modification	Visual amenity and residential character	c/- John Stewart 4/9 Marama Avenue Epsom
	141.2			Operational and construction traffic	
	141.3			Removal of Special Character Overlay	
142	142.1	John Allen	Decline the plan modification	Removal of Special Character Overlay	32A Owens Road Epsom Auckland 1023
	142.2			Effects from building height (shadowing & privacy)	
	142.3			Urban design - incompatibility of built form	
143	143.1	Karen Tuxford	Decline the plan modification	Removal of Special Character Overlay	33 Windmill Road Mt Eden Auckland 1024
	143.2			Visual amenity and residential character	
	143.3			Operational and construction traffic	
	143.4			No consideration of alternative sites	
144	144.1	Keradith Thomas	Decline the plan modification	Operational and construction traffic	13 Fairview Road Mt Eden Auckland 1024
	144.2			Visual amenity and residential character	
145	145.1	Lani Keane	Decline the plan modification	Removal of Special Character Overlay	c/- Sean Keane 134 Mountain Road Epsom
	145.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	145.3			Visual amenity and residential character	
	145.4			Effects from building height (shadowing & privacy)	
146	146.1	Lindsay Amies	Decline the plan modification	Visual amenity and residential character	
147	147.1	Lucy Johnston	Decline the plan modification	Effects from building height (shadowing & privacy)	157 Gillies Avenue Epsom Auckland 1023
	147.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	147.3			Visual amenity and residential character	
148	148.1	Lynn Towers	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)	167 Gillies Avenue Epsom Auckland 1023
	148.2			Operational and construction traffic	
149	149.1	Mary-Jane Johnson	Decline the plan modification	Effects from building height (shadowing & privacy)	55 Owens Road Epsom Auckland 1023
	149.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address
	149.3			Operational and construction traffic	
	149.4			Visual amenity and residential character	
	149.5			Removal of Special Character Overlay	
150	150.1	Mike and Jenny Merrington	Decline the plan modification	Visual amenity and residential character	
	150.2			No consideration of alternative sites	
	150.3			Effects from building height (shadowing & privacy)	
151	151.1	Min Kang Park	Decline the plan modification	Visual amenity and residential character	168 Gillies Avenue Epsom Auckland 1023
	151.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	151.3			Removal of Special Character Overlay	
152	152.1	Prudence Cotter	Decline the plan modification	No comment	44B St Georges Bay Road Parnell Auckland 1052
153	153.1	Pui Yi Linda Leung	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)	5/2 Brightside Road Epsom Auckland 1023
	153.2			Operational and construction traffic	
154	154.1	Richard Quatermass	Decline the plan modification	Operational and construction traffic	6/34 Owens Road Epsom Auckland 1023
	154.2			Removal of Special Character Overlay	
155	155.1	Richard Thomas	Decline the plan modification	Visual amenity and residential character	13 Fairview Road Mt Eden Auckland 1024
	155.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	155.3			Effects from building height (shadowing & privacy)	
	155.4			Operational and construction traffic	
156	156.1	Sanjay Dutt	Decline the plan modification	Operational and construction traffic	20 Epsom Avenue Epsom Auckland 1023
	156.2			No consideration of alternative sites	
	156.3			Visual amenity and residential character	
157	157.1	Sean Keane	Decline the plan modification	Removal of Special Character Overlay	134 Mountain Road Epsom Auckland 1023
	157.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	157.3			Visual amenity and residential character	
	157.4			Effects from building height (shadowing & privacy)	
158	158.1	Sharon Cogan-Beck	Decline the plan modification	No comment	9A Wilding Avenue Epsom Auckland 1023



Sub Number	Sub # point	Submitter Name	Summary	Theme	Address
159	159.1	Simon Nelson and Florence Holdsworth	Decline the plan modification	Operational and construction traffic	4 Shiphards Close Epsom Auckland 1023
	159.2			Visual amenity and residential character	
	159.3			Construction effects (vibration/noise and safety from excavation and rock blasting)	
160	160.1	Sophia Johnston	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)	157 Gillies Avenue Epsom Auckland 1023
161	161.1	Heritage New Zealand Pouhere Taonga	Amend the plan modification if not declined	Removal of Special Character Overlay	attn: Susan Andrews
161	161.2		That should the plan change e adopted that this is subject to the inclusion of appropriate plan provisions to ensure protection of the heritage ad special character features as identified in the application in perpetuity.	Removal of Special Character Overlay	
162	162.1	Suzanne Elgar	Decline the plan modification	No comment	
163	163.1	Sylvie Allen	Decline the plan modification	Removal of Special Character Overlay	
	163.2			Visual amenity and residential character	
	163.3			No consideration of alternative sites	
164	164.1	Tara Keane	Decline the plan modification	Operational and construction traffic	c/- Sean Keane 134 Mountain Road Epsom
	164.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	164.3			Effects from building height (shadowing & privacy)	
	164.4			Visual amenity and residential character	
165	165.1	Te Aute Limited	Decline the plan modification	Visual amenity and residential character	107 Market Road Epsom Auckland 1023
166	166.1	Terence Kennelly	Decline the plan modification	No comment	Unit 2 21 Ashton Road Mt Eden Auckland 1024
167	167.1	Terry Kennelly	Decline the plan modification	No consideration of alternative sites	Unit 2 21 Ashton Road Mt Eden Auckland 1024
	167.2			Removal of Special Character Overlay	
	167.3			Operational and construction traffic	
168	168.1	Tiani Keane	Decline the plan modification	Operational and construction traffic	c/- Sean Keane 134 Mountain Road Epsom
	168.2			Effects from building height (shadowing & privacy)	
	168.3			Construction effects (vibration/noise and safety from excavation and rock blasting)	
169	169.1	Tierman Keane	Decline the plan modification	Removal of Special Character Overlay	c/- Sean Keane 134 Mountain Road Epsom

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address
	169.2			Operational and construction traffic	
	169.3			Effects from building height (shadowing & privacy)	
	169.4			Construction effects (vibration/noise and safety from excavation and rock blasting)	
170	170.1	Tim Johnston	Decline the plan modification	Removal of Special Character Overlay	157 Gillies Avenue Epsom Auckland 1023
	170.2			Re-zoning will set precedent allowing non-residential use in residential zones	
171	171.1	Vivienne Prew	Decline the plan modification	Operational and construction traffic	63 Epsom Avenue Epsom Auckland 1023
	171.2			Effects from building height (shadowing & privacy)	
	171.3			Visual amenity and residential character	
172	172.1	Jane C G Mason	Decline the proposed plan change	Removal of Special Character Overlay	410 Pt Chevallier Road Pt Chevallier Auckland 1022
	172.2			Visual amenity and residential character	
173	173.1	Jane M Mason	Decline the proposed plan change	Operational and construction traffic	41 Owens Road Epsom Auckland 1023
	173.2			Visual amenity and residential character	
174	174.1	Stephen Mason	Decline the proposed plan change	Visual amenity and residential character	41 Owens Road Epsom Auckland 1023
	174.2			Effects from building height (shadowing & privacy)	
	174.3			Removal of Special Character Overlay	
175	175.1	Graham Dexter	Decline the proposed plan change	Removal of Special Character Overlay	43 Owens Road Epsom Auckland 1023
	175.2			Visual amenity and residential character	
	175.3			Operational and construction traffic	
	175.4			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	175.5			Effects from building height (shadowing & privacy)	
176	176.1	Marianne Gits	Decline the proposed plan change	Visual amenity and residential character	43 Owens Road Epsom Auckland 1023
	176.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	176.3			Operational and construction traffic	
	176.4			No consideration of alternative sites	
	176.5			Re-zoning will set precedent allowing non-residential use in residential zones	
	176.6			Removal of Special Character Overlay	

**Plan Change 21- Southern Cross Hospital  
Summary of Decisions Requested**

<b>Sub Number</b>	<b>Sub # point</b>	<b>Submitter Name</b>	<b>Summary</b>	<b>Contact details</b>
1	1.1	Spring Chunchun Xu	Decline the plan modification	<a href="mailto:chunchunxu122@gmail.com">chunchunxu122@gmail.com</a>
2	2.1	Stuart King	Accept the plan modification with amendments.	<a href="mailto:stuart_patrick_king@hotmail.com">stuart_patrick_king@hotmail.com</a>
3	3.1	Jianming Huang	Decline the proposed plan change	<a href="mailto:danielhuang66@hotmail.com">danielhuang66@hotmail.com</a>
4	4.1	John Kippenburger	Decline the plan modification.	<a href="mailto:johnripp@gmail.com">johnripp@gmail.com</a>
5	5.1	Julie Kippenburger	Decline the plan modification	<a href="mailto:juliekippenburger@gmail.com">juliekippenburger@gmail.com</a>
6	6.1	Tom Lorimer	Decline the plan modification	<a href="mailto:tlorimer2@gmail.com">tlorimer2@gmail.com</a>
7	7.1	Erica Hussona	Decline the plan modification	<a href="mailto:erica.hussona@ix.net.nz">erica.hussona@ix.net.nz</a>
8	8.1	Zhengyu He	Decline the plan modification	<a href="mailto:danielhuang66@hotmail.com">danielhuang66@hotmail.com</a>
9	9.1	Gregory Towers	Decline the plan modification	<a href="mailto:greg.towers1@gmail.com">greg.towers1@gmail.com</a>
10	10.1	Miranda Rabone	Decline the proposed plan change	<a href="mailto:bhgc@xtra.co.nz">bhgc@xtra.co.nz</a>
11	11.1	Dr Stuart Rabone	Decline the proposed plan change	<a href="mailto:bhgc@xtra.co.nz">bhgc@xtra.co.nz</a>
12	12.1	Janet Wightman	Decline the plan modification	<a href="mailto:nzjanetwightman@gmail.com">nzjanetwightman@gmail.com</a>
13	13.1	William Lorimer	Decline the plan modification	<a href="mailto:willlorimer21@gmail.com">willlorimer21@gmail.com</a>
14	14.1	Shuqin Zhang	Decline the proposed plan change	<a href="mailto:nzxinxin@gmail.com">nzxinxin@gmail.com</a>
15	15.1	Geoffrey Hinds	Decline the proposed plan change	<a href="mailto:geowill4@gmail.com">geowill4@gmail.com</a>
16	16.1	David Ross	Decline the plan modification	<a href="mailto:David.ross@kotahi.co.nz">David.ross@kotahi.co.nz</a>
17	17.1	Hannah Saulbrey Ross	Decline the plan modification	<a href="mailto:hannahsr@me.com">hannahsr@me.com</a>
18	18.1	Jane Robson	Decline the plan modification	<a href="mailto:robsonjp@xtra.co.nz">robsonjp@xtra.co.nz</a>
19	19.1	Lisa Phillimore	Decline the plan modification	<a href="mailto:phillimorefamily@gmail.com">phillimorefamily@gmail.com</a>
20	20.1	Elsbeth Whitmore	Decline the proposed plan change	<a href="mailto:arnwhit@xtra.co.nz">arnwhit@xtra.co.nz</a>
21	21.1	Lisa Manks	Decline the plan modification	<a href="mailto:manksyak@gmail.com">manksyak@gmail.com</a>

22	22.1	Philip Taylor	Decline the proposed plan change	<a href="mailto:philipjtaylor@xtra.co.nz">philipjtaylor@xtra.co.nz</a>
23	23.1	Janet Taylor	Decline the proposed plan change	<a href="mailto:jan_taylor@xtra.co.nz">jan_taylor@xtra.co.nz</a>
24	24.1	Norfolk Limited attn: Frederick Knights	Decline the proposed plan change	<a href="mailto:faknights@gmail.com">faknights@gmail.com</a>
25	25.1	Margaret Knights	Decline the proposed plan change	<a href="mailto:faknights@gmail.com">faknights@gmail.com</a>
26	26.1	David Lim	Decline the plan modification	<a href="mailto:david.lim49@gmail.com">david.lim49@gmail.com</a>
27	27.1	Harvey White and Janette White	Decline the plan modification	<a href="mailto:harveywhite1911@gmail.com">harveywhite1911@gmail.com</a>
28	28.1	Karim Hussona	Decline the plan modification	<a href="mailto:erica.hussona@ix.net.nz">erica.hussona@ix.net.nz</a>
29	29.1	Marion Armstrong	Decline the plan modification	
30	30.1	Pavneet Grover	Decline the plan modification	<a href="mailto:pavneet.grover@yahoo.com">pavneet.grover@yahoo.com</a>
31	31.1	Terry Kayes and Marion Kayes	Decline the plan modification	<a href="mailto:terry.kayes@gmail.com">terry.kayes@gmail.com</a>
32	32.1	Nicola Maling	Decline the plan modification	<a href="mailto:an.maling@xtra.co.nz">an.maling@xtra.co.nz</a>
33	33.1	Michael Lorimer	Decline the plan modification	<a href="mailto:michaellorimer@xtra.co.nz">michaellorimer@xtra.co.nz</a>
34	34.1	Peter Robson	Decline the plan modification	<a href="mailto:alertelectrical@xtra.co.nz">alertelectrical@xtra.co.nz</a>
35	35.1	Stephanie Watson	Decline the proposed plan change	<a href="mailto:stephaniewatson126@gmail.com">stephaniewatson126@gmail.com</a>
36	36.1	Trevor Watson	Decline the proposed plan change	<a href="mailto:trevor.watson@xtra.co.nz">trevor.watson@xtra.co.nz</a>
37	37.1	Colin Wightman	Decline the proposed plan change	<a href="mailto:colin@jaysondesigns.co.nz">colin@jaysondesigns.co.nz</a>
38	38.1	Lynn Huhtala	Decline the proposed plan change	<a href="mailto:lynn.chris@xtra.co.nz">lynn.chris@xtra.co.nz</a>
39	39.1	Cherie Lovatt	Decline the plan modification	<a href="mailto:lovatt.lovegrove@gmail.com">lovatt.lovegrove@gmail.com</a>
40	40.1	Digby Draper	Decline the plan modification	<a href="mailto:digbydraperdd@gmail.com">digbydraperdd@gmail.com</a>
41	41.1	Jan Hughes	Decline the plan modification	<a href="mailto:trevorjanhughes@gmail.com">trevorjanhughes@gmail.com</a>
42	42.1	Heather Golder	Decline the plan modification	<a href="mailto:hgolder@xtra.co.nz">hgolder@xtra.co.nz</a>
43	43.1	Jennifer Lim	Decline the plan modification	<a href="mailto:janlim1979@gmail.com">janlim1979@gmail.com</a>
44	44.1	John Stewart	Decline the plan modification	<a href="mailto:johnstewart@xtra.co.nz">johnstewart@xtra.co.nz</a>
45	45.1	Michelle Adams	Decline the plan modification	<a href="mailto:m.adams@auckland.ac.nz">m.adams@auckland.ac.nz</a>

46	46.1	Philip Chong and Virginia Chong	Decline the plan modification	<a href="mailto:philip.chong29@gmail.com">philip.chong29@gmail.com</a>
47	47.1	Tobias Lorimer	Decline the plan modification	<a href="mailto:tobiaslorimer@gmail.com">tobiaslorimer@gmail.com</a>
48	48.1	Vanita Dutt	Decline the application in its entirety as indicated [in the submission]	<a href="mailto:vanitamd@gmail.com">vanitamd@gmail.com</a>
49	49.1	Andi He	Decline the proposed plan change	<a href="mailto:grace.liu7380@gmail.com">grace.liu7380@gmail.com</a>
50	50.1	Fred Blackley	Decline the plan modification.	<a href="mailto:fb378520@kings.net.nz">fb378520@kings.net.nz</a>
51	51.1	Gabriella Amies	Decline the plan modification	
52	52.1	Hugo Blackley	Decline the plan modification	<a href="mailto:hjblackley@gmail.com">hjblackley@gmail.com</a>
53	53.1	Sam Blackley	Decline the plan modification	<a href="mailto:samblackley2000@gmail.com">samblackley2000@gmail.com</a>
54	54.1	Sophia Amies	Decline the plan modification	
55	55.1	Ian Kohler	Decline the proposed plan change	<a href="mailto:ik@ikarchitect.com">ik@ikarchitect.com</a>
56	56.1	Deborah Wade	Decline the proposed plan change	<a href="mailto:debbiewade@brandz.co.nz">debbiewade@brandz.co.nz</a>
57	57.1	Grace Liu	Decline the proposed plan change	<a href="mailto:grace.liu7380@gmail.com">grace.liu7380@gmail.com</a>
58	58.1	Eva Ji	Decline the proposed plan change	<a href="mailto:nexinxin@hotmail.com">nexinxin@hotmail.com</a>
59	59.1	Andrew Kohler	Decline the proposed plan change	<a href="mailto:kandrew2302@gmail.com">kandrew2302@gmail.com</a>
60	60.1	Lancia Hicks	Decline the proposed plan change	<a href="mailto:lanciahicks@gmail.com">lanciahicks@gmail.com</a>
61	61.1	Anita Chhita	Decline the proposed plan change	<a href="mailto:d.patel@xtra.co.nz">d.patel@xtra.co.nz</a>
62	62.1	Dinesh Naran	Decline the proposed plan change	<a href="mailto:d.patel@xtra.co.nz">d.patel@xtra.co.nz</a>
63	63.1	Naomi Dexter	Decline the proposed plan change	
64	64.1	Sungita Chhita	Decline the proposed plan change	<a href="mailto:dhurur@xtra.co.nz">dhurur@xtra.co.nz</a>

65	65.1	Robyn Hawkes		Decline the proposed plan change	<a href="mailto:robynhawkes21@gmail.com">robynhawkes21@gmail.com</a>
66	66.1	Vinay Deobhakta		Decline the proposed plan change	<a href="mailto:vinaydeobhakta@gmail.com">vinaydeobhakta@gmail.com</a>
67	67.1	Richard Hawkes		Decline the proposed plan change	<a href="mailto:rhawkes21@gmail.com">rhawkes21@gmail.com</a>
68	68.1	Kanan Deobhakta		Decline the proposed plan change	
69	69.1	Devendra Patel		Decline the plan modification	<a href="mailto:family@patel.co.nz">family@patel.co.nz</a>
70	70.1	Gillian Anderson		Decline the plan modification	<a href="mailto:g.anderson5758@gmail.com">g.anderson5758@gmail.com</a>
71	71.1	Jashwanti Patel		Decline the plan modification	<a href="mailto:jashu@patel.co.nz">jashu@patel.co.nz</a>
72	72.1	Victor Rabone		Decline the proposed plan change	<a href="mailto:bhgc@xtra.co.nz">bhgc@xtra.co.nz</a>
73	73.1	Cheryl Cliffe		Decline the proposed plan change	<a href="mailto:cherylcliffe@xtra.co.nz">cherylcliffe@xtra.co.nz</a>
74	74.1	Claire Mason		Decline the proposed plan change	<a href="mailto:cejmason@gmail.com">cejmason@gmail.com</a>
75	75.1	Margaret Parker		Decline the proposed plan change	<a href="mailto:margaretparker@sangarchitects.com">margaretparker@sangarchitects.com</a>
76	76.1	Aden Leung		Decline the proposed plan change	<a href="mailto:adenleung40@gmail.com">adenleung40@gmail.com</a>
77	77.1	Hyun Chi Cho		Decline the plan modification	<a href="mailto:kenjicho@hotmail.com">kenjicho@hotmail.com</a>
78	78.1	John Allen		Decline the plan modification	<a href="mailto:ja@sdg.net.nz">ja@sdg.net.nz</a>
79	79.1	Anthony Randerson		Decline the proposed plan change	<a href="mailto:tonyranderson@xtra.co.nz">tonyranderson@xtra.co.nz</a>
80	80.1	Glenda Randerson		Decline the proposed plan change	<a href="mailto:glendaranderson@xtra.co.nz">glendaranderson@xtra.co.nz</a>
81	81.1	Ellen Majurey		Decline the proposed plan change	<a href="mailto:e.majurey@xtra.co.nz">e.majurey@xtra.co.nz</a>
82	82.1	Savita Mistry, Vinodbhail Mistry, M		Decline the proposed plan change	<a href="mailto:vinod@giftwrapping.co.nz">vinod@giftwrapping.co.nz</a>
83	83.1	Christina Lucas		Decline the proposed plan change	<a href="mailto:lucas.clan@xtra.co.nz">lucas.clan@xtra.co.nz</a>

84	84.1	Paul Lucas	Decline the proposed plan change	<a href="mailto:paul.lucas@xtra.co.nz">paul.lucas@xtra.co.nz</a>
85	85.1	Gordon Mckendry	Decline the proposed plan change	<a href="mailto:Gordon@geomac.co.nz">Gordon@geomac.co.nz</a>
86	86.1	Anne Callinan	Decline the proposed plan change	<a href="mailto:anne.callinan@simpsongrinson.com">anne.callinan@simpsongrinson.com</a>
87	87.1	Richard Poole	Decline the proposed plan change	<a href="mailto:rick@poolez.nz">rick@poolez.nz</a>
88	88.1	Nicholas Allen	Decline the proposed plan change	<a href="mailto:nickallen111@gmail.com">nickallen111@gmail.com</a>
89	89.1	Mary Crosby	Decline the proposed plan change	<a href="mailto:marybernadettecrosby@gmail.com">marybernadettecrosby@gmail.com</a>
90	90.1	Katherine Bullog	Decline the proposed plan change	<a href="mailto:katherine.bullog@gmail.com">katherine.bullog@gmail.com</a>
91	91.1	Gemma Allen	Decline the plan modification	<a href="mailto:gemma@hydrobio.co.nz">gemma@hydrobio.co.nz</a>
92	92.1	Robert Speer	Decline the proposed plan change	<a href="mailto:robert@speer.co.nz">robert@speer.co.nz</a>
93	93.1	Suzanne Speer	Decline the proposed plan change	<a href="mailto:suzanne@speer.co.nz">suzanne@speer.co.nz</a>
94	94.1	Eden Epsom Residential Protection	Decline the proposed plan change	<a href="mailto:gemma@hydrobio.co.nz">gemma@hydrobio.co.nz</a>
95	95.1	Kefu Liu	Decline the proposed plan change	<a href="mailto:trade7lkf7@gmail.com">trade7lkf7@gmail.com</a>
96	96.1	Charles Deane	Decline the proposed plan change	<a href="mailto:Charles.deane7@gmail.com">Charles.deane7@gmail.com</a>
97	97.1	Ernest and Gillian Willoughby	Decline the proposed plan change	<a href="mailto:gilly.willoughby@gmail.com">gilly.willoughby@gmail.com</a>



98	98.1	Auckland Transport- Planning and Investment	That Auckland Council approves PPC21, provided that the transport requirements/concerns raised in this submission are resolved , or that Council identifies a more appropriate zone or provision that will address these matters.	<a href="mailto:Kevin.wong-toi@at.govt.nz">Kevin.wong-toi@at.govt.nz</a>
	98.2	Auckland Transport- Planning and Investment	If ATs concerns are not resolved , then the Plan Change should be declined	
99	99.1	Simon Jones	Decline the proposed plan change	<a href="mailto:simon.jones@moana.co.nz">simon.jones@moana.co.nz</a>
100	100.1	Carolina Boyle	Decline the proposed plan change	<a href="mailto:ncpmuller@gmail.com">ncpmuller@gmail.com</a>
101	101.1	Prudence Cotter	Decline the proposed plan change	<a href="mailto:cotter.smith@xtra.co.nz">cotter.smith@xtra.co.nz</a>
102	102.1	James Boyle	Decline the proposed plan change	<a href="mailto:james.boyle0259@gmail.com">james.boyle0259@gmail.com</a>
103	103.1	James McLennan	Decline the proposed plan change	<a href="mailto:j.mclennan@xtra.co.nz">j.mclennan@xtra.co.nz</a>
104	104.1	Priya Naran	Decline the proposed plan change	<a href="mailto:d.patel@xtra.co.nz">d.patel@xtra.co.nz</a>
105	105.1	Ashok Patel	Decline the proposed plan change	<a href="mailto:dhruv@xtra.co.nz">dhruv@xtra.co.nz</a>
106	106.1	Gregory Thwaitte	Decline the proposed plan change	
107	107.1	Peter King	Decline the proposed plan change	<a href="mailto:peter_king@xtra.co.nz">peter_king@xtra.co.nz</a>

108	108.1	Housing New Zealand c/- Ellis Gould Lawyers	That the proposed provisions of the Plan Change seeking the proposed removal of the Special Character Area Overlay from three sites at 149, 151 and 153 Gillies Avenue, Epsom, be deleted or amended, so as to provide for the sustainable management of the Region's natural and physical resources and thereby achieve the purpose of the Act.	<a href="mailto:ckirman@ellisgould.co.nz">ckirman@ellisgould.co.nz</a>
	108.2	Housing New Zealand c/- Ellis Gould Lawyers	Such further or other relief, or other consequential or other amendments, as are considered appropriate and necessary to address the concerns set out herein.	
109	109.1	Dhruv Chhita-Patel	Decline the proposed plan change	<a href="mailto:dhruv@xtra.co.nz">dhruv@xtra.co.nz</a>
110	110.1	Ian Wolfgram	If the proposed plan change is not declined then amend. No relaxing of the parking ratio from 1:50sq.m GFA to 1:64sq.m GFA	ian.wolfgram@gmail.com
111	111.1	Leonie Deane	Decline the proposed plan change	leonie@deaneco.co.nz
112	112.1	Christopher Deane	Decline the proposed plan change	Christopher@Deane Co.co.nz
113	113.1	Edward Deane	Decline the proposed plan change	edward_deane@hotmail.com
114	114.1	Francesca Deane	Decline the proposed plan change	deane.francesca@gmail.com

115	115.1	Alison Warren	Decline the plan modification	awarrenz@yahoo.com
116	116.1	Margaret Parker	Decline the proposed plan change	margaretparker@sangarchitects.com
117	117.1	Tara Deobhakta	Decline the proposed plan change	taradeobhakta@gmail.com
118	118.1	Carlton Brown	Decline the plan modification	carltonbro@gmail.com
119	119.1	Auckland Grammar School Board of	Decline the plan modification	p.gargiulo@ags.school.nz
120	120.1	Alister Prew	Decline the plan modification	alisterprew@hotmail.co.nz
121	121.1	Brent Druskovich	Decline the plan modification	brentdruskovich@gmail.com
122	122.1	Charles Stewart	Decline the plan modification	cr_stewart@hotmail.com
123	123.1	Chi Wong	Decline the plan modification	thomas321@gmail.com
124	124.1	Christine Fletcher	Decline the plan modification	fletch.family@xtra.co.nz
125	125.1	Mt Eden Village Inc	Decline the plan modification	admin@mountededen.co.nz
126	126.1	David Jones	Decline the plan modification	doj@halaw.co.nz
127	127.1	Emma Carr-Smith	Decline the plan modification	timandemma@xtra.co.nz
128	128.1	Eun Rae Cho	Decline the plan modification	pinebay@xtra.co.nz
129	129.1	Fisi Amies	Decline the plan modification	Fisi.amies@gmail.com
130	130.1	Frances Ioo	Decline the plan modification	info@chapter.co.nz
131	131.1	Gemma Allen	Decline the plan modification	gemma@hydrobio.co.nz
132	132.1	Georgina Johnston	Decline the plan modification	timandemma@xtra.co.nz
133	133.1	Glennis Loo	Decline the plan modification	glennisloo@gmail.com
134	134.1	Hamish Wanhill	Decline the plan modification	hamish@liberation.co.nz
135	135.1	Hugh Blackley	Decline the plan modification	hughblackley@xtra.co.nz
136	136.1	Hyeon Tae Cho	Decline the plan modification	kenta.cho@auckland.ac.nz
137	137.1	James Currie	Decline the proposed plan change	currie_jim2010@hotmail.com
138	138.1	Hyun Ryang Cho	Decline the plan modification	hcho529@aucklanduni.ac.nz
139	139.1	Jennifer Spillane	Decline the plan modification	spillanej01@gmail.com
140	140.1	Jennifer Scott	Decline the plan modification	bnjscott@xtra.co.nz
141	141.1	Jennifer Stewart	Decline the plan modification	jennystewart20@gmail.com
142	142.1	John Allen	Decline the plan modification	ja@sdg.net.nz
143	143.1	Karen Tuxford	Decline the plan modification	hastiephysio@hotmail.com
144	144.1	Kerarith Thomas	Decline the plan modification	richard2keri@yahoo.co.nz

145	145.1	Lani Keane	Decline the plan modification	lanikeane@hotmail.com
146	146.1	Lindsay Amies	Decline the plan modification	lindsayamies@hotmail.com
147	147.1	Lucy Johnston	Decline the plan modification	timandemma@xtra.co.nz
148	148.1	Lynn Towers	Decline the plan modification	lynnnetowers1@gmail.com
149	149.1	Mary-Jane Johnson	Decline the plan modification	mjohnson550@gmail.com
150	150.1	Mike and Jenny Merrington	Decline the plan modification	jenmerrington@gmail.com
151	151.1	Min Kang Park	Decline the plan modification	toshiedon@gmail.com
152	152.1	Prudence Cotter	Decline the plan modification	
153	153.1	Pui Yi Linda Leung	Decline the plan modification	lindaee@gmail.com
154	154.1	Richard Quatermass	Decline the plan modification	quatermass@xtra.co.nz
155	155.1	Richard Thomas	Decline the plan modification	richard2keri@yahoo.co.nz
156	156.1	Sanjay Dutt	Decline the plan modification	scoobjay@gmail.com
157	157.1	Sean Keane	Decline the plan modification	mtecho@hotmail.com
158	158.1	Sharon Cogan-Beck	Decline the plan modification	sharoncoganbeck@yahoo.com
159	159.1	Simon Nelson and Florence Holdsw	Decline the plan modification	simon@holdson.co.nz
160	160.1	Sophia Johnston	Decline the plan modification	timandemma@xtra.co.nz
161	161.1	Heritage New Zealand Pouhere Ta	Amend the plan modification if not declined	sandrews@heritage.org.nz
161	161.2		That should the plan change be adopted that this is subject to the inclusion of appropriate plan provisions to ensure protection of the heritage and special character features as identified in the application in perpetuity.	
162	162.1	Suzanne Elgar	Decline the plan modification	suemelgar@gmail.com
163	163.1	Sylvie Allen	Decline the plan modification	sylvie.e.allen@gmail.com
164	164.1	Tara Keane	Decline the plan modification	mtecho@hotmail.com
165	165.1	Te Aute Limited	Decline the plan modification	macleans01@gmail.com
166	166.1	Terence Kennelly	Decline the plan modification	terry@profitmultipliers.co.nz
167	167.1	Terry Kennelly	Decline the plan modification	terry@profitmultipliers.co.nz
168	168.1	Tiani Keane	Decline the plan modification	mtecho@hotmail.com
169	169.1	Tiernan Keane	Decline the plan modification	mtecho@hotmail.com

170	170.1	Tim Johnston	Decline the plan modification	tjohnston@castlepartners.co.nz
171	171.1	Vivienne Prew	Decline the plan modification	vivprew@hotmail.com
172	172.1	Jane C G Mason	Decline the proposed plan change	missjanemason@gmail.com
173	173.1	Jane M Mason	Decline the proposed plan change	jane millarmason@gmail.com
174	174.1	Stephen Mason	Decline the proposed plan change	shmmason@xtra.co.nz
175	175.1	Graham Dexter	Decline the proposed plan change	dexiotropic@gmail.com
176	176.1	Marianne Gits	Decline the proposed plan change	marianne-gits@gmail.com

# **ATTACHMENT THREE**

## **Further Submissions and Local Board Views**



Summary of Decisions Requested						
Sub Number	Sub # point	Submitter Name	Summary	Theme	Address	
1	1.1	Spring Chunchun Xu	Decline the plan modification	Trees	149 Gillies Avenue	Epsom Auckland 1023
3	3.1	Jianming Huang	Decline the proposed plan change	Setting precedent allowing non-residential use in residential zones	5/4 Brightside Road	Epsom Auckland 1023
	3.2			Excavation and rock blasting		
	3.3			Construction traffic (traffic volume, noise and safety)		
4	4.1	John Kippenburger	Decline the plan modification.	Operational traffic (traffic generation, noise, safety and parking)	22 Disraeli Street	Mt Eden Auckland 1024
	4.2			No consideration of alternative sites		
	4.3			Excavation and rock blasting		
	4.4			Visual amenity		
5	5.1	Julie Kippenburger	Decline the plan modification	No consideration of alternative sites	22 Disraeli Street	Mt Eden Auckland 1024
	5.2			Construction effects (vibration/noise and safety from excavation and rock blasting)		
	5.3			Operational and construction traffic		
	5.4			Visual amenity and residential character		
6	6.1	Tom Lorimer	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)	6 Brightside Road	Epsom Auckland 1023
	6.2			Trees		
7	7.1	Erica Hussona	Decline the plan modification	Removal of Special Character Overlay	20 Pentland Avenue	Mt Eden Auckland 1024
	7.2			Re-zoning will set precedent allowing non-residential use in residential zones		
	7.3			Operational and construction traffic		
	7.4			Effects from building height (shadowing & privacy)		
8	8.1	Zhengyu He	Decline the plan modification	Removal of Special Character Overlay	c/-Jianming Huang	
	8.2			Re-zoning will set precedent allowing non-residential use in residential zones		
	8.3			Construction effects (vibration/noise and safety from excavation and rock blasting)		
	8.4			Effects from building height (shadowing & privacy)		
9	9.1	Gregory Towers	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)	187 Gillies Avenue	Epsom Auckland 1023
	9.2			Operational and construction traffic		
	9.3			Removal of Special Character Overlay		



Sub Number	Sub # point	Submitter Name	Summary	Theme	Address
10	10.1	Miranda Rabone	Decline the proposed plan change	Effects from building height (shadowing & privacy)	PO Box 99732 Newmarket Auckland 1149
	10.2			Trees	
	10.3			Visual amenity and residential character	
	10.4			Construction effects (vibration/noise and safety from excavation and rock blasting)	
11	11.1	Dr Stuart Rabone	Decline the proposed plan change	Visual amenity and residential character	Eden- EpsomResidential PO Box 99732 Newmarket
	11.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	11.3			No consideration of alternative sites	
12	12.1	Janet Wightman	Decline the plan modification	Removal of Special Character Overlay	95 Owens Road Epsom Auckland 1023
	12.2			Visual amenity and residential character	
	12.3			Operational and construction traffic	
	12.4			Re-zoning will set precedent allowing non-residential use in residential zones	
13	13.1	William Lorimer	Decline the plan modification	Removal of Special Character Overlay	6 Brightside Road Epsom Auckland 1023
14	14.1	Shuqin Zhang	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	3 Kingsway Three Kings Auckland
15	15.1	Geoffrey Hinds	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	12/24 Sherbourne Road Mt Eden Auckland 1024
	15.2			No consideration of alternative sites	
	15.3			Re-zoning will set precedent allowing non-residential use in residential zones	
16	16.1	David Ross	Decline the plan modification	No comment	19 Fairview Road Mt Eden Auckland 1024
17	17.1	Hannah Saubrey Ross	Decline the plan modification	Operational and construction traffic	19 Fairview Road Mt Eden Auckland 1024
	17.2			Removal of Special Character Overlay	
18	18.1	Jane Robson	Decline the plan modification	Operational and construction traffic	25 Prospect Terrace Mt Eden Auckland 1024
	18.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	18.3			Removal of Special Character Overlay	
19	19.1	Lisa Phillimore	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)	2a Poronui Street Mt Eden Auckland 1024
	19.2			No consideration of alternative sites	
20	20.1	Elspeth Whitmore	Decline the proposed plan change	Operational and construction traffic	5 Shipherds Avenue Epsom Auckland 1023
21	21.1	Lisa Manks	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)	16A Fairview Road Mt Eden Auckland 1024

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address	
22	22.1	Philip Taylor	Decline the proposed plan change	Visual amenity and residential character	19 Glenfell Place	Epsom Auckland 1023
	22.2			Re-zoning will set precedent allowing non-residential use in residential zones		
	22.3			Removal of Special Character Overlay		
	22.4			Operational and construction traffic		
23	23.1	Janet Taylor	Decline the proposed plan change	Visual amenity and residential character	19 Glenfell Place	Epsom Auckland 1023
	23.2			Removal of Special Character Overlay		
	23.3			Operational and construction traffic		
	23.4			Construction effects (vibration/noise and safety from excavation and rock blasting)		
24	24.1	Norfolk Limited attn: Frederick Knights	Decline the proposed plan change	Visual amenity and residential character	Norfolk Limited	PO Box 9723 Newmarket
	24.2			No consideration of alternative sites		
	24.3			Construction effects (vibration/noise and safety from excavation and rock blasting)		
	24.5			Removal of Special Character Overlay		
	24.6			Operational and construction traffic		
25	25.1	Margaret Knights	Decline the proposed plan change	Operational and construction traffic	PO Box 9723	Newmarket Auckland 1149
	25.2			Construction effects (vibration/noise and safety from excavation and rock blasting)		
	25.3			Effects from building height (shadowing & privacy)		
	25.4			Re-zoning will set precedent allowing non-residential use in residential zones		
26	26.1	David Lim	Decline the plan modification	Visual amenity and residential character	1/15 Shiphards Avenue	Three Kings Auckland 1023
	26.2			Construction effects (vibration/noise and safety from excavation and rock blasting)		
	26.3			Operational and construction traffic		
27	27.1	Harvey White and Janette White	Decline the plan modification	Re-zoning will set precedent allowing non-residential use in residential zones	137 Mountain Road	Epsom Auckland 1023
28	28.1	Karim Hussona	Decline the plan modification	No consideration of alternative sites	20 Pentland Avenue	Mt Eden Auckland 1024
29	29.1	Marion Armstrong	Decline the plan modification	No consideration of alternative sites	37 Owens Road	Epsom Auckland 1023
	29.2			Operational and construction traffic		
	29.3			Construction effects (vibration/noise and safety from excavation and rock blasting)		
30	30.1	Pavneet Grover	Decline the plan modification	No comment	41B Peary Road	Mt Eden Auckland 1024

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address	
31	31.1	Terry Kayes and Marion Kayes	Decline the plan modification	Visual amenity and residential character	19 Essex Road	Mt Eden Auckland 1024
	31.2			Operational and construction traffic		
	31.3			Re-zoning will set precedent allowing non-residential use in residential zones		
32	32.1	Nicola Maling	Decline the plan modification	Visual amenity and residential character	73 Prospect Terrace	Mt Eden Auckland 1024
	32.2			Construction effects (vibration/noise and safety from excavation and rock blasting)		
	32.3			Operational and construction traffic		
	32.4			No consideration of alternative sites		
33	33.1	Michael Lorimer	Decline the plan modification	Re-zoning will set precedent allowing non-residential use in residential zones	6 Brightside Road	Epsom Auckland 1023
	33.2			Visual amenity and residential character		
	33.3			Removal of Special Character Overlay		
	33.4			Operational and construction traffic		
	33.5			Construction effects (vibration/noise and safety from excavation and rock blasting)		
34	34.1	Peter Robson	Decline the plan modification	Operational and construction traffic	25 Prospect Terrace	Mt Eden Auckland 1024
	34.2			Re-zoning will set precedent allowing non-residential use in residential zones		
	34.3			Removal of Special Character Overlay		
35	35.1	Stephanie Watson	Decline the proposed plan change	Removal of Special Character Overlay	3 Shipherds Avenue	Epsom Auckland 1023
	35.2			Operational and construction traffic		
36	36.1	Trevor Watson	Decline the proposed plan change	Operational and construction traffic	3 Shipherds Avenue	Epsom Auckland 1023
	36.2			Removal of Special Character Overlay		
37	37.1	Colin Wightman	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	95 Owens Road	Epsom Auckland 1023
	37.2			Operational and construction traffic		
	37.3			Visual amenity and residential character		
38	38.1	Lynn Huhtala	Decline the proposed plan change	Removal of Special Character Overlay	31 Glenfell Place	Epsom Auckland 1023
	38.2			Visual amenity and residential character		
	38.3			Re-zoning will set precedent allowing non-residential use in residential zones		
	38.4			Operational and construction traffic		

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address		
	38.5			Construction effects (vibration/noise and safety from excavation and rock blasting)			
39	39.1	Cherie Lovatt	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)	8 Liverpool Street	Epsom	Auckland 1023
	39.2			Visual amenity and residential character			
40	40.1	Digby Draper	Decline the plan modification	No comment	PO Box 29017	Epsom	Auckland 1344
41	41.1	Jan Hughes	Decline the plan modification	No comment	17 Albany Avenue	Epsom	Auckland 1023
42	42.1	Heather Golder	Decline the plan modification	Removal of Special Character Overlay	45 St Leonards Road	Mt Eden	Auckland 1024
	42.2			Visual amenity and residential character			
	42.3			No consideration of alternative sites			
43	43.1	Jennifer Lim	Decline the plan modification	Visual amenity and residential character	1/15 Shiphards Avenue	Epsom	Auckland 1023
	43.2			Operational and construction traffic			
	43.3			Construction effects (vibration/noise and safety from excavation and rock blasting)			
	43.4			No consideration of alternative sites			
44	44.1	John Stewart	Decline the plan modification	Removal of Special Character Overlay	5 Omana Avenue	Epsom	Auckland 1023
	44.2			Visual amenity and residential character			
	44.3			Effects from building height (shadowing & privacy)			
	44.4			Construction effects (vibration/noise and safety from excavation and rock blasting)			
	44.5			Operational and construction traffic			
	44.6			No consideration of alternative sites			
45	45.1	Michelle Adams	Decline the plan modification	Removal of Special Character Overlay	6 Brightside Road	Epsom	Auckland 1023
	45.2			Visual amenity and residential character			
	45.3			Construction effects (vibration/noise and safety from excavation and rock blasting)			
	45.4			Operational and construction traffic			
46A	46A.1	Philip Chong	Decline the plan modification	Operational and construction traffic	29 Shiphards Avenue	Epsom	Auckland 1023
	46A.2			Construction effects (vibration/noise and safety from excavation and rock blasting)			
	46A.3			Effects from building height (shadowing & privacy)			
	46A.4			Visual amenity and residential character			

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address
46B	46B.1	Virginia Chong	Decline the plan modification	Operational and construction traffic	29 Shiphards Avenue Epsom Auckland 1023
	46B.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	46B.3			Effects from building height (shadowing & privacy)	
	46B.4			Visual amenity and residential character	
47	47.1	Tobias Lorimer	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)	6 Brightside Road Epsom Auckland 1023
48	48.1	Vanita Dutt	Decline the application in its entirety as indicated [in the submission]	Removal of Special Character Overlay	20 Epsom Avenue Epsom Auckland 1023
	48.2			Operational and construction traffic	
	48.3			Effects from building height (shadowing & privacy)	
49	49.1	Andi He	Decline the proposed plan change	Removal of Special Character Overlay	2/2 Brightside Road Epsom Auckland 1023
	49.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	49.3			No consideration of alternative sites	
50	50.1	Fred Blackley	Decline the plan modification. Please reject this modification for the people of Auckland who need accommodation ad not more private	No consideration of alternative sites	
	50.2			Removal of Special Character Overlay	
51	51.1	Gabriella Amies	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)	37 Owens Road Epsom Auckland 1023
	51.2			Visual amenity and residential character	
	51.3			Operational and construction traffic	
52	52.1	Hugo Blackley	Decline the plan modification	Visual amenity and residential character	
	52.2			No consideration of alternative sites	
53	53.1	Sam Blackley	Decline the plan modification	Visual amenity and residential character	
	53.2			No consideration of alternative sites	
	53.3			Operational and construction traffic	
	53.4			Effects from building height (shadowing & privacy)	
54	54.1	Sophia Amies	Decline the plan modification	Effects from building height (shadowing & privacy)	37 Owens Road Epsom Auckland 1023
	54.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
55	55.1	Ian Kohler	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	PO Box 28718 Remuera

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address
	55.2			No consideration of alternative sites	
	55.3			Visual amenity and residential character	
	55.4			Operational and construction traffic	
56	56.1	Deborah Wade	Decline the proposed plan change	Visual amenity and residential character	Epsom Auckland
	56.2			Effects from building height (shadowing & privacy)	
	56.3			No consideration of alternative sites	
57	57.1	Grace Liu	Decline the proposed plan change	Operational and construction traffic	Epsom Auckland 1023
	57.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	57.3			Visual amenity and residential character	
58	58.1	Eva Ji	Decline the proposed plan change	Removal of Special Character Overlay	Epsom Auckland 1023
	58.2			Visual amenity and residential character	
	58.3			Operational and construction traffic	
59	59.1	Andrew Kohler	Decline the proposed plan change	Visual amenity and residential character	Remuera Auckland 1541
	59.2			Effects from building height (shadowing & privacy)	
	59.3			Construction effects (vibration/noise and safety from excavation and rock blasting)	
60	60.1	Lancia Hicks	Decline the proposed plan change	Visual amenity and residential character	Remuera Auckland 1541
	60.2			Effects from building height (shadowing & privacy)	
	60.3			Construction effects (vibration/noise and safety from excavation and rock blasting)	
61	61.1	Anita Chhita	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	Newmarket Auckland 1149
	61.2			Visual amenity and residential character	
	61.3			Effects from building height (shadowing & privacy)	
	61.4			Re-zoning will set precedent allowing non-residential use in residential zones	
62	62.1	Dinesh Naran	Decline the proposed plan change	Effects from building height (shadowing & privacy)	Newmarket Auckland 1149
	62.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	62.3			Operational and construction traffic	
63	63.1	Naomi Dexter	Decline the proposed plan change	Operational and construction traffic	Epsom Auckland 1023

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address		
	63.2			Visual amenity and residential character			
64	64.1	Sungita Chhita	Decline the proposed plan change	Visual amenity and residential character	PO Box 99150	Newmarket	Auckland 1149
	64.2			Effects from building height (shadowing & privacy)			
	64.3			No consideration of alternative sites			
	64.4			Operational and construction traffic			
	64.5			Construction effects (vibration/noise and safety from excavation and rock blasting)			
65	65.1	Robyn Hawkes	Decline the proposed plan change	Visual amenity and residential character	1/48A Owens Road	Epsom	Auckland 1023
	65.2			No consideration of alternative sites			
66	66.1	Vinay Deobhakta	Decline the proposed plan change	Operational and construction traffic			
	66.2			Construction effects (vibration/noise and safety from excavation and rock blasting)			
	66.3			Visual amenity and residential character			
67	67.1	Richard Hawkes	Decline the proposed plan change	Removal of Special Character Overlay	1/48A Owens Road	Epsom	Auckland 1023
	67.2			Effects from building height (shadowing & privacy)			
	67.3			Construction effects (vibration/noise and safety from excavation and rock blasting)			
68	68.1	Kanan Deobhakta	Decline the proposed plan change	Operational and construction traffic	PO Box 26403	Epsom	Auckland 1023
	68.2			Construction effects (vibration/noise and safety from excavation and rock blasting)			
	68.3			Visual amenity and residential character			
69	69.1	Devendra Patel	Decline the plan modification	Visual amenity and residential character	c/- Jashwanti Ratanji Bhika	155 Mountain Road	Epsom
	69.2			Construction effects (vibration/noise and safety from excavation and rock blasting)			
	69.3			No consideration of alternative sites			
70	70.1	Gillian Anderson	Decline the plan modification	Removal of Special Character Overlay	7 Domett Avenue	Epsom	Auckland 1023
71	71.1	Jashwanti Patel	Decline the plan modification	Visual amenity and residential character	155 Mountain Road	Epsom	Auckland 1023
	71.2			Construction effects (vibration/noise and safety from excavation and rock blasting)			
72	72.1	Victor Rabone	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	PO Box 99732	Newmarket	Auckland 1149
73	73.1	Cheryl Cliffe	Decline the proposed plan change	Visual amenity and residential character	1/2 Brightside Road	Epsom	Auckland 1023
	73.2			Effects from building height (shadowing & privacy)			

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address	
	73.3			Construction effects (vibration/noise and safety from excavation and rock blasting)		
	73.4			Re-zoning will set precedent allowing non-residential use in residential zones		
	73.5			Operational and construction traffic		
74	74.1	Claire Mason	Decline the proposed plan change	Visual amenity and residential character	7/59 Victoria Avenue	Auckland 1050
	74.2			Construction effects (vibration/noise and safety from excavation and rock blasting)		
75	75.1	Margaret Parker	Decline the proposed plan change	Effects from building height (shadowing & privacy)	11 Glenfell Place	Auckland 1023
	75.2			Operational and construction traffic		
	75.3			Construction effects (vibration/noise and safety from excavation and rock blasting)		
	75.4			Visual amenity and residential character		
	75.6			Re-zoning will set precedent allowing non-residential use in residential zones		
76	76.1	Aden Leung	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	1/23 Kipling Avenue	Auckland 1023
	76.2			Operational and construction traffic		
77	77.1	Hyun Chi Cho	Decline the plan modification	Removal of Special Character Overlay	c/- Kenji Cho	Epsom
	77.2			Visual amenity and residential character		
	77.3			Construction effects (vibration/noise and safety from excavation and rock blasting)		
78	78.1	John Allen	Decline the plan modification	Effects from building height (shadowing & privacy)	32A Owens Road	Auckland 1023
	78.2			Removal of Special Character Overlay		
	78.3			Operational and construction traffic		
79	79.1	Anthony Randerson	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	7 Shipherds Avenue	Auckland 1023
	79.2			Operational and construction traffic		
	79.3			Visual amenity and residential character		
	79.4			Removal of Special Character Overlay		
	79.5			Re-zoning will set precedent allowing non-residential use in residential zones		
80	80.1	Glenda Randerson	Decline the proposed plan change	Visual amenity and residential character	7 Shipherds Avenue	Auckland 1023
	80.2			Operational and construction traffic		
	80.3			Construction effects (vibration/noise and safety from excavation and rock blasting)		



Sub Number	Sub # point	Submitter Name	Summary	Theme	Address
81	81.1	Ellen Majurey	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	Epsom 13 Shipherds Avenue Auckland 1023
	81.2			Operational and construction traffic	
82	82.1	Savita Mistry, Vinodbhail Mistry, Mukesh Mistry	Decline the proposed plan change	Effects from building height (shadowing & privacy)	Epsom 144 Gillies Avenue Auckland 1023
	82.2			Visual amenity and residential character	
	82.3			Construction effects (vibration/noise and safety from excavation and rock blasting)	
83	83.1	Christina Lucas	Decline the proposed plan change	No comment	Epsom 8 Shipherds Avenue Auckland 1023
84	84.1	Paul Lucas	Decline the proposed plan change	No comment	Epsom 8 Shipherds Avenue Auckland 1023
85	85.1	Gordon McKendry	Decline the proposed plan change	Operational and construction traffic	Epsom 3 Shipherds Avenue Auckland 1023
86	86.1	Anne Callinan	Decline the proposed plan change	Removal of Special Character Overlay	Epsom 2 Shipherds Avenue Auckland 1023
	86.2			Visual amenity and residential character	
	86.3			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	86.4			Operational and construction traffic	
	86.5			Effects from building height (shadowing & privacy)	
87	87.1	Richard Poole	Decline the proposed plan change	Removal of Special Character Overlay	Epsom 2 Shipherds Avenue Auckland 1023
	87.2			Visual amenity and residential character	
	87.3			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	87.4			Operational and construction traffic	
	87.5			Effects from building height (shadowing & privacy)	
88	88.1	Nicholas Allen	Decline the proposed plan change	Re-zoning will set precedent allowing non-residential use in residential zones	Epsom 32A Owens Road Auckland 1023
	88.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	88.3			Visual amenity and residential character	
	88.4			Effects from building height (shadowing & privacy)	
89	89.1	Mary Crosby	Decline the proposed plan change	No comment	Mt Eden 13/53 Bellevue Road Auckland 1024
90	90.1	Katherine Bulog	Decline the proposed plan change	Effects from building height (shadowing & privacy)	Kensington 9 Bendall Street Melbourne 3031
	90.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address	
	90.3			Visual amenity and residential character		
	90.4			No consideration of alternative sites		
	90.5			Re-zoning will set precedent allowing non-residential use in residential zones		
91	91.1	Gemma Allen	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)	32A Owens Road	Auckland 1023
	91.2			Visual amenity and residential character		
	91.3			Re-zoning will set precedent allowing non-residential use in residential zones		
	91.4			Effects from building height (shadowing & privacy)		
92	92.1	Robert Speer	Decline the proposed plan change	Operational and construction traffic	3A Shipherds Avenue	Auckland 1023
	92.2			Re-zoning will set precedent allowing non-residential use in residential zones		
	92.3			Visual amenity and residential character		
	92.4			No consideration of alternative sites		
93	93.1	Suzanne Speer	Decline the proposed plan change	Visual amenity and residential character	3A Shipherds Avenue	Auckland 1023
	93.2			Operational and construction traffic		
	93.3			Urban design - incompatibility of built form		
	93.4			Removal of Special Character Overlay		
	93.5			Re-zoning will set precedent allowing non-residential use in residential zones		
94	94.1	Eden Epsom Residential Protection Society	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	32A Owens Road	Auckland 1023
	94.2			Removal of Special Character Overlay		
	94.3			Visual amenity and residential character		
	94.4			Re-zoning will set precedent allowing non-residential use in residential zones		
	94.5			Effects from building height (shadowing & privacy)		
	94.6			Operational and construction traffic		
95	95.1	Kefu Liu	Decline the proposed plan change	No comment	162 Aviemore Drive	Highland Park
96	96.1	Charles Deane	Decline the proposed plan change	Visual amenity and residential character	163 Gillies Avenue	Auckland 1023
	96.2			Operational and construction traffic		

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address
97	97.1	Ernest and Gillian Willoughby	Decline the proposed plan change	Visual amenity and residential character	25 Shiphards Avenue Epsom Auckland 1023
	97.2			Operational and construction traffic	
	97.3			Removal of Special Character Overlay	
98	98.1	Auckland Transport- Planning and Investment	That Auckland Council approves PPC21, provided that the transport requirements/concerns raised	Operational and construction traffic	attn: Cynthia Gillespie, Executive General Private Bag 92250 Auckland 1142
	98.2		If ATs concerns are not resolved , then the Plan Change should be declined	Operational and construction traffic	
99	99.1	Simon Jones	Decline the proposed plan change	Removal of Special Character Overlay	11 Epsom Avenue Epsom Auckland 1023
	99.2			Re-zoning will set precedent allowing non-residential use in residential zones	
100	100.1	Carolina Boyle	Decline the proposed plan change	Operational and construction traffic	1/155 Gillies Avenue Epsom Auckland 1023
	100.2			Visual amenity and residential character	
	100.3			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	100.4			Re-zoning will set precedent allowing non-residential use in residential zones	
101	101.1	Prudence Cotter	Decline the proposed plan change	Operational and construction traffic	44B St Georges Bay Road Parnell Auckland 1052
	101.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	101.3			Visual amenity and residential character	
	101.4			Removal of Special Character Overlay	
102	102.1	James Boyle	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	1/155 Gillies Avenue Epsom Auckland 1023
	102.2			Operational and construction traffic	
	102.3			Effects from building height (shadowing & privacy)	
103	103.1	James McLennan	Decline the proposed plan change	Visual amenity and residential character	2/2A Valley Road Mt Eden Auckland 1024
	103.2			Removal of Special Character Overlay	
	103.3			Operational and construction traffic	
	103.4			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	103.5			Re-zoning will set precedent allowing non-residential use in residential zones	
104	104.1	Priya Naran	Decline the proposed plan change	Removal of Special Character Overlay	PO Box 99150 Newmarket Auckland 1149
	104.2			Re-zoning will set precedent allowing non-residential use in residential zones	

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address
	104.3			Effects from building height (shadowing & privacy)	
105	105.1	Ashok Patel	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	PO Box 99150 Newmarket Auckland 1149
	105.2			Visual amenity and residential character	
	105.3			Removal of Special Character Overlay	
106	106.1	Gregory Thwaitte	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	PO Box 6239 Wellesley Street Auckland 1141
	106.2			Effects from building height (shadowing & privacy)	
107	107.1	Peter King	Decline the proposed plan change	Removal of Special Character Overlay	18 Brightside Road Epsom Auckland 1023
	107.2			Visual amenity and residential character	
	107.3			Construction effects (vibration/noise and safety from excavation and rock blasting)	
108	108.1	Housing New Zealand c/- Ellis Gould Lawyers	That the proposed provisions of the Plan Change seeking the proposed removal of the Special Character Area Overlay from three sites at 149, 151 and 153 Gillies Avenue, Epsom, be deleted or amended, so as to provide for the sustainable management of the Region's natural and physical resources and thereby achieve the purpose of the Act.	Removal of Special Character Overlay	PO Box 1509 attn: Dr Claire Kirman and Alex Devine Auckland 1140
	108.2		Such further or other relief, or other consequential or other amendments, as are considered appropriate and necessary to address the concerns set out herein.		
109	109.1	Dhruv Chhita-Patel	Decline the proposed plan change	Construction effects (vibration/noise and safety from excavation and rock blasting)	PO Box 99150 Newmarket Auckland 1149
	109.2			Visual amenity and residential character	
	109.3			Effects from building height (shadowing & privacy)	
110	110.1	Ian Wolfigram	If the proposed plan change is not declined then amend. No relaxing of the parking ratio from 1:50sq.m GFA to 1:64sq.m GFA	Re-zoning will set precedent allowing non-residential use in residential zones	17 Shipherds Avenue Epsom Auckland 1023
	110.2			Operational and construction traffic	
	110.3			Construction effects (vibration/noise and safety from excavation and rock blasting)	
111	111.1	Leonie Deane	Decline the proposed plan change	Removal of Special Character Overlay	163 Gillies Avenue Epsom Auckland 1023
	111.2			Operational and construction traffic	
	111.3			Visual amenity and residential character	

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address	
112	112.1	Christopher Deane	Decline the proposed plan change	Visual amenity and residential character	163 Gillies Avenue	Epsom Auckland 1023
	112.2			Construction effects (vibration/noise and safety from excavation and rock blasting)		
	112.3			Effects from building height (shadowing & privacy)		
113	113.1	Edward Deane	Decline the proposed plan change	Operational and construction traffic	163 Gillies Avenue	Epsom Auckland 1023
114	114.1	Francesca Deane	Decline the proposed plan change	No comment	163 Gillies Avenue	Epsom Auckland 1023
115	115.1	Alison Warren	Decline the plan modification	Operational and construction traffic	11 Ngaruahoe Street	Mt Eden Auckland 1024
	115.2			Visual amenity and residential character		
	115.3			Removal of Special Character Overlay		
	115.4			Effects from building height (shadowing & privacy)		
	115.5			Construction effects (vibration/noise and safety from excavation and rock blasting)		
116	116.1	Margaret Parker	Decline the proposed plan change	Visual amenity and residential character	11 Glenfell Place	Epsom Auckland 1023
	116.2			Effects from building height (shadowing & privacy)		
	116.3			Operational and construction traffic		
	116.4			Construction effects (vibration/noise and safety from excavation and rock blasting)		
	116.5			Re-zoning will set precedent allowing non-residential use in residential zones		
117	117.1	Tara Deobhakta	Decline the proposed plan change	Visual amenity and residential character	27 Donnett Avenue	Epsom Auckland 1023
118	118.1	Carlton Brown	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)	1 Shipherds Close	Epsom Auckland 1023
	118.2			Effects from building height (shadowing & privacy)		
	118.3			Visual amenity and residential character		
119	119.1	Auckland Grammar School Board of Trustees	Decline the plan modification	Urban design - incompatibility of built form	attn: P Gargiolo	Private Bag 99930 Newmarket
	119.2			Effects from building height (shadowing & privacy)		
	119.3			Operational and construction traffic		
	119.4			Construction effects (vibration/noise and safety from excavation and rock blasting)		
120	120.1	Alister Prew	Decline the plan modification	Effects from building height (shadowing & privacy)	63 Epsom Avenue	Epsom Auckland 1023
	120.2			Visual amenity and residential character		

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address
121	121.1	Brent Druskovich	Decline the plan modification	Removal of Special Character Overlay	10A Domett Avenue Epsom Auckland 1023
	121.2			Operational and construction traffic	
	121.3			Visual amenity and residential character	
122	122.1	Charles Stewart	Decline the plan modification	Visual amenity and residential character	c/- John Stewart 20C Kipling Avenue Epsom
	122.2			Effects from building height (shadowing & privacy)	
123	123.1	Chi Wong	Decline the plan modification	Operational and construction traffic	5/2 Brightside Road Epsom Auckland 1023
	123.2			Visual amenity and residential character	
	123.3			Effects from building height (shadowing & privacy)	
124	124.1	Christine Fletcher	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)	7 Bourne Street Mt Eden Auckland 1024
	124.2			Visual amenity and residential character	
	124.3			Re-zoning will set precedent allowing non-residential use in residential zones	
125	125.1	Mt Eden Village Inc	Decline the plan modification	Re-zoning will set precedent allowing non-residential use in residential zones	attn: Claire Siddens 33a Ellerton Road Mt Eden
	125.2			Visual amenity and residential character	
	125.3			Removal of Special Character Overlay	
	125.4			Operational and construction traffic	
126	126.1	David Jones	Decline the plan modification	Removal of Special Character Overlay	3 Poronui Street Mt Eden Auckland 1024
	126.2			Visual amenity and residential character	
127	127.1	Emma Carr-Smith	Decline the plan modification	Effects from building height (shadowing & privacy)	157 Gillies Avenue Epsom Auckland 1023
	127.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	127.3			Operational and construction traffic	
128	128.1	Eun Rae Cho	Decline the plan modification	Visual amenity and residential character	168 Gillies Avenue Epsom Auckland 1023
	128.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	128.3			Operational and construction traffic	
129	129.1	Fisi Amies	Decline the plan modification	Visual amenity and residential character	
130	130.1	Frances Ioo	Decline the plan modification	No consideration of alternative sites	442 Mt Eden Road Mt Eden Auckland 1024
	130.2			Re-zoning will set precedent allowing non-residential use in residential zones	

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address		
	130.3			Visual amenity and residential character			
131	131.1	Gemma Allen	Decline the plan modification	No comment	32A Owens Road	Epsom	Auckland 1023
132	132.1	Georgina Johnston	Decline the plan modification	Effects from building height (shadowing & privacy)	157 Gillies Avenue	Epsom	Auckland 1023
133	133.1	Glennis Loo	Decline the plan modification	Removal of Special Character Overlay	436 Mt Eden Road	Mt Eden	Auckland 1024
	133.2			Visual amenity and residential character			
	133.3			Operational and construction traffic			
	133.4			Construction effects (vibration/noise and safety from excavation and rock blasting)			
134	134.1	Hamish Wanhill	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)			
	134.2			Re-zoning will set precedent allowing non-residential use in residential zones			
	134.3			Removal of Special Character Overlay			
	134.4			No consideration of alternative sites			
135	135.1	Hugh Blackley	Decline the plan modification	Visual amenity and residential character			
	135.2			Effects from building height (shadowing & privacy)			
	135.3			Removal of Special Character Overlay			
	135.4			Operational and construction traffic			
	135.5			No consideration of alternative sites			
136	136.1	Hyeon Tae Cho	Decline the plan modification	Visual amenity and residential character	168 Gillies Avenue	Epsom	Auckland 1023
	136.2			No consideration of alternative sites			
137	137.1	James Currie	Decline the proposed plan change	Visual amenity and residential character	149 Gillies Avenue	Epsom	Auckland 1023
138	138.1	Hyun Ryang Cho	Decline the plan modification	Visual amenity and residential character	168 Gillies Avenue	Epsom	Auckland 1023
	138.2			Operational and construction traffic			
	138.3			No consideration of alternative sites			
	138.4			Construction effects (vibration/noise and safety from excavation and rock blasting)			
139	139.1	Jennifer Spillane	Decline the plan modification	Visual amenity and residential character	79 Epsom Avenue	Epsom	Auckland 1023
	139.2			Removal of Special Character Overlay			
	139.3			Effects from building height (shadowing & privacy)			

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address
140	140.1	Jennifer Scott	Decline the plan modification	No consideration of alternative sites	49 Mt St John Avenue Epsom Auckland 1051
	140.2			Visual amenity and residential character	
141	141.1	Jennifer Stewart	Decline the plan modification	Visual amenity and residential character	c/- John Stewart 4/9 Marama Avenue Epsom
	141.2			Operational and construction traffic	
	141.3			Removal of Special Character Overlay	
142	142.1	John Allen	Decline the plan modification	Removal of Special Character Overlay	32A Owens Road Epsom Auckland 1023
	142.2			Effects from building height (shadowing & privacy)	
	142.3			Urban design - incompatibility of built form	
143	143.1	Karen Tuxford	Decline the plan modification	Removal of Special Character Overlay	33 Windmill Road Mt Eden Auckland 1024
	143.2			Visual amenity and residential character	
	143.3			Operational and construction traffic	
	143.4			No consideration of alternative sites	
144	144.1	Keradith Thomas	Decline the plan modification	Operational and construction traffic	13 Fairview Road Mt Eden Auckland 1024
	144.2			Visual amenity and residential character	
145	145.1	Lani Keane	Decline the plan modification	Removal of Special Character Overlay	c/- Sean Keane 134 Mountain Road Epsom
	145.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	145.3			Visual amenity and residential character	
	145.4			Effects from building height (shadowing & privacy)	
146	146.1	Lindsay Amies	Decline the plan modification	Visual amenity and residential character	
147	147.1	Lucy Johnston	Decline the plan modification	Effects from building height (shadowing & privacy)	157 Gillies Avenue Epsom Auckland 1023
	147.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	147.3			Visual amenity and residential character	
148	148.1	Lynn Towers	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)	167 Gillies Avenue Epsom Auckland 1023
	148.2			Operational and construction traffic	
149	149.1	Mary-Jane Johnson	Decline the plan modification	Effects from building height (shadowing & privacy)	55 Owens Road Epsom Auckland 1023
	149.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	



Sub Number	Sub # point	Submitter Name	Summary	Theme	Address
	149.3			Operational and construction traffic	
	149.4			Visual amenity and residential character	
	149.5			Removal of Special Character Overlay	
150	150.1	Mike and Jenny Merrington	Decline the plan modification	Visual amenity and residential character	
	150.2			No consideration of alternative sites	
	150.3			Effects from building height (shadowing & privacy)	
151	151.1	Min Kang Park	Decline the plan modification	Visual amenity and residential character	168 Gillies Avenue Epsom Auckland 1023
	151.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	151.3			Removal of Special Character Overlay	
152	152.1	Prudence Cotter	Decline the plan modification	No comment	44B St Georges Bay Road Parnell Auckland 1052
153	153.1	Pui Yi Linda Leung	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)	5/2 Brightside Road Epsom Auckland 1023
	153.2			Operational and construction traffic	
154	154.1	Richard Quatermass	Decline the plan modification	Operational and construction traffic	6/34 Owens Road Epsom Auckland 1023
	154.2			Removal of Special Character Overlay	
155	155.1	Richard Thomas	Decline the plan modification	Visual amenity and residential character	13 Fairview Road Mt Eden Auckland 1024
	155.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	155.3			Effects from building height (shadowing & privacy)	
	155.4			Operational and construction traffic	
156	156.1	Sanjay Dutt	Decline the plan modification	Operational and construction traffic	20 Epsom Avenue Epsom Auckland 1023
	156.2			No consideration of alternative sites	
	156.3			Visual amenity and residential character	
157	157.1	Sean Keane	Decline the plan modification	Removal of Special Character Overlay	134 Mountain Road Epsom Auckland 1023
	157.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	157.3			Visual amenity and residential character	
	157.4			Effects from building height (shadowing & privacy)	
158	158.1	Sharon Cogan-Beck	Decline the plan modification	No comment	9A Wilding Avenue Epsom Auckland 1023

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address
159	159.1	Simon Nelson and Florence Holdsworth	Decline the plan modification	Operational and construction traffic	4 Shiphards Close Epsom Auckland 1023
	159.2			Visual amenity and residential character	
	159.3			Construction effects (vibration/noise and safety from excavation and rock blasting)	
160	160.1	Sophia Johnston	Decline the plan modification	Construction effects (vibration/noise and safety from excavation and rock blasting)	157 Gillies Avenue Epsom Auckland 1023
161	161.1	Heritage New Zealand Pouhere Taonga	Amend the plan modification if not declined	Removal of Special Character Overlay	attn: Susan Andrews
161	161.2		That should the plan change e adopted that this is subject to the inclusion of appropriate plan provisions to ensure protection of the heritage ad special character features as identified in the application in perpetuity.	Removal of Special Character Overlay	
162	162.1	Suzanne Elgar	Decline the plan modification	No comment	
163	163.1	Sylvie Allen	Decline the plan modification	Removal of Special Character Overlay	
	163.2			Visual amenity and residential character	
	163.3			No consideration of alternative sites	
164	164.1	Tara Keane	Decline the plan modification	Operational and construction traffic	c/- Sean Keane 134 Mountain Road Epsom
	164.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	164.3			Effects from building height (shadowing & privacy)	
	164.4			Visual amenity and residential character	
165	165.1	Te Aute Limited	Decline the plan modification	Visual amenity and residential character	107 Market Road Epsom Auckland 1023
166	166.1	Terence Kennelly	Decline the plan modification	No comment	Unit 2 21 Ashton Road Mt Eden Auckland 1024
167	167.1	Terry Kennelly	Decline the plan modification	No consideration of alternative sites	Unit 2 21 Ashton Road Mt Eden Auckland 1024
	167.2			Removal of Special Character Overlay	
	167.3			Operational and construction traffic	
168	168.1	Tiani Keane	Decline the plan modification	Operational and construction traffic	c/- Sean Keane 134 Mountain Road Epsom
	168.2			Effects from building height (shadowing & privacy)	
	168.3			Construction effects (vibration/noise and safety from excavation and rock blasting)	
169	169.1	Tieman Keane	Decline the plan modification	Removal of Special Character Overlay	c/- Sean Keane 134 Mountain Road Epsom

Sub Number	Sub # point	Submitter Name	Summary	Theme	Address
	169.2			Operational and construction traffic	
	169.3			Effects from building height (shadowing & privacy)	
	169.4			Construction effects (vibration/noise and safety from excavation and rock blasting)	
170	170.1	Tim Johnston	Decline the plan modification	Removal of Special Character Overlay	157 Gillies Avenue Epsom Auckland 1023
	170.2			Re-zoning will set precedent allowing non-residential use in residential zones	
171	171.1	Vivienne Prew	Decline the plan modification	Operational and construction traffic	63 Epsom Avenue Epsom Auckland 1023
	171.2			Effects from building height (shadowing & privacy)	
	171.3			Visual amenity and residential character	
172	172.1	Jane C G Mason	Decline the proposed plan change	Removal of Special Character Overlay	410 Pt Chevallier Road Pt Chevallier Auckland 1022
	172.2			Visual amenity and residential character	
173	173.1	Jane M Mason	Decline the proposed plan change	Operational and construction traffic	41 Owens Road Epsom Auckland 1023
	173.2			Visual amenity and residential character	
174	174.1	Stephen Mason	Decline the proposed plan change	Visual amenity and residential character	41 Owens Road Epsom Auckland 1023
	174.2			Effects from building height (shadowing & privacy)	
	174.3			Removal of Special Character Overlay	
175	175.1	Graham Dexter	Decline the proposed plan change	Removal of Special Character Overlay	43 Owens Road Epsom Auckland 1023
	175.2			Visual amenity and residential character	
	175.3			Operational and construction traffic	
	175.4			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	175.5			Effects from building height (shadowing & privacy)	
176	176.1	Marianne Gits	Decline the proposed plan change	Visual amenity and residential character	43 Owens Road Epsom Auckland 1023
	176.2			Construction effects (vibration/noise and safety from excavation and rock blasting)	
	176.3			Operational and construction traffic	
	176.4			No consideration of alternative sites	
	176.5			Re-zoning will set precedent allowing non-residential use in residential zones	
	176.6			Removal of Special Character Overlay	

**Plan Change 21- Southern Cross Hospital  
Summary of Decisions Requested**

<b>Sub Number</b>	<b>Sub # point</b>	<b>Submitter Name</b>	<b>Summary</b>	<b>Contact details</b>
1	1.1	Spring Chunchun Xu	Decline the plan modification	<a href="mailto:chunchunxu122@gmail.com">chunchunxu122@gmail.com</a>
2	2.1	Stuart King	Accept the plan modification with amendments.	<a href="mailto:stuart_patrick_king@hotmail.com">stuart_patrick_king@hotmail.com</a>
3	3.1	Jianming Huang	Decline the proposed plan change	<a href="mailto:danielhuang66@hotmail.com">danielhuang66@hotmail.com</a>
4	4.1	John Kippenburger	Decline the plan modification.	<a href="mailto:johnripp@gmail.com">johnripp@gmail.com</a>
5	5.1	Julie Kippenburger	Decline the plan modification	<a href="mailto:juliekippenburger@gmail.com">juliekippenburger@gmail.com</a>
6	6.1	Tom Lorimer	Decline the plan modification	<a href="mailto:tlorimer2@gmail.com">tlorimer2@gmail.com</a>
7	7.1	Erica Hussona	Decline the plan modification	<a href="mailto:erica.hussona@ix.net.nz">erica.hussona@ix.net.nz</a>
8	8.1	Zhengyu He	Decline the plan modification	<a href="mailto:danielhuang66@hotmail.com">danielhuang66@hotmail.com</a>
9	9.1	Gregory Towers	Decline the plan modification	<a href="mailto:greg.towers1@gmail.com">greg.towers1@gmail.com</a>
10	10.1	Miranda Rabone	Decline the proposed plan change	<a href="mailto:bhgc@xtra.co.nz">bhgc@xtra.co.nz</a>
11	11.1	Dr Stuart Rabone	Decline the proposed plan change	<a href="mailto:bhgc@xtra.co.nz">bhgc@xtra.co.nz</a>
12	12.1	Janet Wightman	Decline the plan modification	<a href="mailto:nzjanetwightman@gmail.com">nzjanetwightman@gmail.com</a>
13	13.1	William Lorimer	Decline the plan modification	<a href="mailto:willlorimer21@gmail.com">willlorimer21@gmail.com</a>
14	14.1	Shuqin Zhang	Decline the proposed plan change	<a href="mailto:nzxinxin@gmail.com">nzxinxin@gmail.com</a>
15	15.1	Geoffrey Hinds	Decline the proposed plan change	<a href="mailto:geowill4@gmail.com">geowill4@gmail.com</a>
16	16.1	David Ross	Decline the plan modification	<a href="mailto:David.ross@kotahi.co.nz">David.ross@kotahi.co.nz</a>
17	17.1	Hannah Saulbrey Ross	Decline the plan modification	<a href="mailto:hannahsr@me.com">hannahsr@me.com</a>
18	18.1	Jane Robson	Decline the plan modification	<a href="mailto:robsonjp@xtra.co.nz">robsonjp@xtra.co.nz</a>
19	19.1	Lisa Phillimore	Decline the plan modification	<a href="mailto:phillimorefamily@gmail.com">phillimorefamily@gmail.com</a>
20	20.1	Elsbeth Whitmore	Decline the proposed plan change	<a href="mailto:arnwhit@xtra.co.nz">arnwhit@xtra.co.nz</a>
21	21.1	Lisa Manks	Decline the plan modification	<a href="mailto:manksyak@gmail.com">manksyak@gmail.com</a>

22	22.1	Philip Taylor	Decline the proposed plan change	<a href="mailto:philipjtaylor@xtra.co.nz">philipjtaylor@xtra.co.nz</a>
23	23.1	Janet Taylor	Decline the proposed plan change	<a href="mailto:jan_taylor@xtra.co.nz">jan_taylor@xtra.co.nz</a>
24	24.1	Norfolk Limited attn: Frederick Knights	Decline the proposed plan change	<a href="mailto:faknights@gmail.com">faknights@gmail.com</a>
25	25.1	Margaret Knights	Decline the proposed plan change	<a href="mailto:faknights@gmail.com">faknights@gmail.com</a>
26	26.1	David Lim	Decline the plan modification	<a href="mailto:david.lim49@gmail.com">david.lim49@gmail.com</a>
27	27.1	Harvey White and Janette White	Decline the plan modification	<a href="mailto:harveywhite1911@gmail.com">harveywhite1911@gmail.com</a>
28	28.1	Karim Hussona	Decline the plan modification	<a href="mailto:erica.hussona@ix.net.nz">erica.hussona@ix.net.nz</a>
29	29.1	Marion Armstrong	Decline the plan modification	
30	30.1	Pavneet Grover	Decline the plan modification	<a href="mailto:pavneet.grover@yahoo.com">pavneet.grover@yahoo.com</a>
31	31.1	Terry Kayes and Marion Kayes	Decline the plan modification	<a href="mailto:terry.kayes@gmail.com">terry.kayes@gmail.com</a>
32	32.1	Nicola Maling	Decline the plan modification	<a href="mailto:an.maling@xtra.co.nz">an.maling@xtra.co.nz</a>
33	33.1	Michael Lorimer	Decline the plan modification	<a href="mailto:michaellorimer@xtra.co.nz">michaellorimer@xtra.co.nz</a>
34	34.1	Peter Robson	Decline the plan modification	<a href="mailto:alrtelectrical@xtra.co.nz">alrtelectrical@xtra.co.nz</a>
35	35.1	Stephanie Watson	Decline the proposed plan change	<a href="mailto:stephaniewatson126@gmail.com">stephaniewatson126@gmail.com</a>
36	36.1	Trevor Watson	Decline the proposed plan change	<a href="mailto:trevor.watson@xtra.co.nz">trevor.watson@xtra.co.nz</a>
37	37.1	Colin Wightman	Decline the proposed plan change	<a href="mailto:colin@jaysondesigns.co.nz">colin@jaysondesigns.co.nz</a>
38	38.1	Lynn Huhtala	Decline the proposed plan change	<a href="mailto:lynn.chris@xtra.co.nz">lynn.chris@xtra.co.nz</a>
39	39.1	Cherie Lovatt	Decline the plan modification	<a href="mailto:lovatt.lovegrove@gmail.com">lovatt.lovegrove@gmail.com</a>
40	40.1	Digby Draper	Decline the plan modification	<a href="mailto:digbydraperdd@gmail.com">digbydraperdd@gmail.com</a>
41	41.1	Jan Hughes	Decline the plan modification	<a href="mailto:trevorjanhughes@gmail.com">trevorjanhughes@gmail.com</a>
42	42.1	Heather Golder	Decline the plan modification	<a href="mailto:hgolder@xtra.co.nz">hgolder@xtra.co.nz</a>
43	43.1	Jennifer Lim	Decline the plan modification	<a href="mailto:janlim1979@gmail.com">janlim1979@gmail.com</a>
44	44.1	John Stewart	Decline the plan modification	<a href="mailto:johnstewart@xtra.co.nz">johnstewart@xtra.co.nz</a>
45	45.1	Michelle Adams	Decline the plan modification	<a href="mailto:m.adams@auckland.ac.nz">m.adams@auckland.ac.nz</a>

46	46.1	Philip Chong and Virginia Chong	Decline the plan modification	<a href="mailto:philip.chong29@gmail.com">philip.chong29@gmail.com</a>
47	47.1	Tobias Lorimer	Decline the plan modification	<a href="mailto:tobiaslorimer@gmail.com">tobiaslorimer@gmail.com</a>
48	48.1	Vanita Dutt	Decline the application in its entirety as indicated [in the submission]	<a href="mailto:vanitamd@gmail.com">vanitamd@gmail.com</a>
49	49.1	Andi He	Decline the proposed plan change	<a href="mailto:grace.liu7380@gmail.com">grace.liu7380@gmail.com</a>
50	50.1	Fred Blackley	Decline the plan modification.	<a href="mailto:fb378520@kings.net.nz">fb378520@kings.net.nz</a>
51	51.1	Gabriella Amies	Decline the plan modification	
52	52.1	Hugo Blackley	Decline the plan modification	<a href="mailto:hjblackley@gmail.com">hjblackley@gmail.com</a>
53	53.1	Sam Blackley	Decline the plan modification	<a href="mailto:samblackley2000@gmail.com">samblackley2000@gmail.com</a>
54	54.1	Sophia Amies	Decline the plan modification	
55	55.1	Ian Kohler	Decline the proposed plan change	<a href="mailto:ik@ikarchitect.com">ik@ikarchitect.com</a>
56	56.1	Deborah Wade	Decline the proposed plan change	<a href="mailto:debbiewade@brandz.co.nz">debbiewade@brandz.co.nz</a>
57	57.1	Grace Liu	Decline the proposed plan change	<a href="mailto:grace.liu7380@gmail.com">grace.liu7380@gmail.com</a>
58	58.1	Eva Ji	Decline the proposed plan change	<a href="mailto:nexinxin@hotmail.com">nexinxin@hotmail.com</a>
59	59.1	Andrew Kohler	Decline the proposed plan change	<a href="mailto:kandrew2302@gmail.com">kandrew2302@gmail.com</a>
60	60.1	Lancia Hicks	Decline the proposed plan change	<a href="mailto:lanciahicks@gmail.com">lanciahicks@gmail.com</a>
61	61.1	Anita Chhita	Decline the proposed plan change	<a href="mailto:d.patel@xtra.co.nz">d.patel@xtra.co.nz</a>
62	62.1	Dinesh Naran	Decline the proposed plan change	<a href="mailto:d.patel@xtra.co.nz">d.patel@xtra.co.nz</a>
63	63.1	Naomi Dexter	Decline the proposed plan change	
64	64.1	Sungita Chhita	Decline the proposed plan change	<a href="mailto:dhurur@xtra.co.nz">dhurur@xtra.co.nz</a>

65	65.1	Robyn Hawkes	Decline the proposed plan change	<a href="mailto:robynhawkes21@gmail.com">robynhawkes21@gmail.com</a>
66	66.1	Vinay Deobhakta	Decline the proposed plan change	<a href="mailto:vinaydeobhakta@gmail.com">vinaydeobhakta@gmail.com</a>
67	67.1	Richard Hawkes	Decline the proposed plan change	<a href="mailto:rhawkes21@gmail.com">rhawkes21@gmail.com</a>
68	68.1	Kanan Deobhakta	Decline the proposed plan change	
69	69.1	Devendra Patel	Decline the plan modification	<a href="mailto:family@patel.co.nz">family@patel.co.nz</a>
70	70.1	Gillian Anderson	Decline the plan modification	<a href="mailto:g.anderson5758@gmail.com">g.anderson5758@gmail.com</a>
71	71.1	Jashwanti Patel	Decline the plan modification	<a href="mailto:jashu@patel.co.nz">jashu@patel.co.nz</a>
72	72.1	Victor Rabone	Decline the proposed plan change	<a href="mailto:bhgc@xtra.co.nz">bhgc@xtra.co.nz</a>
73	73.1	Cheryl Cliffe	Decline the proposed plan change	<a href="mailto:cherylcliffe@xtra.co.nz">cherylcliffe@xtra.co.nz</a>
74	74.1	Claire Mason	Decline the proposed plan change	<a href="mailto:cejmason@gmail.com">cejmason@gmail.com</a>
75	75.1	Margaret Parker	Decline the proposed plan change	<a href="mailto:margaretparker@sangarchitects.com">margaretparker@sangarchitects.com</a>
76	76.1	Aden Leung	Decline the proposed plan change	<a href="mailto:adenleung40@gmail.com">adenleung40@gmail.com</a>
77	77.1	Hyun Chi Cho	Decline the plan modification	<a href="mailto:kenjicho@hotmail.com">kenjicho@hotmail.com</a>
78	78.1	John Allen	Decline the plan modification	<a href="mailto:ja@sdg.net.nz">ja@sdg.net.nz</a>
79	79.1	Anthony Randerson	Decline the proposed plan change	<a href="mailto:tonyranderson@xtra.co.nz">tonyranderson@xtra.co.nz</a>
80	80.1	Glenda Randerson	Decline the proposed plan change	<a href="mailto:glendaranderson@xtra.co.nz">glendaranderson@xtra.co.nz</a>
81	81.1	Ellen Majurey	Decline the proposed plan change	<a href="mailto:e.majurey@xtra.co.nz">e.majurey@xtra.co.nz</a>
82	82.1	Savita Mistry, Vinodbhail Mistry, M	Decline the proposed plan change	<a href="mailto:vinod@giftwrapping.co.nz">vinod@giftwrapping.co.nz</a>
83	83.1	Christina Lucas	Decline the proposed plan change	<a href="mailto:lucas.clan@xtra.co.nz">lucas.clan@xtra.co.nz</a>

84	84.1	Paul Lucas		Decline the proposed plan change	<a href="mailto:paul.lucas@xtra.co.nz">paul.lucas@xtra.co.nz</a>
85	85.1	Gordon Mckendry		Decline the proposed plan change	<a href="mailto:Gordon@geomac.co.nz">Gordon@geomac.co.nz</a>
86	86.1	Anne Callinan		Decline the proposed plan change	<a href="mailto:anne.callinan@simpsongrimson.com">anne.callinan@simpsongrimson.com</a>
87	87.1	Richard Poole		Decline the proposed plan change	<a href="mailto:rick@poolez.nz">rick@poolez.nz</a>
88	88.1	Nicholas Allen		Decline the proposed plan change	<a href="mailto:nickallen111@gmail.com">nickallen111@gmail.com</a>
89	89.1	Mary Crosby		Decline the proposed plan change	<a href="mailto:marybernadettecrosby@gmail.com">marybernadettecrosby@gmail.com</a>
90	90.1	Katherine Bullog		Decline the proposed plan change	<a href="mailto:katherine.bullog@gmail.com">katherine.bullog@gmail.com</a>
91	91.1	Gemma Allen		Decline the plan modification	<a href="mailto:gemma@hydrobio.co.nz">gemma@hydrobio.co.nz</a>
92	92.1	Robert Speer		Decline the proposed plan change	<a href="mailto:robert@speer.co.nz">robert@speer.co.nz</a>
93	93.1	Suzanne Speer		Decline the proposed plan change	<a href="mailto:suzanne@speer.co.nz">suzanne@speer.co.nz</a>
94	94.1	Eden Epsom Residential Protection		Decline the proposed plan change	<a href="mailto:gemma@hydrobio.co.nz">gemma@hydrobio.co.nz</a>
95	95.1	Kefu Liu		Decline the proposed plan change	<a href="mailto:trade7lkf7@gmail.com">trade7lkf7@gmail.com</a>
96	96.1	Charles Deane		Decline the proposed plan change	<a href="mailto:Charles.deane7@gmail.com">Charles.deane7@gmail.com</a>
97	97.1	Ernest and Gillian Willoughby		Decline the proposed plan change	<a href="mailto:gilly.willoughby@gmail.com">gilly.willoughby@gmail.com</a>



98	98.1	Auckland Transport- Planning and Investment	That Auckland Council approves PPC21, provided that the transport requirements/concerns raised in this submission are resolved , or that Council identifies a more appropriate zone or provision that will address these matters.	<a href="mailto:Kevin.wong-toi@at.govt.nz">Kevin.wong-toi@at.govt.nz</a>
	98.2	Auckland Transport- Planning and Investment	If ATs concerns are not resolved , then the Plan Change should be declined	
99	99.1	Simon Jones	Decline the proposed plan change	<a href="mailto:simon.jones@moana.co.nz">simon.jones@moana.co.nz</a>
100	100.1	Carolina Boyle	Decline the proposed plan change	<a href="mailto:ncpmuller@gmail.com">ncpmuller@gmail.com</a>
101	101.1	Prudence Cotter	Decline the proposed plan change	<a href="mailto:cotter.smith@xtra.co.nz">cotter.smith@xtra.co.nz</a>
102	102.1	James Boyle	Decline the proposed plan change	<a href="mailto:james.boyle0259@gmail.com">james.boyle0259@gmail.com</a>
103	103.1	James McLennan	Decline the proposed plan change	<a href="mailto:j.mclennan@xtra.co.nz">j.mclennan@xtra.co.nz</a>
104	104.1	Priya Naran	Decline the proposed plan change	<a href="mailto:d.patel@xtra.co.nz">d.patel@xtra.co.nz</a>
105	105.1	Ashok Patel	Decline the proposed plan change	<a href="mailto:dhruv@xtra.co.nz">dhruv@xtra.co.nz</a>
106	106.1	Gregory Thwaitte	Decline the proposed plan change	
107	107.1	Peter King	Decline the proposed plan change	<a href="mailto:peter_king@xtra.co.nz">peter_king@xtra.co.nz</a>

108	108.1	Housing New Zealand c/- Ellis Gould Lawyers	That the proposed provisions of the Plan Change seeking the proposed removal of the Special Character Area Overlay from three sites at 149, 151 and 153 Gillies Avenue, Epsom, be deleted or amended, so as to provide for the sustainable management of the Region's natural and physical resources and thereby achieve the purpose of the Act.	<a href="mailto:ckirman@ellisgould.co.nz">ckirman@ellisgould.co.nz</a>
	108.2	Housing New Zealand c/- Ellis Gould Lawyers	Such further or other relief, or other consequential or other amendments, as are considered appropriate and necessary to address the concerns set out herein.	
109	109.1	Dhruv Chhita-Patel	Decline the proposed plan change	<a href="mailto:dhruv@xtra.co.nz">dhruv@xtra.co.nz</a>
110	110.1	Ian Wolfgram	If the proposed plan change is not declined then amend. No relaxing of the parking ratio from 1:50sq.m GFA to 1:64sq.m GFA	ian.wolfgram@gmail.com
111	111.1	Leonie Deane	Decline the proposed plan change	leonie@deaneco.co.nz
112	112.1	Christopher Deane	Decline the proposed plan change	Christopher@Deane Co.co.nz
113	113.1	Edward Deane	Decline the proposed plan change	edward_deane@hotmail.com
114	114.1	Francesca Deane	Decline the proposed plan change	deane.francesca@gmail.com

115	115.1	Alison Warren	Decline the plan modification	awarrenz@yahoo.com
116	116.1	Margaret Parker	Decline the proposed plan change	margaretparker@sangarchitects.com
117	117.1	Tara Deobhakta	Decline the proposed plan change	taradeobhakta@gmail.com
118	118.1	Carlton Brown	Decline the plan modification	carltonbro@gmail.com
119	119.1	Auckland Grammar School Board of	Decline the plan modification	p.gargiulo@ags.school.nz
120	120.1	Alister Prew	Decline the plan modification	alisterprew@hotmail.co.nz
121	121.1	Brent Druskovich	Decline the plan modification	brentdruskovich@gmail.com
122	122.1	Charles Stewart	Decline the plan modification	cr_stewart@hotmail.com
123	123.1	Chi Wong	Decline the plan modification	thomas321@gmail.com
124	124.1	Christine Fletcher	Decline the plan modification	fletch.family@xtra.co.nz
125	125.1	Mt Eden Village Inc	Decline the plan modification	admin@mountedden.co.nz
126	126.1	David Jones	Decline the plan modification	doj@halaw.co.nz
127	127.1	Emma Carr-Smith	Decline the plan modification	timandemma@xtra.co.nz
128	128.1	Eun Rae Cho	Decline the plan modification	pinebay@xtra.co.nz
129	129.1	Fisi Amies	Decline the plan modification	Fisi.amies@gmail.com
130	130.1	Frances Ioo	Decline the plan modification	info@chapter.co.nz
131	131.1	Gemma Allen	Decline the plan modification	gemma@hydrobio.co.nz
132	132.1	Georgina Johnston	Decline the plan modification	timandemma@xtra.co.nz
133	133.1	Glennis Loo	Decline the plan modification	glennisloo@gmail.com
134	134.1	Hamish Wanhill	Decline the plan modification	hamish@liberation.co.nz
135	135.1	Hugh Blackley	Decline the plan modification	hughblackley@xtra.co.nz
136	136.1	Hyeon Tae Cho	Decline the plan modification	kenta.cho@auckland.ac.nz
137	137.1	James Currie	Decline the proposed plan change	currie_jim2010@hotmail.com
138	138.1	Hyun Ryang Cho	Decline the plan modification	hcho529@aucklanduni.ac.nz
139	139.1	Jennifer Spillane	Decline the plan modification	spillanej01@gmail.com
140	140.1	Jennifer Scott	Decline the plan modification	bnjscott@xtra.co.nz
141	141.1	Jennifer Stewart	Decline the plan modification	jennystewart20@gmail.com
142	142.1	John Allen	Decline the plan modification	ja@sdg.net.nz
143	143.1	Karen Tuxford	Decline the plan modification	hastiephysio@hotmail.com
144	144.1	Keradith Thomas	Decline the plan modification	richard2keri@yahoo.co.nz

145	145.1	Lani Keane	Decline the plan modification	lanikeane@hotmail.com
146	146.1	Lindsay Amies	Decline the plan modification	lindsayamies@hotmail.com
147	147.1	Lucy Johnston	Decline the plan modification	timandemma@xtra.co.nz
148	148.1	Lynn Towers	Decline the plan modification	lynnnetowers1@gmail.com
149	149.1	Mary-Jane Johnson	Decline the plan modification	mjohnson550@gmail.com
150	150.1	Mike and Jenny Merrington	Decline the plan modification	jenmerrington@gmail.com
151	151.1	Min Kang Park	Decline the plan modification	toshiedon@gmail.com
152	152.1	Prudence Cotter	Decline the plan modification	
153	153.1	Pui Yi Linda Leung	Decline the plan modification	lindaee@gmail.com
154	154.1	Richard Quatermass	Decline the plan modification	quatermass@xtra.co.nz
155	155.1	Richard Thomas	Decline the plan modification	richard2keri@yahoo.co.nz
156	156.1	Sanjay Dutt	Decline the plan modification	scoobjay@gmail.com
157	157.1	Sean Keane	Decline the plan modification	mtecho@hotmail.com
158	158.1	Sharon Cogan-Beck	Decline the plan modification	sharoncoganbeck@yahoo.com
159	159.1	Simon Nelson and Florence Holdsw	Decline the plan modification	simon@holdson.co.nz
160	160.1	Sophia Johnston	Decline the plan modification	timandemma@xtra.co.nz
161	161.1	Heritage New Zealand Pouhere Ta	Amend the plan modification if not declined	sandrews@heritage.org.nz
161	161.2		That should the plan change be adopted that this is subject to the inclusion of appropriate plan provisions to ensure protection of the heritage and special character features as identified in the application in perpetuity.	
162	162.1	Suzanne Elgar	Decline the plan modification	suemelgar@gmail.com
163	163.1	Sylvie Allen	Decline the plan modification	sylvie.e.allen@gmail.com
164	164.1	Tara Keane	Decline the plan modification	mtecho@hotmail.com
165	165.1	Te Aute Limited	Decline the plan modification	macleans01@gmail.com
166	166.1	Terence Kennelly	Decline the plan modification	terry@profitmultipliers.co.nz
167	167.1	Terry Kennelly	Decline the plan modification	terry@profitmultipliers.co.nz
168	168.1	Tiani Keane	Decline the plan modification	mtecho@hotmail.com
169	169.1	Tiernan Keane	Decline the plan modification	mtecho@hotmail.com

170	170.1	Tim Johnston	Decline the plan modification	tjohnston@castlepartners.co.nz
171	171.1	Vivienne Prew	Decline the plan modification	vivprew@hotmail.com
172	172.1	Jane C G Mason	Decline the proposed plan change	missjanemason@gmail.com
173	173.1	Jane M Mason	Decline the proposed plan change	jane millarmason@gmail.com
174	174.1	Stephen Mason	Decline the proposed plan change	shmmason@xtra.co.nz
175	175.1	Graham Dexter	Decline the proposed plan change	dexiotropic@gmail.com
176	176.1	Marianne Gits	Decline the proposed plan change	marianne-gits@gmail.com

# Further submission 1

**From:** [UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan further submission - 21 - Eden Epsom Residential Protection Society Inc  
**Date:** Monday, 10 June 2019 4:30:54 PM

---

The following customer has submitted a Unitary Plan online further submission.

## Contact details

Full name of person making a further submission: Eden Epsom Residential Protection Society Inc

Organisation name:

Full name of your agent:

Email address: [suzanne@speer.co.nz](mailto:suzanne@speer.co.nz)

Contact phone number: 0212238090

Postal address:  
32A Owens Road  
Epsom  
Auckland 1023

## Submission details

### This is a further submission to:

Plan modification number: 21

Plan modification name: Southern Cross Hospital

### Original submission details

Original submitters name and address:  
Auckland Transport - Planning and Investment

Submission number: 98

Do you support or oppose the original submission? I or we oppose the submission

Specific parts of the original submission that your submission relates to:  
Point number 98.1

The reasons for my or our support or opposition are:

We support the concerns raised by Auckland Transport about traffic and parking. We agree with the submitter that the material provided by Southern Cross Hospitals Ltd to date is inadequate. We consider that the issues raised in this submission are not capable of satisfactory resolution. We further note that the AT submission is void of any comment regarding the major effects of blasting and construction and associated high volumes and frequencies of truck movements over a multiple-years period and the effects of inevitable road closures over substantial periods of time including Brightside Road and the major arterial of Gillies Avenue. Further, we do not accept the AT conclusion that if these concerns can be resolved, then the proposal is acceptable. AT describes its interest as being only within the context of the transportation network and its capacity to accept future development. The topic of traffic is only one of many factors to be considered in assessing the plan change. We oppose the proposal in its entirety and consider that alternative provisions to address the submitter's concerns as referred to in this submission will neither satisfy the principles and purpose of the RMA, section 32 of the Act, nor the direction and objectives and policies of the Unitary Plan.

I or we want Auckland council to make a decision to: Disallow the whole original submission

# Further submission 1

Submission date: 10 June 2019

## **Attend a hearing**

I or we wish to be heard in support of this submission: Yes

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

Yes

## **Declaration**

What is your interest in the proposal? I am a person who has an interest in the proposal that is greater than the interest that the general public has

Specify upon which grounds you come within this category:

The Society represents a large number of people who reside and/or work within the adjacent or greater area of the subject site particularly the Eden Epsom area.

I declare that:

- I understand that I must serve a copy of my or our further submission on the original submitter within five working days after it is served on the local authority
- I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

## Further submission 2

**From:** [UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan further submission - 21 - Eden Epsom Residential Protection Society Inc  
**Date:** Monday, 10 June 2019 4:15:38 PM

---

The following customer has submitted a Unitary Plan online further submission.

### Contact details

Full name of person making a further submission: Eden Epsom Residential Protection Society Inc

Organisation name:

Full name of your agent:

Email address: [suzanne@speer.co.nz](mailto:suzanne@speer.co.nz)

Contact phone number: 0212238090

Postal address:  
32A Owens Road  
Epsom  
Auckland 1023

### Submission details

#### This is a further submission to:

Plan modification number: 21

Plan modification name: Southern Cross Hospital

#### Original submission details

Original submitters name and address:  
Housing New Zealand

[ckirman@ellisgould.co.nz](mailto:ckirman@ellisgould.co.nz)

Submission number: 108

Do you support or oppose the original submission? I or we oppose the submission

Specific parts of the original submission that your submission relates to:  
Point number 108.2

The reasons for my or our support or opposition are:

The submission supports in principle the proposed healthcare and hospital zone. – refer paragraph 8 of the submission. We oppose this because the Society's original submission sets out numerous reasons why the proposal does not meet the purpose and principles of the RMA nor that of the direction, objectives and policies of the Unitary Plan. The Society opposes alternative relief and amendments to enable the proposal to proceed as this does not address the fundamental reason for the plan change request being a healthcare and hospital zone. The Society supports the retention of residentially zoned land over the entire subject site including that part of the subject site with the Special Character Area Overlay.

I or we want Auckland council to make a decision to: Disallow the whole original submission

Submission date: 10 June 2019

### Attend a hearing



## Further submission 2

I or we wish to be heard in support of this submission: Yes

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

Yes

### **Declaration**

What is your interest in the proposal? I am a person who has an interest in the proposal that is greater than the interest that the general public has

Specify upon which grounds you come within this category:

The Society represents a large number of people who reside and/or work within the adjacent or greater area of the subject site particularly the Eden Epsom area.

I declare that:

- I understand that I must serve a copy of my or our further submission on the original submitter within five working days after it is served on the local authority
- I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

## Further submission 3

**From:** [UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan further submission - 21 - Eden Epsom Residential Protection Society Inc  
**Date:** Monday, 10 June 2019 4:00:40 PM

---

The following customer has submitted a Unitary Plan online further submission.

### Contact details

Full name of person making a further submission: Eden Epsom Residential Protection Society Inc

Organisation name:

Full name of your agent:

Email address: [suzanne@speer.co.nz](mailto:suzanne@speer.co.nz)

Contact phone number: 0212238090

Postal address:  
32A Owens Road  
Epsom  
Auckland 1023

### Submission details

#### This is a further submission to:

Plan modification number: 21

Plan modification name: Southern Cross Hospital

#### Original submission details

Original submitters name and address:  
Housing New Zealand

[ckirman@ellisgould.co.nz](mailto:ckirman@ellisgould.co.nz)

Submission number: 108

Do you support or oppose the original submission? I or we oppose the submission

Specific parts of the original submission that your submission relates to:  
Point number 108.1

The reasons for my or our support or opposition are:

We support the retention of the Special Character Area Overlay on the three sites at 149, 151, and 153 Gillies Avenue as an integral part of the special character values of this residential area as identified in the Unitary Plan and as having collective and cohesive values, importance, relevance and interest to the local community and wider Auckland region. The retention of the Special Character Area Overlay and its retention without any amendment provides for the sustainable management of the Region and achieves the purpose of the RMA.

I or we want Auckland council to make a decision to: Disallow the whole original submission

Submission date: 10 June 2019

### Attend a hearing

I or we wish to be heard in support of this submission: Yes

## Further submission 3

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

### **Declaration**

What is your interest in the proposal? I am a person who has an interest in the proposal that is greater than the interest that the general public has

Specify upon which grounds you come within this category:

The Society represents a large number of people who reside and/or work within the adjacent or greater area of the subject site particularly the Eden Epsom area.

I declare that:

- I understand that I must serve a copy of my or our further submission on the original submitter within five working days after it is served on the local authority
- I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

## Further submission 4

**From:** [UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan further submission - 21 - Eden Epsom Residential Protection Society Inc  
**Date:** Monday, 10 June 2019 12:45:40 PM

---

The following customer has submitted a Unitary Plan online further submission.

### Contact details

Full name of person making a further submission: Eden Epsom Residential Protection Society Inc

Organisation name:

Full name of your agent:

Email address: [suzanne@speer.co.nz](mailto:suzanne@speer.co.nz)

Contact phone number: 0212238090

Postal address:  
32A Owens Road  
Epsom  
Auckland 1023

### Submission details

**This is a further submission to:**

Plan modification number: 21

Plan modification name: Southern Cross Hospital

### Original submission details

Original submitters name and address:  
Heritage New Zealand Pouhere Taonga

[sandrews@heritage.org.nz](mailto:sandrews@heritage.org.nz)

Submission number: 161

Do you support or oppose the original submission? I or we oppose the submission

Specific parts of the original submission that your submission relates to:  
Point number 161.2

The reasons for my or our support or opposition are:

The position of the submitter assumes adoption of the plan change and possible amendments to plan provisions. The Society oppose the entirety of the plan change as being completely contrary to intentions of the AUP and its objectives, policies and rules for Special Character Residential Areas and for the many reasons set out in the Society's original submission. Provisions to ensure protection of a few special features along Gillies Avenue will not make the proposal any more acceptable as a major healthcare and hospital zone within a residential area with a special character overlay.

I or we want Auckland council to make a decision to: Disallow the whole original submission

Submission date: 10 June 2019

### Attend a hearing

I or we wish to be heard in support of this submission: Yes

## Further submission 4

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

### **Declaration**

What is your interest in the proposal? I am a person who has an interest in the proposal that is greater than the interest that the general public has

Specify upon which grounds you come within this category:

The Society represents a large number of people who reside and/or work within the adjacent or greater area of the subject site particularly the Eden Epsom area.

I declare that:

- I understand that I must serve a copy of my or our further submission on the original submitter within five working days after it is served on the local authority
- I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

## Further submission 5

**From:** [UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan further submission - 21 - Eden Epsom Residential Protection Society Inc  
**Date:** Monday, 10 June 2019 12:30:46 PM

---

The following customer has submitted a Unitary Plan online further submission.

### Contact details

Full name of person making a further submission: Eden Epsom Residential Protection Society Inc

Organisation name:

Full name of your agent:

Email address: [suzanne@speer.co.nz](mailto:suzanne@speer.co.nz)

Contact phone number: 0212238090

Postal address:  
32A Owens Road  
Epsom  
Auckland 1023

### Submission details

**This is a further submission to:**

Plan modification number: 21

Plan modification name: Southern Cross Hospital

### Original submission details

Original submitters name and address:  
Heritage New Zealand Pouhere Taonga

[sandrews@heritage.org.nz](mailto:sandrews@heritage.org.nz)

Submission number: 161

Do you support or oppose the original submission? I or we oppose the submission

Specific parts of the original submission that your submission relates to:  
Point number 161.1

The reasons for my or our support or opposition are:

Amending the plan modification to simply protect a few features referred to in the submission by the various means suggested by the submitter does not make the fundamental purpose of the proposed plan change for a healthcare and hospital zone acceptable in terms of the principles of the RMA and the aims and objectives of the Auckland Unitary Plan, nor does it respect the integrity and purpose of the Special Character Area within the AUP. That part of the subject site recognised as a Special Character Area directly links with similarly identified land immediately to the north and south. To consider retaining only stone walls and trees in isolation from the protection of the special character buildings and residential land that exist along Gillies Avenue fails to recognise the integrity of the residential sites and the surrounding residential area and the reasons why the Special Character Area actually exists here. The Society's original submission provides many reasons why this is so.

I or we want Auckland council to make a decision to: Disallow the whole original submission

Submission date: 10 June 2019

## Further submission 5

### **Attend a hearing**

I or we wish to be heard in support of this submission: Yes

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

Yes

### **Declaration**

What is your interest in the proposal? I am a person who has an interest in the proposal that is greater than the interest that the general public has

Specify upon which grounds you come within this category:

The Society represents a large number of people who reside and/or work within the adjacent or greater are of the subject site particularly the Eden Epsom area

I declare that:

- I understand that I must serve a copy of my or our further submission on the original submitter within five working days after it is served on the local authority
- I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

## Further submission 6

**From:** [UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan further submission - 21 - Eden Epsom Residential Protection Society Inc  
**Date:** Monday, 10 June 2019 12:00:40 PM

---

The following customer has submitted a Unitary Plan online further submission.

### Contact details

Full name of person making a further submission: Eden Epsom Residential Protection Society Inc

Organisation name:

Full name of your agent:

Email address: [suzanne@speer.co.nz](mailto:suzanne@speer.co.nz)

Contact phone number: 0212238090

Postal address:  
32A Owens Road  
Epsom  
Auckland 1023

### Submission details

#### This is a further submission to:

Plan modification number: 21

Plan modification name: Southern Cross Hospital

#### Original submission details

Original submitters name and address:  
Stuart King

[stuart\\_patrick\\_king@hotmail.com](mailto:stuart_patrick_king@hotmail.com)

Submission number: 2

Do you support or oppose the original submission? I or we oppose the submission

Specific parts of the original submission that your submission relates to:  
Point number 2.1

The reasons for my or our support or opposition are:

The submitter accepts the plan change but requests images of the proposed structure to clarify the visual and shading impact of it and where windows will be located in terms of his property's privacy. However the submitter should be aware that the proposed zoning does not include any certainty as to the type of building that will be constructed in the zone. Should the plan change be approved, it is clear that residents will have little or no say in any application for a Restricted Discretionary Activity consent (H 25.5 of the AUP) and that the Council would be severely restricted in the matters it could take into account in considering any such application (H 25.8.1 of the AUP). The new zone would result in a large scale development that is much too intensive for the relatively small site available and would be seriously incompatible with the surrounding residentially zoned land including the site at 147 Gillies Avenue to which this submission relates, all as explained in our Society's original submission. We oppose this submission in total.

I or we want Auckland council to make a decision to: Disallow the whole original submission

Submission date: 10 June 2019



## Further submission 6

### **Attend a hearing**

I or we wish to be heard in support of this submission: Yes

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

### **Declaration**

What is your interest in the proposal? I am a person who has an interest in the proposal that is greater than the interest that the general public has

Specify upon which grounds you come within this category:

The Society represents a large number of people who reside and/ or work within the adjacent or greater area of the subject site particularly the Eden Epsom area.

I declare that:

- I understand that I must serve a copy of my or our further submission on the original submitter within five working days after it is served on the local authority
- I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

## Further submission 7

**From:** [UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan further submission - 21 - Eden Epsom Residential Protection Society Inc  
**Date:** Monday, 10 June 2019 4:45:34 PM

---

The following customer has submitted a Unitary Plan online further submission.

### Contact details

Full name of person making a further submission: Eden Epsom Residential Protection Society Inc

Organisation name:

Full name of your agent:

Email address: [suzanne@speer.co.nz](mailto:suzanne@speer.co.nz)

Contact phone number: 0212238090

Postal address:  
32A Owens Road  
Epsom  
Auckland 1023

### Submission details

**This is a further submission to:**

Plan modification number: 21

Plan modification name: Southern Cross Hospital

### Original submission details

Original submitters name and address:  
Auckland Transport - Planning and Investment

[kevin.wong-toi@at.govt.nz](mailto:kevin.wong-toi@at.govt.nz)

Submission number: 98

Do you support or oppose the original submission? I or we oppose the submission

Specific parts of the original submission that your submission relates to:  
Point number 98.2

The reasons for my or our support or opposition are:  
Whether or not AT's concerns are resolved, we support the position that the plan change should be declined.

I or we want Auckland council to make a decision to: Disallow the whole original submission

Submission date: 10 June 2019

### Attend a hearing

I or we wish to be heard in support of this submission: Yes

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

### Declaration

## Further submission 7

What is your interest in the proposal? I am a person who has an interest in the proposal that is greater than the interest that the general public has

Specify upon which grounds you come within this category:

The Society represents a large number of people who reside and/or work within the adjacent or greater area of the subject site particularly the Eden Epsom area.

I declare that:

- I understand that I must serve a copy of my or our further submission on the original submitter within five working days after it is served on the local authority
- I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

## Further submission 8

**From:** [UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan further submission - 21 - Eden Epsom Residential Protection Society Inc  
**Date:** Thursday, 13 June 2019 12:15:32 PM  
**Attachments:** [EERPS.pdf](#)

---

The following customer has submitted a Unitary Plan online further submission.

### Contact details

Full name of person making a further submission: Eden Epsom Residential Protection Society Inc

Organisation name:

Full name of your agent:

Email address: [suzanne@speer.co.nz](mailto:suzanne@speer.co.nz)

Contact phone number: 0212238090

Postal address:  
32A Owens Road  
Epsom  
Auckland 1023

### Submission details

#### This is a further submission to:

Plan modification number: 21

Plan modification name: Southern Cross Hospital

#### Original submission details

Original submitters name and address:

Spring Chunchun Xu and other individual submitters referred to in the attachment below covering submissions #1, #3-97, #99-107, #109-160, #162-176

[chunchun122@gmail.com](mailto:chunchun122@gmail.com) and other addresses given in the Summary of Decisions Requested for the individual submitters referred to in the attachment below.

Submission number: #1, #3-97, #99-107, #109-160, #162-176

Do you support or oppose the original submission? I or we support the submission

Specific parts of the original submission that your submission relates to:  
Point number All points of each submission

The reasons for my or our support or opposition are:  
Refer attachment

I or we want Auckland council to make a decision to: Allow the whole original submission

Submission date: 13 June 2019

Supporting documents  
[EERPS.pdf](#)

### Attend a hearing

I or we wish to be heard in support of this submission: Yes

## Further submission 8

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

### **Declaration**

What is your interest in the proposal? I am a person who has an interest in the proposal that is greater than the interest that the general public has

Specify upon which grounds you come within this category:

The Society represents a large number of people who reside and/or work within the adjacent or greater area of the subject site particularly the Eden Epsom area.

I declare that:

- I understand that I must serve a copy of my or our further submission on the original submitter within five working days after it is served on the local authority
- I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

## Further submission 8

### ATTACHMENT

#### Scope of Further Submission

This is a further submission by the Eden Epsom Residential Protection Society Inc. in support of the submissions opposing Proposed Plan Change 21 – Southern Cross Hospitals Ltd.

#### We support :

Submissions #1, #3-97, #99-107, #109-160, #162-176

and each of these submissions with their submitter's names and addresses as set out in the Summary of Decisions Requested.

#### The reasons for our support are :

1. These many submissions completely oppose the plan change and request it be declined in total, demonstrating a united community concern to protect this well established residential area from inappropriate commercial development.
2. We note that the submissions amply show that granting proposed PC21 would have a range of major adverse impacts on surrounding properties, would create a highly undesirable precedent for enabling commercial activities in residentially zoned areas, and would destroy the integrity of the recently confirmed AUP.
3. The submissions support our submission that the proposed site is unsuitable for the proposed Special Purpose Healthcare and Hospital Zone for a wide range of reasons as set out in our Original Submission not the least being it does not meet the policies of the AUP residential zones or Part 2 of the RMA.
4. We particularly support Submissions #91 from Mrs. Gemma Allen and #142 from Mr John Allen, who explain at length, and illustrate by plans and photos, the very real adverse impacts that will arise for neighbouring properties nearby to the proposal.
5. We find confirmation of our submission that there is no demonstrated need for a hospital at this site, as explained in Submission #135 from Mr Hugh Blackley an experienced surgeon, and in Submission #92 from Mr Robert Speer market analyst. Both submissions explain in detail the lack of need for new elective surgery hospitals, and also discuss the lack of any useful assessment contained in the proposed plan change request regarding alternative sites to which there are many.
6. The submissions as a whole oppose the removal of the Special Character Overlay and the removal of character housing, matters seen as fundamental to the identity of the Eden Epsom community. We support these submissions.
7. We record our opposition to Submission #108 from Housing NZ that accepts the plan change as being in accordance with the purpose and principles of the RMA. (refer: para#8 in submission #108); we believe this is an incorrect statement. We

## Further submission 8

Further Submission by Eden Epsom Residential Protection Society Inc, submitter #94 / 2

note that a separate further submission has been lodged by the Society specifically against submission #108.

8. Many submissions confirm community concerns for the loss of housing at a time of well-documented housing shortages. This applies not only to the removal of housing from the Gillies Avenue properties, but also the removal of the potential for comprehensive residential redevelopment on the existing hospital site with its underlying residential zone.

The Residential-Single House Zone and the Residential-Mixed Housing Suburban Zone both provide for housing diversity including Boarding houses, and in this regard we support Submission #1 from Ms Spring Chunchun Xu, and #137 from Mr James Currie, both who live in a boarding house at 149 Gillies Ave being one of the properties subject to potential demolition. These submitters point out the very real problems faced by parts of our society needing low-cost housing but with few options, showing the need to retain the residential zones to achieve a liveable city where a range of types of residential accommodation is provided for.

We also note and support Submission #93 from Mrs Suzanne Speer which has discussed at length the topic of loss of housing.

9. We record our opposition to Submission #161 from Heritage NZ which expresses interest in preserving notional character features only like stonewalls and trees without protection of the actual special character homes currently existing on site. This fails to recognise the integrity of the surrounding residential area and the reasons why the Special Character Overlay actually exists here. Further, the suggestions made by Heritage NZ as to how to protect these features would be legally and practically ineffective for the reasons set out in our Original Submission. We note that a separate further submission has been lodged by the Society specifically about submission #161.
10. The submissions confirm community concerns about the safety of school children traversing the area and we specifically support Submission #119 by Auckland Grammar School Board raising health and safety concerns affecting school pupils.
11. We support the concerns raised by Submission #98 from Auckland Transport about several issues requiring clarification on the impact of the proposal to the transport network. Amongst other matters, the AT submission specifically notes the need to assess trip generation differences between existing and proposed levels of traffic to understand the change in effects.

The AT submission also notes the lack of information about future staffing demands on parking and specifically onsite vs. on-street demand, plus seeks further information on the type of on-street demand that exists including not only staff and hospital visitors but residents and their associated residential generated traffic eg.

## Further submission 8

Further Submission by Eden Epsom Residential Protection Society Inc, submitter #94 / 3

private contractors and visitors including work-at-home visitors, and any other parking demands like schools, and general commuter parking making use of public transport through the area.

With regard to the very real problems with current on-street parking, we note and support Submission #110 from Mr Ian Wolfgram that provides detailed information about on-street parking demand in the local area and notes the inadequacies of the traffic report accompanying the application in giving any serious consideration to this matter. We similarly note and support Submission #92 from Mr Robert Speer which has included findings from a 3-week on-street parking survey in the area, concluding as Mr Wolfgram did that the local streets are already under heavy demand with no useful spare capacity.

Additionally, we wish to point out that we feel it is essential for Council to ask AT to address the issue of disruption to traffic along Gillies Ave arterial road arising from blasting at the subject site. This vital topic is unaddressed in the AT submission and we have pointed this out in our Further Submission to AT. Blasting over an extended period will be required to excavate the site to provide parking for a hospital or any other substantial building, a feature clearly illustrated in the indictive development plans included in the application. The potential for flyrock from blasting is a significant hazard, and this will have consequences for traffic disruption if Health and Safety guidelines are adhered to for management of blasting events.

However, please note we do not accept the AT conclusion that if traffic and parking concerns can be resolved, then the proposal is acceptable. AT describes its interest as being only within the context of the transportation network and its capacity to accept future development. The topic of traffic is only one of many factors to be considered in assessing the plan change. We note that the Society has lodged a separate further submission specifically about submission #98.

12. Many submissions confirm widespread community concerns about the risk of property damage and physical injury from blasting which will be an inevitable feature of commercial development on this site. To this end we specifically support Submission #159 from Mr Simon and Mrs Florence Holdsworth and #107 from Mr Peter King and #136 from Mr Hyeon Tae Cho who are all longtime residents in the local area and have firsthand experience of property damage from the first Southern Cross development during 1998-2000.

We also specifically support Submission #135 from Mr Hugh Blackley who notes his personal efforts to restore a home over 100 years old and his concerns for damage to masonry walls and special tile roofing (this property is less than 100 metres from the subject site). He also points out the very real problem that personal house insurance does not cover any damage caused by construction activity (eg. blasting) on nearby properties; this is a heavy burden to be placed on local residents.

We also specifically support Submission #11 from Dr Stuart Rabone and #72 from Mr Victor Rabone, both geologists of many years experience in mining and the use



## Further submission 8

Further Submission by Eden Epsom Residential Protection Society Inc, submitter #94 / 4

of controlled substances (explosives and blasting). Both point out the serious nature of this activity especially when combined with the "very strong to extremely strong" nature of the underlying columnar basalt rock from the Mt Eden volcanic event.

13. To help advise on these concerns, the Society has engaged Mr Simon Carryer, geologist and specialist in quarrying and blasting. He will be reviewing the technical reports still pending from Southern Cross on this key issue, and will in-turn provide expert evidence in due course. One very noteworthy item of advice already received is that the potential for flyrock from blasting is a significant hazard, and from a Health and Safety point of view unless Gillies Avenue and other roads are closed during blasting then the basic guidelines for management of blasting events would not be adhered to. Obviously this implies traffic disruption to a very busy arterial road and, as already noted, it is essential that AT should be asked to specifically comment on this as soon as possible.
14. We reiterate our view that blasting and earthworks is of such significance that it must be considered in your Section 42A report as an adverse physical characteristic of the site relevant to PC 21 and cannot be left to a later stage when a resource consent of some unspecified type may be sought.

We consider that the widespread existence of the basalt is of such significance that it amounts to a physical characteristic of the site and is a relevant consideration that must be taken into account under Part 2 of the RMA as part of the plan change. By way of analogy, if the site were subject to slipping or inundation the Council could not possibly ignore its physical suitability if a request were made for a plan change which would permit a major building on the site. The position is no different here.

We are well aware of the Babbage report included in the PC21 application but the only reference to this topic is a 4 line statement in paragraph 5.3 which provides no detail at all. Advice from our own experts have confirmed this is a serious issue for neighbours as well as the safety of the public. This includes disruption to passing traffic on Gillies Avenue and the many students attending local schools. As earlier advised, this issue occupied a great deal of time in the Environment Court hearings at the time the existing hospital was under consideration. The excavation there was smaller than now envisaged. Blasting was employed then and in spite of numerous conditions of consent imposed there were still serious adverse effects on neighbouring properties through noise and vibration and actual property damage.

15. The Society has raised a number of issues with the Council that are still outstanding. We are aware that the Council has requested further information in relation to each of these matters and that Southern Cross has agreed to provide that information. These matters include:
  - the condition and longevity of trees,
  - the visual and privacy effects on 32A Owens Rd in particular,

## Further submission 8

Further Submission by Eden Epsom Residential Protection Society Inc, submitter #94 / 5

- revised photo montages showing the bulk and mass of buildings on the existing and new sites that could arise on a restricted discretionary basis up to 25m in height,
- a report on the adverse effects from blasting including neighbourhood safety and property damage and disruptions to traffic like Gillies Ave and to general amenity over a prolonged period.

16. The further information still outstanding is very fundamental and relevant to any consideration about significant adverse effects arising from the proposal on the surrounding residential area. We reserve our right to comment and provide further submissions on these or any other matters either before or at the hearing before Commissioners.

17. We note we wish to be consulted before any hearing date is fixed so that we can ensure our legal and professional advisers are available.

We seek that all of the submissions opposing PC21 (as listed above) BE ALLOWED.

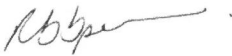
We wish to be heard in support of our submission.

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

---

Signed

Date



12 June 2019

Robert S Speer,

Vice President and authorised person for the Eden Epsom Residential Protection Society Inc.



## Further submission 9

**From:** [UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan further submission - 21 - Gemma Louise Tolich Allen  
**Date:** Thursday, 13 June 2019 4:15:32 PM

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The following customer has submitted a Unitary Plan online further submission.

### Contact details

Full name of person making a further submission: Gemma Louise Tolich Allen

Organisation name:

Full name of your agent:

Email address: [gemma@hydrobio.co.nz](mailto:gemma@hydrobio.co.nz)

Contact phone number: 0210526973

Postal address:

32A Owens Rd

Epsom

Auckland 1023

### Submission details

**This is a further submission to:**

Plan modification number: 21

Plan modification name: Southern Cross Hospital

### Original submission details

Original submitters name and address:

Gemma Tolich Allen

Submission number: ##91

Do you support or oppose the original submission? I or we support the submission

Specific parts of the original submission that your submission relates to:

Point number Points within the Submission 66-74

The reasons for my or our support or opposition are:

In my earlier Submission (#91) I referred to Southern Cross non-compliance at the existing hospital at 3 Brightside Rd in terms of deliveries outside of consented times. In my submission I stated that deliveries and waste removal which were non compliant had continued from first commissioning in the late 1990's until May 2018. Non compliant waste removal and deliveries are continuing to occur outside of consented times; waste removal trucks operated on the SX site on Good Friday 19th April a Public Holiday at 10.15am, and before 7am on Monday 13 May and two days later 15th May despite correspondence with SX that such incidents were occurring. On May 16 between 6.50am and 7.00am in addition to the waste removal truck which operated over a period of around 15 minutes with incessant beeping and clanging from the bins two, other commercial trucks visited the delivery area. From first beginning operation in the late 1990's to May 2019 Southern Cross has not complied with Consent Conditions in terms of delivery and waste collection times. We have go confidence that will comply with any further conditions in relation to extended activity.

I or we want Auckland council to make a decision to: Allow the whole original submission

Submission date: 13 June 2019

## Further submission 9

### **Attend a hearing**

I or we wish to be heard in support of this submission: Yes

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

### **Declaration**

What is your interest in the proposal? I am a person who has an interest in the proposal that is greater than the interest that the general public has

Specify upon which grounds you come within this category:

Our property at 32A Owens Rd directly adjoins the subject side on our eastern and southern boundaries. Our entire family of 2 adults and 3 children have been affected by non-compliant deliveries and waste removal from the existing hospital over an 18 year period, mostly occurring multiple times per week in the early hours of the morning.

I declare that:

- I understand that I must serve a copy of my or our further submission on the original submitter within five working days after it is served on the local authority
- I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.



12th June 2019

File ref: LBY

Planning Technician  
Auckland Council  
Level 24, 135 Albert Street  
Private Bag 92300  
Auckland 1143

Dear Sir or Madam

**FURTHER SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA**

**PROPOSED PRIVATE PLAN CHANGE 21: 3 BRIGHTSIDE ROAD, 149, 151 & 153 GILLIES AVENUE, EPSOM**

**To:** Auckland Council

**Name of submitter:** Heritage New Zealand Pouhere Taonga

1. This is a further submission in respect of submissions on the following proposed change to the Auckland Unitary Plan (Operative in Part):

Proposed Private Plan Change 21: 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom: To rezone land at 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom from Mixed Housing Suburban and Single House Zones to Special Purpose – Healthcare Facility and Hospital Zone, to remove the special character overlays from the sites and to amend transport provisions to specify the parking requirement for the hospital.

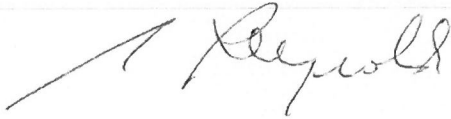
2. Heritage New Zealand is *a person who has an interest in the proposal that is greater than the interest the general public has:*

Heritage New Zealand Pouhere Taonga (formerly New Zealand Historic Places Trust) is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) for the identification, protection, preservation and conservation of New Zealand's historical and cultural heritage. Heritage New Zealand is New Zealand's lead agency for heritage protection.

3. Heritage New Zealand supports the submission of:
  - Refer to Appendix A for a list of those submissions which Heritage New Zealand supports.
4. The particular parts of the submission Heritage New Zealand supports are:
  - Refer to Appendix A.
5. The reasons for Heritage New Zealand's support are listed in the tables attached as Appendix A.
6. Heritage New Zealand seeks that the part of the submission be allowed as listed in the tables in Appendix A.
7. Heritage New Zealand wishes to be heard in support of our further submission.

## Further submission 10

Yours sincerely



Sherry Reynolds

Director Northern Region

Address for Service:

Heritage New Zealand Northern Regional Office

PO Box 105 291, Auckland

Telephone: 09 307 9920

Email: [PlannerMN@heritage.org.nz](mailto:PlannerMN@heritage.org.nz)

[SAndrews@heritage.org.nz](mailto:SAndrews@heritage.org.nz)

Attachment: Appendix A

Appendix A:

Heritage New Zealand Pouhere Taonga Further Submission on Private Plan Change 21 – 3 Brightside Road, 149, 151 & 153 Gillies Avenue Epsom

Submitter and Submission Reference	Submission Point	Support or Oppose	Reasons for Submission	Decision Sought
4 John Robert Kippenberger; 9 Gregory Brett Towers; 18 Jane Robson; 32 Nicola Maling; 44 John William Stewart; 142 John Damian Allen; 17 Hannah Saubrey-Ross; 107 Peter Gregory King	Decline the plan change.	Support in Part	Heritage NZ agrees with and supports these submissions with regard to the negative visual effects on the surrounding residential heritage environment and the incompatibility of a large commercial building that would be enabled by Plan Change 21.	Allow Submission in Part
33 Michael Lorimer	Decline the plan change.	Support in Part	Heritage NZ agrees with and supports the points raised in the submission which note the existing (Residential – Mixed Housing Suburban) zoning of 3 Brightside Road provides for a sympathetic 'transition zone' adjacent to the neighbouring Residential – Single House Zone and the Special Character Overlay characterised by a sense of spaciousness, large setbacks, and mature specimen trees and plantings that are a legacy to the vision of the Owens Family. Conversely under a Special Purpose – Health Facility and Hospital Zone a far greater development density is provided for with an achievable bulk and dominance that is incompatible with the	Allow Submission in Part

AR



<p>91 Gemma Tollich Allen</p>	<p>Decline the plan change.</p>	<p>Support in Part</p>	<p>attributes and scale of the surrounding Special Character Area. Heritage NZ supports the points raised in the submission which note the presence of large specimen trees planted by original Owen Family throughout existing Owens Road/Brightside Block more than 100 years ago, but that none of the mature trees within the subject sites are currently protected and able to be relied upon to remain under the proposed plan change. We agree with the submitter's opposition to the plan change on the grounds that it would allow for commercial buildings 16 metres in height as of right, twice the allowable height under the current zoning, and provide for buildings up to 25 metres in height as a Restricted Discretionary Activity, and which would be incongruent with the heritage values of adjoining and surrounding residences located in the Special Character Area.</p>	<p>Allow Submission in Part</p>
<p>92 Robert Sterling Speer</p>	<p>Decline the plan change.</p>	<p>Support in Part</p>	<p>Heritage NZ supports the points raised in the submission which note the established low density heritage context of the location, with predominantly pre-1940 one and two storey heritage dwellings on large single sites. Further we agree with the submitters opposition to the visual imposition, dominance and conflict presented by the scale and bulk of building that would be enabled by Plan Change 21, with extensive frontage on Gillies Avenue and potentially also on Brightside Road, the ability to construct 5 to 6 or even 7 storey buildings, up to 16 metres in height, or up to 25 metres under certain circumstances.</p>	<p>Allow Submission in Part</p>

2  
NR

<p>93 Suzanne Muriel Speer</p>	<p>Decline the plan change.</p>	<p>Support in Part</p>	<p>Heritage NZ agrees with and supports the following submission points raised in opposition to the proposal:</p> <ul style="list-style-type: none"> <li>- the incompatibility of built form relationships contemplated by Plan Change 21;</li> <li>- the undermining and degradation of the heritage environment of the subject site and its vicinity;</li> <li>- the failure to protect substantial trees over the subject area and other landscape elements including walls and hedges as recognised in the Special Character Area, and no variation proposed to the generic zoning to provide certainty that these will be retained;</li> <li>- the likely scale of change resulting from the rezoning proposal that will not compare with or respect the residential scale existing in the neighbourhood; and</li> <li>- that the provision of a draft hospital development design does not provide any certainty that this will actually occur, particularly as the proposed zone provides for a greater density of development to occur than that indicated in the draft design.</li> </ul>	<p>Allow Submission in Part</p>
<p>94 Eden Epsom Residential Protection Society Incorporated</p>	<p>Decline the plan change.</p>	<p>Support in Part</p>	<p>Heritage NZ agrees with and supports the following submission points raised in opposition to the proposal:</p> <ul style="list-style-type: none"> <li>- that in addition to the adverse effects associated with the removal of the existing heritage buildings at 149-153</li> </ul>	<p>Allow Submission in Part</p>

				<p>Gillies Avenue, the incompatibility of the bulk, scale and height of buildings that would replace them as permitted by the zone as proposed in the plan change is unacceptable;</p> <ul style="list-style-type: none"><li>- the lack of definitive (or enforceable) plans as to what form development will take on the site;</li><li>- the reliance of the plan change request on existing trees and stonewalls to mitigate the proposed scale of permitted development, despite Council having no ability to compel Southern Cross to maintain these features;</li><li>- that while reference has been made to development plans or covenants to compel retention of these features neither has been offered;</li><li>- that the design and appearance of the proposed hospital buildings (as per draft development plans made available to date) is distinctly commercial and unsympathetic to the surrounding heritage neighbourhood; and</li><li>- that the proposed zone, unlike other urban zones provides for no consideration of effects of new buildings on the surrounding area, limited matters of discretion and limited scope for community input on consent applications.</li></ul>
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# Further submission 11

**From:** [UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz](mailto:UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan further submission - 21 - John Damain Allen  
**Date:** Thursday, 13 June 2019 3:45:20 PM

---

The following customer has submitted a Unitary Plan online further submission.

## Contact details

Full name of person making a further submission: John Damain Allen

Organisation name:

Full name of your agent:

Email address: ja@sdg.net.nz

Contact phone number: 021630145

Postal address:

32A Owens Rd

Epsom

Auckland 1023

## Submission details

**This is a further submission to:**

Plan modification number: 21

Plan modification name: Southern Cross Hospital

## Original submission details

Original submitters name and address:

John Damian Allen

Submission number: #142

Do you support or oppose the original submission? I or we support the submission

Specific parts of the original submission that your submission relates to:

Point number P142.1

The reasons for my or our support or opposition are:

We have not yet received photomontages from within our property of the proposed 16 - 25m buildings that would be allowed under the PC to Hospital Zone. Our residence at 32A Owens Rd adjoins the Southern Cross site on the full extent of both our Eastern and Southern Boundaries. In terms of the effect of the bulk and mass of the building in relation to our privacy, shading, loss of skyline and visual effect we are the most affected party. The development is proposed to take place within 6m of our eastern boundary. Council first requested additional information of the Visual Effects of the proposal on properties from 30 - 38 Owens Rd in February 2019. LA4, consultants for Southern Cross Ltd replied to a request for further information in what we consider an inadequate response in early March 2019. The Council then asked for photomontages from within the boundaries of those properties. This information was to provide residents and the community generally with an accurate depiction of the effect of the 16, 20 and or 25m buildings on their properties so that they could then consider this information when making a Further Submission. We were told this information would be available for us to provide comment in our further submission before 13th June. The photomontages have not been made available and we have been denied the right to comment in the further submission process on this very important issue as it directly affects our property. During the Submission process many residents and people within the community

## Further submission 11

expressed outrage as to the effect of buildings of this height, bulk and mass. To date montages have only been provided for buildings up to 16m and from vantage points that do not include most affected properties. This information should have been available when SX requested a Plan Change as up until then consultation with neighbours was based on a 16m building. Given the amount of time available this information should have at the very least been available for the Further Submission process.

I or we want Auckland council to make a decision to: Allow the whole original submission

Submission date: 13 June 2019

### **Attend a hearing**

I or we wish to be heard in support of this submission: Yes

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

### **Declaration**

What is your interest in the proposal? I am a person who has an interest in the proposal that is greater than the interest that the general public has

Specify upon which grounds you come within this category:  
adjoining resident on our eastern and the southern boundaries to the subject site and directly adversely affected.

I declare that:

- I understand that I must serve a copy of my or our further submission on the original submitter within five working days after it is served on the local authority
- I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**Local Board Feedback on Publicly Notified Application process:  
Proposed plan change 21 (Private) - 3 Brightside Road, 149, 151  
and 153 Gillies Avenue, Epsom**

*(includes: Resource Consents, Plan Changes, Notice of Requirements, Reserves Act public submission process)*

<b>Date:</b>	18 April 2019
<b>Form to be sent to:</b>	unitaryplan@aucklandcouncil.govt.nz (for Plan Changes and Notice of Requirements)
<b>Application reference:</b>	Proposed plan change 21 (Private)
<b>Location:</b>	3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom
<b>Applicant:</b>	Southern Cross Hospitals Ltd

**Brief summary of the proposal:**

The proposal seeks to rezone land at 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom from Mixed Housing Suburban and Single House Zones to Special Purpose – Healthcare Facility and Hospital Zone, to remove the special character overlays from the sites and to amend transport provisions to specify the parking requirement for the hospital.

**Local Board Feedback:**

**The Albert-Eden Local Board** provides the following feedback in relation to the proposed plan change for 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom.

*Please see below.*

**Outcome sought by local board**

The plan change proposal is declined in its entirety.

**Attendance at any Hearing:**

**The Albert-Eden Local Board does not wish to speak to this feedback** at any hearing on this matter.

**This feedback is authorised by:**



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**Peter Haynes**

Email: [peter.haynes@aucklandcouncil.govt.nz](mailto:peter.haynes@aucklandcouncil.govt.nz)

Date: 18 April 2019

**SUBMISSION ON BEHALF OF THE ALBERT-EDEN LOCAL BOARD OF  
AUCKLAND COUNCIL IN RELATION TO A REQUEST FOR A PRIVATE PLAN  
CHANGE BY SOUTHERN CROSS HEALTHCARE LTD 149, 151 AND 153  
GILLIES AVENUE, EPSOM**

1. The Albert-Eden Local Board (hereafter 'the Local Board') is an local authority entity established in 2010 under the *Local Government (Auckland Council) Act 2009* for the purpose of: (a) enabling democratic decision making by, and on behalf of, communities within the local board area; and (b) better enabling the purpose of local government to be given effect to within the local board area (s. 10).

2. The role of local boards in planning matters has evolved since 2010 to include comment on notification of resource consent applications and their merits. The Local Board was closely involved in the development of the Auckland Unitary Plan (AUP), participating in the workshops, public meetings and many other meetings that led to the adoption of the AUP by Auckland Council, although not in the final decision.

The Local Board is opposed to the plan change in its entirety on the following grounds:

*3. Integrity of the Auckland Unitary Plan*

The Local Board is concerned that a plan change with such major effects (discussed below) has been proposed only a little over two years after the AUP became operative in part (on 15 November 2016). The process to create the AUP was intended to be exhaustive, as the AUP was intended to set the planning parameters for Auckland for some decades. Controls such as residential zoning and heritage overlays were carefully considered on an integrated, area-wide basis, and a major change to an overlay therefore has implications for the integrity of the entire overlay. A change of this magnitude to the AUP at this point, with the precedent-setting consequences it entails, would undermine the integrity of the AUP and how it is regarded by the public at large. Importantly, during the AUP development process the applicant did not submit for the zoning currently applied for to allow a major expansion of a hospital in a residential area.



#### *4. Major Adverse Effects*

The application seeks the removal the heritage overlay and removal of demolition controls on 149, 151 and 153 Gillies Avenue and to change the zoning from Residential 1 to 'Special Purpose – Healthcare Facility and Hospital Zone.' This would mean the loss of residential character and severe adverse effects for neighbours:

(a) The application of the heritage overlay to these properties is an integral part of carefully considered planning for the retention of housing character across the Auckland area. The effect of the removal of the overlay and of the houses from these properties on the surrounding neighbourhood would be dramatic, with a significant diminution of environmental and amenity values (a point on which the applicant's submission is silent).

(b) The bulk, dominance, overshadowing, loss of privacy, light spill and other effects on the residential neighbours of the site, arising from the bulk, scale and height of buildings proposed to be permitted, would seriously impact on the amenity values of neighbouring and nearby residents in the area.

(c) Increased traffic at unsociable times and parking problems that are incompatible with a residential area, particularly if the applicant pursues some of the activities permitted under the proposed zoning and which are not included in its current plans, such as visitor accommodation, supported residential care and so on. Further, the Local Board notes that traffic congestion is particularly congested on the Gillies Avenue road corridor at peak times.

(d) The nature of the geology of the area means that there would be an unduly lengthy construction period with continuous blasting of basalt rock.

#### *5. Potential for Incremental Development*

A recurring pattern observed over time is for developers to pursue their development plans incrementally, so that the complete effects of their plans are not considered at any particular time; indeed, as additional resource consents are granted, the effects resulting from later applications diminish. By adopting this approach, developers often achieve an outcome that they would not were their development to be

considered in its entirety. Should the current application be granted, the way would be open for the applicant to apply for a further plan change for the rest of the block bounded by Gillies Avenue, Owens Road and Brightside Road.

#### *6. Consideration of Alternative Sites*

Given the magnitude of the effects of development under the proposed plan change to an area currently zoned residential, the Local Board believes that very careful consideration should be given to alternative sites in areas where those effects would be less significant. It does not appear that adequate consideration has been given to more appropriate sites as required by section 32 (1)(b) of the *Resource Management Act 1991*.

#### *7. Summary*

In summary, the Albert-Eden Local Board opposes the plan change requested in its entirety. It submits that the proposed plan change would permit development that would be completely out of character with the existing neighbourhood and result in major adverse effects for the neighbouring residents in the area, while undermining the integrity of the Auckland Unitary Plan.



**ATTACHMENT FOUR**  
**Specialists' Assessments**



# Southern Cross Ltd Private Plan Change 21: Special Character

## 1. SUMMARY OF QUALIFICATIONS AND EXPERIENCE

- 1.1. My full name is Rebecca Anne Berlyoung Freeman. I hold the position of Senior Specialist Historic Heritage in the Heritage Unit at Auckland Council. I have been in this position since October 2015. Prior to this role, I held the position of Specialist - Built Heritage from May 2011.
- 1.2. I earned a Master's Degree in Historic Preservation from George Washington University in 2008, and a Bachelor's Degree in History from Ashland University in 2006. I have 10 years of experience in heritage policy planning in New Zealand, the United Kingdom and the United States, including skills and experience in developing strategy and policy, plan development and modifications, inputting into strategic and spatial plans, processing resource consents, evaluating heritage places and developing guidance and methodologies. I have been a full member of ICOMOS NZ since 2016.

## 2. INTRODUCTION

### Involvement with the proposal

- 2.1. In November 2018, I was asked to review and provide feedback on draft versions of the Special Character specialist reports prepared on behalf of Southern Cross Ltd to support its proposed plan change (**PC21**). My involvement in PC21 has continued in this capacity, including requesting and reviewing further information from the applicant and providing advice and feedback to Council's planner.

### Purpose of report

- 2.2. This report addresses the following matters:
  - The adequacy of the Special Character specialist report prepared on behalf of Southern Cross Ltd by Lifescapes Ltd;
  - My analysis and review of submissions and further submissions; and
  - My conclusions and recommendations.

### Scope

- 2.3. This report addresses the effects of re-zoning and removing the special character overlay from 149-153 Gillies Avenue on identified special character values of the Isthmus B Special Character Overlay.
- 2.4. I acknowledge that the applicant has supplied renderings showing at a conceptual level the intended future development of the subject sites, and that some discussion has taken place among the applicant, Council and submitters on issues relating to the development of the site. However, these issues are not part of the private plan change and sit outside of this process. These issues will be discussed and considered as part of the resource consent (which is currently on hold) or during a future process. This report makes reference to some of these development issues, however, it largely defers consideration of the impacts and effects of these issues to a future process.

### **3. REVIEW OF THE SPECIAL CHARACTER REPORT PREPARED BY LIFESCAPES LTD**

#### **Effects of rezoning from Single House to Healthcare Facility and Hospital Zone (HFHZ)**

- 3.1.** The Lifescapes Ltd report determines that rezoning could result in either a positive or negative effect on the special character area depending on the architectural and landscaping response to the development which is enabled by the zone change. Any number of architectural or landscaping designs could be sympathetic or unsympathetic to the character area based on how they address the period and scale of development, forms and relationship with the street, density and pattern of development and visual coherence of the existing area. Therefore, it is difficult to determine the exact effect of the rezoning proposed through PC21 because the proposed development does not form part of the plan change.
- 3.2.** In general, I agree with these conclusions. Re-zoning is somewhat of an abstract exercise; a zone change may enable an adverse effect on special character, but it is not, in and of itself, an adverse effect. The HFHZ enables development that could have adverse effects on the character area, however, it does not prevent sympathetic new development or even retention of the existing character buildings and features.
- 3.3.** Zone changes, however, can impact special character values by signalling that land containing these values is anticipated to have greater density or a different use. Under these circumstances, it becomes more difficult to argue that a place should continue to be managed for its special character values when the underlying zone signals a built form that is substantially different from the identified special character.
- 3.4.** To address this potential issue, most of the Special Character Overlay - Residential has an underlying zoning of Single House which has the effect of limiting development potential so that the identified character values can be maintained. However, in places where the underlying zoning anticipates greater density or a different use, such as HFHZ or Terraced Housing and Apartment Buildings Zone (**THAB**), these character values are much more vulnerable to being lost to redevelopment.
- 3.5.** Site amalgamation following re-zoning could also result in adverse effects on the special character area as this would disrupt the dominant subdivision pattern in the area. Two sites were amalgamated for the existing hospital, resulting in a block of land that is significantly larger than other sites in the area; PC21 will further increase the size of this block. I acknowledge, however, that the effects of site amalgamation could be mitigated through a sympathetic design response.
- 3.6.** In summary, I agree that a zone change does not fundamentally result in adverse effects on special character values, but can enable adverse effects. In my view, adverse effects can be limited by retention of the special character overlay over the HFHZ, and mitigated through the resource consenting process.

#### **Effects of uplifting the Special Character Overlay from 149-153 Gillies Avenue**

##### *Special character values of the subject sites*

- 3.7.** The Lifescapes Ltd report concludes that 149-153 Gillies Avenue have both historical and physical qualities that are consistent with the identified values of the Isthmus B overlay. The identified values are:
  - Exceptionally large grouping of mid-late 19<sup>th</sup> and early-mid-20<sup>th</sup> century houses, together with associated urban patterns of development that collectively reflect important trends in

New Zealand's residential architectural design (particularly the Garden Suburb ideals) and the development of suburban residential areas in the Auckland region;

- Illustrates the pattern of residential development that occurred following the provision of cheap public transport (electric trams) and improvements to the roading network;
- Demonstrates a variety of architectural styles associated with the period of significance, including Edwardian villas, bungalows and English Cottages;
- Characterised by large sections, larger houses, wider streets, setbacks that provide for a front garden, street trees, and an abundance of vegetation.

**3.8.** The report also concludes that 151 and 153 Gillies Avenue exhibit architectural merit and have a high degree of integrity; 149 Gillies Avenue has been significantly modified as part of its conversion, first to a hostel, then to a boarding house, and now its contribution to the area is primarily limited to scale and setting.

**3.9.** I agree with these conclusions. The three subject sites are consistent with the identified values of the special character overlay and as such, are correctly included and managed within the overlay control.

#### *Contribution of the subject sites to the wider SCA*

**3.10.** The Lifescapes Ltd report concludes that 149-153 Gillies Avenue, when taken together, generally make a positive contribution to the special character area. However, when considered individually, the report concludes that the contribution of 151 and 153 Gillies Avenue is lessened because these properties are largely not visible from the public realm, and because this edge of the overlay area is somewhat fractured due to infill housing and redevelopment which has made it difficult to identify a discernible historical group.

**3.11.** Although the report concludes that the houses make a more limited contribution to the character area, it also concludes that the landscape features (including mature trees, vegetation, stone walls and gates) contribute strongly and form the key visual experience of these properties from the public realm.

#### *Visibility*

**3.12.** I agree that 149-153 Gillies Avenue make a positive contribution to the character area because they demonstrate the identified values of the Isthmus B overlay. I also agree that the landscape features are visually more prominent than the houses and that they make the greatest contribution to the streetscape. However, I disagree that places which are not visible from the streetscape do not contribute to the identified values of the character area. Under the legacy character zone (Residential 2) framework, I agree visibility was a key factor for determining contribution, however this approach was advanced and refined through the Auckland Unitary Plan (AUP) with the introduction of the Character Statements.

**3.13.** Character Statements identify and explain the values to be maintained and enhanced in each character area. These values derive from the history of the place, including thematic (such as residential development that occurred in response to the introduction of the electric tram network), geographic (such as the shared proximity and relationships with Maungawhau/Mt Eden) and physical (such as interrelationships of building and landscape features, architectural style, lot size, etc). Any place within the area may have values derive from its history, irrespective of its level of visibility, and therefore, any place within a character area that is consistent with the values identified in the Character Statement is considered to contribute to the area.



- 3.14.** This approach implies a degree of intrinsic value which is reflected in the special character provisions: the plan controls activities that cannot be seen from the public realm, such as rear extensions. If these unseen spaces did not have value, the plan would not seek to manage them.
- 3.15.** 149-153 Gillies Avenue are consistent with the values identified in the Character Statement. Considering their contribution to be lessened because they are not visible is inconsistent with AUP and to the identified values of the area. The mature trees and vegetation, as well as the basalt stone walls that prevent direct visibility of the houses are key aspects of the Garden Suburb movement and key aspects to the planning and design of each house. As noted in the Lifescapes Ltd report, this concealment is both a deliberate and original feature of the subject properties, and is key to understanding their development and use.
- 3.16.** I acknowledge that other period houses in the area are more visible behind lower walls and sparser vegetation, however, as suggested in the Lifescapes Ltd report, I agree this is likely because the subject properties front Gillies Avenue, a busy arterial road, and most other houses in the area front smaller, quieter residential roads. This likely also accounts for the front yard setback of the three subject houses being larger than those in the surrounding area. Despite these variations, 149-153 Gillies Avenue are consistent with the values of the area because they demonstrate the values identified in the Character Statement.

#### *Landscape features*

- 3.17.** The Lifescapes Ltd report considers the landscape feature to make the greatest contribution to the streetscape and to the visual experience of the character area. The Lifescapes Ltd report and other expert reports prepared on behalf of the applicant frequently mention the intention to retain the stone walls and some of the mature trees both to mitigate the loss of the houses and to help the planned hospital extension fit within its special character setting.
- 3.18.** I agree the landscape features make the greatest visual contribution to the streetscape, but without the period houses behind them, they lose both context and purpose. They become removed from their association with the Garden Suburb movement and subsequently removed from the identified values of the area. In my view, it is helpful to consider each place as a whole landscape, rather than as components (house, garden, walls, trees, etc). This is how the houses were originally designed and planned, and due to the high degree of integrity of 151 and 153 Gillies Avenue, this is how they continue to be experienced.
- 3.19.** I also note that the effect of the demolition or removal of a character building on landscape features and vegetation is included in the assessment criteria (D18.8.1.1(1)). The plan, therefore, acknowledges that removing a character house from its associated setting, including landscape features and vegetation, could have an effect on the values of the place.
- 3.20.** I agree that retaining the walls and trees might help preserve the visual experience of the character area, but I do not agree that it will mitigate the loss of character values.

#### *Fractured edge*

- 3.21.** The Lifescapes Ltd report considers that the area around 149-153 Gillies Avenue has been fractured through redevelopment to the point where there is no longer a discernible grouping, and therefore, further change will not create an adverse effect in the area.
- 3.22.** I agree that this edge of the overlay area has absorbed change over time, however I disagree that this change has been detrimental to the point where the area no longer demonstrates collective

or cohesive values. Although redevelopment in contemporary styles has occurred within the vicinity of 149-153 Gillies Avenue, new houses have largely respected the scale, form, setback, subdivision pattern, lot size, and landscaping patterns of the period houses. The values of the design and layout of this neighbourhood are largely unchanged and therefore continue to derive from the history of the area, even if some of the houses do not date from the period of significance.

**3.23.** The Isthmus B overlay covers a series of areas throughout the Auckland isthmus, from Ōtāhuhu to Mt Albert to Glendowie, and while these areas have consistent and coherent historical values, the Character Statement notes the physical and visual qualities are necessarily diverse to reflect the range of areas covered. Variations in qualities such as architectural style, density, street layout and materials, therefore, are expected and anticipated by the AUP. In my view, such variations cannot be held against the subject sites (or any place in the area) when they have not been identified for their consistency.

#### *Isolated grouping*

**3.24.** An emerging theme related to the fractured edge is the idea that 149-153 Gillies Avenue form an isolated grouping within the block bounded by Gillies Avenue, Brightside Road and Owens Road, and that this limits their relationship with the wider, more contiguous area.

**3.25.** According to the AUP, special character areas are required to have “collective and cohesive” values, but I note that nowhere are they required to have “contiguous” values. The Isthmus B overlay itself is a large and non-contiguous area covering approximately 5,576 properties across the Auckland Isthmus. As discussed above, these areas (grouped into 13 maps in the AUP) cover a wider range of geographic areas, but all demonstrate the same historical values irrespective of their location. Indeed, the fact that these areas are disparate reinforces the importance of the development of the tram network and roading improvements to the growth of suburban Auckland during the late 19<sup>th</sup>-early 20<sup>th</sup> century.

**3.26.** Within the series of areas covered by the Isthmus B overlay, there are a number of instances of isolated groupings. However, I reiterate that although they may be physically separate, they are connected through their shared values, as described in the Character Statement.

**3.27.** I also note that 149-153 Gillies Avenue may be isolated within their block, but the block itself is largely surrounded by land subject to the Isthmus B overlay. From a regulatory standpoint, the overlay does not cover the street, however, in any character area the public realm is an important part of the setting through which shared physical qualities are experienced. On a map, the three subject sites may look isolated, but on the ground, the commonalities in landscaping, lot size, setback and scale are all understood and appreciated.

**3.28.** In summary, I agree that the three subject sites make a positive contribution to the special character area, and that the landscape features make the most prominent visual contribution, however I disagree that the limited visibility of the houses lessens their contribution to the values of the area. I disagree that this edge of the overlay area is fractured to the point where a discernible cohesive group of historical houses cannot be identified. The area has been modified over time, but it still retains integrity and consistency of values. I also disagree that 149-153 are an isolated group at the edge of the overlay, with no connection or relationship to the wider Isthmus B overlay.

#### *Effect of uplifting the overlay*

- 3.29.** The Lifescapes Ltd report concludes that removing the overlay would have an adverse impact on the special character area, and that this impact would be most significantly felt if the landscape features were removed. The report notes, however, that if landscape features were removed, this loss would be mitigated by the inherent diversity of this part of the special character area (for example, the loss of these features would not result in a gap or hole in a continuous line of historic stone wall).
- 3.30.** If the houses were removed as a result of the overlay being uplifted from these sites, the report concludes that the impact of the loss of the houses on the character area would be minor.
- 3.31.** I disagree with the conclusions of the report on the effects of uplifting the character overlay. As with rezoning discussed above, removing the special character overlay does not in and of itself equate to a loss of character values, rather it is what is enabled by the removal of the overlay that could have an adverse effect. It is understood that the applicant is seeking removal of the overlay so that the character houses (and possibly the landscape features) can be removed for the proposed hospital extension. If these three properties are removed, either partially or in their entirety, it will represent a loss of character values in this part of the area, and therefore an adverse effect.
- 3.32.** The loss of any part of 149-153 Gillies Avenue will be more than minor. All three sites are consistent with the identified values of the character area. The loss of any place that is consistent with the values of the area erodes the values of the whole.
- 3.33.** In addition to the immediate vicinity, the wider character area would also be affected by the receding edge of the overlay area. The edges of an overlay area are the most vulnerable to change, and this edge has already lost two identified character buildings<sup>1</sup>. The loss of another three undoubtedly represents an erosion of character values. If the edge continues to recede, the quality of the character area as a whole will decline.
- 3.34.** As stated in the Lifescapes Ltd report, removing the overlay removes the opportunity to consider and mitigate the effects of future development on both the subject sites and in relation to the wider area. A consent would not be required to remove the character houses or landscape features and there would be no requirement to ensure the new hospital extension fit sympathetically in its established character setting. There would be no requirement to mitigate the loss of any of the character buildings or features or to mitigate the effects of the new development on the surrounding character area.
- 3.35.** Without the overlay, the site will only be subject to the provisions of the underlying zoning, which is proposed to be HFHZ. I acknowledge that the HFHZ provides the opportunity to consider amenity values, however, relying on provisions that “allow for” or “encourage” retention of “amenity”, rather than character-specific provisions that require maintenance and enhancement of identified values, is, in my view, an inadequate approach.
- 3.36.** I also acknowledge that the applicant has tried to mitigate the effects of uplifting the overlay by indicating that landscape features and mature trees will be retained, however I note that the applicant has not supplied any specific planning or legal mechanism that would result in the retention of these features, despite the fact that the Lifescapes Ltd report considers their loss would be detrimental.
- 3.37.** The landscape features and mature trees do make the most prominent visual contribution to the streetscape, but visibility is only one aspect of contribution to character values. The loss of the

<sup>1</sup> In 1995-96 to make way for the current hospital building.

houses would affect the values of the stone walls and mature trees by removing their context. Therefore, while this mitigation may serve to retain the visual experience of this character area, it does not mitigate the loss of character values.

- 3.38.** In summary, I consider that the removal of the special character overlay could result in adverse effects on both the character values of the individual sites and the character values of the wider area by enabling character erosion around the edges, and by removing the opportunity to consider effects both within and beyond the subject sites. I acknowledge the applicant's attempt to mitigate the effects of uplifting the character overlay from these sites, however this offer of mitigation is incomplete as it provides no practical solution to the management of the landscape features and does not mitigate the loss of character values.

#### *Erosion of character values*

- 3.39.** The Lifescapes Ltd report does not include an assessment of the erosion of special character values in this area, which is particularly relevant to this plan change. In 1995-1996, two identified character buildings were removed from the legacy character zone (Residential 2) in order to make way for the current hospital building. The intention of PC21 is to remove the character overlay from three other identified character buildings so they can be removed to make way for a hospital extension.
- 3.40.** An understanding of the compounded impacts of these losses on both the immediate and wider vicinity of the character area will be key to understanding the full impact of the proposal.

#### *Alternative options*

- 3.41.** The applicant has provided alternative approaches that could be considered if Council sought a greater degree of control in managing the character values of the subject sites:

#### Retaining the Special Character Overlay over the HFHZ

- 3.42.** This approach is currently applied to Mercy Ascot Hospital in Epsom, where existing character housing has been retained on site, but converted for hospital use. This is a different approach than that proposed at Brightside Hospital, however, it could be a useful exercise for the applicant to consider if the existing houses could be retained within their original sites (perhaps shifted closer to the road to enhance visibility make space at the rear for an addition or a new building) and converted for hospital use. It would also be useful to consider the possibility of redeveloping 149 Gillies Avenue (which is not subject to the demolition control) and shifting forward 151 and 153 as described above. Incorporating the subject sites into the proposed development would go some way toward ensuring any extension to Brightside Hospital would be sympathetic to its surroundings.
- 3.43.** The Lifescapes Ltd rationale for this alternative approach is to retain the special character overlay over the site to manage the landscape features (including stone walls and mature vegetation), however I do not consider this a viable alternative. Although the objectives and policies of the overlay require maintenance and enhancement of landscape features, the rules do not. Effects on landscape features and vegetation are considered through the assessment of effects, however the retention or removal of these features does not trigger resource consent on their own, so relying on these provisions is not an effective means of managing their values.

#### Scheduling specific places and/or features

- 3.44.** Although scheduling specific places and/or features is outside the scope of PC21, it is an alternative approach to managing values and requires robust consideration. While the author

provides a brief discussion of the possibility of scheduling some or all of the places and features on site, part of this discussion relies on a separate discussion in section 6 of the Lifescapes Ltd report where the author has said that these values should not be considered “historic heritage”. In my view, it is premature to state that these places are not historic heritage and do not merit scheduling when no evaluation has been undertaken.

- 3.45.** It is also inappropriate for the author to suggest that the subject sites would not warrant scheduling as a whole because PC21 requires their removal. The fact that buildings and features need to be removed to enable the proposed expansion of the hospital does not factor into an evaluation of historic heritage value.

#### Site specific development plan

- 3.46.** The Lifescapes Ltd report identifies the alternative approach of including a site specific development plan in in Chapter H of the AUP as the most appropriate tool to maintain and enhance identified character values. However, if the subject site is on-sold and rezoned in the future, this plan becomes obsolete and the special character values of the place are put at risk. Even if the site is never on-sold, the AUP is reviewed every 10 years, and the development plan could be changed or removed as part of the plan review.

- 3.47.** This approach is also the most inflexible for both the applicant and the Council. A resource consent can be changed during development to respond to unexpected circumstances, however a site-specific development plan included in Chapter H requires a plan change to make any modifications. From Council’s perspective, the current framework of provisions is intended to be applied across the region; site-specific provisions undermine this wider intent.

#### Other alternatives

- 3.48.** Another alternative option for managing character places and features, which has not been considered by the applicant, is to place an encumbrance on the title. Covenanting significant features creates certainty going forward; an encumbrance is tied to the title, and therefore shielded from changes of ownership and changes to the AUP.

#### *Lifescapes Ltd report conclusions*

- 3.49.** The Lifescapes Ltd report has not provided a clear conclusion on the appropriateness of the proposed plan change. The report indicates that removing the special character overlay would have an adverse effect on identified character values, but then appears to conclude that this would be appropriate.
- 3.50.** The report does not provide any reasoning for why removal of the character overlay is considered appropriate from a special character perspective, instead relying on planning arguments that are outside the ambit of the specialist topic.
- 3.51.** It is not the role of the special character expert to balance wider costs and benefits or competing interests, rather, the specialist needs to provide clear topic-specific advice to the planner, who will consider and make a recommendation on all the issues that affect a site.

## **4. ANALYSIS AND REVIEW OF SUBMISSIONS**

### **Submissions**

- 4.1.** 176 submissions were received on PC21, including 152 that raise issues relating to special character or heritage. Of these 152 submissions, 127 include a pro forma statement that raises technical issues relating to the plan change, including issues relating to special character. Most

of the 127 submissions that include a pro forma statement also include a unique section detailing personal views about the plan change. Many of these personal statements also raise issues relating to special character and heritage.

## Notes on submissions

### *Historic heritage vs special character*

- 4.2.** Many submissions refer to the overlay area as having a “heritage” control or “heritage” buildings. While there are a few places subject to the Historic Heritage Overlay, the area is largely managed through the Isthmus B Special Character Overlay. As set out in Environment Court Decision No: [2018]NZEVC186, special character can derive from the history of a place or area, but it is not historic heritage. Special character relates to amenity and is provided for as an “Other Matter” under sections 7(c) and 7(f) of the Resource Management Act. Historic heritage, as a Matter of National Importance, is provided for under section 6(f) (this also accounts for discrepancies in the use of the word “protection”, which applies only to historic heritage; special character is “managed” or “maintained and enhanced” through the AUP).
- 4.3.** In my view, this is an issue of semantics rather than a deliberate conflation of the special character control. The Isthmus B area is characterised by large numbers of period houses which are managed through the AUP and which many people might perceive to be of heritage value and refer to as “heritage” irrespective of the AUP control.
- 4.4.** I highlight this distinction to ensure there is clarity in the values that relate to this site, and how they are managed.

### *Resource consenting issues*

- 4.5.** Many submissions raised issues relating to the incompatibility of the design, scale, height and massing of the proposed hospital building within the existing special character setting, and issues relating to the retention of historic landscape features, including the stone walls and gates. While these issues do relate to special character, they will not be addressed in this report because they do not relate to the outcomes sought in the proposed private plan change (i.e. re-zoning and removal of the special character overlay). These issues will be traversed during a future resource consent process.

## Pro forma submission

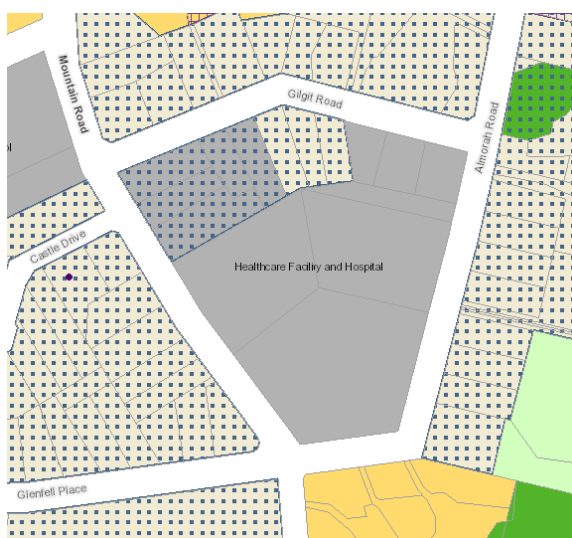
- 4.6.** This section will specifically address the special character issues raised in the pro forma that was included in 127 of the submissions received. The pro forma was prepared by the Eden Epsom Residential Protection Society (sub 94), and is supported by a special character report prepared by Jeremy Salmond (which I will discuss in the following section). The issues raised in the pro forma are:
- *“(d) The subject site lies within an established area of residential zoned land with the Gillies Avenue part of the site covered by an overlay which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter D18 of the AUP. PC21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purposes of the overlay.”*
  - *“(f) Adverse effects from PC21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well*

*as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.”*

- *“(h) PC21 incorporates three special character residential buildings which front Gillies Avenue. These dwellings are included for the purpose of demolition and removal to allow the expansion of the private hospital facilities. The loss of these special character dwellings is inconsistent with the purpose of the Special Character Overlay specifically placed over this part of Gillies Avenue and the adjoining hinterland to the west for the purpose of heritage protection imposed through the RPS and implemented through the Special Character area provisions of the AUP district plan provisions.”*

#### **Evaluation (d)**

- 4.7.** I agree with the pro forma on the nature of the character values in this part of the Isthmus B Special Character Overlay, including inter-relationships with the wider setting, of which Maungawhau/Mount Eden is a defining feature. However, I do not fully support the statement that the proposed land use is incompatible with the special character overlay. Overlays are not tied to land use and may be applied over any zone, and the way a place is used does not necessarily correlate to its contribution to a special character area.
- 4.8.** The zoning and use of a place does not fundamentally affect the character values of an area, rather it is the way a place fits within the area that determines its impact. The way a place fits within an established character setting relates to its design, height, scale, bulk and massing, among other issues such as landscaping; however these issues will be considered through a resource consenting process and are not part of PC21.
- 4.9.** A relevant example is Mercy Ascot Hospital in Epsom which is partially covered by the Special Character Overlay and has an underlying zoning of HFHZ (the zone proposed for the subject site through PC21). Mercy Ascot has incorporated a number of historical residences within its hospital campus, retaining the character buildings but changing their use. Their form, design, scale and massing remain residential, and therefore they continue to contribute to the residential character and quality of the street, irrespective of their current use or underlying zoning.



Figures 1 and 2: Mercy Ascot Hospital (Auckland Council Geomaps)

- 4.10.** I appreciate that the circumstances of the subject site are different because there is an understanding that the existing character buildings will be demolished rather than retained as part

of the new development, however, it remains that the HFHZ would not prevent Southern Cross Ltd from developing the site in a way that could sympathetically contribute to the established character of the area.

- 4.11.** As discussed above, rezoning can have the effect of signaling that the land containing the character values is anticipated to have a greater density or different use, which can mean the development potential enabled by the zone is incompatible with the Special Character Overlay. However, as discussed above, just because development is enabled does not mean it will be unsympathetic. Rather, it is the nature of the development that is key to understanding its relative compatibility or incompatibility, and these aspects of the proposal will be discussed through a resource consent.
- 4.12.** Therefore I do not fully agree that the proposed zoning and use of the place is incompatible with the Special Character Overlay.

#### **Evaluation (f)**

- 4.13.** I agree with the pro forma that removing the special character overlay from the subject sites could result in the degradation of identified character values along this edge of the overlay area. Uplifting the overlay would enable removal of three character buildings without requiring consideration of effects or mitigation through a resource consent. The three character buildings are consistent with the identified values of the area, and therefore their loss would result in an adverse impact. The adverse impact is compounded due to the earlier loss of two other identified character buildings to make way for the current hospital building. The edge of this area has already been compromised and made vulnerable to change, and further loss may call into question whether the area is consistent or cohesive enough to warrant continued management.
- 4.14.** I also agree that changing the zoning and removing the overlay of these sites would enable development that could irretrievably alter the residential and historic amenity currently enjoyed in this area of Isthmus B. If the private plan change is accepted and the maximum development permitted by the HFHZ is constructed on site, this would represent a significant departure from the historic suburban context and would adversely impact on the quality of the special character overlay.

#### **Evaluation (h)**

- 4.15.** I agree with the pro forma that removing the special character overlay from places that are consistent with the identified values of the overlay area is inconsistent with the objectives and policies of the Regional Policy Statement (**RPS**), which require the maintenance and enhancement of character values in areas that reflect patterns of settlement, development, building style and/or streetscape quality over time.
- 4.16.** This area of the Isthmus B overlay (Eden-Epsom) was identified for inclusion in the Isthmus B Special Character Overlay because it reflects patterns of residential development that occurred during the late 19th and early 20th century in response to the provision and expansion of the tram network and improvements to roading. It retains a number of representative areas of historic houses that, together with associated patterns of urban development, collectively reflect important trends in New Zealand's residential architectural design (particularly the Garden Suburb concepts) and the spread of suburban residential areas in the Auckland region.
- 4.17.** The style of dwellings is diverse and the area includes examples of Victorian and Edwardian villas, Arts and Crafts influenced houses, Art Deco houses, English Cottage style dwellings and Californian bungalows. The overlay area also includes good examples of the cottage-style State



housing of the late 1930s and early 1940s, characteristically set well back on the lots and surrounded by unfenced lawns.

- 4.18.** Houses in this special character area are generally located on generous sections facing wide streets. Larger sections with wider road allowed for the development of private gardens and street tree planting which is a dominant aspect of these areas consistent with the Garden Suburb design ideals.

#### **Salmond Reed special character report**

- 4.19.** As discussed above, the pro forma submission was supported by three expert reports, including a special character report prepared by Jeremy Salmond of Salmond Reed Architects, Ltd.
- 4.20.** I also note that most of the issues raised in his report have already been discussed elsewhere in this report, and so I will limit this discussion to issues that have not been previously raised and to areas where our views differ. Mr Salmond and I are, for the most part, in agreement on the nature and extent of the impacts of the changes proposed in PC21.
- 4.21.** Mr Salmond raises the issue of cumulative effects, indicating that the impact of removing 149-153 Gillies Avenue is compounded by the earlier removal of two character buildings that were located on the current hospital site. (Mr Salmond indicates that the two building removed in 1995-96 were not identified character buildings, however I note that they were subject to a character control through the legacy Residential 2 zoning, which sought to “maintain the architectural and landscape qualities of those residential areas which display a special blend of built and natural features, generally involving period housing, coupled with the presence of trees”. When the AUP was drafted, this zone was carried forward as the Isthmus B overlay, which seeks to maintain the same values.)
- 4.22.** As discussed above, I agree that the proposed loss of another three identified character buildings would represent further erosion of character values in this character area. I note, however, that the Resource Management Act test for “cumulative effects” as interpreted through legal precedent, is extremely high. Therefore, I will leave determination of whether this proposal would result in a “cumulative effect” or a further erosion of values to the planner on behalf of Council, Panjama Ampanthong.
- 4.23.** Mr Salmond opposes the proposed zone change from Single House to HFHZ. As discussed in sections above, the effect of rezoning is difficult to measure without knowing how any proposed development would fit within its established character setting. I agree that the HFHZ is an enabling zone which could result in an adverse outcome for special character, however, the HFHZ does not prevent a positive outcome. Whether or not the outcome is positive or negative largely comes down to the design and landscaping response to the site and its surroundings.
- 4.24.** In my view, the proposed zone change could be supported if (and only if) the special character overlay was retained on the site. The overlay would help ensure that a good outcome was secured from an otherwise enabling zone.

#### **Submissions in opposition**

- 4.25.** This section addresses other issues raised in opposition to PC21 that were not specifically raised in the pro forma (or not specifically raised in relation to special character). Note that some of these issues were raised by submitters who also included pro forma in their submission.

**4.26.** Since many of these submitters raise similar issues, these submissions will be grouped together and discussed by theme. I have identified three major themes<sup>2</sup>:

1. Approval of PC21 would establish a precedent of removing the special character overlay for redevelopment to occur, which undermines the integrity of the AUP and makes all special character areas vulnerable to this precedent across the region.
2. The applicant provided inadequate justification for the removal of the overlay from this site from a special character perspective and provided no consideration of alternative options to removing the overlay, instead relying on mitigation.
3. Special character values will be diminished (both on the subject sites and within the wider area).

### **Evaluation (1)**

**4.27.** Although this issue is slightly speculative, I agree there is a fair point worth exploring. If the special character overlay is allowed to be removed from this area to make way for development associated with rezoning, then it sets a precedent that this could happen to any of the special character areas across Auckland. When the overlay is removed from sites or areas that are consistent with the identified values of the area it could send the message that character is expendable, that it can be removed without a robust consideration of its effects in relation to the Issues of Regional Significance identified in B1 of the AUP.

**4.28.** Removing the special character overlay from places that are consistent with the identified values of the place undermines the intent of the AUP and the purpose of this control. Areas are included in SCA because they have been through a public planning process during which their values have been established as warranting management. Removing the overlay from a place that warrants management, that has established value, undermines this process.

### **Evaluation (2)**

**4.29.** I agree with this submission point. The Lifescapes Ltd special character report agrees that 149-153 Gillies Avenue are consistent with the identified values of the overlay, but also considers that it is appropriate to remove the overlay from these sites. Thus far, the applicant has not supplied a justification for this reasoning *from a special character perspective*. The applicant has offered that hospitals serve a vital social function, which I do not doubt, however, that is not a consideration in relation to special character.

**4.30.** I also agree that the applicant has not fully considered options for maintaining and enhancing the character values of 149-153 Gillies Avenue. For example, could the houses be incorporated as part of a proposed expansion? Could they be relocated within their sites, closer to the street? Development could then occur behind them and they could be converted for hospital use. I note that the RPS supports adaptive re-use of buildings included in special character areas.

**4.31.** Although this matter will be considered through a resource consent, I also acknowledge the submitters who note that the practicalities of retaining historic landscape features have not been considered by the applicant. In addition to not offering a specific planning or legal mechanism to ensure their retention, there is no consideration of the effects, particularly on the stone walls, of

<sup>2</sup> I note that the proposed re-zoning is also a common theme, however, most of the support for or opposition to the proposed zoning is based in a planning argument, rather than special character. The primary exception is the pro forma, which is addressed above.

vibrations caused by construction work, which may include controlled blasting of the volcanic substrate.

### **Evaluation (3)**

**4.32.** I agree with this submission point that if PC21 is accepted and Southern Cross Ltd remove the three historic houses the identified character values will be diminished. If 149-153 Gillies Avenue are removed, then the character values of those three sites will be lost entirely, and the character of the wider area will be adversely affected as described above.

### **Submissions in partial support**

**4.33.** Of the three submissions that partially support PC21, only one raises issues relating to special character and heritage. Submission 161 (Heritage New Zealand Pouhere Taonga [HNZPT]), indicates that the application could be supported if “appropriate plan provisions are put into place to ensure protection of the heritage and special character features as identified in the application in perpetuity.”

**4.34.** HNZPT has indicated that “appropriate plan provisions” include:

- Including the character features in Schedule 14.1 and historic trees in Schedule 10; or
- Introduce a precinct plan over the area, which includes adequate heritage and character rules; or
- Include a site-specific development outline plan in the zone which outlines those heritage and character features which will remain protected

**4.35.** In addition, HNZPT recommends that an archaeological assessment be completed prior to works commencing to analyze the pre-1900 cultural landscape relation to the Owen’s farm, which underlies the current hospital and proposed development site. This assessment would allow the stone walls and any other archaeological remains to be recorded and protected.

### **Evaluation of submissions in partial support**

**4.36.** In my view, this submission is more appropriately categorised as being in opposition to the plan change. The submitter’s support is contingent on amendments that would render the proposed plan change impossible to action: full support is contingent on planning provisions being put in place to protect the character houses in perpetuity (and potentially at a higher level, such as Schedule 14.1), but the plan change envisages removing planning provisions from these places. The only way the applicant could amend the plan change to satisfy this submitter’s sought relief would be to withdraw the plan change. Therefore, this submission is essentially in opposition to the proposed plan change.

**4.37.** I agree with the submitter that if the special character overlay is removed, other options for recognising and managing the identified character values of the three houses should be explored by the applicant. The Lifescapes Ltd report is written from the perspective that both the removal of the special character overlay and the demolition of the houses is inevitable. I disagree that demolition is the only conceivable result that can follow removal of the overlay and that special character values must be lost entirely. I agree that alternatives should be considered, which may include, among others, introducing additional planning provisions to manage the existing character buildings.

**4.38.** While I also agree that an archaeological assessment of these sites is warranted, this sits outside the scope of the proposed plan change. Changing the zoning and removing the special character overlay do not, in and of themselves, adversely affect archaeology, however any proposed future

development might. Therefore, the issue of an archaeological assessment is more appropriately addressed through conditions placed on the future resource consent, including earthworks monitoring and an advice note on the Accidental Discovery Rule.

### **Further submissions**

**4.39.** A total of eight further submissions were received and four of these relate to special character.

- FS2 opposes the primary submission of Housing New Zealand (**HNZ**) on the grounds that:
  - HNZ supports removal of the special character overlay (I note that this is inaccurate. HNZ's submission is opposed to the removal of the overlay); and
  - HNZ supports, in principle, the rezoning of the three subject sites.
- FS3 opposes the primary submission of HNZPT on the grounds that retention of historic landscape features fails to appreciate the integrity and purpose of the special character overlay, and that retention of such features does not mitigate the impacts of the proposed zone.
- FS5 supports the pro forma submissions.
- FS8 partially supports a number of submitters who oppose PC21.

**4.40.** In my view, none of these points raise any new issues that have not already been addressed above in the evaluation of primary submissions, but rather serve to confirm support or opposition to the plan change.

## **5. CONCLUSIONS AND OVERALL RECOMMENDATION**

### **Areas of agreement**

- 5.1.** Based on the analysis above, there seems to be agreement among the applicant, the submitter and myself that 149-153 Gillies Avenue clearly demonstrate character values that are consistent with the identified values of the Isthmus B Special Character Overlay. There also seems to be general agreement that if these three places (as a whole) were lost, it would result in an adverse effect on special character values.
- 5.2.** In addition, I agree with the Lifescapes Ltd report that the effects of rezoning are difficult to quantify without knowing how the proposed development will respond to the existing environment; any number of designs could result in either positive or negative effects.
- 5.3.** I agree with the pro forma and submitters in opposition that the loss of 149-153 Gillies Avenue would represent an erosion of character values in this part of the character area. I also agree that removing the overlay from these sites could send the message that character can be removed without a robust consideration of its effects in relation to the Issues of Regional Significance identified in B1 of the AUP.
- 5.4.** I also agree with the pro forma and submitters in opposition that removing the special character overlay from places that are consistent with the values of the overlay, and which have been through several public processes to confirm that their values warrant management, undermines the intent of the AUP and does not provide for the sustainable management of natural and physical resources.

### **Areas of disagreement**

- 5.5.** Based on the above analysis, I disagree with the Lifescapes Ltd report that 151 and 153 Gillies Avenue are limited in their contribution to the character values of the area because of their partial

visibility and because this edge of the overlay area is too fractured to be considered a cohesive grouping.

- 5.6.** I also disagree that the effect of uplifting the character overlay from 149-153 Gillies Avenue would be limited to the landscape features, and would not result in erosion of character values in this area.
- 5.7.** I consider the Lifescapes Ltd report to be incomplete as it has not considered the impact of the potential loss of three further identified character buildings, in addition to the two removed in the 1990s. I also consider that the alternative approaches discussed in the report should be expanded to include options that incorporate the existing buildings within the proposed hospital development.
- 5.8.** I disagree with the pro forma and submitters in opposition that the HFHZ is fundamentally incompatible with the special character overlay. Overlays are not tied to land use, and the proposed zoning does not preclude a positive special character outcome.

## **Conclusions**

- 5.9.** Based on the analysis above, I have concluded that 149-153 Gillies Avenue have values that are consistent with the identified values of the Isthmus B Special Character Overlay. They have been through several planning processes to determine and confirm the nature, extent and management of the values. I consider that removing the overlay from places that are consistent with the values of the overlay is inconsistent with the AUP and does not provide for the sustainable management of natural and physical resources.
- 5.10.** If the overlay is uplifted from 149-153 Gillies Avenue and they are removed from site, the impact would be more than minor because the identified character values of the area would be eroded. This erosion would be compounded by the earlier loss of two other identified character buildings.
- 5.11.** I also consider that uplifting the overlay would adversely affect character values of the wider area by removing the opportunity to consider and mitigate effects both within and beyond the subject sites through a consenting process. This leaves the wider area reliant on the provisions of the proposed underlying zone, which only “encourages” and “allows for” a consideration of positive amenity outcomes. I do not consider this an adequate approach to manage identified character values, and neither do those who submitted to this plan change. I note that none of the 176 submissions (including those that partially support PC21) support uplifting the special character overlay from these sites.
- 5.12.** I consider that there are other options for maintaining and enhancing the character values of 149-153 Gillies Avenue that have yet to be fully explored, including the possibility of retaining and repurposing the existing character buildings as part of the proposed hospital extension, or redeveloping only 149 Gillies Avenue, which is not subject to the demolition control.
- 5.13.** The proposed rezoning and removal of the character overlay are somewhat abstract concepts that would enable adverse effects on special character, but which are not, fundamentally, adverse effects. I have arrived at a different recommendation for each of these proposals, however, because of the extent of the impact of what is enabled.
- 5.14.** Removal of the character overlay enables removal of the identified character buildings and landscape features, resulting in a very concrete outcome: the buildings are either removed or they are not, their character is retained or it is not, there is no in-between. Rezoning on the other hand, enables a large extension to the hospital which could result in an adverse effect on

character values, however, it could also result in a positive outcome including retention of the identified character buildings. For re-zoning, there is an “in-between”. The potential impact is more fluid because it relies on design, landscaping and the extent of which identified character buildings and values are maintained.

### **Recommendations**

- 5.15.** Based on my analysis and conclusions, I do not support removing the Special Character Overlay from 149-153 Gillies Avenue.
- 5.16.** If the special character overlay remains on 149-153 Gillies Avenue, I can support amending the zoning from Single House to HFHZ.
- 5.17.** If the special character overlay is removed from 149-153 Gillies Avenue, I do not support rezoning the site from Single House to HFHZ because this zoning would enable unchecked development of a size and scale that would be dominant and intrusive, and which would adversely impact the identified character values of this area.
- 5.18.** I further recommend that the applicant determine the legal or planning mechanism required to appropriately manage the landscape features it has offered to retain.



Rebecca Freeman, Senior Specialist Historic Heritage  
August 2019

**SOUTHERN CROSS HOSPITAL PRIVATE PLAN CHANGE 21:  
URBAN DESIGN REVIEW**

**To: Panjama Ampanthong  
Auckland Council**

**From: Trevor Mackie, Principal Planner  
Hill Young Cooper**

**Date: 22 July 2019**

**Subject: Private Plan Change Request - Southern  
Cross Hospital – Gillies Avenue and  
Brightside Road, Epsom**

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**1.0 INTRODUCTION**

1. The purpose of this report is to provide an urban design assessment of the proposed rezoning plan change, review the applicant's assessments in relation to urban design of the proposal, and review the urban design-related aspects of submissions.
2. The following information has been reviewed for the private plan change request:
  - Private plan change request Draft Urban Design Assessment Report
  - Private plan change request Assessment of Landscape and Visual Effects
  - Private plan change request Special Character Assessment
  - Private plan change request Bulk and Location Plans
  - Assessment of Effects In relation to a Private Plan Change Request, including section 32 assessment
  - Archimedia Private Plan Change report
  - Further information provided by the applicant
  - Two site visits
  - Auckland Council Geomaps databases
  - AUP(OP) zoning patterns and zone provisions; RPS; and Overlays
  - Submissions made on Plan Change 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

## **2.0 SUMMARY OF QUALIFICATIONS AND EXPERIENCE**

3. My name is Trevor Stewart Mackie. I hold degrees of Bachelor of Architecture and Bachelor of Town Planning. I have practised in town planning and resource management, and urban design for more than 25 years. At various stages there has been more planning and less urban design, including managing urban design and environmental planning policy at North Shore City Council for ten years. Much of my work in urban design is urban design planning, review of urban design of proposed developments and plans, and plan policy for urban design, structure planning, precincts, centre plans, Special Housing Areas, and the built environment.
4. For the Auckland Unitary Plan I prepared policy on various topics for Auckland Council, and evidence on special purpose – school and tertiary education facilities zones, local public viewshaft protection, significant infrastructure, height controls for business zones, and precincts.
5. As Urban Design Planner with North Shore City Council I prepared district plan policy and zones for the heritage character zones of Devonport, Northcote Point and Birkenhead Point, which were early versions of the current Special Character Area – Residential overlay in the AUP(OP), and historic heritage schedules and policy for the district plan.
6. I have been a Hearing Commissioner for Auckland Council since 2014, on planning and urban design in hearings for resource consents, plan changes and notices of requirement.

## **3.0 REVIEW OF URBAN DESIGN ASSESSMENT - EFFECTS ON THE ENVIRONMENT**

7. The proposed re-zoning is from Residential – Mixed Housing Suburban zone for the existing hospital, and Residential – Single House zone with a Special Character Area Overlay – Residential (SCAR) for the Gillies Avenue fronting properties and demolition controls for 151 and 153 Gillies Avenue, to Special Purpose – Healthcare Facility and Hospital zone (SP-HFH).
8. The applicant's urban design assessment and s32 report considered that there could be additional provisions such as a development plan or other mechanism for building footprint setbacks and to protect mature trees and the frontage stone walls on the site, however those are not part of the proposed plan change as notified. The SP-HFH zone allows hospitals as a permitted activity, as well as new building development which is more than 10 metres from the street boundary and which complies with the development standards.
9. There could conceivably be a new hospital developed on this site as a permitted activity and without the ability to address streetscape effects, trees and stone boundary walls. However, a development proposal may require resource consent for other matters, such as extent of earthworks, traffic and parking, and possibly construction noise and vibration. The sample building design is a parallel resource consent application (currently non-complying under the zone and overlay provisions) and has been designed to comply with the SP-HFH height, height in relation to boundary and yard standards, and with a 10 metre setback from the street boundaries.



10. The following section provides a review of the urban design assessment provided with the private plan change request, and urban design merits of the re-zoning with regard to urban design best practice, including the relevant provisions of the *NZ Urban Design Protocol*. The matters below have been considered as part of determining if the proposal is appropriate to its context; if it will enable development and activities that respond positively to the location, the site and its surroundings; and if it will contribute to a high quality and enduring neighbourhood. It is recognised that the land near to the site may also experience substantial change in the future, through re-development and intensification.

### **Urban form context**

11. The applicant's *Assessment of Landscape and Visual Effects* has parts dealing with the site and the landscape context and existing visual environment, but is primarily an assessment of the effects of the proposed building rather than the proposed zone provisions. Landscape and visual effects are relevant to urban design in relation to urban character and amenity; compatibility of building bulk and scale; and maintenance and enhancement of amenity values.
12. The applicant's *Design Statement and Permitted Development Plans* report also has a focus on the proposed building, but as well shows a hypothetical maximum design envelope under the SP-HFH zone provisions to contrast scale and bulk and shading.
13. The applicant's *Urban Design Assessment Report* builds on an earlier urban design analysis of the proposed building and addresses the proposed zone provisions. The report concludes that the SP-HFH zone is an appropriate zoning and mix of activities for the subject site, and from an urban design perspective, the consolidation of healthcare and hospital services around the existing hospital, on a regional arterial, easily accessed from the centre of Auckland by various modes of transport, and in an area that already includes a diverse mix of activities and buildings, has substantial merit. The special character areas of Auckland would be vulnerable to such an approach to urban form assessment.
14. At a big picture scale, Gillies Avenue is a primary corridor of Auckland, centrally located and highly accessible, with a varied mix of older character houses and schools and healthcare / medical facilities, and also many more intensive housing types. Its urban form mission will be to manage that mix of older houses, some on spacious treed sites, and intensification of residential development, schools and healthcare / medical facilities without losing the potential for both growth and character retention.
15. The Regional Policy Statement objectives include values of identified special character areas being protected from inappropriate subdivision, use and development, and that the character and amenity values of identified special character areas are maintained and enhanced.
16. These objectives and policies cascade down through the AUP(OP) to Residential – Single House zoning, Special Character Area Overlay – Residential (SCAR) provisions and demolition controls. This is a relatively fine-grained planning approach down to individual site level, and establishes urban design characters for identified areas of Auckland. These objectives are not changed by the private plan change request, but the efficient use of land for existing and expanded hospital facilities and the landowner's wish to use the land in that way is given greater weight in the application reports. The section 32 assessment in the *Assessment of Effects In relation to a Private Plan Change Request* states:

*“The objectives of the plan change are to enable the efficient operation and expansion of the existing hospital, while maintaining the effects on the adjacent residential amenity.”<sup>1</sup>*

### **Special Character Area Overlay – Residential (SCAR)**

17. The overall site is identified in the AUP(OP) as having special character over the parts at 149, 151 and 153 Gillies Avenue (Figure 5 below), with additional demolition controls on 151 and 153 Gillies Avenue (Figure 6 below).
18. From an urban design perspective historic heritage, older buildings and built environment elements, landscape values and amenity values are some of the factors that contribute to the character or amenity of a place. The existing buildings on the site, and the remnant stone walls, may not have been individually scheduled as historical heritage items, but will still be important contributing factors to the character or amenity of the special character area. In particular, this Isthmus B Mount Eden / Epsom SCAR has the key characteristics of late 19<sup>th</sup> century to 1940 genesis; detached one or two storey houses of varying scale, architectural form and character, setback sizes and boundary fencing; moderate to large sized lots with a range of subdivision densities; and variation in visual coherence.
19. The Gillies Avenue fronting lots are consistent with that character, including the stone walls, mature trees, large lot size and the buildings and setbacks on 151 and 153 Gillies Avenue. The houses on those two lots are consistent with the special character, but are largely screened from public view by the stone walls on the front boundaries and the mature trees in their front yards, which afford only glimpses of the houses from the street.

<sup>1</sup> P26 Assessment of Effects In relation to a Private Plan Change Request, SFH Consultants Ltd

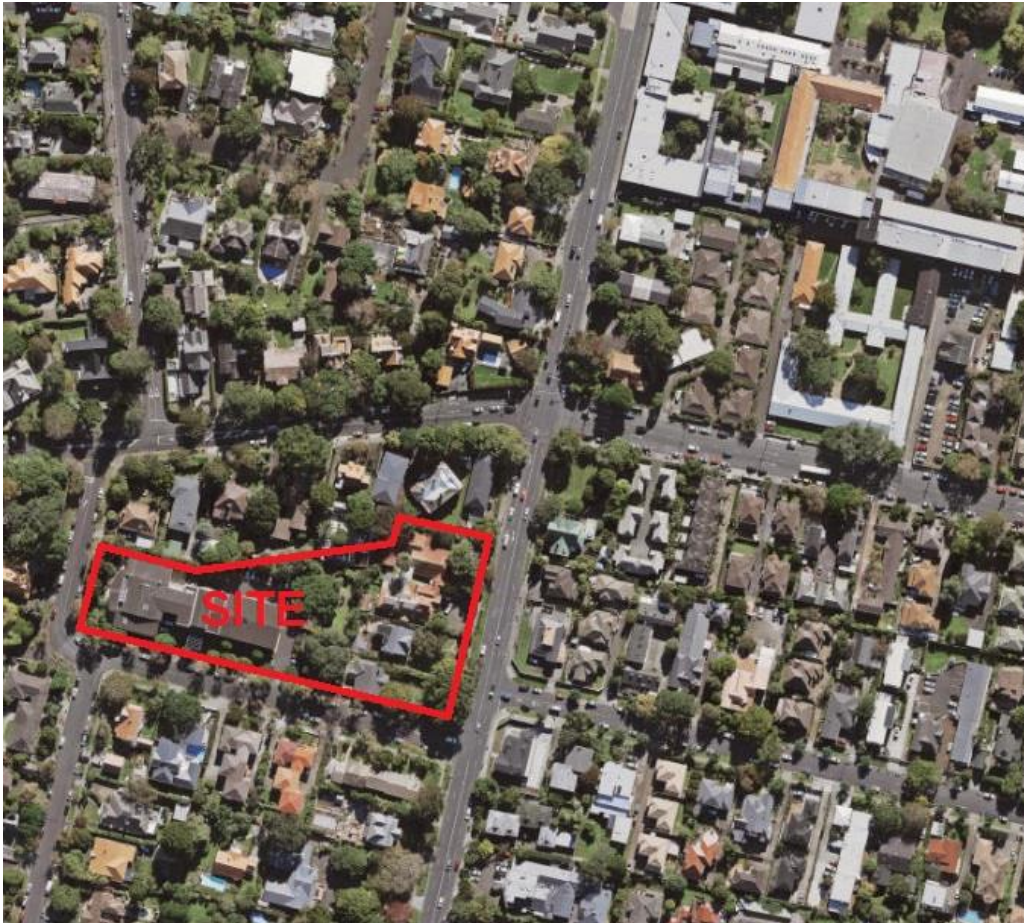


Figure 1 - Locality



Figure 2 - Indicative elevation to Gillies Avenue (resource consent application and zone design sample)

### Relationship to Neighbours

20. The *Archimedia Private Plan Change Report* and the *PPC Urban Design Assessment Report* propose the re-zoning, with supporting provisions for building footprint setbacks and retention of mature trees and stone walls, as fitting within the existing context of hospital and a varied character of Gillies Avenue within this central location, and protecting amenity of neighbouring properties.
21. The private plan change *Urban Design Assessment Report* describes the potential relationships with neighbours in some detail, including building bulk and location effects, overlooking and privacy, boundary treatments, effects of mature tree retention and changes in ground level. The *Archimedia Private Plan Change*

*Report* describes bulk and location effects, and potential shading which is minimised by the building being located mainly to the south of neighbouring properties.

22. The shading assessment uses a maximised bulk building allowed by the SP-HFH zone provisions. It should be noted that the trees on the site contribute substantial shading at certain times of the day and year. An alternative siting of a complying building could have more building mass closer to the northern boundary, and controlled by the height in relation to boundary rule. Set at 45°, the height in relation to boundary control is not a sun access control, particularly for morning and late afternoon when the sun is lower in the sky. Within the Residential – Single House zone the 2.5m and 45° height in relation to boundary control would allow an 8m high building 5.5m from the boundary.
23. In comparing Residential – Single House zone and SCAR with SP-HFH zone provisions the principal differences are as follows:
  - Building height increasing from 8m to 16m
  - Impervious area increasing from 40% to potentially 80%
  - Front Yard changing from average of neighbouring properties to 3m
  - Side yard increasing from 1m to 3m
  - A hospital activity and its building would be a permitted activity if 10m back from the street boundary.
24. Practically, the differences may not be as noticeable from neighbouring properties, if the higher parts of the building are set back from the boundaries, impervious areas include open car-parking at ground level, and the retention of mature trees (and the notable tree on 147 Gillies Avenue) would keep the site open and spacious. Visual building bulk dominance and overlooking / loss of privacy could be significant adverse effects in relation to 32A Owens Road, depending on any mitigation provided by trees and the building design. The loss of special character will be very noticeable when the houses are removed, and again when the new building is constructed.
25. The *Urban Design Assessment Report* concludes that the height in relation to boundary, height and yard controls will ensure residential amenity is maintained on adjoining sites consistent with other SP-HFH zoned sites that have residential adjoining. It also concludes that the Terraced Housing and Apartment Building and Mixed Use zones have similar visual dominance and shading effects, so can be considered reasonable in the context of the wider planning framework. I consider that those AUP(OP) boundary effect provisions were created to authorise a level of effect as reasonable within an intensifying city context, and not to say that there is only a minor or no adverse effect.
26. Visual and amenity effects on neighbours could be significantly more adverse if the mature trees are not retained, particularly those along the northern boundary of the site. The applicant's assessments, including the visual simulations, rely heavily on the trees to mitigate effects on the neighbours to the north. The effects include visual bulk dominance, overlooking and loss of privacy. Some of the mature trees on the existing Brightside Hospital site may be protected by landscape plan condition on the earlier consent, however the submissions identify that some trees have been removed from the site southern frontage. Stephen Brown's *Review of Visual & Amenity Effects* addresses the potential loss of trees, and the reliance on them for mitigating effects on neighbours.

27. I understand local residents objected to and appealed against the existing Brightside Hospital development. The submissions process for the Private Plan Change has provided information about current concerns, for urban design including area special character, proposed building intensity and height, bulk and location, and visual dominance and loss of privacy. Other concerns have also been raised, not directly related to urban design, such as construction noise and traffic effects, operational parking and traffic.

### **Location and Context**

28. Gillies Avenue is a highly accessible corridor within Auckland, with good access to public transport and the motorway. The site has easy access from the arterial road, particularly for private vehicular use for patients and visitors, who typically arrive by car or taxi. Its character and context, and identity, include a number of schools and medical / healthcare facilities, with their varied and often intensive built character. In that sense the general location supports the appropriateness of the SP-HFH zoning, if the site had no other important values.
29. The AUP(OP) applied the SP-HFH zone to existing healthcare facilities and hospitals, particularly those of a larger area and including some within a residential neighbourhood context. The zone was not applied to the Southern Cross Hospital sites at Brightside Road, 160 Gillies Avenue, Wairau Road in Glenfield, and St Marks Road. I consider that it would be an appropriate zone for the existing Brightside Hospital site only if building scale and boundary effects could be managed.
30. Connectivity is vital to an urban residential community, and is one of the seven essential design principles that create quality urban design (*NZ Urban Design Protocol*). The proposed site potentially has good connectivity, through its three street frontages and the transport network more broadly. The street address and main entrance may become Gillies Avenue, according to the development proposal, fitting the more intensive use of the site and its corridor location. The other street frontages will also allow for vehicle access and servicing. At a higher level the location is well-connected in transport terms, and will have a regional rather than local patient and visitor catchment.
31. The *Urban Design Assessment Report* concludes that the provisions of the SP-HFH zone are sufficient to manage potential amenity effects on the streetscape, either by a restricted discretionary activity resource consent if the building is within 10 metres of a street frontage, or by frontage space sufficient for mature tree retention and additional screening landscaping if the building is 10 metres or more from the front boundary. If the building is more than 10 metres from the front boundary then resource consent is not required, and there would be no zone provision requiring mature tree retention or additional landscaping.
32. To be fair the *Urban Design Assessment Report* and *Special Character Assessment* do recommend that the plan change include a mechanism for retention of mature trees, such as a development control plan, to ensure that the site has more than the standard set of SP-HFH rules. In my opinion there would be a significant adverse effect on streetscape, and loss of height and bulk mitigation, if the unprotected trees on the Gillies Avenue properties were removed.

33. Landscape context and visual impact, including Mt Eden Maungawhau and the volcanic cone sightlines, local treescape and streetscape are also covered in Stephen Brown's separate landscape and visual assessment.

### Choice

34. The proposed rezoning is from Residential – Mixed Housing Suburban for the existing hospital, and Residential – Single House zone with a SCAR overlay for the Gillies Avenue fronting properties and demolition controls for 151 and 153 Gillies Avenue, to SP-HFH potentially with additional provisions for building footprint and retention of mature trees and stone frontage walls. In urban design terms the issue of choice is about ensuring a city has all of the facilities it requires, and a broad range of types and scales of residential, business and recreational development. It is not necessarily intended to support choosing to expand an existing intensive healthcare facility onto land which has been determined to have special character to be maintained and enhanced.
35. Choice also involves enabling people and communities of the Auckland region to manage Auckland's natural and physical resources while enabling growth and development and protecting the things people and communities value. In this case there are parts of the area or site where protection of values does not support a change of zoning or removal of the SCAR overlay and demolition controls, being 151 and 153 Gillies Avenue. There are also parts where change and intensification of healthcare and hospital facilities can reasonably be accommodated within the Brightside Road and Gillies Avenue urban fabric, being 149 Gillies Avenue and the existing hospital site in Brightside Road.
36. The *Archimedia Southern Cross Private Plan Change Report* does not recognise the houses at 151 and 153 Gillies Avenue as being either 'Constraints' or 'Opportunities' in its (architectural) site analysis.

### Character

37. The character of Gillies Avenue is a highly varied mix of uses and building types, scale and special residential character, supported in this area for the most part by mature trees and substantial boundary walls, many of them stone walls. There is not a homogeneous character to the whole of Gillies Avenue and its surrounding street network. The applicant's *Assessment of Landscape and Visual Effects (and further information)* and *Urban Design Assessment Report* both refer to a context of other large non-residential developments located along Gillies Avenue. However, they do not recognise the nuanced character of different parts of Gillies Avenue, and in particular the predominance of the Special Character Area – Residential, Residential – Single House and Residential - Mixed Housing Suburban type character on the western side around the site, and which is reflected in the current zoning pattern and SCAR overlay. This can be distinguished from the more intensively zoned and developed land to the east and further towards Newmarket. The applicant's assessments depict an overall mixed development area, which would set a low sensitivity to visual and activity change.
38. The building proposals shown for the hospital expansion are for a resource consent application, which includes retention of mature trees and the frontage stone walls, as well as substantial front and side yard setbacks. The *Archimedia Private Plan Change Report* also demonstrates an example maximum building mass which could occur under the SP-HFH zone provisions, but which still has greater setbacks than required from Gillies Avenue and the northern boundary. Hospital development can be a permitted activity if no part is within 10 metres of

a road boundary. A development under the SP-HFH zone provisions could look quite different to the building form proposed for resource consent.

39. The *Urban Design Assessment Report* does not fully address the special character effects of the proposed zone change, and if the zoning is to be changed the alternative techniques for retaining and protecting that special character. However, that is addressed in some detail in the *Private Plan Change Request Special Character Assessment*. In particular, the option of an encumbrance on the property is proposed there as a means of protecting and retaining mature trees on the site and the stone walls along the street boundaries.
40. These two types of features offer the most visible contribution to special character, with the older houses relatively discreet in the background and screened by the walls and hedge and mature trees (151 and 153 Gillies Avenue) or so substantially altered as to not contribute beyond scale and setting. This protective mechanism would be outside the AUP(OP), and allow a simpler plan treatment as a Healthcare Facilities and Hospital zoned site, consistent with the plan treatment of other such sites. Some hospitals have the SP-HFH zone modified by a height control variation, which identifies parts of the sites able to accommodate taller buildings. Other healthcare facilities and hospitals within or adjacent to residential zones may have conditions on their establishing resource consents, managing boundary effects, vegetation and landscaping, and parking and access.
41. An inevitable outcome of the plan change involves the removal of the existing houses from 151 and 153 Gillies Avenue, as foreshadowed by the proposed building design and the resource consent application. The proposal is in parts inconsistent with the relevant statutory provisions of the Regional Policy Statement, existing zoning and SCAR overlay, including the objectives and policies of the AUP(OP). In particular, the existing houses at 151 and 153 Gillies Avenue contribute to the special character values of the area, not only in their stone walls, mature trees and larger lot sizes, but also in the buildings themselves. They only have limited visibility from the street (streetscape) through the gateway openings in the walls and with their rooflines and upper storey above the walls, but do have a presence and are fully consistent with the identified special character.
42. The proposed resource consent and private plan change have the potential to set a precedent for the removal of buildings on sites subject to (SCAR) demolition rules simply due to the existing building being of low visual prominence, and where more intensive use of the site is desired by the owner. A more efficient use of the site land resource, that is intensification of activity and buildings, is directly opposed to the protective intentions of the existing Residential - Single House zone and SCAR, with existing buildings and their special character, densities and spaciousness of lot sizes and setbacks intended to be maintained.





**Figure 3 – Corner of Brightside Road and Gillies Avenue, with house at 153 Gillies Avenue behind wall and hedge**



**Figure 4 – Driveway entrance to 153 Gillies Avenue, with house at 151 Gillies Avenue visible on adjacent site**

43. The *PPC Special Character Assessment*, in concluding comment, raises the issue of balancing the objectives of the SCAR and the SP-HFH zone, in favour of the interlinked physical, social, economic and cultural associations and needs that evolve and change. The community service roles of the Awanui (later Brightside) hospital and the hostel accommodation at 149 Gillies Avenue are examples of this, and are portrayed as part of the special character as much as the physical fabric.

44. In urban design terms, I consider that the overall site could meet the objectives of both the SCAR for 151 and 153 Gillies Avenue (retaining the houses), and by re-design the SP-HFH zone for the remainder of the amalgamated site, and fit into the Gillies Avenue character. On an environmental effects basis, there is no strong justification for cumulatively replacing the older special character parts with more intensive consolidated healthcare facilities and only retaining remnant stone walls and some of the mature trees.



### **Crime Prevention Through Environmental Design (CPTED)**

45. The Private plan change *Urban Design Assessment Report* identifies that:  
“good urban design outcomes for public buildings, like healthcare and hospital facilities, will typically not include solid wall fencing over 1m in height and visual surveillance of the street from ground floors, along with low planting and/or fencing is usually preferred in contemporary developments. However, there is also urban design merit in maintaining some of the existing character features where they can complement healthcare and hospital facilities, in particular due to privacy to patients and medical activities by the stone walls and majestic nature of the mature trees that provides significant visual amenity to both the users of the hospital, and the wider community.”
46. I agree with that assessment, and note that upper floors of the proposed building will also provide some limited outlook over the streets.
47. The main entrance to the site is proposed from Gillies Avenue in the building proposal, which would provide a good street address and direct connection to the principal street frontage. The proposed zone change does not require vehicle access to Gillies Avenue. The development proposal includes transparent building linkages between the existing hospital and the new building on the Gillies Avenue sites, giving good visibility into and through the site. A resource consent would not necessarily be required for a new hospital building if it is set back 10 metres from the street frontage, and then would not provide an opportunity for CPTED and streetscape urban design assessment.

### **4.0 CONSISTENCY WITH DIRECTION AND FRAMEWORK OF AUP(OP)**

48. The strategic direction of the AUP(OP), relative to urban design, is mainly found in *B2 Urban Growth and Form*. It includes a quality compact urban form, development capacity and a quality built environment. Objectives seek the maintenance and enhancement of the quality of the environment, both natural and built. Efficiency of land use, consolidation of healthcare facilities and hospitals, and the central location and corridor accessibility would be supported by the Urban Growth and Form strategic direction. The proposed re-zoning is not inconsistent with those parts of the strategic direction, but to the extent that the contribution of special character to the quality of the environment would be undermined, and there would potentially be amenity effects on residential neighbours.
49. *B5. Ngā rawa tuku iho me te āhua – Historic heritage and special character* includes issues and objectives of identifying special character areas and protecting them from inappropriate subdivision, use and development. The character and amenity values of identified special character areas are to be maintained and enhanced. This has resulted in the lower levels of the AUP(OP) in the zoning of the Gillies Avenue properties as Residential – Single House with the Special Character Area Overlay – Residential (SCAR) and the demolition controls on 151 and 153 Gillies Avenue.
50. The objectives and policies of the SP-HFH zone are:
- The efficient operation and development of hospitals and healthcare facilities to support the community’s healthcare needs is enabled.
  - A comprehensive range of hospital and healthcare activities, buildings and infrastructure, and accessory buildings and activities are provided for.

- The adverse effects of hospital and healthcare activities, buildings and infrastructure, and accessory buildings and activities on adjacent areas are avoided, remedied or mitigated.
51. The SP-HFH zone is an enabling zone, mainly aimed at existing healthcare facilities and hospitals, and includes direction to manage adverse effects on adjacent areas. The urban design relevance of the zone provisions is in the larger scale and intensity of buildings permitted, a recognition that there may be more sensitive areas adjacent, such as residential or open space, and an effects management approach at the site boundaries.
  52. The SP-HFH zone provisions authorise a greater level of adverse effect on adjacent residential properties than would be considered acceptable within the residential zone, in the same way that Residential - Terraced Housing and Apartment Building, Business – Town Centre, Mixed Use and Light Industry zones have a greater level of adverse effect where adjacent to lower density residential zones. The height in relation to boundary control is partly protective, but there will be greater levels of adverse effects of height and bulk dominance, and potentially overlooking and reduced privacy, although considered acceptable by the permitted activity standard settings at a zone and intensity interface.
  53. Gillies Avenue is in parts a representative example of the juxtaposition of older residential development with newer and more intensive institutional facilities such as schools and healthcare / medical. There is also an intervening layer of more intensive residential re-development, such as boarding houses, flats and apartment buildings. On the question of whether the SP-HFH zone controls (height, height in relation to boundary and yard setbacks) would be robust and efficient in addressing privacy and overlooking issues on adjoining residential properties, it must be acknowledged that the AUP(OP) has deemed those controls to meet the s32 requirements if the zoning is applied within a residential context. However, the AUP(OP) does not require that all healthcare facilities and hospital sites be zoned SP-HFH, and many do not have that zoning. The zone may be inappropriate where there will likely be significant boundary effect issues, or where the site is not large enough to internalise those effects.
  54. The height limit in the SP-HFH zone is 16m (permitted activity standard) and up to 25m as a restricted discretionary activity. There are no matters of discretion listed in the SP-HFH zone provisions for building height exceeding 16m, so it is presumably treated as a restricted discretionary infringement of the permitted height standard.
  55. There is also no purpose stated for the height standard within this zone, so the assessment would be made in relation to objectives and policies and the effects of the additional height. The volcanic cone viewshaft applies a height limit of 12.5 – 13m over much of the western part of the existing hospital site. The existing 2 – 3 storey hospital building is compatible with the heights of surrounding residential development. At 16m height the building would largely not be compatible with the existing neighbourhood scale and form, although some mitigation would be provided by mature trees on the site and on adjacent sites. There are other buildings on and around Gillies Avenue which are of up to 16m or greater height, but not in the immediate vicinity of the site. A building between 16 and 25m in height, that is five to seven storey, would be significantly out of scale with the existing and zoned neighbourhood.
  56. The AUP(OP) has created some substantial scale changes at zone boundaries, where residential intensity is increased or the zone changes from residential to

business. Those scale changes involve a stepping of height while applying the lower intensity height in relation to boundary rule to properties flanking the zone boundary. Auckland will see more of these abrupt height transitions with apartment buildings and intensification at the periphery of the business zones.

57. The SP-HFH zone allows greater height for larger sites, which are more capable of internalising the effects of building height. Retirement villages in residential zones commonly seek greater height for parts of the buildings that are located further from residential boundaries. The Special Purpose – School zone has a 12 or 16m height limit, depending on whether the building is less or more than 20m from residential boundaries. In my opinion the subject site and the surrounding neighbourhood character could not comfortably accommodate the scale effects of buildings taller than 16m, unless the site was significantly larger and able to transition from 2 – 3 storey at the periphery up to taller parts in the centre of the site.

58. The objectives and policies of the Residential – Mixed Housing Suburban zone (the existing hospital site and land to the North of the site) are for:

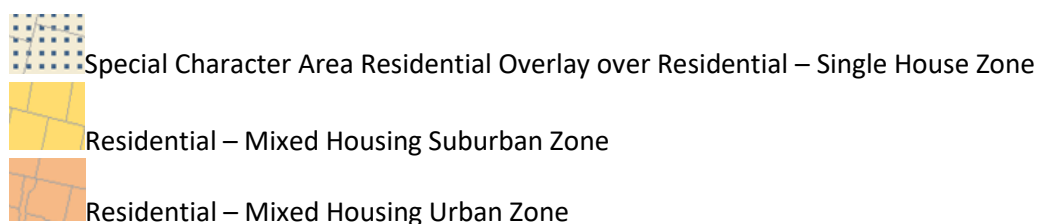
- Increased housing capacity, intensity and choice
- A neighbourhood planned suburban built character
- Quality on-site amenity for residents and adjoining sites and the street
- Amenity-compatible non-residential activities to be enabled.

This zone enables the residential development that exists in the area, and is not inconsistent with the existing hospital development.

59. The objectives and policies of the Residential – Single House zone are:

- Development maintains and is in keeping with the amenity values of established residential neighbourhoods including those based on special character informed by the past, spacious sites with some large trees, or other factors such as established neighbourhood character.
- Development is in keeping with the neighbourhood's existing or planned suburban built character of predominantly one to two storeys buildings.
- Development provides quality on-site residential amenity for residents and for adjoining sites and the street.
- Non-residential activities provide for the community's social, economic and cultural well-being, while being in keeping with the scale and intensity of development anticipated by the zone so as to contribute to the amenity of the neighbourhood.

60. The zone enables non-residential activity, but is relatively protective in terms of residential density, character and residential amenity. It facilitates the maintenance and enhancement of existing built character, site settings and subdivision patterns. These contribute to the urban design character of the area. In some parts they also have a SCAR Overlay and some sites have demolition controls, to reinforce special character.



**Figure 5 - Existing Zoning and Special Character Area Residential Overlay**

61. The objectives and policies of the SCAR overlay are (paraphrased):
- The special character values of the area, as identified in the special character area statement are maintained and enhanced
  - The physical attributes that define, contribute to, or support the special character of the area are retained, including:
    - a) built form, design and architectural values of buildings and their contexts;
    - b) streetscape qualities and cohesiveness, including historical form of subdivision and patterns of streets and roads; and
    - c) the relationship of built form to landscape qualities and/or natural features including topography, vegetation, trees, and open spaces.
  - The adverse effects of subdivision, use and development on the identified special character values of the area are avoided, remedied or mitigated.
  - Require all development and redevelopment to have regard and respond positively to the identified special character values and context of the area as identified in the special character area statement.
  - Maintain and enhance the built form, design and architectural values of the buildings and the area, as identified in the special character area statement, so that new buildings, alterations and additions to existing buildings, infrastructure and subdivision maintain the continuity or coherence of the identified special character values of the area; streetscape qualities and cohesiveness; design, scale, height, setback and massing of existing development, any distinctive pattern of subdivision, intensity of development,

its relationship to the street, streetscape cohesiveness and is of a compatible form which contributes to the identified special character values of the area; relationship of built form to open space and landscape context; setting of the special character area; built fabric and maintenance and repair;

- Discourage the removal or substantial demolition of buildings that contribute to the continuity or coherence of the special character area as identified in the special character area statement.
- Require any application for demolition or removal of a building in a special character area to demonstrate that the loss of the building would not erode the identified special character values of the area or disrupt the cohesiveness of the streetscape and wider special character area.
- Encourage the on-going use and maintenance of buildings in special character areas.
- Manage the design and location of car parking, garaging and accessory buildings to maintain and enhance the streetscape and special character values of the area, as identified in the special character statement.
- Encourage the retention of special features such as boundary walls, fences, paths and plantings that contribute to the character of the area.

62. SCAR facilitates the maintenance and enhancement of identified special character of the built environment, and establishes a framework for urban design that responds to the values of the area and each site.

63. Special character is in my opinion the dominant contribution to urban design setting and development patterns in this neighbourhood. I disagree with the extent to which the loss of special character houses at 151 and 153 Gillies Avenue does not constitute a significant effect because they are not highly visible from the street, and whether special character effects would be mitigated by the retention of the stone frontage walls and mature trees alone.



Figure 6 Sites at 151 and 153 Gillies Avenue with demolition control

## 5.0 SUBMISSIONS ON THE PROPOSED PLAN CHANGE

64. Submissions on the proposed plan change have raised a number of urban design issues, which are addressed in the above sections. They include:
- Appropriateness of the SP-HFH zone for this site
  - Urban form and urban design outcomes depicted by the operative land use zone pattern
  - Incompatibility of built form in neighbourhood
  - Height and bulk dominance, overlooking and loss of privacy, shading effects on adjacent residential amenity
  - Streetscape effect
  - Scheduled notable and unscheduled mature tree contribution to character and building height mitigation
  - Loss of special character houses, cumulative loss of older and character houses
  - Change from residential to commercial character
  - Inconsistency with RPS built character issue of regional significance, and urban growth and form
  - Undermines special character of the neighbourhood and the special character parts of the AUP(OP) – integrity of the plan
  - Rezoning a signal for commercial development to challenge special character areas.

## 6.0 CONCLUSION AND RECOMMENDATIONS

65. Special character is in my opinion the dominant contribution to urban design setting and development patterns in this neighbourhood. The loss of special character houses at 151 and 153 Gillies Avenue would be a significant adverse effect even though they are not highly visible from the street, and special character effects would not be mitigated by the retention of the stone frontage walls and mature trees alone.
66. Construction of a building of the scale proposed will also significantly and adversely diminish the special character which the SCAR overlay seeks to preserve. Retention of mature trees on the site would be essential if larger buildings are to occur, particularly along the street frontages and the northern boundary.
67. The s.32 justification for the zone change, and the s.32AA evaluation if the proposal is changed, would need to be undertaken or adopted by the decision-makers on the private plan change. It would need to examine how the proposed Plan Change objective and the zone change is consistent with the existing relevant AUP(OP) objectives and policies. These include the RPS objectives and policies down to the Single House zone and SCAR overlay and demolition controls that currently apply to the site.
68. If the zone and provisions are changed then there will need to be a redirection of that cascade, giving greater weight to the efficiency of compact city land use for the social and economic benefits of a hospital. Such a redirection would in my view undermine the plan approach to special residential character, and lead to a cumulative vulnerability of Special Character Areas – Residential to replacement by more intensive non-residential development. The special character provisions provide a defined and protective urban design pattern to the area.

69. The private plan change request is consistent with the direction and framework of the AUP(OP), only to the extent that it would allow for growth and intensification, consolidation of hospital facilities and fit the whole of Gillies Avenue mixed character corridor setting if not that of the immediate vicinity of the site.
70. The applicant's assessments, in landscape and visual effects, architecture and urban design, have not been of a 'worst case' outcome of possible permitted activity development under the SP-HFH provisions and with the SCAR deleted. The sample proposed building development would have moderate to severe adverse effects of visual bulk dominance and loss of privacy to the adjacent properties to the north, depending on tree retention and building developed design.
71. In my opinion, the SP-HFH zone is not necessarily appropriate for all healthcare facilities and hospitals, and is more suited to larger sites which have existing intensive development.
72. Overall, and on the basis of the review of application documents and the submissions, and this assessment, Proposed Plan Change 21 (Private) would undermine the Special Character Area – Residential character and identity, and the Special Character Area – Residential provisions of the AUP(OP), which provide and protect the urban design setting of the area. SP-HFH zone provisions would also allow moderate to severe amenity effects on adjacent residential properties. It is recommended that the Plan Change application be declined.

Trevor Mackie  
BTP BArch(Hons)  
Principal Planner  
Hill Young Cooper

## Panjama Ampanthong

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**From:** Trevor Mackie <t.mackie@hyc.co.nz>  
**Sent:** Tuesday, 17 September 2019 4:09 PM  
**To:** Panjama Ampanthong; Stephen Brown  
**Subject:** RE: Private Plan Change 21 - Southern Cross Hospitals

Hi Panjama,

I can confirm that the urban design concerns in relation to urban design character, bulk dominance and visual/landscape amenity of development could be addressed if the SCAR Overlay provisions and the demolition controls apply to the subject site. Stephen Brown may have a different opinion in relation to visual/landscape effects. I note that the applicant considered this option in 5.3.2.1 *Other Reasonably Practicable Options* of the application AEE, and concluded that it would only be practicable if the existing dwellings could be incorporated into the hospital development and development controls generally compiled with. The applicant determined that, as this is not feasible at this site, they did not consider the retention of the SCAR Overlay further. The Mercy Hospital site in Mountain Road, zoned SP-HFH, includes a number of SCAR Overlay sites with older houses converted or re-developed for hospital purposes.

In my Urban Design Review of the proposed plan change, I provided the following opinions:

44. *In urban design terms, I consider that the overall site could meet the objectives of both the SCAR for 151 and 153 Gillies Avenue (retaining the houses), and by re-design the SP-HFH zone for the remainder of the amalgamated site, and fit into the Gillies Avenue character. On an environmental effects basis, there is no strong justification for cumulatively replacing the older special character parts with more intensive consolidated healthcare facilities and only retaining remnant stone walls and some of the mature trees.*

65. *Special character is in my opinion the dominant contribution to urban design setting and development patterns in this neighbourhood. The loss of special character houses at 151 and 153 Gillies Avenue would be a significant adverse effect even though they are not highly visible from the street, and special character effects would not be mitigated by the retention of the stone frontage walls and mature trees alone.*

In urban design terms, the physical setting and development patterns, and the area special character could be maintained with the retention of the SCAR overlay and with the demolition control over 151 and 153 Gillies Avenue.

I note that the demolition control does not apply to 149 Gillies Avenue, and demolition of that building is a permitted activity. The SCAR overlay would influence the form and design of a new building at 149 Gillies Avenue, and is capable of addressing the incompatibility of built form, and protecting the amenity of residential properties to the north and west as well as streetscape amenity. That is, the concerns in relation to bulk dominance and visual/landscape amenity could be addressed if the SCAR Overlay provisions remain over the 149, 151 and 153 Gillies Avenue parts of the subject site.

The existing mature trees and the stone boundary walls are not currently protected, but also contribute strongly to the urban design character. They would also assist in addressing concerns in relation to bulk dominance and visual/landscape and streetscape amenity if their retention can be assured.

Re-zoning the subject site from Residential – Single House to Special Purpose – Healthcare Facility and Hospital would facilitate redevelopment and expansion of the existing Brightside Hospital. It would also allow a change of use for the existing houses at 151 and 153 Gillies Avenue as hospital facilities, including possibly adaptation and some enlargement of the existing house buildings, and repurposing of their grounds for landscaping and parking. The SCAR Overlay would manage physical, character and visual effects from use and development of 149, 151 and 153 Gillies Avenue.



I would anticipate a greater intensity of activity, development and effects from further development on the existing Brightside Hospital site, if that part of the plan change site is re-zoned SP-HFH. Those effects could potentially include bulk dominance, overlooking and adverse visual/landscape amenity effects on some of the Owens Road residential properties, depending on building design and retention of boundary trees as well as the currently protected trees. I consider that those adverse effects could be low to moderate, at a level that is contemplated by the SP-HFH zone provisions. The hypothetical building designs, used to demonstrate bulk and shading effects of development in the application documents, did not include maximising development in the northern part of the existing Brightside Hospital site. The current Residential – Mixed Housing Suburban zone allows less intensive activity on that site, with the existing Brightside Hospital having been established by way of resource consent rather than enabling zone provisions.

Regards,

Trevor Mackie  
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*IMPORTANT - This email and any attachments may be confidential. If received in error, please contact us and*

Brown NZ Ltd  
P O Box 91370  
Victoria St West  
Auckland 1142

**TO:** Panjama Ampanthong | Principal Planner  
Plans and Places  
Auckland Council

**FROM:** Stephen Brown

**DATE:** 22 July 2019

**Re: SOUTHERN CROSS PRIVATE PLAN CHANGE 21: REVIEW OF VISUAL  
& AMENITY EFFECTS**

**SUMMARY OF QUALIFICATIONS AND EXPERIENCE**

1. My name is Stephen Kenneth Brown. I hold a Bachelor of Town Planning degree and a post-graduate Diploma of Landscape Architecture. I am a Fellow and past President of the NZ Institute of Landscape Architects (**NZILA**), and have practised as a landscape architect for 37 years.
  
2. During that period, the great majority of my professional practice has focussed on landscape assessment and planning. I have undertaken strategic studies aimed at evaluating and describing the landscape, natural character and amenity values of territorial areas ranging from the Auckland Region (in 1982-4 and 2002-8) and the Thames Coromandel Peninsula (2008 & 2014-15) to the entire West Coast of the South Island (2012-14) and Hong Kong and its territories (2006). Throughout most of 2015 and 2016 I provided evidence at the Auckland Unitary Plan hearings, supporting Auckland Council in relation to both regional policy statement and district plan provisions about such matters as:
  - Volcanic Viewshafts and Height Sensitive Areas;
  - Outstanding Natural Landscapes;
  - Areas of Outstanding and High Natural Character;
  - Rural Amenity;
  - Rural Urban Boundaries; and
  - Precincts and Re-zoning.

3. In addition, I have previously been involved with a wide range of development projects, including:
  - The Queens Wharf 'Dolphin' Application – for Panuku Development Auckland;
  - The Waterview Connection Project and 'lifting' of the Northwestern Motorway (SH16) – for NZTA;
  - The Launch Bay Precinct, Hobsonville Point (10 apartment buildings & other residential development) – for Winton Partners;
  - The Remarkables Station Gondola project – for the Porter Group Ltd;
  - The East-West Link & Northern Corridor Improvements – for Auckland Council;
  - The Hagley Park Cricket Oval – for Christchurch City Council;
  - Marsden Point port development & subsequent wharf iterations – for Northport;
  - Eden Park Rugby World Cup Redevelopment – for the Eden Park Redevelopment Board;
  - The Waitemata Harbour Crossings Options Study – for Opus & NZTA; and
  - The Channel Tunnel Rail Corridor Options – for Travis Morgan PLC & the UK Department of Transport.
  
4. Of some relevance to the subject application, I was involved in the resource consent application By Southern Cross Hospitals Ltd for the current hospital at 3 Brightside Road in 1995 -6.

## **INTRODUCTION**

### **Involvement With the Proposal**

5. In February, I undertook a preliminary appraisal of the Plan Change 21 proposal as part of Council's review for further information (under clause 23(1) of Schedule 1 of the RMA). Since then, I have been involved with reviewing the applicant's response to that request and I have also replied to matters raised by local submitters. Those matters are detailed in Section 3.1 of this report. I have visited the (Plan Change) application site and its surrounds on numerous occasions and this report reflects my assessment of the visual and amenity effects that the application would give rise to.

### **Purpose of This Report**

6. This report addresses the following matters:
  - a) The technical proficiency and adequacy of LA4's assessment of visual effects in relation to the Plan Change proposal, including any 'gaps' that remain in terms of that assessment;

- b) My assessment of the proposal with regard to relevant objectives and policies, and effects;
- c) Key areas of agreement and disagreement; and
- d) My conclusions and recommendation.

## **REVIEW OF THE ASSESSMENT UNDERTAKEN BY LA4**

### **Response to Additional Information Provided By Applicant**

- 7. My review for further information (clause 23(1)) of the Plan Change application culminated in a request for the following information to be following additional material should be provided to assist with more accurate interpretation of the revised scheme's effects:
  - 1. *Clarification of whether or not the H25 provisions include compliance with the Volcanic Sightline overlay control;*
  - 2. *Clarification as to whether or not the latest set of photo simulations show this control applied to the building envelopes shown for Viewpoints 1-11;*
  - 3. *Explanation of how amenity values in respect of section 7(c) of the Act have been interpreted and applied to the evaluation of effects by LA4;*
  - 4. *Further explanation of how some high levels of visual effect translate into lower levels of amenity effect (as, for example, with Viewpoint 1);*
  - 5. *Further analysis of effects in relation to Viewpoint 2, given the quite limited scope of the photo and simulation prepared for that vantage point;*
  - 6. *Further explanation of the amenity effects that would be experienced by local residents, as opposed to the more transient exposure and effects associated with the motoring public cyclists, etc;*
  - 7. *Further analysis and/or graphic depiction (via photos, etc) of the effects that would be experienced by those living at 30-38 Owens Road;*
  - 8. *Analysis of the degree to which the existing trees and other vegetation found at 3 Brightside Road and on the sections at 149-153 Gillies Avenue could be expected to survive with development under the auspices of the H25 provisions and therefore provide the level of screening, buffering and mitigation anticipated in LA4's report.*
- 8. In reply to these matters, Rob Pryor of LA4 (on behalf of the applicant) responded with a letter dated 5<sup>th</sup> March. The following are key excerpts from that correspondence:

#### ***Request***

*Explanation of how amenity values under section 7(c) of the RMA have been interpreted and applied to the evaluation of effects assessed by LA4.*

**Response**

..... The height and bulk of development enabled by the PPC would not adversely affect the amenity of the surrounding streets or neighbouring properties. The mass and height would result in a development appropriate to its location (as identified in the Motu Site Context: Surrounding Built Form). Overall, it is considered any adverse effects associated with the built form, height and massing can be considered to be minor in the context of the receiving environment.

In my opinion the standards, provisions and assessment criteria within the H25 SPHZ will protect the surrounding residential area and minimise potential adverse effects of overshadowing, visual dominance and loss of visual privacy on adjacent properties while maintaining a high standard of amenity.

**Request**

Explanation of how some high level of visual effects translate into lower levels of amenity effect (for example in Viewpoint 1).

**Response**

..... While some of the viewpoints, in particular those in close proximity to the site resulted in moderate visual effects, the context within which they were viewed resulted in lower levels of amenity effect. For example, Viewpoint 1 from the corner of Gillies Avenue and Brightside Road, while highly visible would not appear incongruous in the context of the adjacent Brightside Hospital, location of the site adjacent to an arterial road and other large non-residential developments located along Gillies Avenue.

**Request**

A further analysis of effects in relation to Viewpoint 2, given the limited scope of the photo and simulation prepared for that vantage point.

**Response**

..... One of the difficulties in such close viewing locations are the restrictions enabled by a 50mm lens on the camera which tends to crop the view. A 50mm lens was chosen in cognisance of Auckland Council's Information Requirements for Landscape and Visual Effects Assessments. A fuller understanding of the effects can be gained in association with Viewpoint 1 taken further south along Gillies Avenue and the analysis accompanying it.  
.....

**Request**

Explanation of the amenity effects that would be experienced by local residents, as opposed to the more transient exposure and effects associated with the motoring public cyclists etc.

**Response**

..... The anticipated massing reference plan (Archimedia plan A920) illustrates the proposed massing building footprint. The footprint is set back 10m from the Gilles Avenue and Brightside Road frontages. As outlined in the Arboricultural response prepared by Peers Brown Miller, all the trees shown around the perimeter of the development footprint would be able to be retained if the building footprint were to be established as shown on that plan. The report also notes that even the large trees near the corner of Brightside Avenue that have the footprint encroaching on their driplines would tolerate any excavation work at or about the distance shown from their bases.

The four feature trees along the Gillies Rd frontage could also be retained, and one feature tree in the northwest corner could be incorporated. The retention of these trees in addition to the two large scheduled trees within the site and street trees along the Brightside Road frontage would provide a suitable level of mitigation to future development enabled by the plan change and ensure the visual amenity values of the surrounding residential area will not be adversely affected.

**Request**

A further analysis and/or graphic depiction (via photos etc) of the effects that would be experienced by those living at 30-38 Owens Road.

**Response**

The existing mature trees within the Southern Cross site will provide a good buffer and screening towards parts of development enabled by the plan change. Additionally, there are trees within the neighbouring properties in Owens Road. The Owens Road properties are generally orientated north towards the sunlight and not south towards the site. The rear yards of these properties, facing the site are typically service and access yards with associated garaging.

**Request**

An analysis of the degree to which the existing trees and other vegetation found at 3 Brightside Road and on the sections at 149, 151 and 153 Gillies Avenue could be expected to survive with development under the controls of Chapter H25 (Special Purpose – Healthcare Facility and Hospital Zone) provisions. ....

**Response**

This has been fully addressed in the Arboricultural response prepared by Peers Brown Miller.

9. In addition, a letter from Reuben O’Halloran of Archimedia dated 20<sup>th</sup> March 2019 states as follows:

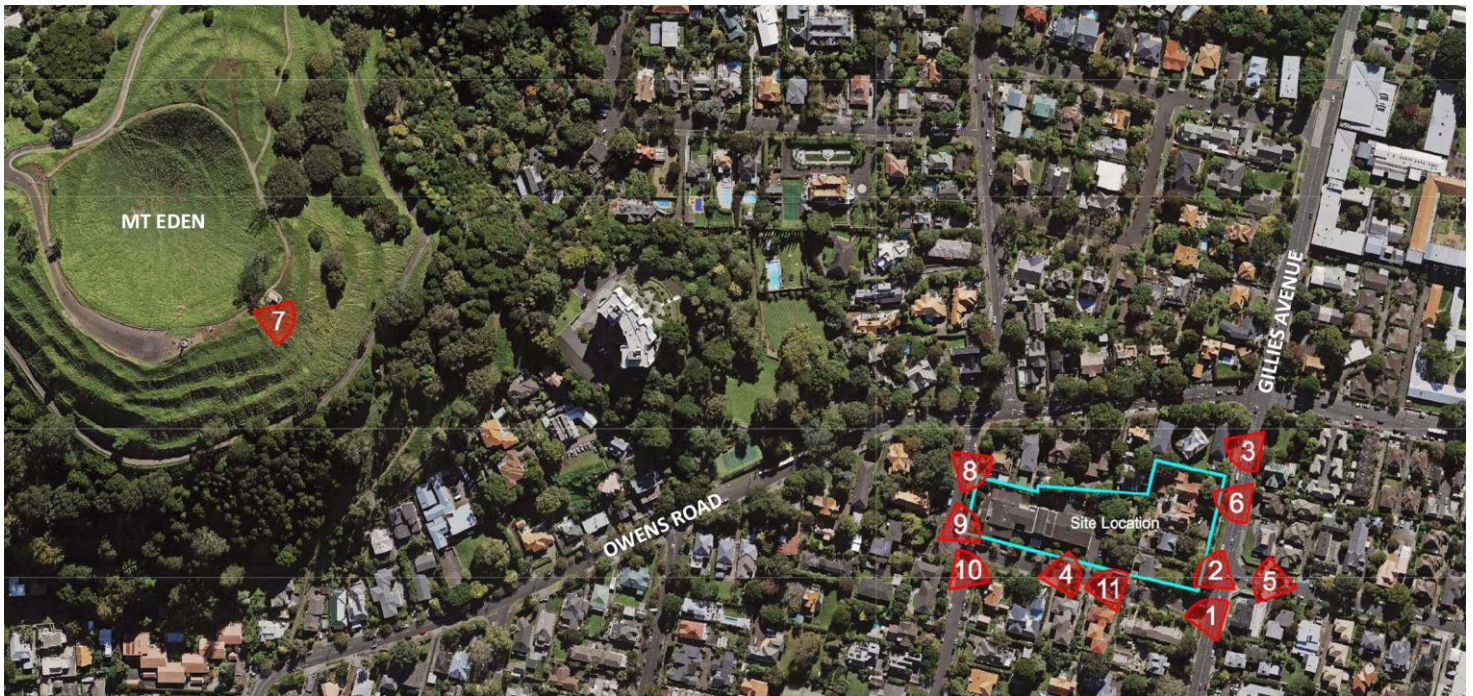
*In response to a request for clarification, Archimedia can confirm that the building massing*

shown in the images contained within the report prepared by LA4, do account for the controls on the site imposed by the volcanic viewshaft. ....

10. I have considered these responses and my evaluation of them is as follows, addressing more technical issues first. It is accompanied by LA4's map showing the location of Viewpoints discussed in my review:

The W26 Viewshaft:

11. Archimedia's visual simulations show the proposed H25 building envelope as simple block models that reflect the 'outline' nature of the Plan Change proposal. Reuben O'Halloran makes it clear that the revised roof profile of the proposed building envelope complies with the control for Volcanic Viewshaft W26. I accept this to be the case.



**Map Showing Viewpoint Locations (LA4)**

Viewpoint 2:

12. Archimedia's simulation for Viewpoint 2 is quite truncated, apparently as a result of employing a 50mm SLR lens format. I discussed this matter with Rob Pryor of LA4 and indicated that I would be quite happy for a wider angle, simulation to be prepared for Viewpoint 2, so as to capture a more realistic perspective of the H25 building envelope – even if this were to result in a degree of image distortion. However, I have yet to see a simulation that captures the view from this vantage point in a more realistic and meaningful fashion. In my opinion, the current 'before' and 'after' photos are of limited assistance in this regard, although they do suggest that a building

within the proposed envelope would have a very high level of visual presence.

Visual Simulations & Trees:

13. The report from Peers Brown Miller Ltd (referred to by Rob Pryor and dated 27 February 2019) indicates that the building footprint shown on Plan A920 would avoid most of the trees currently on site, including three scheduled trees. For that reason, most of the trees on site are shown in Archimedia's visual simulations and their mitigation function is commented on repeatedly in LA4's assessment of effects. In addition, the Peers Brown Miller report comments on the street trees around the site, stating at p.4 of their report that: *"I can say with confidence that all the trees shown around the perimeter of the development footprint would be able to be retained if the building footprint were to be established as shown on that plan. Even the large trees near the corner of Brightside Avenue that have the footprint encroaching on their driplines would tolerate any excavation work at or about the distance shown from their bases."* Even so, the report concludes on a less certain note (p.4, Conclusion) in relation to the provision of vehicle manoeuvring, pedestrian access and circulation, and other activities, on site.
  
14. In fact, most of the vegetation found on site is neither scheduled nor otherwise protected at present. As a result, it is unclear just how much of it would actually be retained in the long term, even though LA4's assessment appears to place considerable reliance on its screening and buffering effects to down-scale and soften the profile of development within the proposed building envelope. The PPC21 provisions do not offer any certainty or assistance in this regard. Consequently, other 'other activities', excavation and development within the dripline of some trees and 'Mother Time' are all likely to take a higher toll of this 'screening vegetation' than is suggested by the photo simulations.
  
15. It is my opinion, therefore, that LA4 have taken a somewhat optimistic view of the mitigation that will be provided by the site's vegetation cover into the future even though such mitigation is central to many of their findings – as with the example (Viewpoint 1) described in my further information review. In that case, paragraph 5.25 of LA4's report states as follows:

***Implications of permitted development***

5.25 *From this close viewing location, there will be a highly noticeable change in visual amenity due to the currently less developed nature of the site. The more vegetated character will be replaced with a greater level of built form and development.*
  
16. Even so, LA4's paragraphs 5.26 and 5.27 then go on to state that:

5.26 *Development permitted under the H25 provisions will not adversely affect the existing urban amenity due to the highly modified nature of the surrounding*



*environs and mitigating effect provided by the existing puriri, tulip and pohutukawa trees along the street frontage. The development will appear continuous with the existing urban fabric, albeit of a greater height and form than currently exists.*

5.27 *From this viewpoint the height and massing will have minimal adverse visual effects as depicted in the architectural rendering due to the form and scale provided by the mature vegetation within the site. The height infringement does not obstruct any views or visually dominate the streetscape.*

17. This is but one example that highlights the considerable reliance placed on vegetation to limit the effects of development within the H25 building envelope. In fact, all of the other effect ratings for Viewpoints 2- 11 appear to be influenced to some degree by the presence of large scale, trees on and around the subject site. Even the analysis of effects in relation to Viewpoint 7, located atop Mt Eden, includes the following comment at paragraph 5.54 of the LA4 report – that, “*The vegetated characteristics of the Epsom residential area are evident from here with dwellings set into well-established properties*”.

Residential Amenity Effects & The Proposal’s Impact on Owens Road Properties:

18. The RMA describes “*Amenity Values*” as being:

*those natural or physical qualities and characteristics of an area that contribute to people’s appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes.*

19. This alone indicates that ‘amenity’ is ultimately more complex than just the degree to which development within the H25 envelope would intrude into current views of, and towards, the Brightside Hospital site and 149-153 Gillies Avenue. Amenity values relate to appreciation of an environment that is ‘known’ and appreciated - bringing into play concepts of identity and sense of place (evolved from the Greek concept of the ‘*genius loci*’) that reflect the more particular, even unique, qualities of a location or area. Furthermore, while *pleasantness* and *aesthetic coherence* can solely relate to visual attributes or qualities, they are more typically also influenced by a wider range of sensory factors, including noise, lighting, smells and awareness of activity and movement – in effect, the fuller spectrum of sensory factors that contribute to perception and appreciation of an area’s character, pleasantness and aesthetic coherence.
20. In this case, it is difficult to determine the degree to which such values have been explored. None of the photos included in LA4’s assessment have been taken from local private properties, although many of those included in Motu Design’s “*Urban Design and Landscape Analysis*” (dated 21 January 2019) are of local properties. Instead, it appears that all of LA4’s assessment has been undertaken solely from surrounding streets, without recourse to actually visiting and interpreting

effects on local residential properties. I do not consider this to be a 'fatal flaw' relative to those properties lining the southern and western sides of Brightside Road, as the road corridor (together with fencing, walls, hedgerows, trees and other vegetation) offers a degree of mediation between most local properties and the subject site.

21. However, I do not regard LA4's assessment as being adequate in relation to the residential properties that physically abut the Plan Change site down Owens Road. The close proximity and direct interface of those properties with the subject site requires more specific, fine-grained, evaluation. At p.3 of Rob Pryor's response to Council's further information request, the following points are made in relation to these properties:

*In terms of the effects that would be experienced by those living at 30-38 Owens Road I would make the following comments.*

*The existing mature trees within the Southern Cross site will provide a good buffer and screening towards parts of development enabled by the plan change. Additionally, there are trees within the neighbouring properties in Owens Road. The Owens Road properties are generally orientated north towards the sunlight and not south towards the site. The rear yards of these properties, facing the site are typically service and access yards with associated garaging.*

22. I agree that many of the owner-occupied and rental properties within this sequence of housing are indeed aligned perpendicular to the subject site, while garaging is found at the interface of three properties with the Brightside Hospital site. However, this is not always the case.
23. 36 Owens Road has an elevated rear deck and garden area, and both of these are exposed to the boundary with the subject site. Existing trees screen part of the view above and beyond an intervening fence, but not all of it. Moreover, 32A Owens Road appears likely to be affected to an even greater degree: it has a courtyard and swimming pool that would be exposed to both that part of the development envelope abutting Gillies Avenue and the main 'wing' aligned parallel with Brightside Road. That same wing would conceivably also offer more fleeting views into the main house, next to the swimming pool and courtyard – both of which currently enjoy a high level of privacy.
24. These effects are not mentioned in LA4's AEE report at all, while Mr Pryor's reply appears to dismiss them. Moreover, both Mr Pryor and Reuben O'Halloran of Archimedia, were provided with copies of photos that I took during my site visit to Owens Road (overleaf) and Mr O'Halloran subsequently provided me with images also taken from 32A and 36 Owens Road. He indicated that these would provide the basis for photo montages showing the proposed development from those properties. It's my understanding that the photo montages would be included as part of

the applicant's expert evidence and would be circulated prior to the hearing.

25. In addition, it is important to consider the wider context for the application. The characteristics, aesthetic coherence, identity and sense of place associated with the area around the subject site are all germane to evaluation of the Plan Change proposal. Again, Mr Pryor indicates that he has done this. But, for example, neither his report nor his reply to the further information request mention the Special Character Overlay that applies to 49-53 Gillies Avenue and other local properties, nor can I find any evaluation of the way in which the proposed building envelope would integrate with residential development that largely comprises stand-alone, two-storey, dwellings and mature gardens.



**Photopoint 1 Location:** 32A Owens Rd  
(swimming pool courtyard)

***Photo of the courtyard and swimming pool at 32A Owens Road facing potential development to both the south & east***

## **Review of The Applicant's Assessment**

26. In terms of landscape assessment best practice, it is normal to consider the 'worst case' scenario likely to arise from any development proposal. In this instance, the block profile of the building envelope proposed under the H25 provisions represents the 'worst case' in relation to built form and the integration (or otherwise) of that form with surrounding residential, including the Special Character Overlay applied to part of Gillies Avenue.
  
27. However, the very nature of the Private Plan Change limits the scope to anticipate ways in which a future hospital building might respond to its setting through its own built form and profile, modulation of its walls and roofing, the interplay of solid planes with glazing, architectural detailing and other design mechanisms. Importantly, this also limits the degree to which activities within the grounds surrounds surrounding the building(s) can be foreseen, including areas of vehicle circulation and pedestrian activity, while the future landscape treatment of those grounds also remains a matter of conjecture. In a related vein, the simulations prepared by Archimedia under the apparent direction of LA4 avoid any depiction of such site development and use.
  
28. Unfortunately, this also means that questions remain about the amount of existing vegetation on site that might remain in the future. In this regard, it is notable that just two of the trees shown within the hospital site in various simulations are protected via scheduling in the AUP. With no protection offered the remaining trees and vegetation on site under the H25 provisions, it might therefore be realistic to anticipate that some, potentially all, of this other vegetation will disappear over time. Some of that planting may be replaced by new planting, but that is also a matter of conjecture at this time. In fact, the one tree of real scale that is scheduled – a pohutukawa – sits between the two proposed blocks in Plan A920, whereas virtually all of the other trees around the proposed building platform's periphery remain unprotected.
  
29. As a result, any building or buildings eventuating under the aegis of the proposed H25 provisions appears likely to be much more visually conspicuous and prominent than is indicated by the AEE simulations, particularly so in the longer term. While the rock walling facing Gillies Avenue and Brightside Road that is to remain, together with street trees and vegetation within neighbouring properties, would help to soften the profile of such development, it is unlikely to achieve the level of screening shown in the simulations. As a result, it is my opinion that LA4 has not assessed the full range of effects associated with potential development under the H25 provisions, either in a 'worst case' sense or with regard to what might be realistically expected to eventuate on site. Its assessment has, in fact, relied heavily on the mitigation provided by that unprotected vegetation cover for virtually all of the viewpoints employed in its report.

30. Moreover, the issue of a building with a 15,000m<sup>2</sup> floor area and height of 16- (Permitted) to 25m (Restricted Discretionary) that has not been assessed with regard to the existing building stock and pattern of development within Brightside Road and Owens Road, or the Special Character Overlay applied to 149-153 Gillies Avenue. In my view these matters are directly germane to evaluation of the degree to which the proposed Plan Change would affect appreciation of the locality's character, aesthetic coherence and identity. Unfortunately, none of these matters are apparently discussed in LA4's report.
31. Finally, in this rather critical vein, the effects of potential development within the proposed H25 building envelope do not appear to have been assessed in any detail with regard to 30-38 Owens Road, the neighbours that physically abut the subject site. I have considered this area, specifically because of its physical proximity to the proposed building envelope.
32. Having visited all of these properties, and notwithstanding the absence of the additional simulations requested of the applicant, it is my assessment that a building complying with the proposed controls has the potential to be both intrusive and excessively dominant – especially so in relation to 32A Gillies Avenue. It would also potentially impact on the privacy currently enjoyed by the occupants of both 32A and 36 Owens Road. In terms of such direct effects, it is therefore my opinion that the Plan Change proposal would conceivably have a high, to very high, impact on the occupants of 32A Owens Road – regardless of how much vegetation is retained on the subject site. The Plan Change's amenity effects in relation to no.36 would be more limited, but still conceivably of a Moderate level, while those for other properties between the 'top' of Brightside Road and Gillies Avenue would typically be of a Low, to perhaps Low-Moderate, order.
33. Turning to Brightside Road itself and the properties down both the southern and western sides of the road, it is clear that views of the proposed building envelope would be partially interrupted by a mixture of fences, walling, garden vegetation, street trees and even some of the trees within the hospital grounds. Even so, the 139m length and 16m plus height of the proposed hospital development would totally dominate Brightside Road, irrespective of the mediation that I have just described. It would become the visual and physical 'centrepiece' of the environment enclosed by Brightside Road, Owens Road and Gillies Avenue – including Shipherds Avenue. As such, it is my assessment that it would generate a Moderate-High level of effect in relation to those properties lining Brightside Road and the northern end of Shipherds Avenue.
34. Additionally, however, it is important to consider the changes that the H25 provisions would give rise to relative to the wider character and identity of the residential area around the hospital site. As indicated above, effects on an area's 'pleasantness' and 'aesthetic coherence' are critical in terms of any locality's identity and sense of place. In addressing this issue and related matter of

integration of a new hospital with its landscape setting, the Special Character Overlay also needs to be considered.

35. Schedule 15 of the AUP identifies the Gilles Avenue properties, together with others within that road, down both sides of Shipherds Avenue, and along the northern side of Owens Road, as being within the Special Character – Isthmus B1 Overlay. That Overlay is described as follows:

**15.1.7.3.2. Summary of special character values**

*Historical:*

*The area collectively reflects an important aspect, or is representative, of a significant period and pattern of community development within the region or locality.*

*The overlay area is of significance as it demonstrates an early period of residential development in Auckland City. It retains a number of representative areas of late 19<sup>th</sup> and early 20<sup>th</sup> century suburban residential developments. House designs and streetscape character are typically that of the Edwardian villa suburb, English Cottage revival and the Garden Suburb movement. Substantial population growth in Auckland and the provision of cheap public transport with the introduction of electric trams resulted in a wave of residential development in the late 19<sup>th</sup> and early 20<sup>th</sup> Centuries. ....*

**Physical and visual qualities:**

*The area collectively reflects important or representative buildings, types, designs, styles, methods of construction, materials and craftsmanship, urban patterns, landscape, and streetscape qualities.*

*The overlay area is of significance for its physical and visual qualities as it encompasses an exceptionally large grouping, of mid to late 19<sup>th</sup> and early to mid-20<sup>th</sup> century houses, together with associated urban patterns of development, that collectively reflect important trends in New Zealand's residential architectural design (particularly the Garden Suburb concepts described above) and the development of suburban residential areas in the Auckland region.*

*The style of dwellings can be diverse and the area includes examples of Victorian and Edwardian villas, Arts and Crafts influenced houses, Art Deco houses, English Cottage style dwellings and Californian bungalows. ....*

*Dwellings in the overlay area are typically set well back from the road, and there is an abundance of trees and vegetation both on private and public land. The Special Character Areas Overlay – Residential: Isthmus B1 and B3 areas are characterised by lower housing densities generally combined with period housing and an abundance of planting. The Special Character Areas Overlay – Residential: Isthmus B2 areas generally have higher housing densities and building coverage than areas in the Special Character Areas Overlay – Residential: Isthmus B1 and B3 area, and also include period homes.*

36. Collectively, the subject houses at 149-153 Gillies Avenue, together with the wider array of heritage dwellings and mature gardens spread across Mt Eden's volcanic mantle, contribute to perception of a landscape that remains both fundamentally residential in nature and that is imbued with very strong heritage overtones. It is also clear that a reasonably clear demarcation has already emerged between the residential environment dominated by one and two storey dwellings and mature gardens down the western side of Gillies Avenue and the sequence of larger scale, increasingly commercial and institutional, development (such as Epsom Girls Grammar) that now lines much of the eastern side of that road corridor.
37. Furthermore, even though Brightside Road often acts as a cut-through between Gillies Avenue and Owens Road, both that road and (even more so) Shiphards Avenue, retain a sense of relative tranquillity, and peace and quiet, that belie the locality's proximity to Newmarket and a series of major road corridors (including the Southern Motorway and Market Road). In my view, this also needs to be recognised in assessing the effects of the Plan Change proposal. This, however, is not the case for Gillies Avenue, which is a heavily trafficked road corridor.
38. Finally, I have considered the effects of the current Brightside Hospital in its surrounds. Like the residential development surrounding that current facility, the existing hospital is a predominantly two-storey structure that is set well back from both the Brightside Road corridor and adjoining properties off Owens Road. It is enclosed by a mixture of mature trees, other vegetation and stone walls. Activity within the hospital grounds is quite low key and insular, so that there appears to be limited interaction with neighbouring properties, except in relation to related parking within the local street network. Aided by the site's ample yards, it remains reasonably recessive and there is little evident disruption of the key qualities associated with the residential catchment facing and physically abutting the current hospital. In my assessment, it would be very difficult for development under the H25 provisions to protect those same qualities, particularly given the inordinate bulk, length and overall scale of the proposed building envelope.
39. Taking all of these matters into account, I have compiled the following set of ratings for LA4's viewpoints in **Table 1** (overleaf). These summarise my evaluation of the likely effects of development under the H25 provisions. In addition to the viewpoints addressed by LA4, I have added a viewpoint, which generically addresses the effects on properties from 30-38 Owens Rd.

**Table 1.**

VIEWPOINT:	SENSITIVITY TO CHANGE:	AMENITY EFFECTS:				EFFECT RATING:
		Visual Presence / Contrast:	Changes to Character:	Impact on Aesthetic Coherence:	Changes to Local Identity:	
1. Gillies Ave / Brightside Rd	Moderate / High	High	High	High	Moderate / High	High
2. Gillies Ave / Kipling Ave	Moderate / High	Very High	Very High	High	High	High
3. Gillies Avenue	Moderate	Moderate / High	Moderate / High	Moderate / High	Moderate	Moderate / High
4. Brightside Road	High	Very High	High	High	Moderate / High	High
5. Kipling Avenue	Moderate	High	Very High	Moderate / High	High	High
6. Gillies Avenue	High	Very High	Very High	High	High	High
7. Mt Eden Summit	Low	Low	Low	Very Low	Very Low	Low
8. Brightside Rd / Owens Rd	Moderate	Moderate	Low / Moderate	Low / Moderate	Moderate	Moderate
9. 10 Brightside Rd	Moderate	Moderate / High	Moderate / High	High	Moderate / High	Moderate / High
10. Shiphards Avenue	Moderate / High	High	High	High	High	High
11. 2 Brightside Rd	Moderate	High	Moderate / High	High	High	Moderate / High
12. 30-38 Owens Rd	Low - High	Low – Very High	Low – Very High	Moderate / High	Low – Very High	Low – Very High

40. Of necessity, the last ratings – for Viewpoint 12 – reflect the wide range of effects that would be visited on the properties adjoining the northern boundary of the hospital site. It should also be noted that this assessment takes into account the potential removal of most of the trees within the hospital site and the fact that most of the street trees lining the northern side of Brightside Road are deciduous. The proposal has been evaluated both with and without a full canopy on those silver birches, and the differences associated with seasonal changes to those trees can be appreciated by comparing the images for Viewpoint 4 with those for Viewpoint 8-11.

41. Finally, I confirm that **Table 1** employs a rating scale that is aligned with the 7-point scale of ratings recommended by the NZ Institute of Landscape Architects (*Best Practice Note: Landscape Assessment And Sustainable Management 10.1*) and Auckland Council’s “*Information Requirements for the Assessment of Landscape and Visual Effects*”<sup>1</sup>. An explanation of the rating scale employed is found in the table overleaf:

1

<http://content.aucklanddesignmanual.co.nz/resources/tools/landscapeandvisualeffectsassessment/Documents/Landscape%20and%20Visual%20Effects%20Assessment%20Requirements.pdf>



**Ratings Scale:**

Adverse Effects:		Adverse Effects Rating:	RMA Rating:
<b>1</b>	No appreciable change to existing urban character & values	No Effect	Minor Effect
<b>2</b>	Limited change to some urban landscape elements & character; no change to amenity values	Very Low / Low Effect	
<b>3</b>	Increasingly evident change to some urban landscape elements & character; limited change to amenity values (aesthetic cohesion, pleasantness, identity)	Low/ Moderate Effect	Significant Effect (Or greater)
<b>4</b>	Appreciable change to some urban landscape elements & character; more obvious impact on some amenity values	Moderate Effect	
<b>5</b>	Marked change to some urban landscape elements, character & amenity values	Moderate / High Effect	
<b>6</b>	Obvious degradation / loss of urban landscape elements, character & amenity values	High Effect	Significant Effect (Or greater)
<b>7</b>	Severe degradation / loss of urban landscape elements, character & amenity values	Very High Effect	

**REVIEW OF PUBLIC SUBMISSIONS**

42. I have reviewed the submissions received in respect of the Plan Change proposal. Those of most relevance to my review include the following from:

- 22 P Taylor
- 33 M Lorimer
- 45 M Adams
- 73 C Cliffe
- 75 M Parker
- 79 A Randerson
- 91 G Allen
- 92 R Speer
- 93 S Speer
- 94 Eden Epsom Residential Protection Society Inc
- 108 Housing NZ Corporation
- 142 J Allen
- 159 S Nelson & F Holdsworth

43. The matters raised in these submissions are varied, but in relation to landscape and amenity issues the following comments are typical of many of those received:

**C Cliffe:**

- (ii) *The retention of particular large trees on site and stone walls will not mitigate or adequately screen the dominance, visual bulk and mass of the proposed new buildings as viewed from my property. Existing birch trees lining Brightside Road provide partial*

*screening, but these are deciduous and sporadic. Buildings of the proposed form, bulk and height of 16 metres and potentially reaching 25 metres, will be highly visible from my residence and will create a visual intrusion incongruous with the residential milieu of the area. There will be a significant and unacceptable loss of residential amenity.*

- (iii) Stemming from (ii) the height and bulk of the proposed new buildings will result in a loss of visual privacy from the upper storeys and increase shadowing of Brightside Road and property frontages, particularly in mid-winter when sunlight and warmth is most needed. This further detracts from amenity value and results in a loss of personal well-being.*

**A Randerson:**

- (d) The subject site lies within an established area of residential zoned land with the Gillies Ave part of the site covered by an overlay, which seeks to retain and manage the special character values of this part of Epsom, integrated as it is with the eastern side of Mt Eden. The purpose of the overlay is described in Chapter 018 of the AUP. PC 21 undermines the integrity of the Special Character Overlay by introducing a land use which is contrary in all respects to the heritage and special character purpose of the overlay.*
- (e) PC 21 has potential adverse effects on neighbouring properties and the locality arising from the potential intensity of development, the incompatibility of built form relationships contemplated by PC 21, ..... Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.*
- (f) Adverse effects from PC 21 also include the undermining and degradation of the residential and character heritage environment of the subject site and its vicinity as well as the urban amenity considered and protected by the integration of the Single House Zone and the Special Character Overlay in this location.*

**G Allen:**

*We have enjoyed the heritage aspects of our immediate community, and the many large specimen trees, planted by the original Owens family which are dotted though out the existing Owens Rd/ Brightside Rd block. Four of these trees, two Totara, a Phoenix Palm and a full-size Macadamia tree have been retained on our site, and at our instructions, the house was specifically designed around them, forming a north facing central Courtyard. Specimen Pohutukawa, Puriri, Karaka and Queensland Kauri which are all found within the block, are part of a wider-scale planting undertaken at the same time within the Owens Rd, Gillies Ave area*

*The effects of the current proposed rezoning of the 3 Brightside Rd and the four Gillies Ave sites from mixed residential and single house residential with special character overlay (151, 153 Gillies Ave) to Special Purpose Healthcare Facility and Hospital Zone, on our residence, and the neighbourhood generally, would be immensely detrimental in terms of daily residential living and enjoyment .....*

**R. Speer:**

Proposed building height up to 16metres permitted and up to 25 metres under certain circumstances. This contrasts greatly with the 8metre maximum allowed in the surrounding residential area. This is a 200% to 300% increase with consequences for privacy, overlook and shadowing of adjacent residential properties.

Proposed large building bulk will extend along the full frontage of the subject site on Gillies Ave and potentially most if not all of Brightside Road. Redevelopment of the existing hospital building will be possible to provide for 5-6-even 7 storey buildings. This scale of building bulk will enable visual imposition and dominance completely out of character with the local area which is largely comprised of one and two storey buildings often on large single sites.

**J Allen:**

The likely scale of change resulting from the rezoning proposal will be enormous when compared with the existing residential baseline for the area. ....

Draft drawings presented to residents last year for a new hospital reveal the high scale of intrusion into the established residential area. Overall the comparison shows a hospital campus that is planned to be approximately 3 times the size of the current Brightside Hospital facility. ....

..... Epsom Girls Grammar School lies to the north of the proposed development. Three of its buildings are located on Gillies Ave; the most prominent being the Raye Freedman Arts Centre which is the most northerly building. At its Northern extreme, the tip of its cantilevered roof is at 10m above ground/street level. The building's height at its opposite southern end is 7.5m. The average height of the building is approximately 9m above ground level, and at this height the building is both very prominent and imposing within its landscape. The building proposed by Southern Cross is a 16m high block, being almost twice the height of the Raye Freedman Arts Centre and approximately twice the maximum height permitted for the residentially zoned sites that Southern Cross propose to build over.

The building proposed by Southern Cross is grossly incompatible with both the historical and present character and zoning (recently reinforced and reiterated in the unitary plan) of this neighbourhood. ....

**The NZ Housing Corporation:**

While the Corporation does not have an interest in the land subject to the Proposal and does not oppose the proposed activity, the Corporation has concerns regarding that part of the Proposal that seeks to remove the Special Character Area Overlay from three sites at 149, 151 and 153 Gillies Avenue, Epsom.

*In summary, the Corporation has concerns regarding the appropriateness of, and adequacy of the case made in support of, the removal of the Special Character Area Overlay from the three sites at 149, 151 and 153 Gillies Avenue, Epsom.*

44. Mr J Allen has produced a very detailed submission, which addresses PPC21 and its effects, both in relation to the area surrounding the subject site and the property owned by him and his wife at 32A Owens Road. That submission includes a written statement, some 17 figures addressing the design, scale and mass of potential buildings on the hospital site, and another 14 pages of photos – primarily addressing the Allen property, including its swimming pool and courtyard.

### **The Eden Epsom Residential Protection Society Inc**

45. In addition, Bridget Gilbert's expert assessment of the application and the subject site's setting on behalf of the Eden Epsom Residential Protection Society Inc raises a number of quite specific issues:

2.1. *In my opinion, both the LA4 and Motu Reports over emphasise the role of the busy traffic corridor of Gillies Avenue (and to a lesser degree, Owens Road), variable architectural styles and the scattered non-residential uses within the wider context in shaping the (urban) landscape character of the local area.*

2.2. *This is important as it effectively 'sets the scene' of an urban landscape context that has a relatively low sensitivity (in their opinion), to change of the type contemplated by the proposed plan change.*

2.3. *In my view, LA4 and Motu have:*

- *Glossed over the quite different urban character associated with the Gillies Avenue corridor roughly south of the Newmarket Viaduct, whereby the overtly commercial neighbourhood character (to the north) gives way to a distinctly spacious, leafy and residential character. Whilst non-residential uses are evident, they are either of a type that suggests a good 'fit' with a residential neighbourhood (e.g. a secondary school, sports facilities and parks), or of a limited scale and scattered patterning such that they do not dominate the neighbourhood character (e.g. the scattered medical facilities, childcare facilities, boarding houses/backpackers). In fact, in relation to several of the latter uses, many of these developments are located within character buildings serving to maintain (to at least some degree), the impression of a residential neighbourhood.*
- *Overlooked the critical role that the comprehensive network of mature specimen trees supported by a mosaic of established hedges, historic rock walls and spacious garden plantings contributes to neighbourhood character. It is my expectation that the coherent and legible patterning of*

*these landscape features, together with the character homes throughout the area, were instrumental in the application of the Special Character Overlay. Further, whilst these landscape features serve to obscure public views of at least some of the character homes, the sense of spaciousness and 'green relief that they imbue is, in my view, noteworthy in shaping the special identity of this part of the isthmus.*

- *Failed to acknowledge the very carefully considered development controls that were applied to the existing hospital development to ensure that it did not detract from neighbourhood character and residential amenity (for example, restricting the height of built development along the Brightside Road front age to ensure that the building reads as two-storey from this orientation).*

#### **Visual Effects**

5.8 *The LA4 Report considers the effects of the proposed plan change in relation to the existing visual environment; however, fails to factor into their analysis the extent of visual change that is enabled by the existing zoning and overlay provisions. ....*

5.13. *In my opinion, the bulk and mass of built development enabled by the plan change will read as overwhelmingly dominant and institutional in character; and, in so doing, form a jarring contrast with the surrounding spacious and leafy, residential context. ....*

5.19 *Whilst I accept that private residential views are not protected per se, ..... I consider the scale and proximity of built development to indoor and outdoor living areas and degree of outlook obstruction enabled by the proposed plan change (noting that a 25m high building can be undertaken as a RD activity<sup>2</sup> with no consideration given to effects on neighbouring residential properties) amounts to a significant adverse visual effect.*

#### **Residential Amenity Effects**

6.4 *I consider that the very close proximity (3m setback) and scale of built development (16m, up to 25m as RD) enabled by the plan change is likely to dominate 32A Owens Road and appreciably detract from the existing high degree of privacy enjoyed at this property. The inability to consider such effects (in addition to visual amenity and shading effects) in any future RD development were the proposed zoning applied to the site, points to a very real risk of such adverse effects.*

6.5 *As a consequence, adverse dominance and privacy effects are rated as significant adverse in relation to 32A Owens Road.....*

#### **Sense of Place/ Neighbourhood Character**

6.8 *Drawing from my comments with respect to visual effects and vegetation effects,*

*it is my opinion that the removal of the existing character homes, specimen trees and other landscape features on the site and their replacement with large, institutional scale buildings and extensive carparking, will significantly detract from the highly attractive and cohesive, spacious and leafy residential neighbourhood (in which character homes dominate) that currently prevails throughout the local area.*

- 6.9 *Overall, it is my impression that the scale and character of development associated with the proposed rezoning is a poor fit in this sensitive part of the cityscape. Further (and taking into consideration the comparisons cited in the LA4 Report), the limited size of the site for development of this type serves to exacerbate this incongruity.*
- 6.10 *On balancing these considerations, adverse (urban) landscape effects are rated as significant.*

46. In addition, Ms Gilbert has raised a number of concerns about the technical aspects of the photo montages prepared for the application:

***Photomontages***

- 5.1 *I am concerned that the Photomontages may be inaccurate as they rely on site features such as “fencelines, driveways, road markings and power poles” (Archimedia Report page 22) to locate and scale the architectural model. In my experience, for this photomontaging technique to be accurate, the ‘site features’ need to coincide with the building edges. There is no evidence in the Archimedia Report this is the case.*
- 5.2 *I consider that panoramas are necessary (in addition to ‘single frame’ views) in this instance, due to the sensitivity of the location together with the proposed scale of development change.*
7. *Visual simulation (or photomontage) best practice typically applies the methods set out in the NZILA Best Practice Guide Visual Simulations BPG10.2. I consider that the imagery produced by Archimedia (or others, acknowledging that this is a specialist field of work) should comply with the methods recommended in that document.....*

47. The issues raised by Ms Gilbert are hardly new: the difficult is that close-up views are not easily captured in photos, and it is difficult to create simulations that do not appear distorted. In this case, I think the approach adopted by LA4 and Archimedia appears to be appropriate, but the images prepared by Archimedia highlight the inadequacy of relying on such images alone when assessing proposals. In this case, the site inevitably appears closer and has more visual presence, when viewed ‘on the ground’ - as opposed to via photographic images. I therefore anticipate that the proposed building would also have a greater level of effect than the

simulations convey. However, this simply reflects the technical inadequacies of photographic simulations, given the present state of technology.

## Summary

48. The key concerns raised by submitters therefore relate to:

- The perceived inadequacies of the applicant's assessment of effects;
- The excessive visual bulk and mass of a new hospital building within the H25 envelope;
- The inadequacy of yards and other buffer areas around the new building(s);
- The cumulative effects of this built form, together with activities on site;
- The loss of heritage buildings;
- The loss of mature vegetation and gardens;
- The visual over dominance and intrusion of a building under the aegis of the H25 provisions;
- The erosion and loss of residential amenity values;
- The modified character and identity of what is presently a relatively cohesive and attractive residential environment.

## RELEVANT STATUTORY CONSIDERATIONS

49. PPC21 would introduce its own objectives, policies and rules that are described in the application. Even so, the following, overarching RPS objectives still have a bearing on consideration of the proposal and its amenity effects:

### **B2.3. A quality built environment**

#### **B2.3.1. Objectives**

(1) *A quality built environment where subdivision, use and development do all of the following:*

(a) *respond to the intrinsic qualities and physical characteristics of the site and area, including its setting;*

(2) *Innovative design to address environmental effects is encouraged.*

#### **B2.3.2. Policies**

(1) *Manage the form and design of subdivision, use and development so that it does all of the following:*

- (a) *supports the planned future environment, including its shape, landform, outlook, location and relationship to its surroundings, including landscape and heritage;*

**B2.4. Residential growth**

**B2.4.1. Objectives**

- (2) *Residential areas are attractive, healthy and safe with quality development that is in keeping with the planned built character of the area.*

50. Assessed in relation to these provisions, with reference to my effects assessment, PPC21:

- Does not appropriately respond to the intrinsic qualities of the subject site and its residential setting;
- Incorporates some mitigation measures, such as the retention of existing rock walls, but (largely because of the Plan Change's very nature) is unable to demonstrate any 'innovative design' that might respond to the effects identified;
- Does not adequately address the relationship of the large-scale development anticipated for the subject site with its immediate residential surrounds and the Special Character - Residential: Isthmus B1 Overlay (see **Map 1** overleaf); and
- Does not address that development's relationship with the 'planned built character' of the area around the subject site that is reflected in the Residential - Mixed Housing Urban and Mixed Housing Suburban zoning (see **Map 2** overleaf) applied to Brightside Road and Shiphards Avenue, most of Owens Road and much of Gillies Avenue.

51. The AUP outcomes anticipated for the MHU and MHS zones are significant in terms of this interface issue:

**Residential Mixed Housing Urban**

**H5.3. Policies**

- (2) *Require the height, bulk, form and appearance of development and the provision of sufficient setbacks and landscaped areas to achieve an urban built character of predominantly three storeys, in a variety of forms.*

**Residential Mixed Housing Suburban**

**H4.3. Policies**

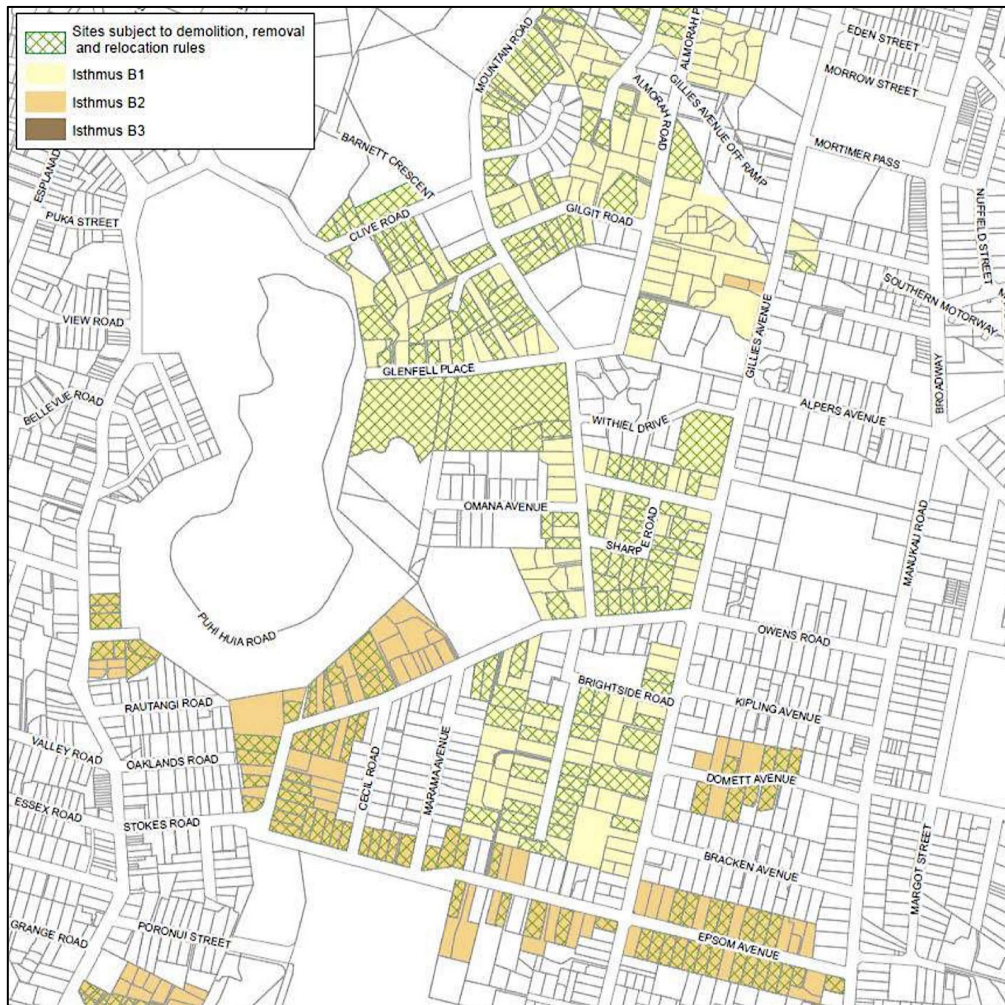
- (2) *Achieve the planned suburban built character of predominantly two storey buildings, in a variety of forms by:*
- (a) *limiting the height, bulk and form of development;*



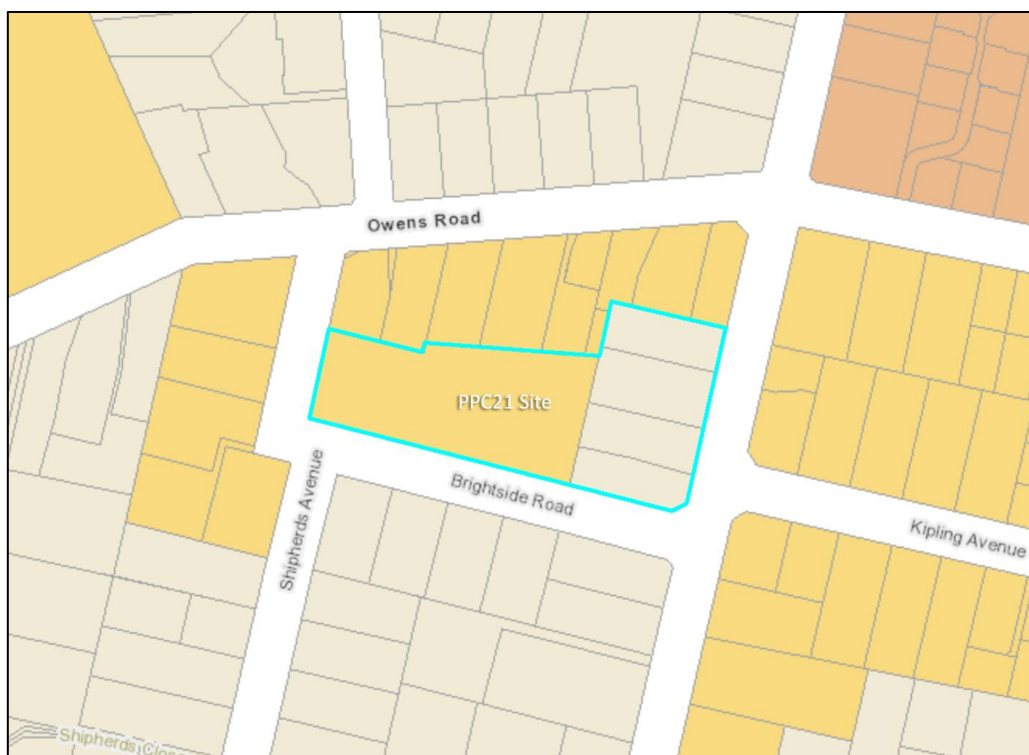
- (b) managing the design and appearance of multiple-unit residential development; and
- (c) requiring sufficient setbacks and landscaped areas. [My emphasis]

52. The 16-25m high (Permitted / Restricted Discretionary) building envelope proposed for the PPC21 site (Massing Elevation Drawings A930, A931 & A940) and, in particular the 139.5m length of that envelope relative to Brightside Road, is not consistent with these outcomes. As is reflected in my effects assessment, these proportions carried over to a future hospital building (or buildings) would generate levels of over-dominance and related amenity effects that are not considered to be consistent with the relevant provisions outlined above.

**Map 1.**



**Map 2.**



## **CONCLUSIONS & RECOMMENDATIONS**

53. On the basis of this assessment, it is considered that PPC21 would give rise to a range of effects, including visual over-dominance, erosion of 'aesthetic coherence' and 'pleasantness', and modification of the local residential area's identity that are adverse and significant. As a result, it is recommended that the Plan Change application be declined.

**Stephen Brown**

BTP, Dip LA, Fellow NZILA



## APPENDIX A.

**TO:** Panjama Ampanthong | Principal Planner  
Plans and Places  
Auckland Council  
  
Email: [Panjama.Ampanthong@aucklandcouncil.govt.nz](mailto:Panjama.Ampanthong@aucklandcouncil.govt.nz)

**FROM:** Stephen Brown

**DATE:** 11 February 2019

**Re: Southern Cross (Brightside Hospital) Plan Change: Visual & Amenity Effects – S.92 Review**

I have reviewed the following documents that are relevant to the revised application by Southern Cross Hospitals Ltd for a Private Plan Change for the Brightside Hospital site on Brightside Road and 149-153 Gillies Avenue, Epsom:

1. The *Architectural Design Statement and Bulk and Location Plans* prepared by Archimedia, dated 17 January 2019;
2. The *Visual Effects Assessment* report and graphic Annexures for Viewpoints 1-11, prepared by LA4 and dated 18 January 2019;
3. The *Urban Design and Landscape Analysis* report and *Appendix A* (graphic attachments), prepared by Motu Design, dated 22 January 2019; and
4. The *Special Character Assessment of 149-153 Gillies Ave*, prepared by Lifescapes Ltd, dated January 2019.

Southern Cross Hospital's private plan change seeks to change the zoning of the properties that it owns facing Brightside Road and Gillies Avenue from Mixed Housing Suburban and Single House to Special Purpose Healthcare Facility and Hospital zone. The revised modelling of architectural profiles and simulations accompanying the current Plan Change proposal further indicates that development on the subject site would comply with the height limit imposed by the W26 Volcanic Sightline to Mt Eden that traverses part of it.

The AUP Viewer image overleaf shows the current zones across and around the subject site, together with the W26 sightline overlay and the height limit contours associated with the sightline.





AUP Viewer map showing the subject site bounded by Brightside Road, Gillies Avenue and properties on Owens Road, together with:

- The MHS Zone (yellow);
- The Single House Zone (Tan);
- The sightline overlay (marked by green “V”s and a green outer boundary); and
- The height limits imposed by the sightline (set out as contours).

## Review

The Private Plan Change proposal appears to have changed since November, as the *Design Statement* prepared by Archimedia addressed other bulk and location controls, including the breach of some ‘height in relation to boundary’ controls, but did not address the W26 Viewshaft shown above. However, the January *Design Statement* does respond to the overlay and adjusts the roof planes of the third floor accordingly – most obviously in the Massing Sections of Drawing A940. The “*Impact of Volcanic Viewshaft Restriction*” is shown on both of that drawing’s cross-sections, and it is notable that LA4’s Section 4 – addressing the “*Planning Context*” relevant to its assessment – mentions the W26 sightline at paragraph 4.6 of their report. In that section, it is stated that: “*The Volcanic Viewshaft overlay also restricts height to 11.5m-16m across the western half of the site at 3 Brightside Road. The Volcanic Viewshaft overlay also applies to the balance of the site, while any development at 16m would still sit below this viewshaft restriction.*”

Even so, it remains uncertain if the Private Plan Change will actually comply with the overlay control. It is also unclear if the photomontages found in LA4’s graphic annexes – most notably in relation to the Viewpoints 8, 9 and (in particular) 10 reflect this modification. These matters need to be clarified.

In relation to the description of the Visual Amenity Effects Assessment at paragraphs 5.14 to 5.20 of the report, the key parameters employed in the effects evaluation are outlined, together with the ratings scale employed by LA4. However, there is no discussion about how the assessment process and criteria employed in it correlate with the meaning of “Amenity” contained in the Resource Management Act. It appears that the scale found at paragraph 5.20 solely relates to the visual magnitude of change associated with development under the H25 proposal. It does not address effects in relation to ‘aesthetic coherence’ or (as an extension of this) such matters as the identity, sense of place or other perceptual values associated with the area potentially affected by the Private Plan Change. I consider that a clear link needs to be established between LA4’s assessment and current concepts of ‘amenity’ derived from both the Act (see below) and the Environment Court interpretation of such values.

*“those natural or physical qualities and characteristics of an area that contribute to people’s appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes.”*

Turning to the detailed evaluation of effects from paragraph 5.21 onwards, there appear to be some inconsistencies in that analysis. For example, in relation to Viewpoint 1 at paragraph 5.25 it is stated that:

***Implications of permitted development***

- 5.25 *From this close viewing location, there will be a highly noticeable change in visual amenity due to the currently less developed nature of the site. The more vegetated character will be replaced with a greater level of built form and development.*

However, LA4’s paragraph 5.26 and 5.27 then state:

- 5.26 *Development permitted under the H25 provisions will not adversely affect the existing urban amenity due to the highly modified nature of the surrounding environs and mitigating effect provided by the existing puriri, tulip and pohutukawa trees along the street frontage. The development will appear continuous with the existing urban fabric, albeit of a greater height and form than currently exists.*
- 5.27 *From this viewpoint the height and massing will have minimal adverse visual effects as depicted in the architectural rendering due to the form and scale provided by the mature vegetation within the site. The height infringement does not obstruct any views or visually dominate the streetscape.*

These statements appear to be inconsistent with one another, and even if this were not the case, it would be of assistance to have some clarification about the differences evident between paragraph 5.25, then the findings of 5.26 and 5.27. Much the same disconnect between initial findings about the visibility of the proposed building envelope and its effects are found in relation to most viewpoints.

In relation to Viewpoint 2, the current photo and photo simulation do not show the full extent of the view that opens out at the top of Kipling Avenue (which Viewpoint 5 shows more clearly). As a result, it is uncertain if the “moderate adverse visual effects” identified for this viewpoint arise from a fuller appraisal of that wider view on site, or the effects identified are limited by constrained scope of the photos employed for it. This matter needs to be addressed in LA4’s statement.

In relation to a number of viewpoints, such as 3 and 6, the point is made that even though a hospital developed under the H25 controls would have a high level of exposure to local audiences, most of those affected would view the development in a transient fashion, while driving past it. There is no indication of whether or not such effects would be different in relation to local residents, and if so, in what manner? My concerns in relation to these different effects associated with quite different audiences pertain to Brightside Road, the northern end of Shipherds Avenue and Kipling Avenue – as well as Gillies Avenue.

I was also initially concerned that Rob Pryor's assessment did not address the visual and amenity effects of the building envelope on those living down the western side of Owens Road from no.s30 to 38 – assessed, in a comparative fashion, with likely permitted baseline effects. At present, all of that assessment focuses on views across roads, but fails to address the more direct MHS / H25 interface. This matter is, however, addressed in part within Motu's report at Section 5.7 (*Relationship to Residential Neighbours Along Northern Boundary*). Unfortunately, though, Motu's *Urban Design and Landscape Analysis – Appendix A* does not contain any photos, photomontages or other graphic images to support its descriptive assessment of effects. I consider this to be a shortcoming in the current analysis.

Finally, I note the very considerable reliance placed on mature trees within 149-153 Gillies Avenue, as well as within the existing hospital grounds in Brightside Road, to both reduce the level of effect generated by new buildings. Has there been any assessment of how many of the trees that are so evident in LA4's photomontages would remain in conjunction with development under the H25 provisions, and what the likely longevity of those, often, very mature trees will be in conjunction with the PPC proposal? This is an important issue as it goes to the credibility of many of LA4's findings about the building envelopes shown for the various viewpoints. Indeed, comments about the mitigatory effects of the current trees and 'vegetative content' in general are found in relation to virtually every viewpoint, apart from that on the summit of Mt Eden.

## Conclusions & Recommendations

Based on this review, it is considered that the following additional material should be provided to assist with more accurate interpretation of the revised scheme's effects:

9. Clarification of whether or not the H25 provisions include compliance with the Volcanic Sightline overlay control;
10. Clarification as to whether or not the latest set of photo simulations show this control applied to the building envelopes shown for Viewpoints 1-11;
11. Explanation of how amenity values in respect of section 7(c) of the Act have been interpreted and applied to the evaluation of effects by LA4;
12. Further explanation of how some high levels of visual effect translate into lower levels of amenity effect (as, for example, with Viewpoint 1);
13. Further analysis of effects in relation to Viewpoint 2, given the quite limited scope of the photo and simulation prepared for that vantage point;
14. Further explanation of the amenity effects that would be experienced by local residents, as opposed to the more transient exposure and effects associated with the motoring public cyclists, etc;
15. Further analysis and/or graphic depiction (via photos, etc) of the effects that would be experienced by those living at 30-38 Owens Road;
16. Analysis of the degree to which the existing trees and other vegetation found at 3 Brightside Road and on the sections at 149-153 Gillies Avenue could be expected to survive with development under the auspices of the H25 provisions and therefore provide the level of screening, buffering and mitigation anticipated in LA4's report.

Regards,  
Stephen



**Stephen Brown**

BTP, Dip LA, Fellow NZILA  
Registered NZILA Landscape Architect

---

**From:** Stephen Brown <stephen@brownltd.co.nz>

**Sent:** Saturday, 21 September 2019 9:14 AM

**To:** Panjama Ampanthong <Panjama.Ampanthong@aucklandcouncil.govt.nz>; Trevor Mackie <t.mackie@hyc.co.nz>

**Subject:** Re: Private Plan Change 21 - Southern Cross Hospitals

Panjama / Trevor,

I agree with many of the points made by Trevor in his analysis associated with retention of the SCAR Overlay on 149 to 153 Gillies Avenue. In particular, the Overlay provisions would help to maintain a scale, pattern height and intensity of development that remains compatible with that found within the SCAR Overlay east of Gillies Avenue.

However, the same provisions do not ensure compatibility with residential development down Owens Road, for which the potential visual dominance of development across the PC25 site remains an issue. In addition, it doesn't ensure the integration of redevelopment on the existing hospital site – just outside the SCAR Overlay – with other SCAR properties south of Brightside Road. That road remains a relatively small scale, intimate, residential environment that has a quite different character to Gillies Avenue, and its current level of amenity is maintained by the setback of the current hospital building from Brightside Road, its two-story profile, and trees and walling down that same frontage. Under the PC25 provisions, a redeveloped hospital has the potential to rise up to 4 storeys, possibly more, with much more limited 'sleeving'. As such, it has the potential to be both visually dominant and devoid of any feeling of congruence with the SCAR residential properties across Brightside Road. These matters would not be addressed via retention of the SCAR overlay on the two Gillies Avenue properties.

Consequently, even though retention of the overlay has the potential to reduce the level of visual effect relative to Gillies Avenue and properties across that major road corridor, it would have little real effect in relation to the sensitive residential environment of Brightside Road merging with Shepherds Avenue. In addition, the Overlay across those properties would not address, or resolve, potential issues in relation to a new hospital's interface with the Owens Road residential properties.

Regards,  
Stephen

Stephen Brown Director

**brown**

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**From:** Brown NZ Ltd <stephen@brownltd.co.nz>

**Date:** Thursday, 19 September 2019 at 4:15 PM

**To:** Panjama Ampanthong <Panjama.Ampanthong@aucklandcouncil.govt.nz>, Trevor Mackie <t.mackie@hyc.co.nz>

**Subject:** Re: Private Plan Change 21 - Southern Cross Hospitals



**BRIGHTSIDE  
HOSPITAL  
PROPOSED  
PRIVATE PLAN  
CHANGE**

Review of Transportation Matters

Auckland Council



# DOCUMENT CONTROL RECORD

**CLIENT** Auckland Council  
**PROJECT** Brightside Hospital Proposed Private Plan Change  
**HG PROJECT NO.** 1040-145262-01  
**DOCUMENT** Review of Transportation Matters

# ISSUE AND REVISION RECORD

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**ORIGINATOR** Phillip Shipton & Meredith Bates



**REVIEWED** Meredith Bates



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## 1.0

# QUALIFICATIONS AND EXPERIENCE

The transportation matters have been reviewed by Meredith Bates, Principal Transportation Engineer with assistance by Graduate Transportation Consultant, Phillip Shipton.

Meredith is a Principal Transportation Engineer at Harrison Grierson and holds a Bachelor of Engineering Degree (Civil) (Hons) from The University of Auckland (2002).

She is a Chartered Member of Engineering New Zealand (CEngNZ).

Meredith has over 15 years experience in transportation investigations, traffic engineering and safety auditing in NZ, Australia and the UK. Meredith has excellent project management skills and a strong technical understanding, proven throughout feasibility and scheme assessment projects. She is also an experienced RMA expert on Transportation matters.

## 2.0 INTRODUCTION

Harrison Grierson Consultants Ltd (HG) has been commissioned by Auckland Council (Council) to undertake a review of the proposal to re-zone residential land owned by Southern Cross Hospitals to 'Special Purpose – Healthcare Facilities and Hospital Zone'.

The scope of this report includes the following:

- Brief summary of the proposed plan change.
- Review of application material.
- Review of transport related matters raised in submissions.
- Review of transport related matters raised by Auckland Transport.
- Conclusions and recommendations.

### 2.1 TRANSPORT MATERIAL REVIEWED

The review is based on the following documents:

- Transport Assessment (TA) dated December 2018 (Version: 2 February 2019) prepared by Flow Transportation Specialists (Flow).
- Public Submissions received 17<sup>th</sup> May 2019 and 17<sup>th</sup> June 2019 by Auckland Council.

### 2.2 PROPOSAL SUMMARY

The proposal consists of rezoning the properties at 3 Brightside Road and 149, 151, and 153 Gillies Avenue ("the subject site") from 'Mixed Housing Suburban' Zone and 'Single House' Zone to 'Special Purpose – Healthcare Facilities and Hospital' Zone.

The existing Brightside Hospital is located at 3 Brightside Road and is a three-storey building, comprising 40 patient beds with a gross floor area ('GFA') of 5,196 m<sup>2</sup>.

149 Gillies Avenue is currently occupied by the Everdell Guest House and the properties at 151 and 153 Gillies Avenue are currently occupied by single residential dwellings.

The Proposed Plan Change includes the introduction of a Parking Variation Control on the AUP (OP) planning maps for the subject site, with the inclusion of the parking provision rates in Table E27.6.2.4 of the AUP (OP). The proposed rate is a minimum of 1 per 64m<sup>2</sup> GFA with no maximum rate. The proposed parking rate applies to additional development. The TA states "a minimum car parking provision standard of 1 parking space per 64 m<sup>2</sup> GFA for any additional medical facility development permitted under the Proposed Plan Change is recommended to be established as part of the proposed Plan Change".

## 3.0 REVIEW OF APPLICATION MATERIAL

We acknowledge that the TA completed for the subject site is to gain an appreciation of the transport effects should the subject site be rezoned. The TA does not provide an assessment of effects associated with a land use activity consent, but rather suggests an indicative proposal based on the development potential of the site, should the land be rezoned.

In review of the application material, the authors undertook a site visit to gain an understanding of the context of which the plan change, and hospital extension is proposed.

### 3.1 INDICATIVE DEVELOPMENT

Archimedia Architects have developed a proposal which could be enabled by the Proposed Plan Change. This development proposition includes the retention of the existing Brightside Hospital and the construction of a new extension to the hospital.

This indicative development provides a total of 10,700 m<sup>2</sup> GFA (an additional 5,500 m<sup>2</sup> GFA) of hospital activity permitted in Table H25.4.1 of the Special Purpose – Healthcare Facilities and Hospital Zone, of the AUP (OP). The indicative development is proposed to include a basement parking level.

The TA assesses effects based on this indicative development at an intensity (number of beds) consistent with that of the existing Brightside Hospital. This assumption is based on:

- The parking demand survey is an observation of car parking activity relating to the existing hospital operation. The subsequent parking rate is therefore derived from the existing Brightside Hospital activity. Applying these findings to the proposed extension assumes the extension will consist of a like-intensity.
- The trip generation and subsequent SIDRA intersection modelling is derived from the parking demand survey. Providing assessment of the proposed extension, based on parking demand survey findings assumes the extension will consist of a like-intensity.

It is noted that the Plan Change could enable a development larger than the proposition outlined in the TA.

### 3.2 TRAFFIC GENERATION

A peak hour traffic generation survey was conducted by Flow in April 2017. A total of forty-one (41) peak hour trips were recorded. These trips included vehicles entering and exiting the Hospital accesses and entering and exiting adjacent on-street parking spaces. The peak hour coincided with the 'school' peak hour of 2.45pm to 3.45pm.

Based on the indicative development of 10,700m<sup>2</sup> GFA and the survey recorded by Flow in April 2017 (0.79 trips per 100m<sup>2</sup> GFA), the combined peak trip generation anticipated by the TA would be 84 trips during the 'school' peak hour. The anticipated trip generation complies with E27.6.1 of the AUP (OP), less than 100 vehicle movements for any hour.

The existing Brightside Hospital has 40 beds, with a GFA of 5,196m<sup>2</sup>. With an indicative GFA of 10,700m<sup>2</sup>, approximately 82 beds would be expected, based on the same floor area per bed remaining the same. This equates to an estimated 1.02 vehicle trips per bed during the peak period. The number of staff members is unknown.

It is acknowledged that the number of beds accommodated in a private hospital is often a more reliable indication of trip generation. The RMS Guide<sup>1</sup> states that private hospitals “*peak traffic generation or peak vehicle trips (PVT) was found to be a combination of the number of beds (B) and the number of staff per weekday day shift (ASDS). If the average number of staff per weekday day shift (ASDS) is unknown or unavailable the number of beds (B) alone was found to be a good indicator of peak traffic generation or peak vehicle trips (PVT).*”

The RMS Guide specifies the following equation for finding PVT: **-22.07 + 1.04 B**  
By applying the above equation, the indicative hospital expansion can be expected to generate 63 peak hour vehicle trips.

The NZTA RR 453<sup>2</sup> specifies a peak hour trip generation rate of 1.3 per bed for hospitals, based on 85<sup>th</sup> percentile figures from available surveys. At this rate, the indicative hospital expansion could be expected to generate 107 peak hour vehicle movements. RR453 states that as these are 85<sup>th</sup> percentile rates, they are likely to be 1.05 to 1.15 times higher than the average hospital. Therefore this is considered a conservative rate for this hospital.

Therefore, the 84 peak hour trip generation estimated by the TA is considered an acceptable assumption based on the above industry recognised publications.

In the case of the indicative development, the SIDRA analysis in the TA is based on a GFA and bed numbers consistent with that stated above. However, it is noted that the Proposed Plan Change could enable a development larger than that proposed in the TA (in terms of GFA and/or number of beds) or of different activity, and therefore have potential to generate greater vehicle trips than that assessed in the TA.

### **3.21 SIDRA ANALYSIS**

Section 5.3.4 of the TA assesses the effects of the indicative development (enabled through the Plan Change Proposal) on the operation of nearby intersections using the traffic modelling software ‘SIDRA 7.0 Plus’ (SIDRA).

The SIDRA models developed use 2018 survey data and 2017 data for movements where 2018 data was not collected. The existing SIDRA models were calibrated with collected queue data to ensure that the predicted queues from the models corresponded to the observed queue data. The SIDRA models used are considered up to date and accurate.

The TA concludes that “*the additional traffic predicted to be generated by a permitted development under the Proposed Plan Change can be easily accommodated by the surrounding road network. The effects on the surrounding arterial roads will be no more than minor, and the increase in delay on the turning movements on the surrounding local roads insignificant*”.

It is however recognised that on some local roads, the predicted increase in delay on turning movements may be notable as a result of the indicative development (enabled under the proposed plan change). In particular, right-turn movements out of Brightside Road onto Owens Road are estimated to have an increase in delay of 24 seconds per vehicle on average in the morning peak period (8am to 9am), from 88 seconds to 112 seconds, resulting in a degree of saturation of 1.038 (0.993 existing).

<sup>1</sup> Road and Marine Services (RMS) Guide to Traffic Generating Developments.

<sup>2</sup> New Zealand Transport Agency (NZTA) Research Report 453. Trips and parking related to land use, November 2011



This indicates the difficulty for motorists undertaking right-hand turning movements out of Brightside Road onto Owens Road during the morning peak period, due to significant traffic flow and turning movements on Owens Road and Mountain Road.

However, despite predicted delays, the actual increase in vehicle movements from Brightside Road is relatively small, estimated at nine per hour and an increased length of the 95% queue for the right turn of four vehicles. This indicates that Brightside Road currently reaches capacity in its existing state during the morning peak. As such, the growth variation observed in the SIDRA modelling (2.8%) is consistent with the existing variation expected to occur at the intersection resulting from general changes in traffic behaviour (<10%).

Therefore, the actual effect could be less than predicted, as the existing daily variation could result in similar levels of change in delay, due to the existing saturation level of the intersection.

Overall, we agree with the conclusion made in the TA that SIDRA results showed no overall variation in level of service (LOS) at any of the modelled intersections for any peak period under the trip generation assumed for a development of 10,700m<sup>2</sup> GFA.

### 3.2.2 SUMMARY

The TA notes that should a development be proposed that is bigger than the indicative development, it is likely that the 100 vehicles per hour trip generation threshold will be met, as per E27.6.1 of the AUP (OP), and resource consent for a restricted discretionary activity will be required.

It is noted that a hospital development of at least 12,700m<sup>2</sup> GFA (an additional 2,000m<sup>2</sup> GFA) would need to be proposed in order to meet the 100 vehicles per hour trip generation threshold. This assumes a trip generation rate of 0.79 per 100m<sup>2</sup> GFA is applied based on the existing hospital.

As stated in Section 3.2 above, the Proposed Plan Change could enable a development larger than that proposed in the TA (in terms of GFA and/or number of beds) or of a different activity, and therefore have potential to generate greater vehicle trips than that assessed in the TA. The impact of additional vehicle trips, above that assessed in the TA is unknown.

We have concerns that if a larger development is proposed (in GFA or beds) than the indicative development, or of different activity, there may be negative effects on the local road network.

Therefore, we recommend that any activity other than private hospital and/or a private hospital development with a combined GFA greater than 10,700m<sup>2</sup> and/or a combined total of beds greater than 82, will be required to undertake a revised assessment of the trip generation effects e.g. SIDRA modelling of adjacent intersections. Where the analysis shows any change to the level of service of any movement, Council may request additional measures to be put in place to mitigate this effect.

### 3.3 CRASH HISTORY

Flow conducted a search of New Zealand Transport Agency's ("NZTA") Crash Analysis System ("CAS") for the five-year period from 2013 to 2017 (inclusive), to identify the details of all reported crashes on the roads surrounding the subject site. The results of this CAS search are summarised in Table 9 of the TA. We verify these CAS results as accurate and are summarised below:

- **Gillies Ave/Owens Road Intersection**  
28 total crashes (5 minor injury, 23 non-injury)  
50% of the crashes were crossing turning manoeuvres, 25% rear end/obstruction,



and 21% overtaking (changing lanes). Of the five injury crashes, one was loss of control, and four involved right turns.

- **Brightside Road/Owens Road and Mountain Road/Owens Road Intersections**  
8 total crashes (2 minor injury, 6 non-injury)  
No crashes were reported that resulted from conflict between turning movements at the Mountain Road and Brightside Road Intersections.
- **Brightside Road/Gillies Avenue and Kipling Avenue/Gillies Avenue Intersections**  
10 total crashes (2 minor injury, 8 non-injury)  
Three of the crashes involved vehicles turning right out of Kipling Avenue, including one minor injury. One crash was a rear end on Gillies Avenue, one crash a result of overtaking/merging, and one crash a loss of control on Gillies Avenue (minor injury).

Four of these crashes involved vehicles turning right out of Brightside Road, and colliding with northbound vehicles on Gillies Avenue. All crashes were non-injury. This trend highlights the difficulty of performing cross lane manoeuvres on Gillies Avenue, and the importance of left in/left out only accesses at any development on Gillies Avenue, enabled by the proposed plan change.

The TA concluded that vehicles parked on-street (west side) reduced the inter-visibility south along Gillies Avenue to 40m and contributed to the four turning crashes at this intersection. Austroads recommends 123m is required for 'Safe Intersection Sight Distance' (SISD) for a design speed of 60km/h and reaction time of 2 seconds. Vehicles parked on the eastern side of Gillies Avenue further restrict turning movements from Brightside Road.

To ensure adequate sight distance compliant with Austroads south along Gillies Avenue from Brightside Road, the TA suggests Auckland Transport consider providing an additional 20 m of No Stopping At All Time ("NSAAT") markings linking the two existing sections of NSAAT markings. This would result in the loss of two to three parking spaces, however these are already subject to clearway restrictions.

We advise the applicant to consult Auckland Transport with regard to the proposed NSAAT marking extension on Gillies Avenue. However, the provision of additional NSAAT marking is to be considered independently from the implementation of the proposed Plan Change.

Overall, additional turning movements at these intersections, resulting from the Proposed Plan Change are not anticipated to exacerbate any existing or create any new safety issues.

### 3.4 ACCESS

The TA considers that should a left in/left out access on Gillies Avenue be included as part of a development that could be enabled by the Plan Change, the operation of this access will have a negligible effect on the operation of Gillies Avenue.

Notwithstanding this, it is noted that any vehicle access for a permitted development proposal enabled by the Proposed Plan Change will be subject to the rules in Chapter E27 of the AUP (OP). A Vehicle Access Restriction will apply to Gillies Avenue due to its classification as an Arterial Road in the AUP (OP). As such any vehicle access that is proposed to/from Gillies Avenue will need a restricted discretionary consent.

Auckland Transport recommends a mechanism is provided to ensure that vehicle turning movements from any new or reconstructed vehicle access off Gillies Avenue are restricted.

We agree that a left in/left out restriction is applied to any access on Gillies Ave proposed through the plan change proposal. Furthermore, we recommend access is restricted a single access only onto Gillies Avenue and the main entrance to the hospital remains on Brightside Road. This will minimise the effects on the surrounding road network.

### 3.5 PARKING

The subject site is proposed to be rezoned as 'Special Purpose – Healthcare Facility and Hospital Zone' for hospital activities. Table E27.6.2.4 of the AUP (OP) - Hospitals require a minimum of one parking space per 50 m<sup>2</sup> GFA and no maximum.

As such, a development of similar size to the proposed development (10,700m<sup>2</sup>) enabled under the Proposed Plan Change with no Parking Variation Control would be required to provide a total of 214 onsite car parking spaces.

The survey undertaken in April 2017 established the peak demand within the existing hospital site was 50 cars, where a total on-site parking capacity of 54 spaces was recorded. In addition, a total of 31 hospital related cars were parked on Brightside Road and Shiphards Avenue, where an on-street parking capacity of 100 spaces was recorded. The peak parking demand is therefore estimated to be 81 cars.

Accordingly, the peak parking demand rate for Brightside Hospital is therefore 1 parking space per 64 m<sup>2</sup> GFA, based on the existing GFA of 5,196 m<sup>2</sup>. The results from the survey therefore inform the proposal to introduce a Parking Variation Control on the AUP (OP) planning maps for the subject site.

The TA states that based on their parking demand survey results, the AUP (OP) parking rate for hospitals (1 parking space per 50 m<sup>2</sup> GFA) will likely be too much and result in adverse amenity effects. The TA suggests the existing parking rate for 'non-specified' hospital activity specified in the AUP (OP) is based on larger scale and intensity hospitals, unlike that of the subject site.

For the indicative development of 10,700 m<sup>2</sup> GFA, the TA states that a total of 136 onsite parking spaces will be required.

Applying the proposed parking provision to the hospital extension only, requires 86 new parking spaces. This would result in a total of 140 (54 plus 86) parking spaces on site. It is evident the TA has used the surveyed on-site parking demand of 50 spaces to calculate 136 spaces.

It is accepted that parking for the existing hospital occurs both on site and on street, and as such, some off site effects are already accepted.

Any future development should provide sufficient parking onsite to meet the demand of the additional beds. We agree that applying the parking variation rate to the additional development GFA is acceptable, as this will ensure the new on-site parking spaces accommodate the total demand for the additional hospital activity (calculated using surveyed on-site plus on-street demand). The existing parking numbers for the existing hospital must also remain. This equates to a combined total of 140 on-site parking spaces for the existing hospital and indicative development.

Further, it is considered that the controls given in Chapter E27 of the AUP (OP) relating to the provision of appropriate loading facilities, bicycle parking and accessible parking spaces, as well as the design of these transport elements, are adequate to ensure that these matters can be appropriately addressed at the time when consent will be sought to implement a new building under the Proposed Plan Change.

## 4.0 SUBMISSIONS

A total of 20 submissions were received on the 17<sup>th</sup> May 2019 and 17<sup>th</sup> June 2019 from Auckland Council relating to traffic and transportation. The main concerns relating to traffic and transportation matters are summarised below:

- An undersupply of on-site parking, resulting in an over-demand of on-street parking space in the area and illegal parking activity.
- Exacerbated traffic congestion resulting from the hospital extension.
- Concern for cyclist safety on Gillies Avenue resulting from increased vehicle movements associated with the proposed hospital extension.
- Concerns regarding the impact of construction traffic, considering prolonged construction impacts of the original Brightside Hospital.

Table 1 below summarises the matters raised by the submitters and provides comments on the issues raised.

Table 2 below summarises the matters raised and recommendations provided by Auckland Transport, along with our comments.

## 4.2 PUBLIC SUBMISSIONS

**TABLE 1:** PUBLIC SUBMISSION SUMMARY

ISSUE TOPIC	REFERENCE	OPPOSE OR SUPPORT	SUMMARY OF ISSUE	COMMENTS
Parking under-supply	Submission 22 Philip Taylor - resident of 19 Glenfell Place	All Oppose	<p>There is an existing on-street parking shortage on Brightside Road and surrounding streets due to the high demand of spaces.</p> <p>On-street parking is currently used by local education providers, local office activity, local medical providers including Mercy Hospital, and commuters among others.</p> <p>The existing Brightside Hospital on-site parking undersupply contributes to a high demand for on-street parking in the surrounding residential streets.</p> <p>On-street parking on Brightside Road and Shipherds Avenue fills up during the early morning on weekdays. The loss of parking for guests and servicing is stated as an inconvenience.</p> <p>Many submitters have experienced and/or witnessed negative impacts from this over-demand of parking spaces, including motorists blocking driveways and parking illegally.</p>	<p>Submitter 92 conducted their own on-street parking survey. The submitter undertook observations along Brightside Road and part of Shipherds Avenue for the weekdays between 12<sup>th</sup> and 30<sup>th</sup> November 2018 in the morning between 8:00 – 8:30am. The survey identified that parking demand for hospital workers was on average 33 spaces. The survey assumed the on-site parking was at capacity (54 spaces). It is noted the time period of 8:00-8:30am is a much shorter time period than the survey undertaken by Flow.</p> <p>Based on the submitters observed parking demand, a parking rate of 1 per 60m<sup>2</sup> GFA is derived. This would require 10 additional parking spaces compared to that proposed by the Plan Change.</p> <p>Therefore, the parking survey conducted by Flow in 2017 and the submitter in 2018 established similar parking demands from Brightside Road and Shipherds Avenue.</p> <p>Overall, we are in agreement with the desire to reduce on-site parking to be consistent with the Chapter E27.3 (8) and (9) policies of the AUP (OP), however acknowledge the need to provide sufficient parking as to reduce the impact on the local on-street parking demand for full time employees.</p>
	Submission 33 Michael Lorimer - resident of 6 Brightside Road			
	Submission 75 Margaret Parker - resident of 11 Glenfell Place			
	Submission 79 Anthony Randerson - resident of 7 Shipherds Avenue			
	Submission 92 Robert Speer - resident of 3A Shipherds Avenue			

**TABLE 1: PUBLIC SUBMISSION SUMMARY**

ISSUE TOPIC	REFERENCE	OPPOSE OR SUPPORT	SUMMARY OF ISSUE	COMMENTS
	<p>Submission 93 Suzanne Speer – resident of 3 Brightside Road</p> <p>Submission 94 Eden Epsom Residential Protection Society Inc.</p> <p>Submission 159 Simon Nelson and Florence Holdsworth – resident of 4 Shipherds Avenue.</p>		<p>Many submitters noted that the 1997 resource consent for the current Brightside Hospital included 61 on-site parking spaces are to be provided. The hospital is in breach of this condition where between 53 and 57 spaces are currently provided. As such, staff also attribute to on-street parking demand. All submitters referenced in this table conclude that the hospital extension would exacerbate existing on-street parking problems in the area and that the proposed on-site parking variation will be insufficient to accommodate all staff.</p>	<p>The proposed parking rate is considered acceptable in providing sufficient parking space to accommodate the indicative hospital extension to 10,700m<sup>2</sup> GFA. Further, the subject site is considered to be well serviced by public transport.</p> <p>The proposed parking variation control is based on parking demand from the existing hospital. Currently, this parking demand is on-site and on-street. It is expected all additional parking demand will be provided for on-site and the effects of on-street parking will not be increased with the indicative development.</p> <p>Further, the condition outlined in Section 3.2 of this report states that where a development with a combined GFA greater than 10,700m<sup>2</sup> and/or greater than a total of 82 beds are proposed, the applicant will be required to undertake a revised assessment of the trip generation effects e.g. SIDRA modelling of adjacent intersections. Where the analysis shows any change to the level of service of any movement, Council may request additional measures to be put in place to mitigate this effect.</p>
Traffic Congestion	<p>Submission 22 Philip Taylor - resident of 19 Glenfell Place</p> <p>Submission 73 Cheryl Cliffe – resident of ½ Brightside Road</p>	All Oppose	<p>Increased traffic volumes resulting from the proposed expansion will exacerbate existing congestion on Brightside Road, Gillies Avenue, Owens Road and Mountain Road. These roads are currently busy during the commuter and school peak hours.</p>	<p>Our review of trip generation in Section 3.2 above concluded that SIDRA results displayed no overall variation in the level of service (LOS) at any of the modelled intersections for any peak period under the proposed plan change trip generation.</p> <p>Further, the condition outlined in Section 3.2 of this report would require further SIDRA modelling analysis where a development larger than that proposed in the TA (GFA greater than 10,700m<sup>2</sup></p>

**TABLE 1: PUBLIC SUBMISSION SUMMARY**

ISSUE TOPIC	REFERENCE	OPPOSE OR SUPPORT	SUMMARY OF ISSUE	COMMENTS
Construction Traffic	<p>Submission 75 Margaret Parker – resident of 11 Glenfell Place</p> <p>Submission 79 Anthony Randerson – resident of 7 Shipherds Avenue</p> <p>Submission 45 Michelle Adams – resident of 6 Brightside Road</p>	All Oppose	<p>Brightside Road is used as a 'rat-run' to avoid the Owens Road lights. At peak hours, traffic queues extend to the intersection of Owens Road and Brightside Road, blocking the access from Shipherds Avenue.</p> <p>Concern for school children that walk, cycle and scooter the area will have to negotiate risk from the reported excavation, construction traffic, road closure and increased congestion.</p>	<p>and/or greater than 82 beds total) is proposed. Where the analysis shows any change to the level of service of any movement, Council may request additional measures to be put in place to mitigate this effect.</p> <p>The recommended extension of NSAAT markings along Gillies Avenue (further detailed in Section 3.3 above) will improve visibility at the Brightside Road/Gillies Avenue intersection and facilitate flow efficiency.</p> <p>It is anticipated that construction traffic activity would primarily occur on the northern side of Brightside Road.</p> <p>For school children who reside on Brightside Road and Shipherds Avenue, an alternative access to local schools is possible via Owens Road, which avoids the construction activity on Brightside Road. However, where the northern side of Brightside Road is restricted for construction activity, traffic management plans should ensure safe pedestrian access is available on the southern side, with a temporary pedestrian refuge installed for crossing Brightside Road where necessary.</p> <p>Congestion is an existing occurrence in Brightside Road and surrounding streets. Pram crossing facilities at the northern end of Brightside Road are considered appropriate for use during construction period.</p> <p>The existing signalised pedestrian crossings at the Owens Road/Gillies Avenue intersection is also considered appropriate for pedestrian accessibility.</p>

**TABLE 1: PUBLIC SUBMISSION SUMMARY**

ISSUE TOPIC	REFERENCE	OPPOSE OR SUPPORT	SUMMARY OF ISSUE	COMMENTS
				<p>The CTMP conditions recommended in Table 2 below provide further provisions for reducing the construction effects on the local road network and ensuring pedestrian safety and accessibility.</p>
	<p>Submission 159 Simon Nelson and Florence Holdsworth – resident of 4 Shipherds Avenue</p>		<p>Inconvenience experienced from the heavy transport needed to extract and transport soil from previous hospital. The submitter estimates the proposed hospital extension would require upward of 4,000 truck movements over a 3-year period, resulting in enormous adverse impacts on residents in the vicinity.</p>	<p>It is appropriate for a CTMP to manage construction effects. A CTMP does not have to be approved by the Road Controlling Authority (RCA) if it considers effects cannot be managed. The RCA can also include thresholds and monitoring aspects to the CTMP which will allow them to shut down the site should there be breaches.</p> <p>The CTMP provides the RCA with thorough control over the construction effects and identifies mitigation measures by the consent holder throughout the construction period.</p> <p>It may also be practical to have a liaison committee during construction to allow residents to identify effects to the contractor and the RCA, which should facilitate more immediate action from the contractor and result in less effects to residents. This would also allow the contractor to forewarn residents about disruptive periods of activity that may occur (i.e. during a large concrete pour).</p>
<p>Road Safety</p>	<p>Submission 22 Philip Taylor - resident of 19 Glenfell Place</p>	<p>Oppose</p>	<p>Concerned that additional traffic volume will impact on cyclists at the Gillies Road/Owens Road and Mountain Road/Owens Road intersections, particularly during school peak periods.</p>	<p>No cyclist infrastructure exists on Gillies Avenue and Owens Road and none are planned.</p> <p>Our review of trip generation in Section 3.2 above concluded that SIDRA results show no overall variation in the level of service (LOS) at any of the modelled intersections for any peak period under the proposed plan change trip generation. Therefore, the</p>

**TABLE 1: PUBLIC SUBMISSION SUMMARY**

ISSUE TOPIC	REFERENCE	OPPOSE OR SUPPORT	SUMMARY OF ISSUE	COMMENTS
				<p>increase in traffic movements from the indicative hospital extension is unlikely to have an impact on cyclist safety.</p> <p>The recommended extension of NSAAT markings along Gillies Avenue (further detailed in Section 3.3 above) will improve visibility south of the Brightside Road/Gillies Avenue intersection.</p> <p>Any additional access proposed on Gillies Ave will be subject to a Restricted Discretionary Assessment and therefore the design can be optimised with appropriate measures (speed humps, markings, signage) to improve pedestrian and cyclist safety.</p>

**4.3 AUCKLAND TRANSPORT SUBMISSION**

**TABLE 2: AUCKLAND TRANSPORT (AT) SUBMISSION SUMMARY**

ISSUE TOPIC	SUMMARY OF ISSUE	AUCKLAND TRANSPORT RECOMMENDATION	COMMENTS
Encouraging/ facilitating use of transport alternatives	To mitigate or reduce the effects of the plan change on the transport network.	AT recommends measures to support a shift to public transport. The Transport Assessment supporting PPC21 identifies the development and maintenance of a Travel Plan as a possible measure to encourage staff to travel by public transport, walking and cycling.	We consider a Travel Plan is desirable and will support AT's recommendation. It is considered that the reduced parking supply also contributes to achieving the desired outcome to a degree. The provision for a travel plan will also be subject to what development is proposed and therefore the specific details of a travel plan should be determined once the scale of a specific land use activity is identified. <u>Overall, we strongly recommend the provision for a travel demand management plan associated with the proposed plan change and any enabled development.</u>



**TABLE 2: AUCKLAND TRANSPORT (AT) SUBMISSION SUMMARY**

ISSUE TOPIC	SUMMARY OF ISSUE	AUCKLAND TRANSPORT RECOMMENDATION	COMMENTS
		<p>As there is no certainty that there will be an opportunity to incorporate these measures through subsequent consenting and approval processes based on the PPC21 and AUPOIP provisions, AT requests the applicant identify how this mechanism identified in the Transport Assessment can be provided for.</p>	
<p>Impact on Walking &amp; Cycling</p>	<p>Walking accessibility is enabled through existing footpaths and crossing facilities. Cyclist's will generally utilise the general traffic lanes or footpaths.</p>	<p>AT request further information from the applicant to confirm whether the walking demands generated by the expanded hospital development enabled through PPC21 will be adequately addressed by the existing walking infrastructure and facilities (taking into account existing demand generated from other activities in the area such as schools) or if any mitigation is required in regard to the availability and safety of crossing points, the dimensions or condition of footpath assets or other safety related measures (e. g. lighting).</p>	<p>We consider that the walking demand generated by the expanded hospital development will not require new or upgraded pedestrian facilities. The existing footpaths within the vicinity of the subject site are of satisfactory size and condition. The signalised crossing points at Owens Road are considered sufficient for use by visitors of the hospital.</p> <p>Providing pedestrian crossings/refuges on Gillies Avenue would expose pedestrians to four high volume traffic lanes, which is considered undesirable when considering the age and ability of visitors likely to visit the hospital. A pedestrian crossing/refuge would also be difficult to implement due to limited road reserve space.</p> <p>Providing signalised pedestrian crossing at the Gillies Avenue/Brightside Road intersection is considered unnecessary assuming any development is consistent with that proposed in the TA. However, any development that exceed a GFA of 10,700m<sup>2</sup> and/or 42 beds, would require further assessment, of which signalisation may then be considered as a mitigation measure.</p>

**TABLE 2: AUCKLAND TRANSPORT (AT) SUBMISSION SUMMARY**

ISSUE TOPIC	SUMMARY OF ISSUE	AUCKLAND TRANSPORT RECOMMENDATION	COMMENTS
Trip Generation Effects	To understand the change in traffic effects between the existing levels of traffic and the anticipated residential activity under the AUP (OP) and the level of estimated incremental change over and above this scenario based on the plan change enabled hospital development.	<i>Request further information from the applicant to understand the relative extent of traffic effects and to demonstrate that the traffic effects are appropriately assessed and mitigated to address the matters raised in this submission.</i>	<p>The recommended extension of NSAAAT markings along Gillies Avenue (further detailed in Section 3.3 above) will improve visibility at the Brightside Road/Gillies Avenue intersection in the southward direction.</p> <p>We consider the request for assessment of the comparative traffic effects under the AUP (OP) enabled scenario would be beneficial to gain a complete understanding of the relative traffic impacts of each scenario.</p> <p>The indicative development proposed under the plan change is estimated to generate 84 peak hour vehicle trips. The TA states this is an increase of 43 trips on the existing trip generation of Brightside Hospital, based on no change in the density of the number of beds.</p> <p>Under the existing 'Residential – Single House Zone', the three land parcels would generate 3 peak hour vehicle movements (assuming trip generation rates specified by the RMS Guide). It can be concluded that the indicative development proposed under the plan change would generate an additional 40 peak hour vehicle movements. The impact of this increase in vehicle activity at the subject site is assessed in SIDRA modelling in the TA.</p> <p>Therefore, sufficient information has been provided to assess the impacts of the indicative development. Further, the condition outlined in Section 3.2 of this report would require further SIDRA modelling analysis where a development larger than that proposed in the TA (GFA greater than 10,700m<sup>2</sup> and/or greater than 82 beds total) is proposed. Where the analysis shows any change to the level of service of any movement, Council may request additional measures to be put in place to mitigate this effect.</p>

**TABLE 2: AUCKLAND TRANSPORT (AT) SUBMISSION SUMMARY**

ISSUE TOPIC	SUMMARY OF ISSUE	AUCKLAND TRANSPORT RECOMMENDATION	COMMENTS
	<p>Concerns around the timeframes used for the trip generation survey considering hospital visitor hours are between 11am and 8pm.</p>		<p>Although the traffic survey neglected the hospital visitor hours, we consider that at these off-peak times the trip generation is able to be accommodated on the local road network, and therefore the effects are negligible.</p>
	<p>Convert the calculated trip rates to per bed and/or per staff rate and compare these against documented guidelines and rates.</p>		<p>In Section 3.2 of this report, the estimated trip generation for the indicative hospital development is 84 trips in the peak hour. A comparative analysis of the per bed peak trip generation rates from industry recognised publications is included in the assessment of the trip generation. The existing Brightside Hospital has 40 beds, with a GFA of 5,196m<sup>2</sup>. With an indicative GFA of 10,700m<sup>2</sup>, it can be expected there to be approximately 82 beds. Therefore, it is estimated 1.02 vehicle trips per bed during the peak period, based on the same density of number of beds to GFA. The number of staff members is unknown.</p>
	<p>Trip generation should include discussion on pick-up and drop-off of staff, patients and visitors and the impact on parking demand and the appropriateness of the proposed parking variation control.</p>		<p>We acknowledge the pick-up and drop-off portion of trip generation activity may have an impact on parking demand during the peak periods. However, this is expected to be minor considering the existing Brightside Hospital has a dedicated vehicle circulation for this purpose. Further, any indicative development will have potential to include a similar system for pick-up and drop-off activity.</p>
	<p>In regard to the SIDRA modelling, a diagram of where the existing</p>		<p>We agree a diagrammatic representation of the SIDRA results would be useful, however not necessary to understand the impact of the indicative hospital extension, on the surrounding intersections.</p>

**TABLE 2: AUCKLAND TRANSPORT (AT) SUBMISSION SUMMARY**

ISSUE TOPIC	SUMMARY OF ISSUE	AUCKLAND TRANSPORT RECOMMENDATION	COMMENTS
Parking	<p>movements and the proposed movements are predicted to go would be useful to understand the level of change.</p> <p>Further clarification and explanation that the proposed parking rate will not result in an underestimation of the parking demand, including for short stay visitor parking.</p> <p>Relevant operational factors impacting on the existing and future parking demand patterns should be identified. E.g. whether vehicle departures correspond to standard hospital staff shift operational hours.</p> <p>Confirmation is sought around how a total of 136 parking spaces was reached, based on the</p>	<p><i>Request further information from the applicant to understand the relative extent of parking effects and to demonstrate that the parking effects are appropriately assessed and mitigated to address the matters raised in this submission.</i></p> <p><i>Requests that an appropriate mechanism be considered to ensure the applicant undertakes monitoring of on-site and on-street parking after the redeveloped hospital has been established to support the management of transport effects.</i></p>	<p>The proposed parking rate incorporates the demand of staff and visitor parking and therefore it is considered new visitor parking demand associated with the indicative hospital extension will be accommodated on-site.</p> <p>Hospital staff shifts may not follow the traditional working day pattern – Shifts may be eight hours, twelve hours or longer. Twelve hour shifts usually occur from 7am to 7pm, however some may start at 3am and end at 3pm.</p> <p>Overall, only a portion of staff vehicle movements will occur in line with the traditional commuter peaks, while others will occur off-peak or during school-peaks.</p>
			<p>We assume the 136 parking spaces is the result of applying the parking variation rate to the indicative development (10,700m<sup>2</sup>) and excluding the existing on-street parking demand of 31 cars. It is unknown why this approach was taken to arriving at the total on-site parking provision.</p>

**TABLE 2: AUCKLAND TRANSPORT (AT) SUBMISSION SUMMARY**

ISSUE TOPIC	SUMMARY OF ISSUE	AUCKLAND TRANSPORT RECOMMENDATION	COMMENTS
	<p>proposed parking rate of 1 per 64m<sup>2</sup> GFA.</p>		<p>We recommend the future parking allowance is based on applying the parking control to the additional GFA. This should be in addition to the existing onsite parking supply for the hospital.</p>
	<p>Ensure appropriate monitoring of the on-site and on-street parking after the redeveloped hospital has been established as a basis for determining whether appropriate mitigation is required to address effects.</p>		<p>Assuming the proposed plan change is put into effect, we agree on-going monitoring of the traffic effects is appropriate. We suggest this action be included in the TDMP for the site and as a condition of any consent granted for the site.</p>
Road Safety	<p>Potential safety issues at the Brightside Road/Gillies Avenue intersection.</p>	<p><i>AT recommends that the extension of NSAAT is undertaken by the applicant as a mitigation measure or that an appropriate mechanism be put in place to ensure this occurs as identified in the Transport Assessment to address the matters raised in this submission.</i></p>	<p>We consider the extension of NSAAT is an appropriate mitigation measure, to be undertaken by the applicant.</p>
Vehicle Access	<p>Access arrangement associated with a proposed vehicle access on Gillies Avenue, with regard to intersection performance.</p>	<p><i>AT recommends that a mechanism is provided to ensure that vehicle turning movements from any new or reconstructed vehicle access off Gillies Avenue are restricted as identified in the Transport Assessment to address the matters raised in this submission.</i></p>	<p>We consider the provision for left-in/left-out restriction at any new or reconstructed vehicle crossing on Gillies Avenue is an appropriate mechanism to address concerns raised by submissions.</p>

**TABLE 2: AUCKLAND TRANSPORT (AT) SUBMISSION SUMMARY**

ISSUE TOPIC	SUMMARY OF ISSUE	AUCKLAND TRANSPORT RECOMMENDATION	COMMENTS
Construction Traffic	<p>The TA does not address the construction related traffic effects of the proposal. Potential adverse effects associated with the closing of traffic lanes and footpaths, temporary removal of on-street parking and managing heavy vehicles to and from the site is anticipated.</p>	<p>AT recommends that the Transport Assessment be amended to address construction traffic impacts, with the identification of a mechanism to ensure an appropriate Construction and Traffic Management Plan is undertaken that minimises the impacts on the safe and efficient operation of the transport network to address the matters raised in this submission.</p>	<p>We consider the provision of an Auckland Council approved CTMP is an appropriate mechanism to ensure construction has a minimum impact on the safety and efficiency of the adjacent transport network.</p> <p>It is recommended the CTMP include the following requirements:</p> <ul style="list-style-type: none"> <li>• All loading and unloading activity is to occur on-site where possible. Loading and unloading <u>must not</u> occur from Gillies Avenue at any time.</li> <li>• Loading and unloading activity must occur outside of the commuter peak periods and school peak periods in order to avoid causing congestion and access issues.</li> <li>• Parking of contractor vehicles must occur on site where possible, and eventually utilize the basement parking space upon completion.</li> <li>• Pedestrian access will be maintained along Gillies Avenue and Brightside Road, with the partial use of a gantry and pedestrian refuge where necessary.</li> </ul> <p>The CTMP must address how deliveries would be made to the site, the location of loading areas (such as any temporary use of the on-street traffic lane), and how heavy or over dimension vehicles would be brought to and removed from the site, etc.</p> <p>The CTMP must include details (among other general issues listed in the standard CTMP list) of: hours of operation; the location of parking for workers or sub-contractors who need to have their vehicles on or close to the site; when vehicles would be able to use the roadway to load or unload (if at</p>

**TABLE 2: AUCKLAND TRANSPORT (AT) SUBMISSION SUMMARY**

ISSUE TOPIC	SUMMARY OF ISSUE	AUCKLAND TRANSPORT RECOMMENDATION	COMMENTS
			all); wheel washing; maintenance of pedestrian access on both road frontages past the site; signage; and ensuring that access to neighbouring properties is not compromised.

## 5.0 CONCLUSION

Overall, it is concluded that:

- The subject site is well serviced by public transport, including frequent, connector and local bus services to provide access to other central and southern suburbs. The subject site is located within an area characterised by other medical and educational institutions. The suburbs of Mount Eden and Newmarket are within active transport distance of the subject site.
- The AUP (OP) requires a minimum parking rate of one parking space per 50 m<sup>2</sup> GFA for non-identified hospitals. As part of the proposed plan change, the applicant is proposing a Parking Variation Control on the AUP (OP) planning maps for the subject site, with the inclusion of the parking provision rates in Table E27.6.2.4 of the AUP (OP). The proposed rate is a minimum of 1 per 64m<sup>2</sup> GFA with no maximum rate.

The proposed rate is based on the parking survey conducted by Flow in April 2017. The applicant states the AUP (OP) parking rate will provide an unnecessary oversupply of parking, resulting in negative amenity effects.

We support the proposed Parking Variation Control when considering policies E27.3 (8) and (9) of the AUP (OP), but also acknowledge the need to provide sufficient parking as to reduce the impact on the local on-street parking demand from full time employees.

- The level of the trip generation as a result of the indicative 10,700m<sup>2</sup> GFA development can be accommodated within the road network. SIDRA modelling results in the TA show no overall variation in level of service (LOS) at any of the modelled intersections for any peak period.

However, we recommend the Plan Change include the following provision:

- that any activity other than private hospital and/or a private hospital development with a combined GFA greater than 10,700m<sup>2</sup> and/or a combined total of beds greater than 82, will be required to undertake a revised assessment of the trip generation effects e.g. SIDRA modelling of adjacent intersections. Where the analysis shows any change to the level of service of any movement, Council may request additional measures to be put in place to mitigate this effect.
- The crash record within the vicinity of the site is typical of arterial roads. The crash record at the Gillies Avenue/ Brightside Road indicates issues associated with right-hand turn movements out of Brightside Road onto Gillies Avenue. As part of the Proposed Plan Change, the applicant proposes extending broken yellow lines on Gillies Avenue to remedy this issue. It is advised the applicant consult Auckland Transport with regard to this proposal.
- Any vehicle access propositions of a permitted development proposal enabled by the Proposed Plan Change will be subject to the standards given in Chapter E27 of the AUP (OP). As such any vehicle access that is proposed from Gillies Avenue will need a restricted discretionary consent as under Standards E27.6.4.1 (2) and E27.6.4.1 (3), a Vehicle Access Restriction will apply to Gillies Avenue as Gillies Avenue is classified as an Arterial Road in the AUP (OP).



Auckland Transport recommend a mechanism is provided to ensure that vehicle turning movements from any new or reconstructed vehicle access off Gillies Avenue are restricted. We agree that a left in/left out restriction is applied to any access proposed through the plan change proposal and that access to/from Gillies Avenue is limited to a single access.

- We consider the provision of an Auckland Council approved CTMP is an appropriate mechanism to ensure construction has a minimum impact on the safety and efficiency of the adjacent transport network. It is recommended the CTMP include the following requirements:
  - All loading and unloading activity is to occur on-site where possible. Loading and unloading must not occur from Gillies Avenue at any time.
  - Loading and unloading activity must occur outside of the commuter peak periods and outside of school peak periods.
  - Parking of contractor vehicles will occur on site where possible and utilize the basement parking space upon completion.
  - Pedestrian access will be maintained along Gillies Avenue and Brightside Road, with the partial use of a gantry and temporary pedestrian refuge where necessary.
- The provisions of the plan change are generally acceptable and will allow Council discretion to assess the traffic impacts of developments at the resource consent stage.

Where the Plan Change includes provision to address traffic effects for a development of greater scale and/or intensity, there are no transport related reasons why this plan change application should not be granted.

## 6.0 LIMITATIONS

This report is for the use by Auckland Council only, and should not be used or relied upon by any other person or entity or for any other project.

This report has been prepared for the particular project described to us and its extent is limited to the scope of work agreed between the client and Harrison Grierson Consultants Limited. No responsibility is accepted by Harrison Grierson Consultants Limited or its directors, servants, agents, staff or employees for the accuracy of information provided by third parties and/or the use of any part of this report in any other context or for any other purposes.

19 July 2019

Auckland Council  
Private Bag 92300  
Victoria Street West  
Auckland 1142

**Attention: Panjama Ampanthong**

Dear Panjama

## **PRIVATE PLAN CHANGE: 21 SOUTHERN CROSS HOSPITALS LIMITED – ACOUSTIC REVIEW**

### **Introduction**

Southern Cross Hospitals Limited has applied for a plan change for the re-zoning of land at 3 Brightside Road and 149, 151 and 153 Gillies Avenue. The zoning for the sites would be changed from Residential (Single House and Mixed Housing Suburban) to Special Purpose – Healthcare Facility and Hospital Zone. The purpose of the re-zoning is to permit the extension of the existing Brightside Hospital and activities to include these properties.

The application included an acoustic report assessing the potential environmental noise effects arising from the re-zoning prepared by Earcon Acoustics. In addition, submissions have been received by the Council opposing the application which have referenced acoustic concerns.

I have reviewed the acoustic assessment report and considered the submissions with respect to acoustic impact. This report summarises the findings of our review.

### **Experience**

My name is Curt Robinson and I am an Associate at Marshall Day Acoustics. I hold the degree of Bachelor of Engineering from the University of Auckland (1986) and I am a member of the New Zealand Acoustical Society and the Institute of Acoustics in the United Kingdom.

I have over 25 years' experience in acoustic engineering in both New Zealand and the United Kingdom. Over the past 19 years I have undertaken environmental and building acoustic assessments including the construction and design and specification of building façades and mechanical plant to ensure compliance with the relevant noise performance standards. I have been engaged by both private clients to advise on acoustic and vibration issues and local authorities to undertake peer review assessments of building design.

### **Review of Acoustic Report**

#### General

Earcon Acoustics prepared an acoustic report for Southern Cross Hospitals Limited to assess the environmental acoustic effects of the proposed plan change on 30 January 2019. The report considered noise emission from the building including traffic movements and provided recommended internal noise controls in accordance with AS/NZS 2107:2016 *“Acoustics – Recommended design sound levels and reverberation times for building interiors”*.

#### Existing Acoustic Environment

The acoustic report states that the façades of dwellings looking on to Gillies Avenue would be exposed to a noise level of 50 dB  $L_{Aeq}$  or more at night with noise reducing to 40 dB  $L_{Aeq}$  at the rear of the properties.

It is noted that the report excludes background noise ( $L_{90}$ ) measurements. The witnessed noise levels suggested that there is a relationship of approximately 10 decibels less than the  $L_{eq}$  level.

The background sound at night for these properties would be expected to range between 30 and 40 dB  $L_{A90}$  based on the noise logger data in the absence of information provided in the acoustic report.

#### Noise Performance Standards

The noise performance standards for noise generated within a Residential Zone are given in Rule E25.6.2 which requires that noise shall not exceed 50 dB  $L_{Aeq}$  on Monday to Saturday between 7am to 10pm and on Sunday between 9am and 6pm within the boundary of any other site zoned Residential. Noise shall not exceed 40 dB  $L_{Aeq}$  / 75 dB  $L_{Amax}$  for all other times.

The noise performance standards for noise generated within the Special Purpose Hospital Zone are given in Rule E25.6.13 which requires that noise shall not exceed 55 dB  $L_{Aeq}$  on Monday to Saturday between 7am to 10pm and on Sunday between 9am and 6pm within the boundary of any other site within the zone. Noise shall not exceed 45 dB  $L_{Aeq}$  / 75 dB  $L_{Amax}$  for all other times.

Rule E25.6.22 of the Unitary Plan states that where noise generated by an activity in one zone is received on a site in a different zone, the activity generating the noise shall comply with the noise limits and standards of the receiving zone.

When considering the acoustic impact of the proposed plan change to the receiving residential dwellings in the receiving zone the acoustic consultant correctly identifies that the more stringent Residential Zone noise limit shall apply for any activity occurring on the proposed plan change site.

Compliance with these Standards would ensure that the noise generated from the site would be no more than is permitted now. I consider that compliance with these limits would ensure that the noise levels within the adjacent properties would be acceptable.

The acoustic consultant proposes no amendments to the construction noise and vibration limits from the Unitary Plan and although the receiving acoustic environment will be significantly impacted during the construction period, the limits provide a compromise between the short-term effect and enabling the works to be carried out.

#### Potential Operation Noise – Mechanical Plant

Little information is given on mechanical plant design but given the size of the site and the mitigation measures available for attenuation of mechanical services noise it is considered that the plant can be mitigated to comply with the noise performance standards. Furthermore, as this application is for a Plan Change, detailed information would not be anticipated at this stage. It is expected that the final design will include a lot more equipment other than the chillers mentioned.

#### Potential Operation Noise – Traffic

Drawings for the plan change show that a basement car park would be included as part of any development. Access to the car park would be via a driveway that traverses around the perimeter of the site and along the common boundary with the rear of the properties of 30, 30A and 23A Owens Road.

A 2 m high acoustic screen along the north and western boundaries of the plan change sites has been recommended to ensure compliance with the noise performance standards during vehicle movements.

All of the dwellings identified are 2 storey, the noise emission from vehicle movements to the upper storey windows has not been considered. However, if vehicle numbers are limited to no more than 49 movements during the busiest hour and 12 per hour at night, the acoustic effect is considered likely to be acceptable.

#### Potential Operation Noise – Rubbish Collecting

Rubbish collecting is likely to occur adjacent to Gillies Avenue. Although not mentioned, if rubbish collection was limited to day time hours only (Monday to Saturday 7:00 am to 10:00 pm) then the acoustic emission and effects would be considered as acceptable to the adjacent properties along Owens Road.

### Potential Operation Noise – People

The acoustic report considers that the acoustic effect of people noise outside the building would be negligible and I agree.

### Potential Operation Noise – Emergency Vehicles

The applicant's acoustic report indicates that the proposed hospital activities on site would not include emergency services and so, therefore, has not been considered.

### **Construction Noise & Vibration**

The acoustic report only notes that the noise performance standards in the Unitary Plan for construction noise and vibration are applicable to any works within the proposed plan change area.

No discussion is provided on likely construction noise and vibration levels and compliance with the standards.

Indicative architectural plans provided in the application show that a future hospital would include a car park basement and this is referred to in the acoustic report discussing vehicle noise. The applicant's Civil Engineering report by Babbage indicates that any earthworks for the future hospital are likely to be on basalt and, therefore, some form of rock breaking would be required to excavate and prepare foundations. This activity would not comply with the construction noise limits nor possibly the vibration limits and for some activities the exceedance would be significant.

Whilst non-compliance of the construction noise and vibration limits is not normally a reason to refuse consent for an application, an assessment of effects and limited notification for all dwellings where the noise and vibration levels would exceed the permitted levels is generally considered to be appropriate.

### Conclusions

The acoustic report notes that the noise and vibration conditions would not change with the approval of the proposed plan change and I agree. The development proposal will require some careful consideration during design to ensure compliance with the noise performance standards. I consider that it will not be possible to comply with the construction noise performance standards although this would be likely for any significant construction activity on the sites if they remained residential.

### **Submissions**

Many of the submissions have raised concerns regarding construction noise particularly during the basement construction.

It is my understanding that this application is for a Plan Change and not for Consent to construct a building. The acoustic consultant has recommended the normal Auckland Unitary Plan construction noise and vibration limits shall apply if this application is successful and I concur.

I can state that if a basement excavation is required then those construction noise limits will be exceeded. In addition the vibration amenity limits are likely to be exceeded as well. This must be addressed in a subsequent application for the building design.

Although the construction noise will be significant it does not necessarily mean that the effects will be intolerable. Mitigation measures to reduce the impact of excavation could include: removing the basement from the design; use of expanded grout or blasting to fracture the rock quickly and efficiently; communication with the nearest sensitive receivers to undertake the activities when the houses are not occupied and other management measures to reduce the impact.

This, however, would be required to be addressed, if this application is successful and a further application is submitted to develop the site.

## Conclusions

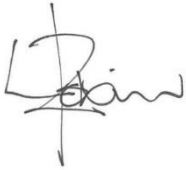
I consider that the proposed noise and vibration rules recommended for the proposed Plan Change are appropriate and the acoustic effects generated by any building or activity located on the site would be reasonable for any adjacent receiver.

I do note that there would be substantial mechanical plant related to the building and that the likely location for a driveway would be adjacent to the nearest dwellings along Owens Road. The design and migration requirements of these activities would need to be carefully considered and designed to ensure compliance with the reasonably stringent noise limits of 55/45 decibels within the boundary of the adjacent properties.

I understand that any hospital building constructed within the proposed plan change area would have a basement area for car parking. Any excavation on this site would require rock breaking of some kind and this construction activity would not comply with the construction noise limits and probably also the construction vibration amenity limits. The exceedance of those standards would need to be addressed when a further application was submitted to develop the site.

Yours faithfully

**MARSHALL DAY ACOUSTICS LTD**

A handwritten signature in black ink, appearing to read 'Curt Robinson', written over a set of horizontal and vertical grid lines.

**Curt Robinson**

**Acoustician**

Auckland Council  
panjama.ampanthong@aucklandcouncil.govt.nz

15 August 2019

Our Ref: 190299-A

Attention: Ms Panjama Ampanthong

Dear Madam

## **GEOTECHNICAL OPINION ON EXCAVATION PRIVATE PLAN CHANGE 21 SOUTHERN CROSS HOSPITAL, BRIGHTSIDE ROAD, EPSOM**

### **Introduction**

The following letter has been prepared in response to a request for expert comments received from Auckland Council (Council) on 17 July 2019. Within that request were four specific questions and these are addressed in this letter.

In addressing the queries, we have attempted to keep comments general, suitable for plan change level. There are many aspects to blasting and control of blasting that would need to be dealt with as part of the resource consent process to address potential effects.

In preparing the following comments, we have reviewed Babbage Civil Engineering Report (dated February 2019) and the supplied public submissions relevant to the excavation anticipated for future development under the proposed Special Purpose – Healthcare Facility and Hospital Zone. We also take into consideration the previous Tonkin + Taylor Ltd Geotechnical Investigation Report (dated July 1994, ref 12729) for the existing Brightside Road hospital.

### **Queries**

Presented below are the four queries received from the Council, each followed by our corresponding answer:

- 1. Would excavation of the basalt rock on the site necessary for the construction of the hospital or any substantial building on the subject site?*

Given the likely size (height, weight) of the structure (approximate 16m height), some excavation of rock would be required to form foundations to support the structure (as the existing surficial fill will likely be unsuitable to support such loads). Such foundation excavations would likely be relatively minor in the scheme of development. However, given the need for car parking, it is likely that some form of basement car parking would be required. Development of such a hospital will likely either require a separate car park building, or a basement excavation. With only approximately 0.5m to 1m of surface soil cover, a basement would have to be excavated into variable condition basalt rock, which would appear to underlie the entire site. As such, excavation of basalt rock is necessary to form a useable basement and could be significant to provide necessary ancillaries to the hospital.

2. *How extensive would the rock blasting be in relation to the hospital development?*

We understand, basement excavations could potentially reach a level of approximately RL 77.5m. Such a level across the proposed building footprint, as shown within the Babbage Civil Engineering report (dated February 2019), would have excavation depths ranging between 0m to over 8m, depending on location. Such an excavation over the entire footprint as shown in Figure 1 below (less the existing basement built in the mid-1990s) could be in the order of 23,000m<sup>3</sup>. (It should be noted the information provided does not show the extent of any proposed basement and this is a broad estimate). If only for the eastern portion (the Gillies Avenue properties) the estimated volume of excavation is 9,500m<sup>3</sup> to 10,000m<sup>3</sup>.

**Figure 1: Excerpt from Babbage Civil Engineering report, drawing A920 (rev C) showing the proposed ground floor extent. An outline is shown extending over the existing hospital footprint and this has been assumed within the proposed basement excavation volume (less the current basement).**



The volume estimates do not allow for blasting outside the footprint, and in our most recent basalt excavation blasting on a similar type of project was performed with a minimum of 400mm excavation outside the proposed basement wall. The proposed depths of excavation will encounter substantial volumes of rock.

Based on available information (rock strengths likely 30MPa to 140MPa, and joint spacing 0.3m to 1.5m with a columnar type rock) reference to Pettifer and Fookes (1994) indicate the excavatability of the basalt rock on-site will likely be 'extremely hard ripping or hydraulic breaking' to 'blasting required'. For efficiency purposes, we expect the latter will be preferred by the developer.

With say an average 0.75m of covering soil, this gives a rock volume of approximate 20,000m<sup>3</sup>, (or 8,500m<sup>3</sup> if the basement is only confined to the Gillies Avenue properties). Available investigation data indicates approximate 20% of the basalt is 'rubbly', which could potentially be excavatable without blasting. This leaves approximate 80% of the rock requiring rock breaking or blasting. However, separating rubbly material for mechanical excavation can be problematic and apart from a surficial layer, any deeper layers would likely be blasted as well.



There are alternatives to blasting, such as hydraulic hammers or chemical breaking, however such methods are typically much slower, and the cost can be similar, hence blasting is preferred. In addition, chemical breaking is often not effective on hard, durable rock such as basalt. Whilst the peak vibrations caused by hydraulic hammer are often not as much as typical blasting, vibrations and noise from such a method are prolonged and can result in significant nuisance value to neighbours, as such, again blasting is often preferred.

3. *Would there be any effects in relation to health and safety on residents who live on Owens Road (adjoining the site to the north), Brightside Road (south to the site) and the neighbourhood?*

Basements excavated in basalt rock have successfully been formed in the Auckland area adjacent to neighbouring residential and commercial areas through blasting. Managing/minimising the effects of these is typically addressed through the land use consent process.

Vibration and noise are typically constrained by limits based within Clause 'E25.6.30. Vibration' of the Auckland Unitary Plan – Operative in part (AUP-OP). This limits peak particle velocities with respect to structures to those outlined in the German standard DIN4150-3:1999. This is a common standard applied to blasting in the Auckland Urban Area. Typically, where small scale blasting trials are performed and appropriate monitoring undertaken, these limits can generally be complied with.

From our previous experience, some of the most common issues and complaints come as a result of rock-breaking and the subsequent excavation of rock following blasting. Some rock may not be sufficiently loose and requires breaking out following a blast. If this is extensive or happens outside normal working hours (say 9.00am to 5.00pm) then complaints from neighbouring residential owners have been received, particularly with respect to continuous noise. We note these hours are less than what is permissible. Under the AUP-OP, blasting and subsequent rock breaking can often occur when people are at home causing disturbance (this is a trade-off between disturbance and productivity leading to reduced overall period of blasting). Generally, in our experience issues with respect to blasting vibrations causing complaints from neighbouring owners or workers have been limited as blast lift heights were limited or neighbouring structures were sufficiently distant to allow significant lift heights and charge weights. Such blasting will likely be felt by neighbouring residents, but not detrimentally affect structures (i.e. a human is typically more sensitive to the vibrations than the dwelling they occupy).

For the subject site, some of the neighbouring structures are very close (within 5m to 10m of the proposed building footprint and presumably the excavation), and compliance with the DIN standard could be problematic for such close distances without significantly reducing charge weights, which may result in rock being insufficiently broken, requiring hydraulic rock-breaking. In addition, the depth and weight of each blast could be relatively small, making the excavation process protracted (many months, if not a year). Whilst such small blasts may not cause damage to neighbouring structures, there may be a 'fatigue' element to the neighbours from multiple small blasts over many months and rock breaking.

The issue of 'fly-rock' and risk is often a matter of opinion. For safety purposes, an exclusion zone around each blast will be required. It is uncertain if this will include neighbouring houses and roads (including Gilles Avenue), however, this is possible. Although measures can be taken to minimise risks, these can reduce excavatability (resulting in more rock hammering due to smaller charge weights or non-optimal holes) and the risk can never be totally eliminated as ground conditions have unknowns. It is considered possible a small portion of Gilles Avenue and neighbouring properties will need to be excluded for a short interval during each blast. When the blast is on the far side of the site, Gillies Avenue would likely not need to be closed.

4. *Would the excavation and blasting for the construction of the hospital require an extended period? If it does, would it necessitate the closure of Gillies Avenue and Brightside Road during the excavation and blasting?*

As highlighted in response to Question 3, the combination of vibration/noise limits and close proximity of structures, roads, and people to the blasting will likely result in an extended period of excavation to minimise short-term effects over many months. Temporary closures of Brightside Road and Gillies Avenue maybe required for short periods during each blast (opinions on this will likely vary depending whom is being consulted).

## **Limitation**

This letter has been prepared solely for the benefit of Auckland Council as our client with respect to the brief. The reliance by other parties on the information or opinions contained in the report shall, without our prior review and agreement in writing, be at such parties' sole risk.

Recommendations and opinions in this email are based on a visual appraisal and review of the supplied information only. The nature and continuity of subsoil conditions are inferred, and it must be appreciated that actual conditions could vary considerably from the assumed model.

We trust the above is sufficient for your purposes at this time. If you have any queries, please do not hesitate to contact the undersigned.

Yours faithfully

**RILEY CONSULTANTS LTD**

Prepared by:



Steven Price  
**Principal, Engineering Geologist**

Reviewed and approved for issue by:



Brett Black  
**Director, CPEng**

## Panjama Ampanthong

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**From:** Gavin Donaldson  
**Sent:** Tuesday, 16 July 2019 1:02 PM  
**To:** Panjama Ampanthong  
**Subject:** RE: Timesheet entries - Southern Cross Hospitals Ltd PC21

Good morning Panjama,

I have visited this site on Monday 8<sup>th</sup> July to assess the trees and the effects of the proposal upon them. The application has provided an indicative footprint for the proposed extension to the existing building supported by an Arboricultural report from Peers Brown Miller Ltd (PBM) which specifically addresses “ the degree to which the existing trees and other vegetation found at 3 Brightside Road and on the sections at 149, 151 and 153 Gillies Avenue could be expected to survive with development under the controls of Chapter H25 (Special Purpose – Healthcare Facility and Hospital Zone) provisions. “

Your specific request was for my assessment of the following, with my comments added below:

- Health and viability of the existing unprotected trees on the site, in particular, those trees located within 149-153 Gillies Avenue.

The trees sited along the Gillies Ave frontage within these sites are in reasonable health and condition for their species, this being:

149 Gillies Ave- two Brush cherry trees, a Pohutukawa, and a privet tree –all in good condition. The privet is a recognized plant pest.

151 Gillies Ave- a dawn redwood tree beside the driveway gate. – in good condition but overshadowed by an adjacent Tulip tree.

153 Gillies Ave- A Tulip tree and a Puriri – both in good health and condition.

153 Gillies Ave- A Pin Oak tree on the Brightside Road frontage, also in good health and condition.

- Condition of street trees in front of the site

The Brightside street trees are mainly silver birch trees of various heights in average

condition. These will provide only a limited contribution to screening of the proposed building

The Gillies Ave street trees are two small cherry trees in fair condition that will provide very little contribution to screening of the proposed building.

- Future development and impact on trees. Richard Peers states that the trees within 149-153 Gillies Avenue would tolerate any excavation work for future development (see indicative development plan below). Do you agree with his statement?

All the trees mentioned above at 149 – 153 Gillies Ave are within a 10m setback from both the Gillies and Brightside property boundaries. I agree with the PBM assessment that these trees will be able to tolerate minor excavation works in the outer periphery of their rootzone for a future development – provided that the correct tree protection and tree works methodologies are adopted from the outset.

It is clear to me that if the Applicant is to rely upon these trees as mitigation and screening of the proposed 16m high extension to the building, then the trees need to be afforded protection during the plan change process – to ensure that any future development is required to take them into consideration at the planning stage. My recommendation for this purpose is to place a restrictive covenant upon the trees by way of a consent notice on the title prohibiting their removal or damage. I have conditions available for this should you require them.

Thank you.



## Panjama Ampanthong

---

**From:** West Fynn  
**Sent:** Monday, 5 August 2019 12:04 PM  
**To:** Panjama Ampanthong  
**Subject:** RE: Review - Tree Scheduling 149-153 Gillies Avenue, Epsom

Hi Panjama

I am writing with reference to your request to see if the trees at 149-153 Gillies Avenue qualify for Notable Tree status under the AUP Notable Tree Evaluation.

I was already familiar with the site and trees and did revisit the site and review the trees with reference to the Notable Tree Evaluation template.

This neighbouring tree is a notable tree:

214	<i>Stenocarpus sinuatus</i>	Australian Firewheel Tree	Isthmus	1	Gillies Avenue 147, Epsom	Lot 3 DP 52878
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With the notable tree assessment, it really is designed to capture trees that are truly exceptional examples of the species and ones that make a significant contribution to the area locally and/or regionally.

The only trees of real merit are (from Brightside Road corner heading north up Gillies Avenue): one Puriri; one Tulip tree; one Dawn Redwood; and on the neighbouring property a Pohutukawa. There are also a number of other lesser trees such as Syzygium, Birch, Gleditsia and Pin Oak.

While the health of these trees is generally good and the Dawn Redwood is a relatively rare species within the region, it is my professional opinion that these trees are not exceptional in their dimensions or character and form, even though they have a large viewing audience being located on such a busy main road.

Because none of these trees are considered exceptional examples of their species they do not qualify as notable trees under the Notable Tree Evaluation criteria.

The merit of these trees would no doubt be increased in value in terms of screening any future development and softening it as such but this would not increase their value in terms of the assessment and in any case the assessment relates to a snapshot of their current values.

One component of the notable tree assessment is heritage value where a strong association with a historic event or feature can be a stand-alone factor where trees can qualify as notable trees on that basis alone. However, this would require an additional heritage assessment and I would suggest that the likelihood of a strong connection would be low.

Therefore, overall I suggest that this is not a mechanism to ensure that these trees have ongoing protection and that another mechanism would be more appropriate such as: a private plan change (costly); a covenant; or consent conditions.

I am happy to discuss further as needed or provide further input.

Regards

**West Fynn | Heritage Arborist**  
**Heritage**



## **ATTACHMENT FIVE**

### **List of Healthcare Facilities and Hospitals in the Special Purpose – Healthcare Facility and Hospital Zone**



**List of healthcare facilities and hospitals currently zoned Special Purpose – Healthcare Facility and Hospital (Auckland Unitary Plan)**

	<b>Name</b>	<b>Address</b>	<b>Land Area</b>
1	Auckland City Hospital	2 Park Road, Grafton	11.7ha
2	MercyAscot	98 Mountain Road, Epsom	2.1ha
3	MercyAscot	90 Green Lane East, Greenlane - Ascot Hospital	1.2ha
4	Greenlane Hospital	210-216 Green Lane West, Epsom	9ha
5	Ryman Retirement Village and Hospital	184-188 St Heliers Bay Road, St Heliers	3.4ha (estimated)
6	North Shore Hospital	132 Shakespeare Road, Takapuna	14.5ha
7	Wilson Centre	212 Lake Road, Hauraki	5.1ha
8	Apollo Medical Centre	119 Apollo Drive, Rosedale	9,988m <sup>2</sup>
9	Waitakere Hospital	55-75 Lincoln Road, Henderson	13ha
10	Warkworth Birthing Centre	56 View Road, Warkworth	4042m <sup>2</sup>
11	Hibiscus Coast Community Health Centre	136 Whangaparaoa Road, Red Beach	4322m <sup>2</sup>
12	Pitman House	50-56 Carrington Road, Mount Albert	9ha (estimated)
13	Middlemore Hospital	100 Hospital Road, Papatoetoe	20ha



	<b>Name</b>	<b>Address</b>	<b>Land Area</b>
14	Manukau Super Clinic and Surgery Centre	901 Great South Road, Manukau Central	37.2ha
15	Awhinatia Health	5-19 Great South Road, Papakura	2.1ha
16	Botany Super Clinic	260-266 Botany Road, Howick	3.5ha
17	Franklin Memorial Hospital	72 Kitchener Road, Waiuku	1.4ha
18	Papakura Maternity	2-4 Clevedon Road, Papakura	1.19ha (estimated)
19	Pukekohe Hospital	1 Tuakau Road, Pukekohe	6ha
20	Spinal Rehabilitation Centre	30-40 Bairds, Otara	4.3ha





Aerial





**Google Maps**

**View North of Park Avenue**



**Eastern View (ASB-hospital branch Manawhenua area)**



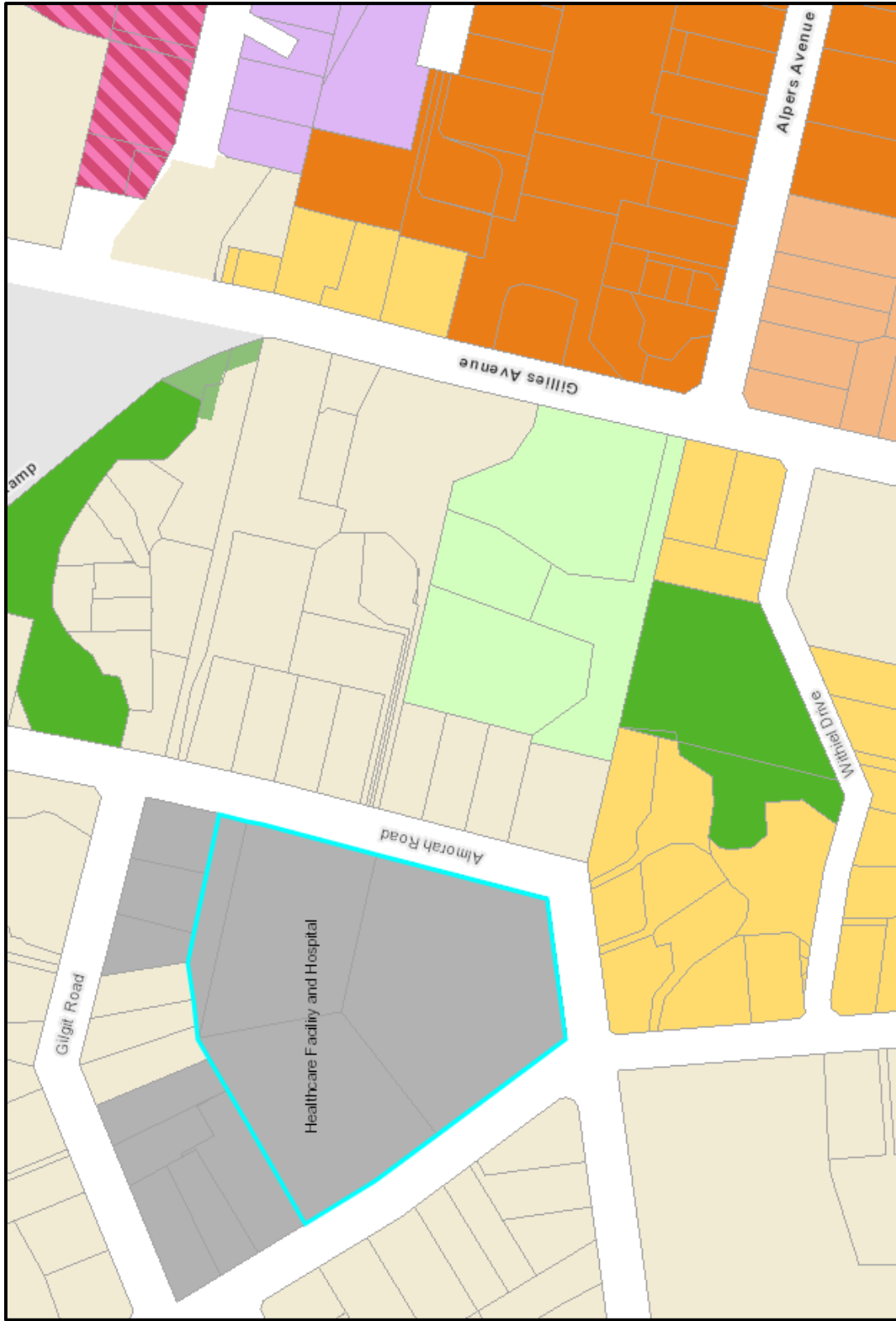
**Grafton Street View**





View from Park Road





**Mercy Ascot**

**Address**

98 Mountain Road  
Epsom 1023

**Zone**

Special Purpose –  
Healthcare Facility  
and Hospital Zone

**Land Area**

2.1ha

**Overlay**

Natural Resources:  
Quality-Sensitive  
Aquifer  
Management Areas  
Overlay [rp] -  
Auckland Isthmus  
Volcanic  
E11, Mount Eden,  
Viewshafts, E12,  
E13, E8 & Height  
Sensitive Area



Aerial





Google Street View



**Mercy Ascot**

**Address**

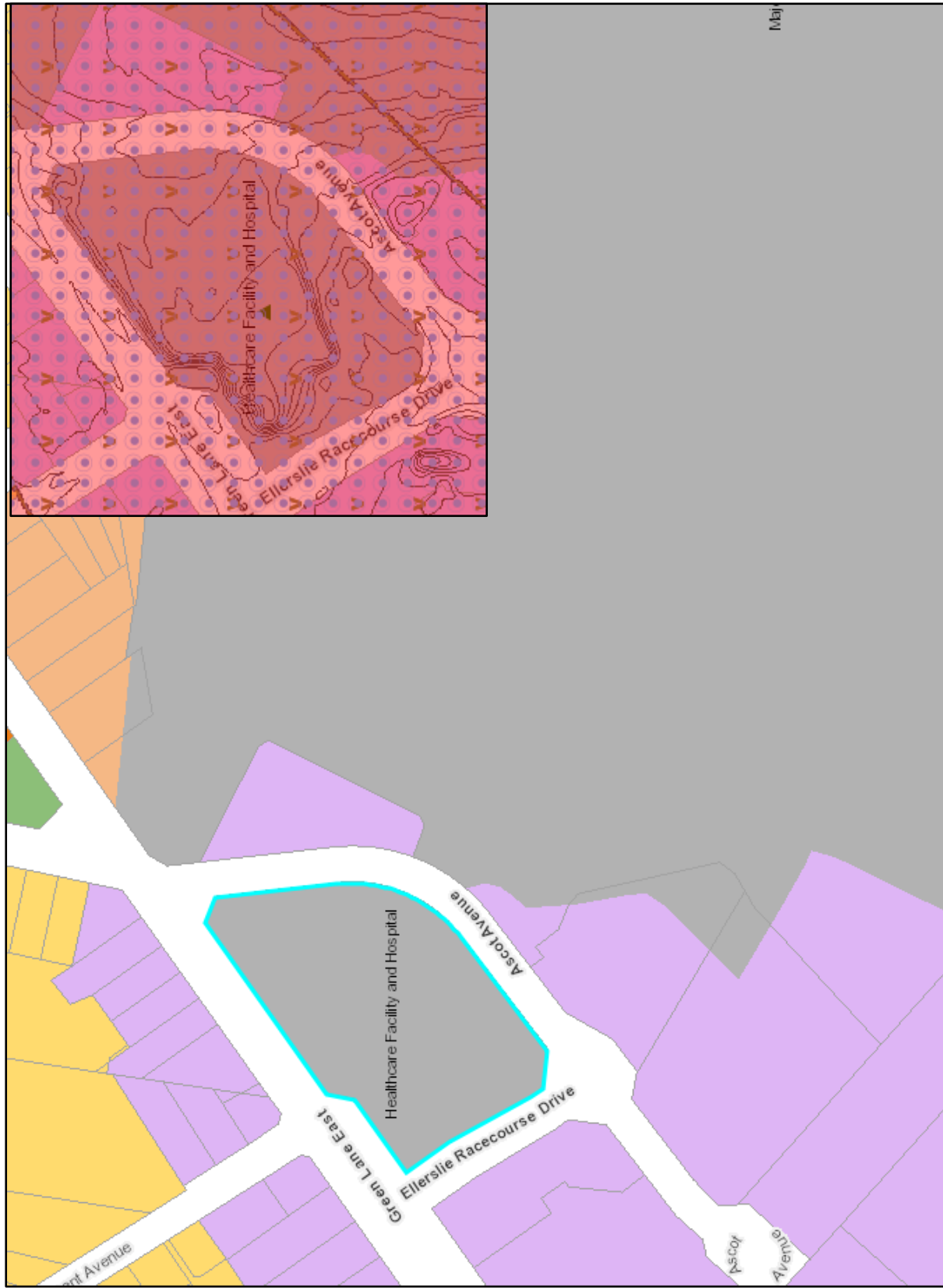
90 Green Lane East  
Greenlane 2024

**Zone**

Special Purpose –  
Healthcare Facility  
and Hospital Zone

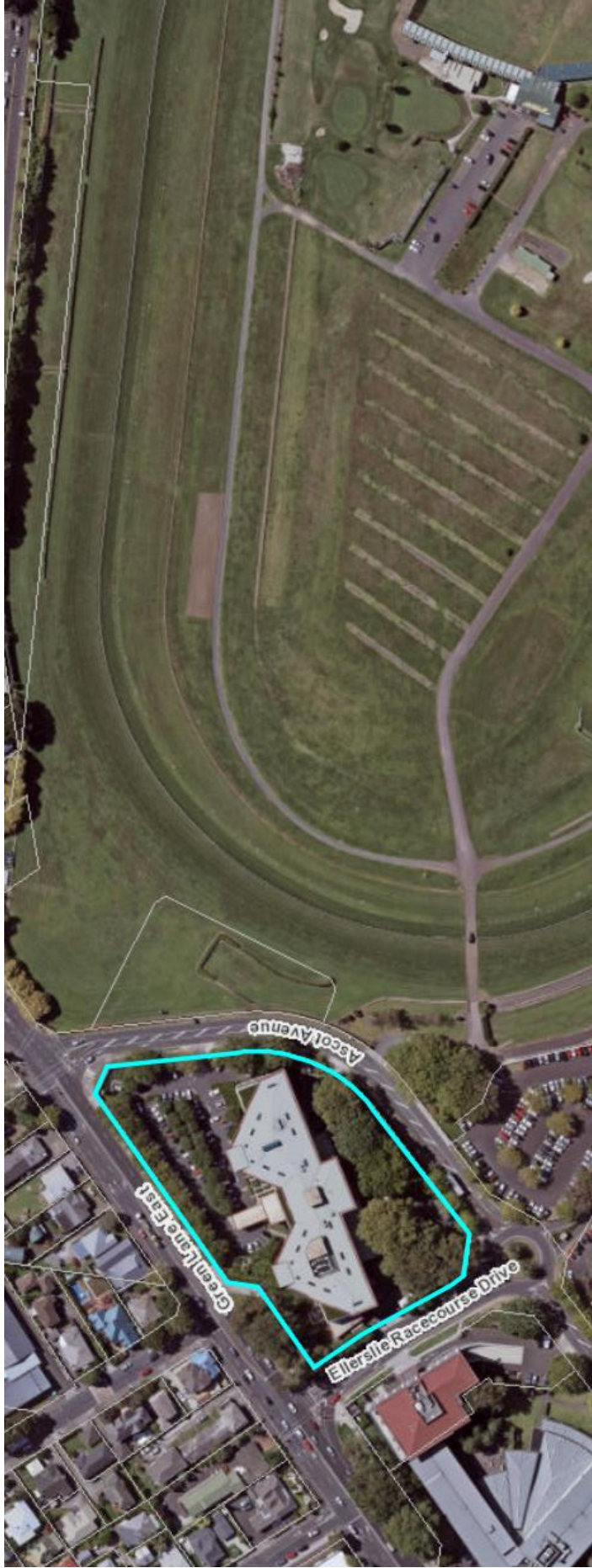
**Land Area**

1.2ha





Aerial



Google Street View



**Greenlane Hospital**

**Address**

210-216 Green Lane  
West Epsom 1051

**Zone**

Special Purpose –  
Healthcare Facility and  
Hospital Zone

**Land Area**

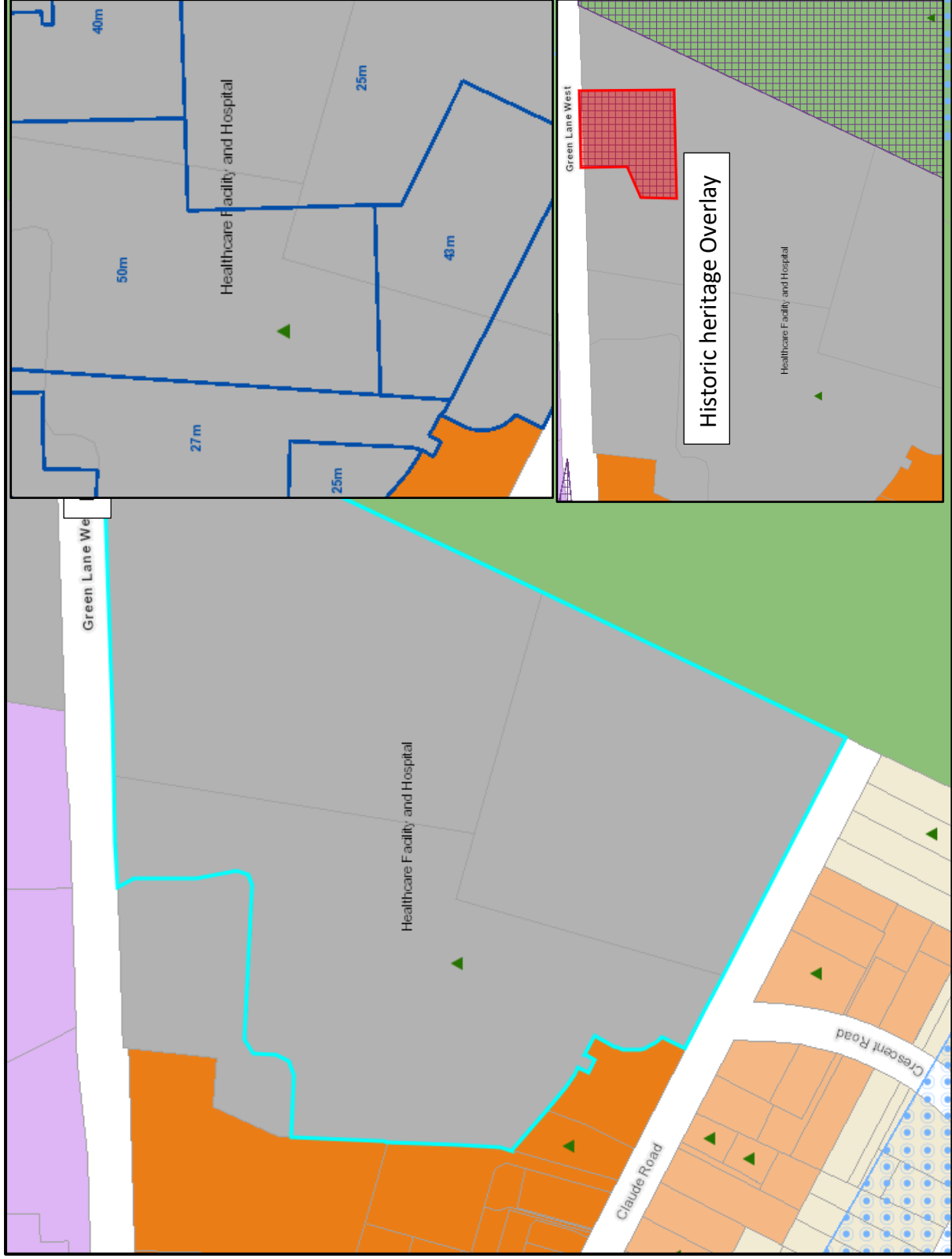
9ha

**Overlays**

Natural Heritage:  
Notable Trees Overlay  
- 390, Pohutukawa,  
Pepper Tree, Holm  
Oak, Pohutukawa

Historic Heritage and

Special Character:  
Historic Heritage  
Overlay Extent of  
Place [rcp/dp] - 1687,  
Greenlane Hospital  
Historic Campus,  
including Costley  
Blocks and Building 5





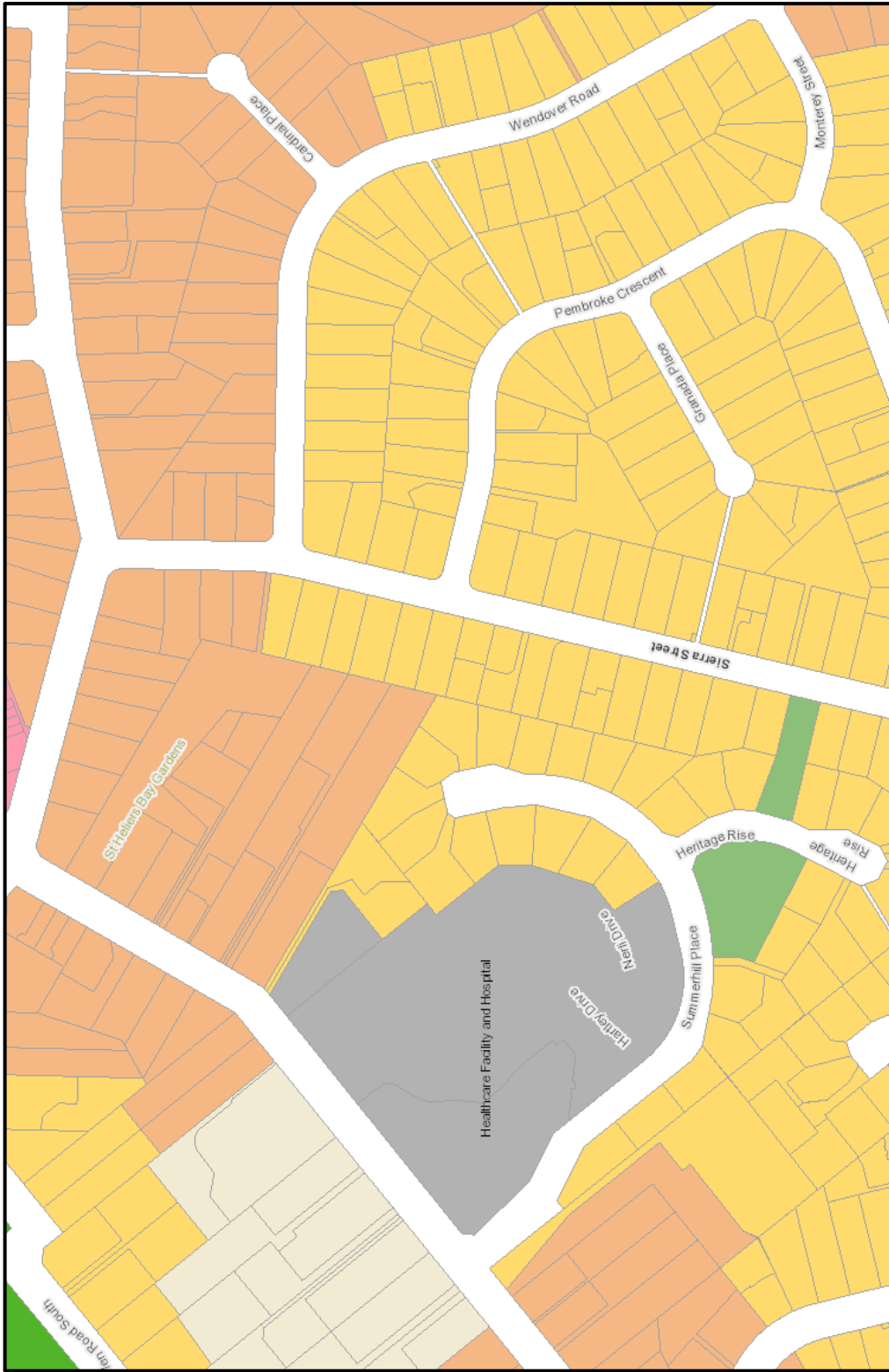
Aerial





Google Street View

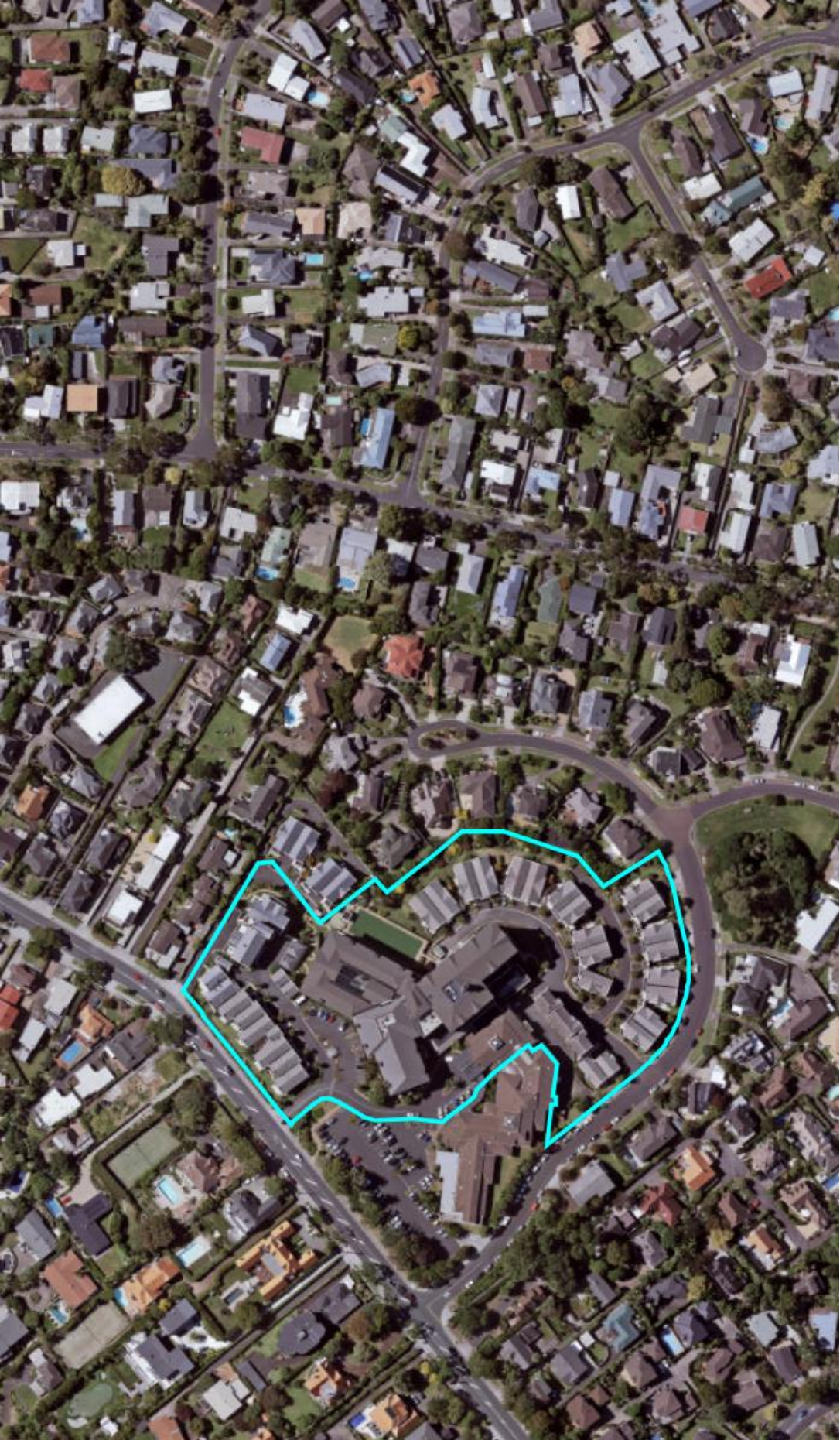




<b>Ryman Retirement Village and Hospital</b>
<b>Address</b> 184-188 St Heliers Bay Road St Heliers 2677
<b>Zone</b> Special Purpose- Healthcare facility and Hospital Zone
<b>Land Area</b> 3.4ha (Estimated)

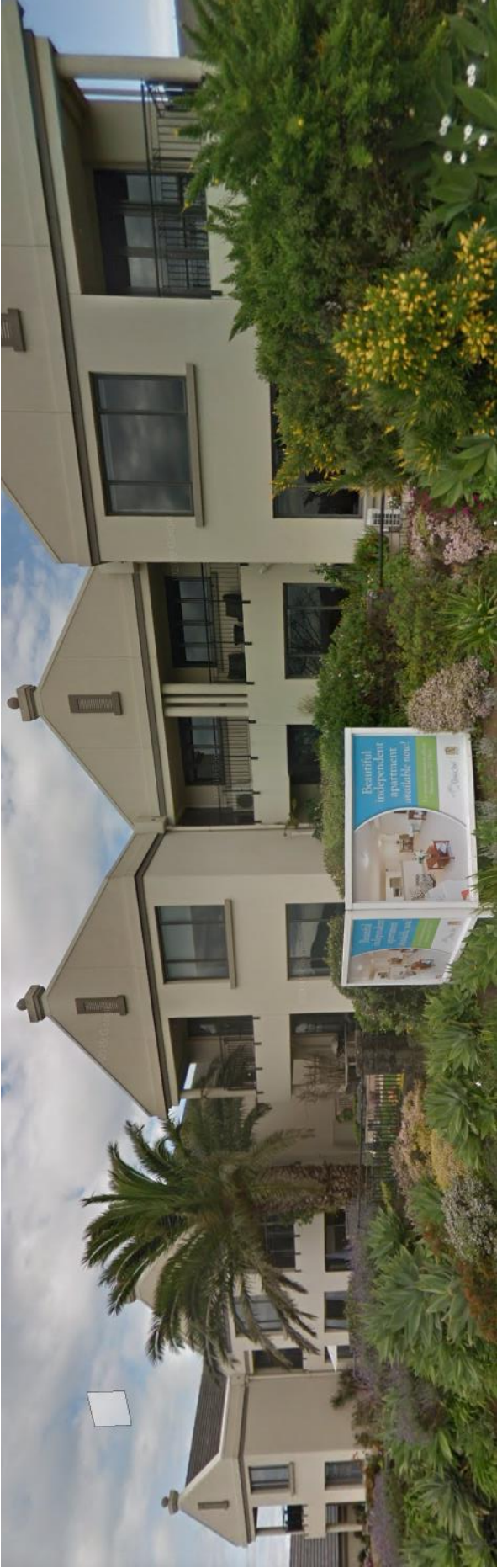


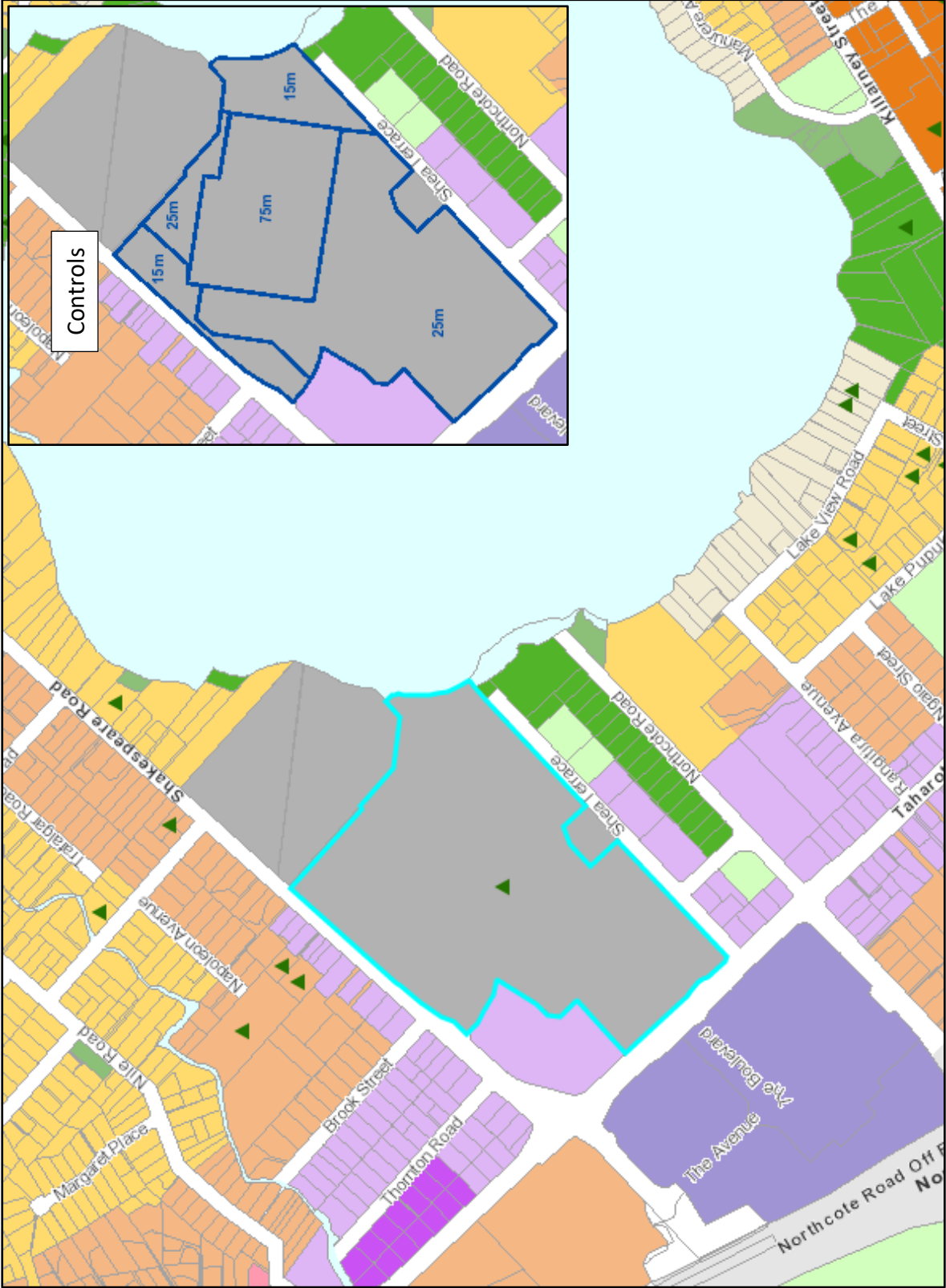
Aerial





Google Street View





<b>North Shore Hospital</b>
<b>Address</b> 132 Shakespeare Road Takapuna
<b>Zone</b> Special Purpose- Healthcare Facility and Hospital Zone
<b>Land Area</b> 14.5ha
<b>Overlay</b> Natural Resources: Significant Ecological Areas Overlay - SEA_T_8140, Terrestrial
<b>Natural Heritage:</b> Notable Trees Overlay - 2897, English Oak



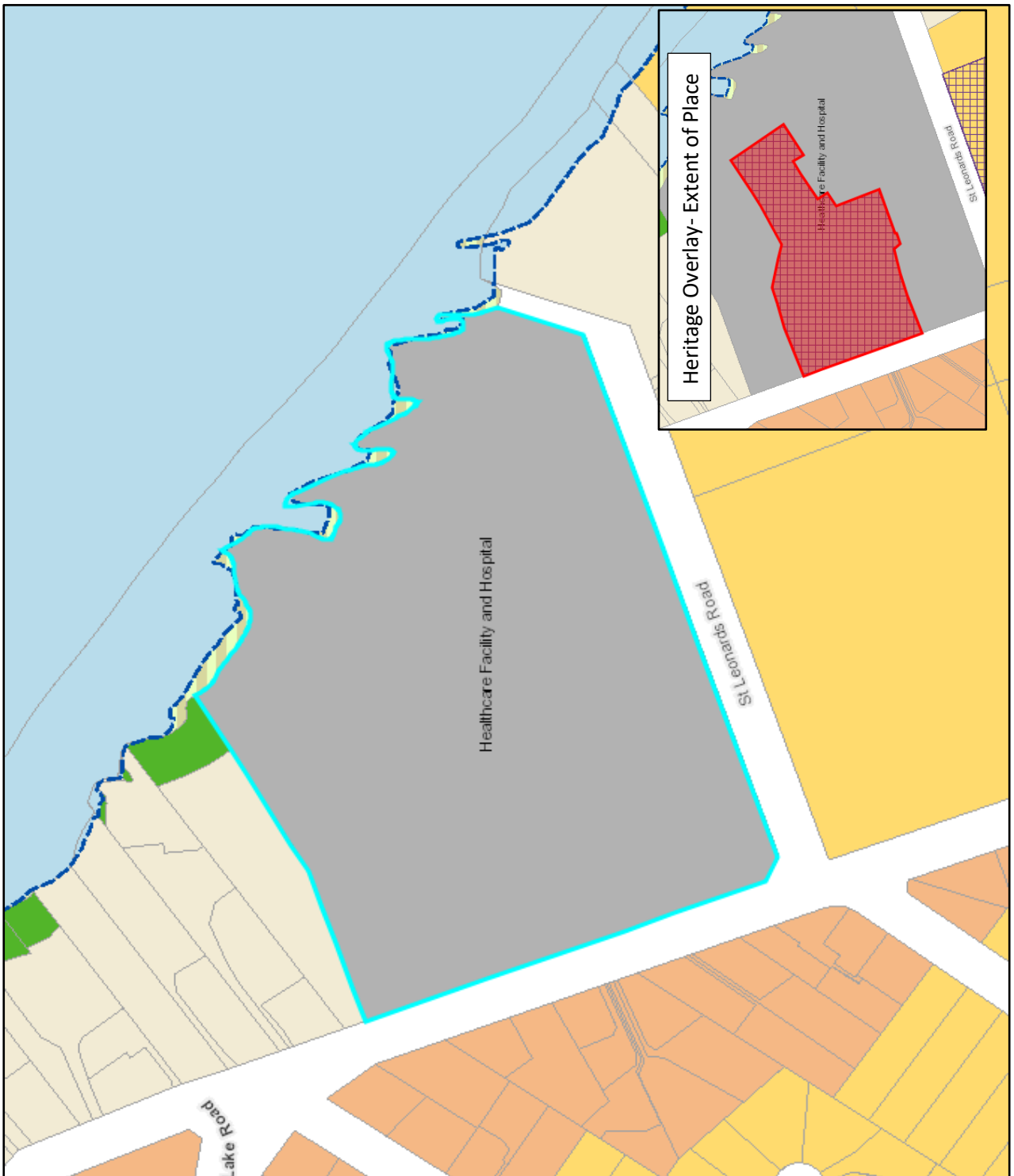
Aerial





Google street View



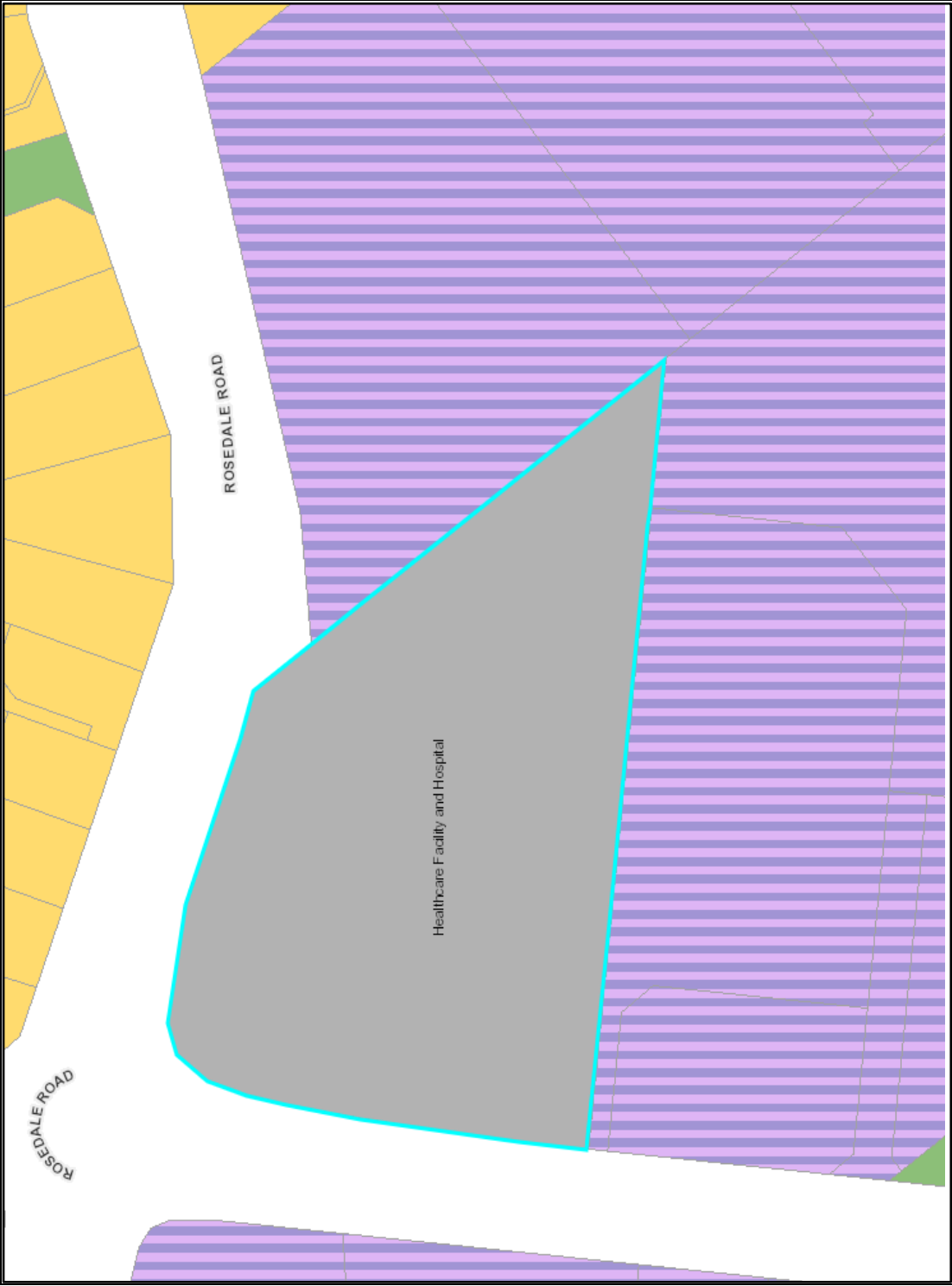


<b>Wilson Centre</b>
<b>Address</b> 212 Lake Road
<b>Zone</b> Special Purpose - Healthcare Facility and Hospital Zone
<b>Land Area</b> 5.1ha
<b>Overlays</b> Natural Resources: Significant Ecological Areas Overlay - SEA-M2-61, Marine 2
Natural Resources: Significant Ecological Areas Overlay - SEA_T_8151, Terrestrial
Natural Heritage: Notable Trees Overlay - 1205, 2 Pohutukawa, 2 Norfolk Island Pine
Natural Heritage: Outstanding Natural Features Overlay [rcp/dp] - ID 195, St Leonards Beach, Takapuna, flysch and slump unit



Aerial

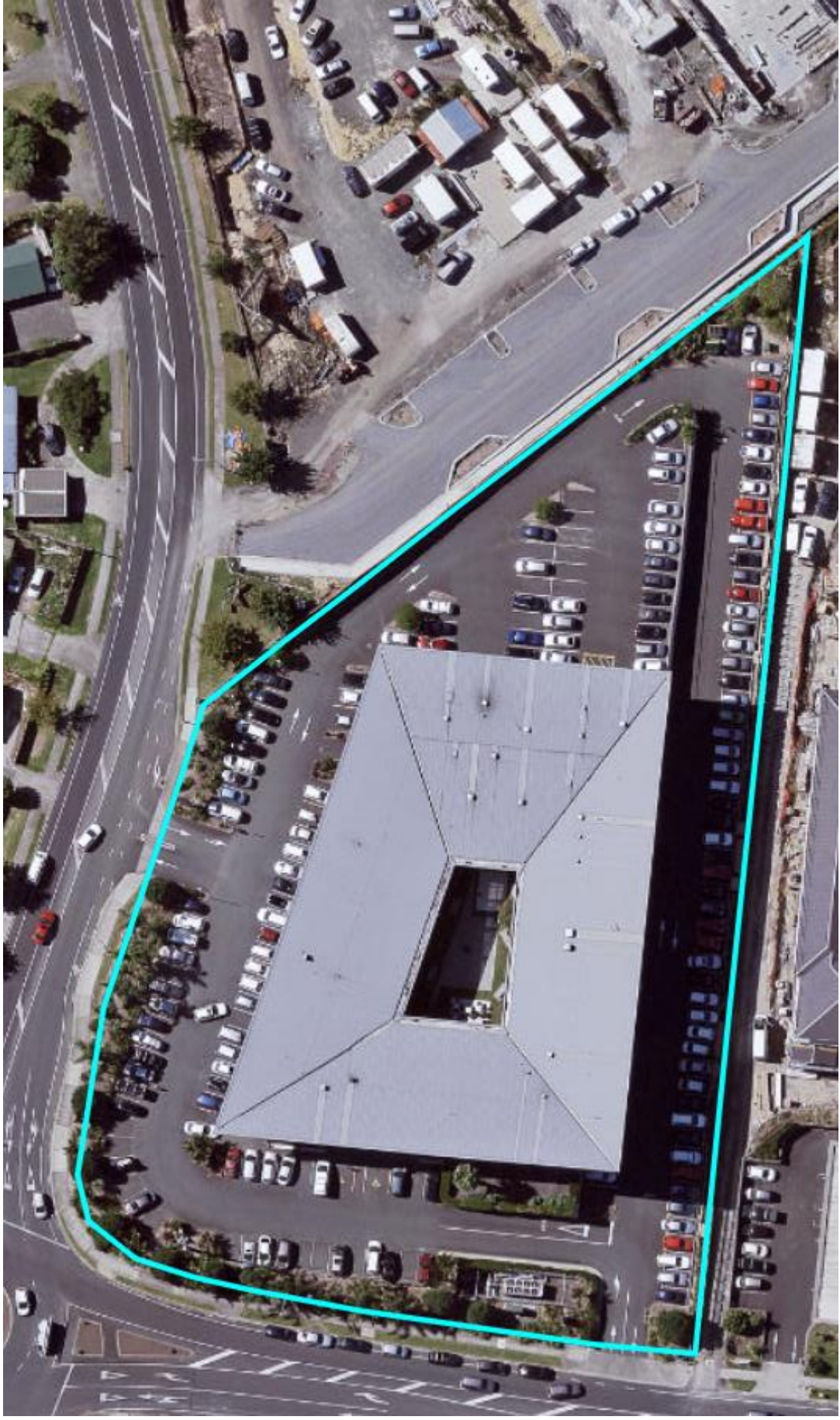




<b>Apollo Medical Centre</b>
<b>Address</b>
119 Apollo Drive Rosedale
<b>Zone</b>
Special Purpose - Healthcare Facility and Hospital Zone
<b>Land Area</b>
9,988m <sup>2</sup>



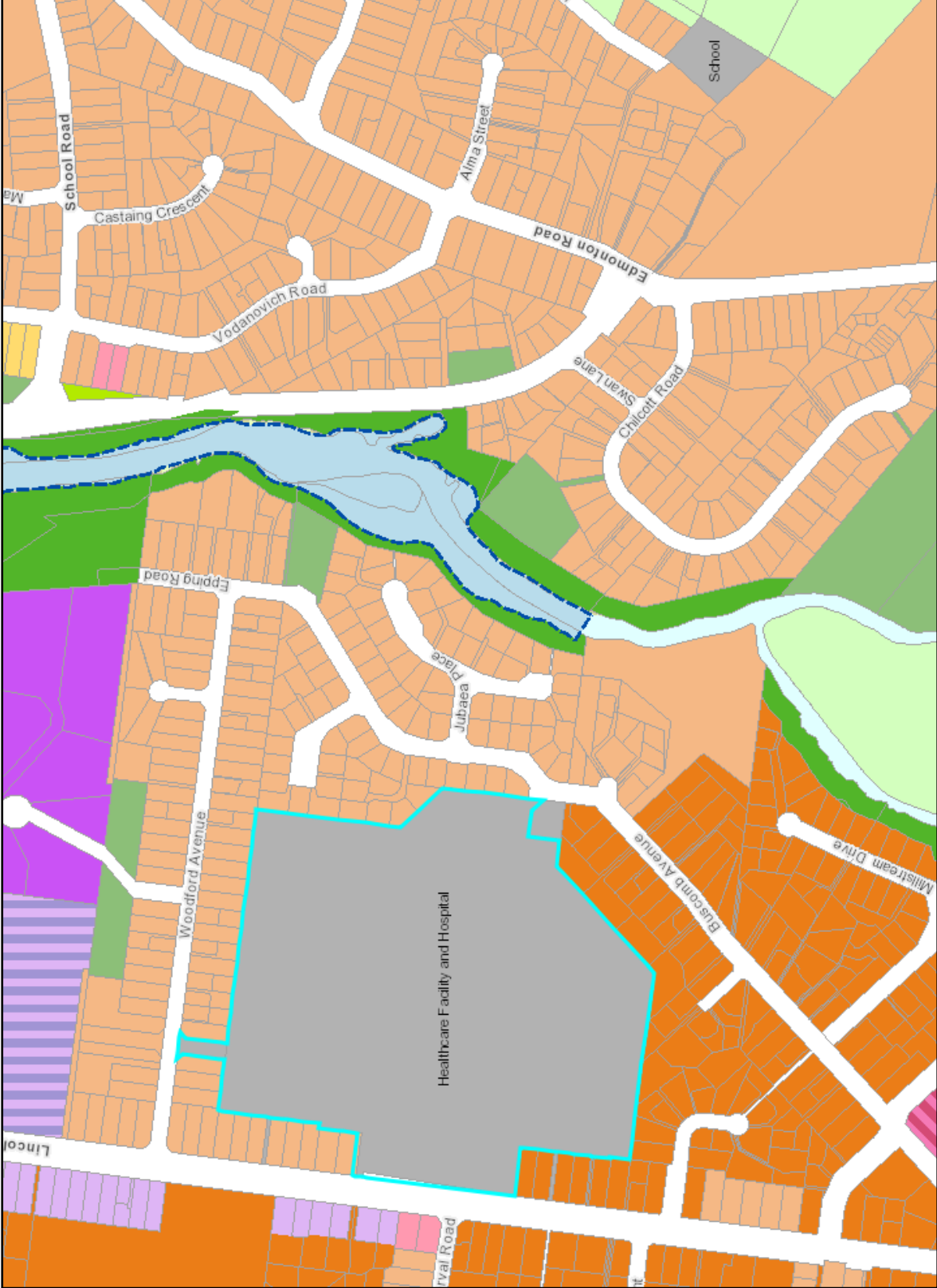
Aerial



Google Street View







<b>Waitakere Hospital</b>
<b>Address</b> 55-75 Lincoln Road Henderson
<b>Zone</b> Special Purpose - Healthcare Facility and Hospital Zone
<b>Land Area</b> 13ha
<b>Overlays</b> Natural Heritage: Notable Trees Overlay - 1942, Plane (2)

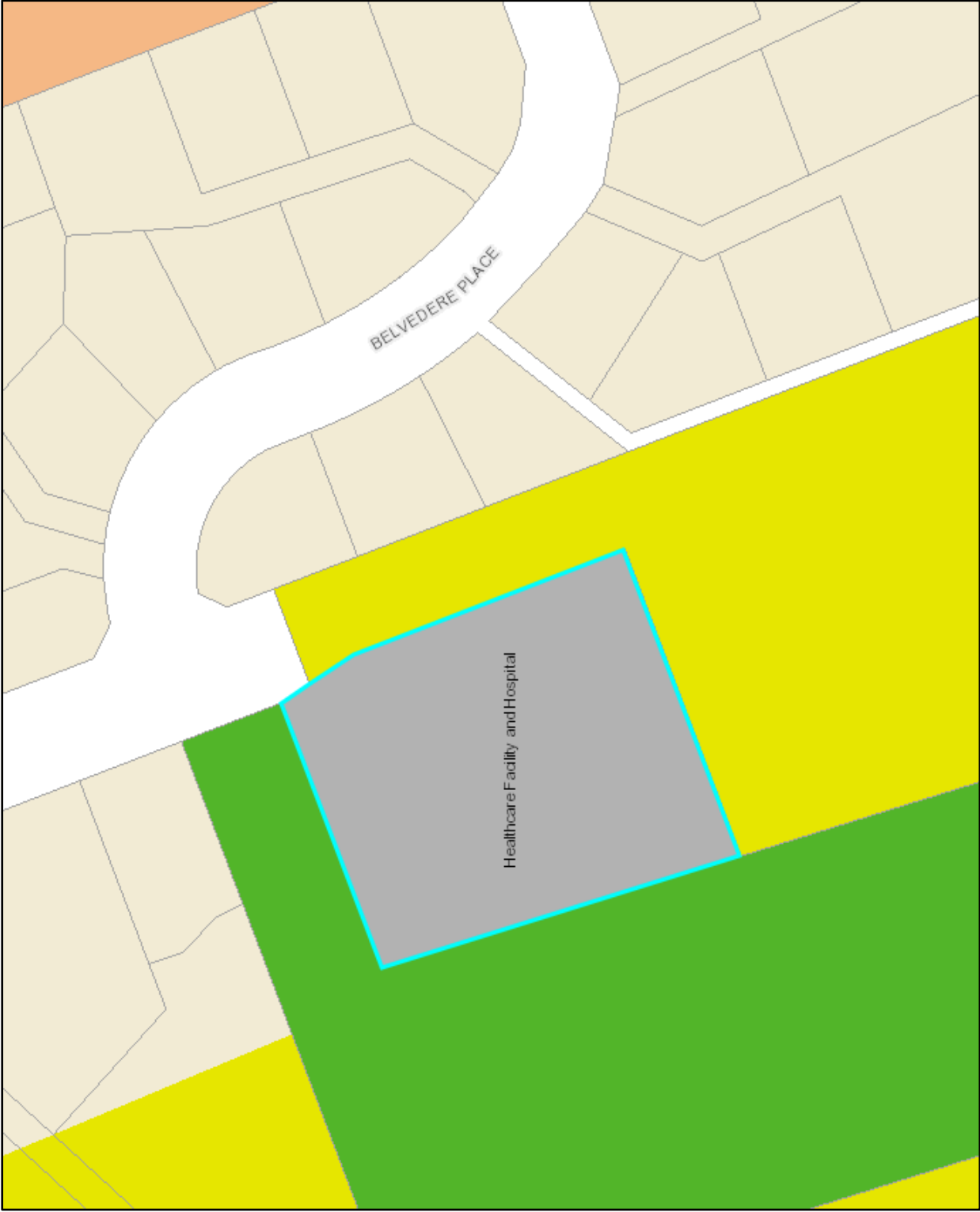
Aerial





Google Street View





<b>Warkworth Birthing Centre</b>
<b>Address</b> 56 View Road Warkworth
<b>Zone</b> Special Purpose - Healthcare Facility and Hospital Zone
<b>Land Area</b> 4042m <sup>2</sup>
<b>Overlays</b> Natural Resources: High-Use Stream Management Areas Overlay [rp] Natural Resources: High-Use Aquifer Management Areas Overlay [rp] - Mahurangi Waitemata



Aerial

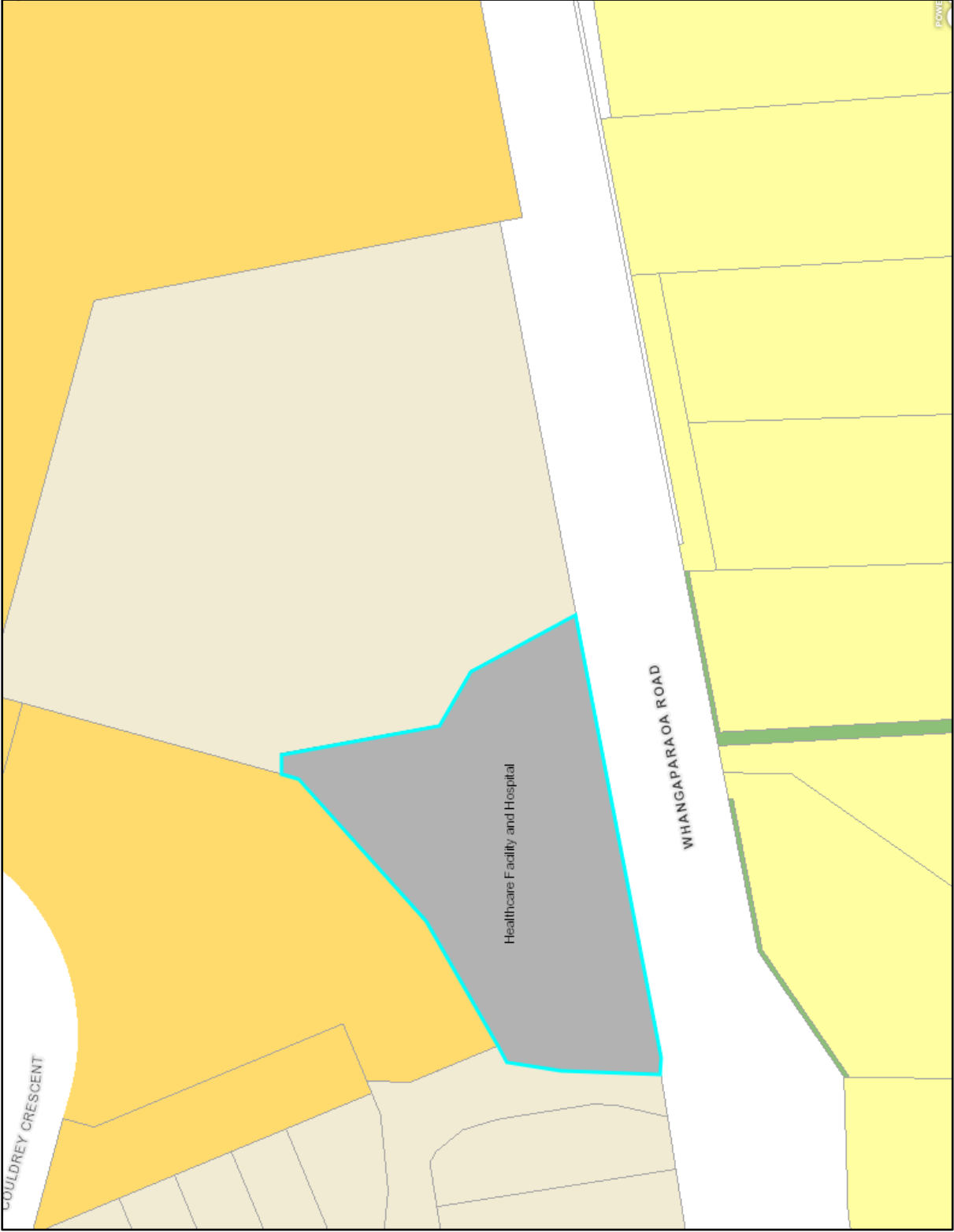




Google Street View







<b>Hibiscus Coast Community Health Centre</b>	<b>Address</b> 136 Whangapararua Road Red Beach 2123	<b>Zone</b> Special Purpose- Healthcare Facility and Hospital Zone	<b>Land Area</b> 4322m <sup>2</sup>
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Aerial





Google Street View



Google Street View



<b>Pitman House</b>
<b>Address</b> 50-56 Carrington Road Mount Albert 1025
<b>Zone</b> Special Purpose- Healthcare Facility and Hospital Zone
<b>Land Area</b> 9ha (Estimated)



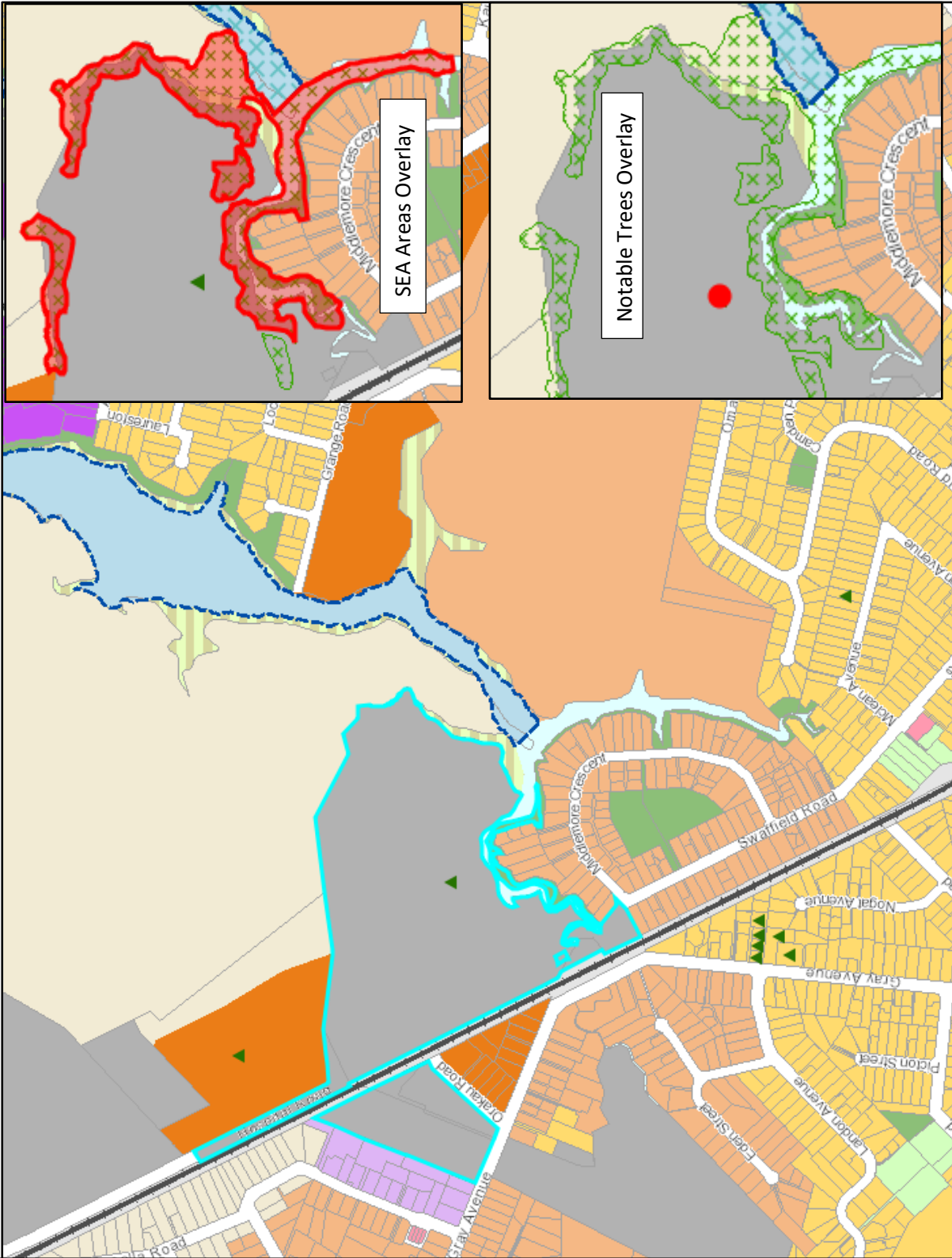
Aerial



Google Street View







<b>Middlemore hospital</b>
<b>Address</b> 100 Hospital Road Papatoetoe
15 Orakau Road Mangere East Auckland
<b>Zone</b> Special Purpose- Healthcare Facility and Hospital Zone
Open Space- Informal Recreation Zone
<b>Land Area</b> 20ha
<b>Overlay</b> Infrastructure: National Grid Corridor Overlay - National Grid Yard Uncompromised Infrastructure: National Grid Corridor Overlay



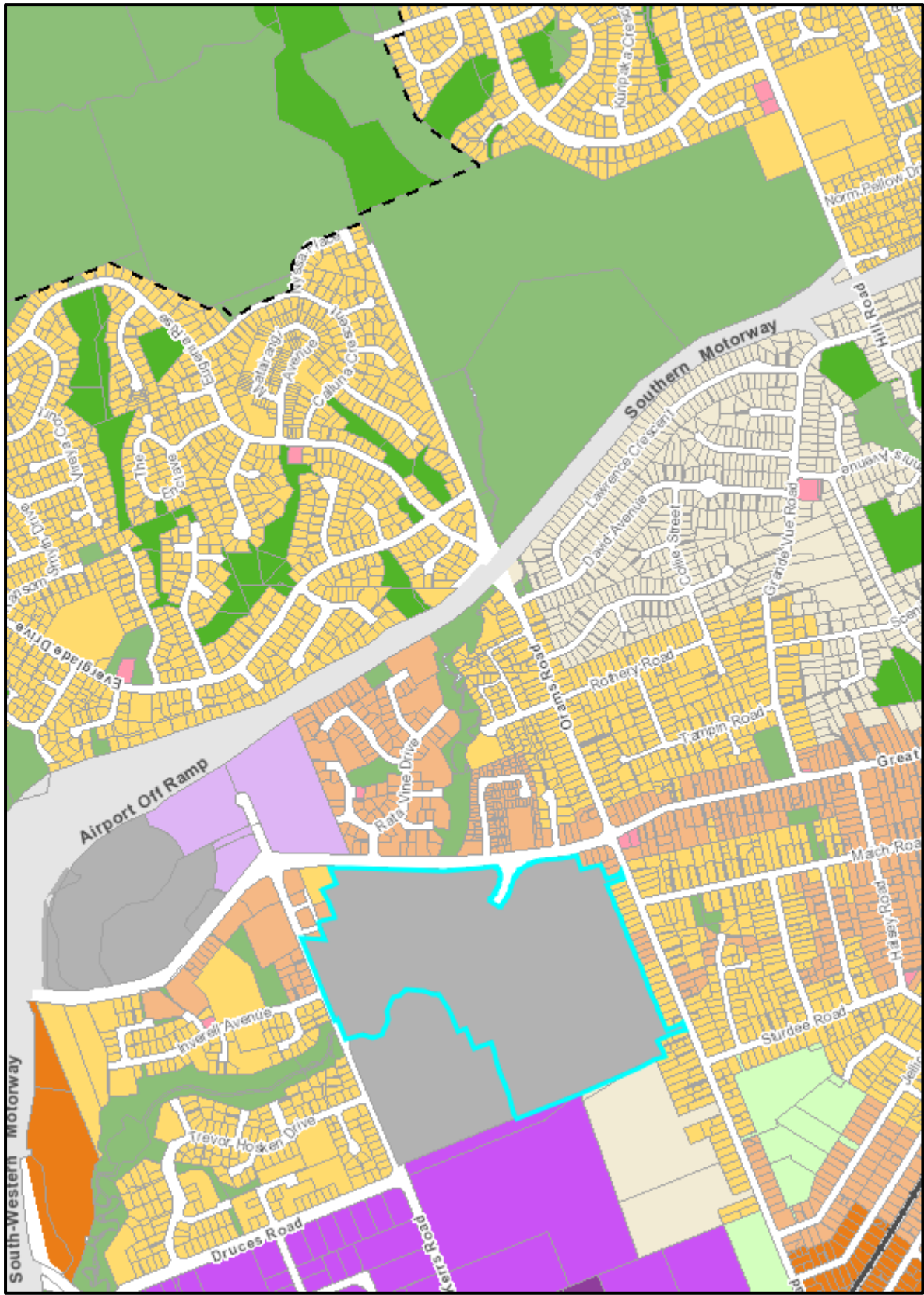
Aerial





Google Street View





**Manukau Super Clinic and Surgery Centre**

**Address**  
 901 Great South Road manukau Central 2104

**Zone**  
 Special Purpose-Healthcare Facility and Hospital Zone

**Land Area**  
 37.2ha

**Overlays**  
 Natural Resources: High-Use Stream Management Areas Overlay [rp]

Manukau Waitemata Aquifer



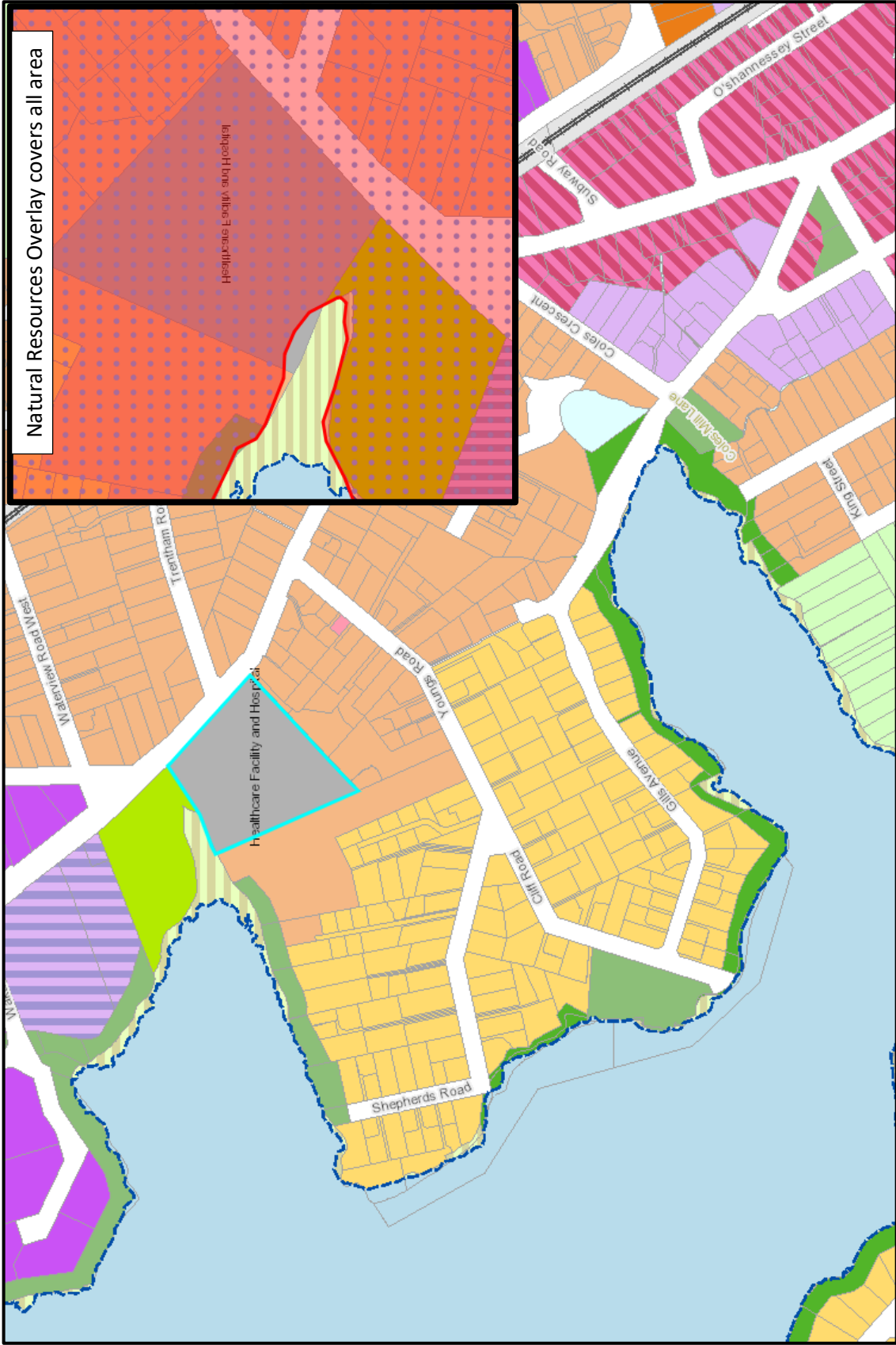
Aerial





Google Street View





**Awhinatia Health**

**Address**

5-19 Great South Road  
Papakura 2113

**Zone**

Special Purpose - Healthcare Facility and Hospital Zone

**Land area**

2.1ha

**Overlays**

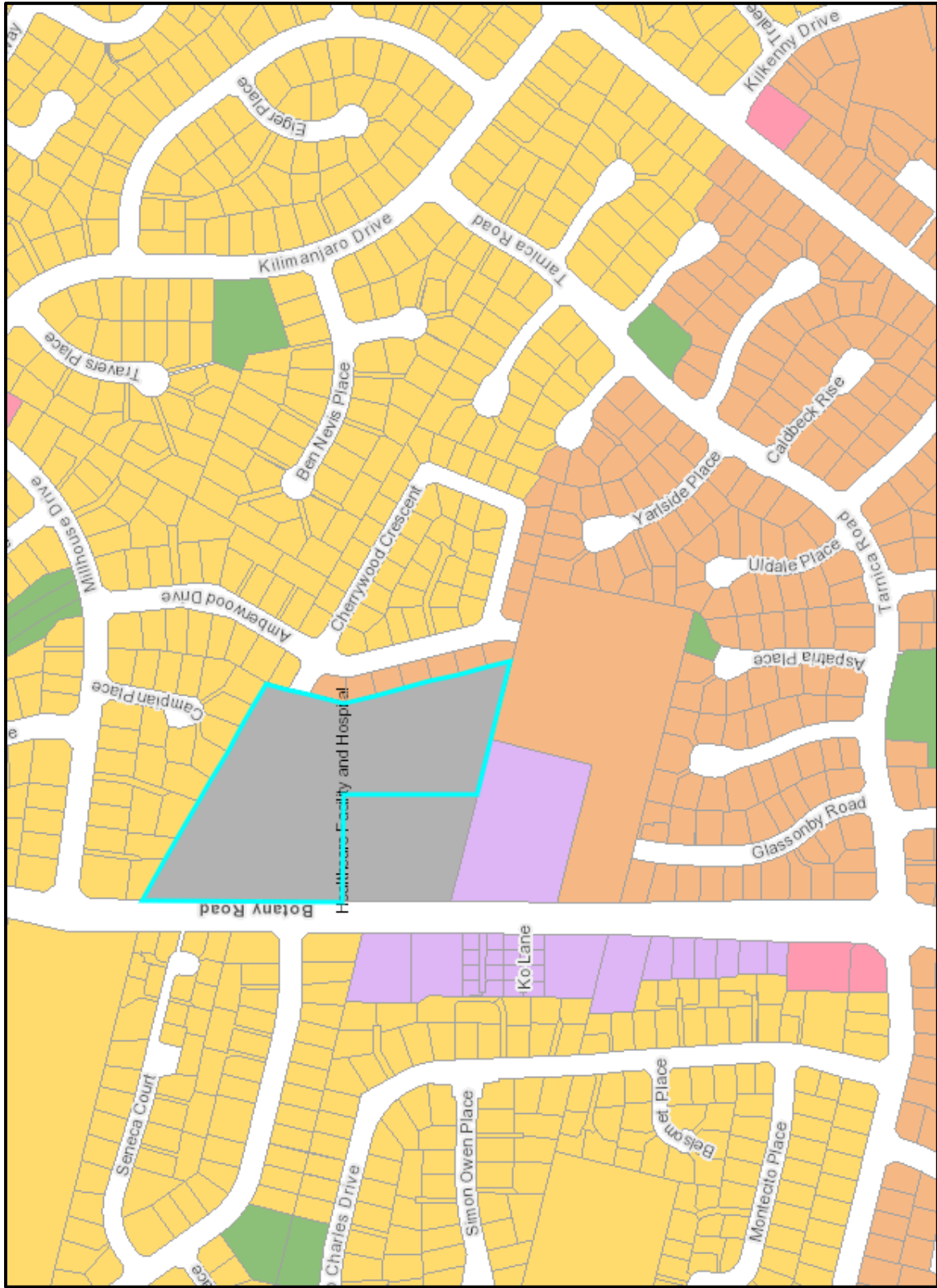
Natural Resources: High-Use Aquifer Management Areas Overlay [rp] - Clevedon West Waitemata Aquifer



Aerial







**Botany Super Clinic**

**Address**

260 Botany Road  
Howick Auckland

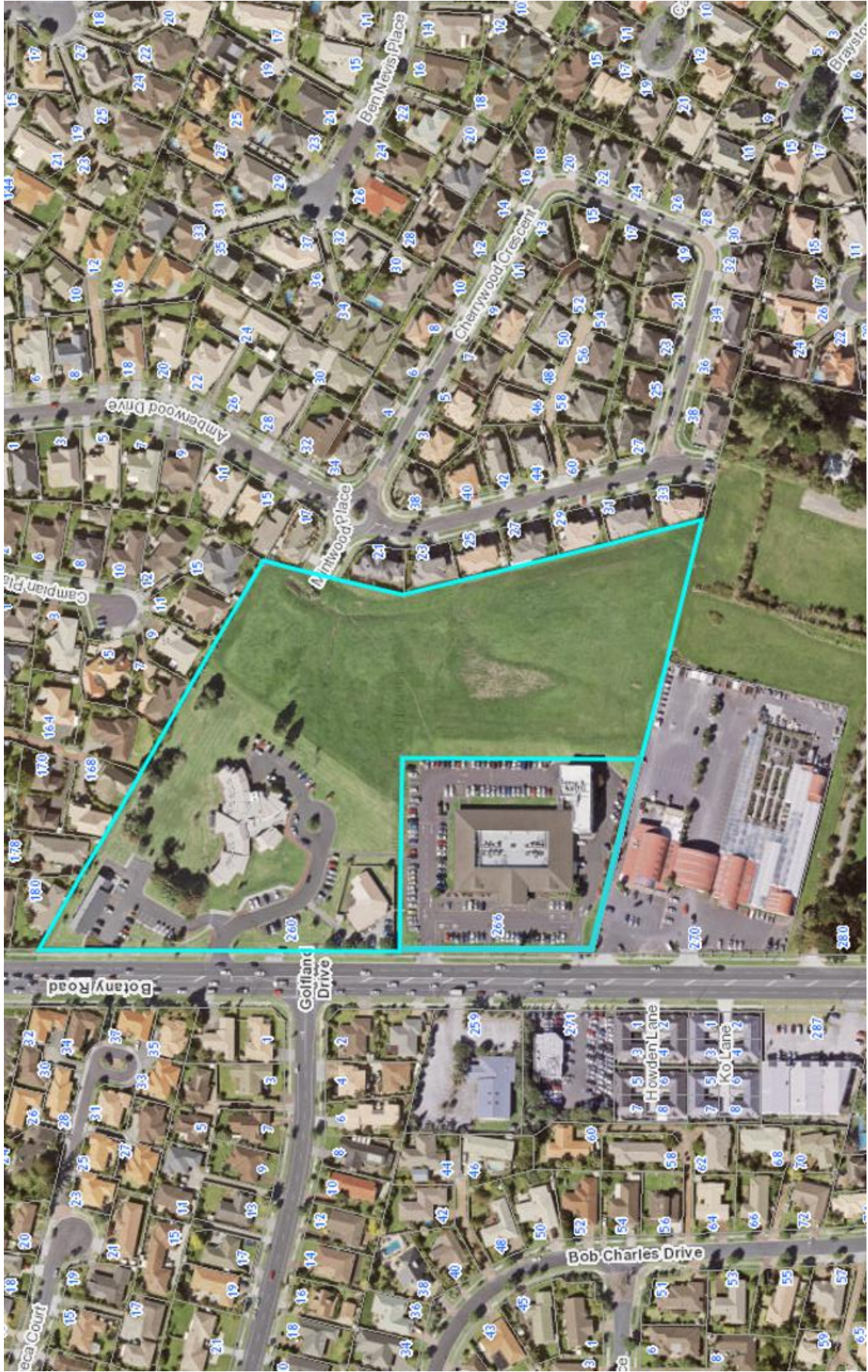
**Land Area**

3.5ha

**Designations**

Airspace Restriction  
Designations - ID  
1102, Protection of  
aeronautical functions  
- obstacle limitation  
surfaces, Auckland  
International Airport  
Ltd

Aerial





Google Street View



**Franklin Memorial Hospital**

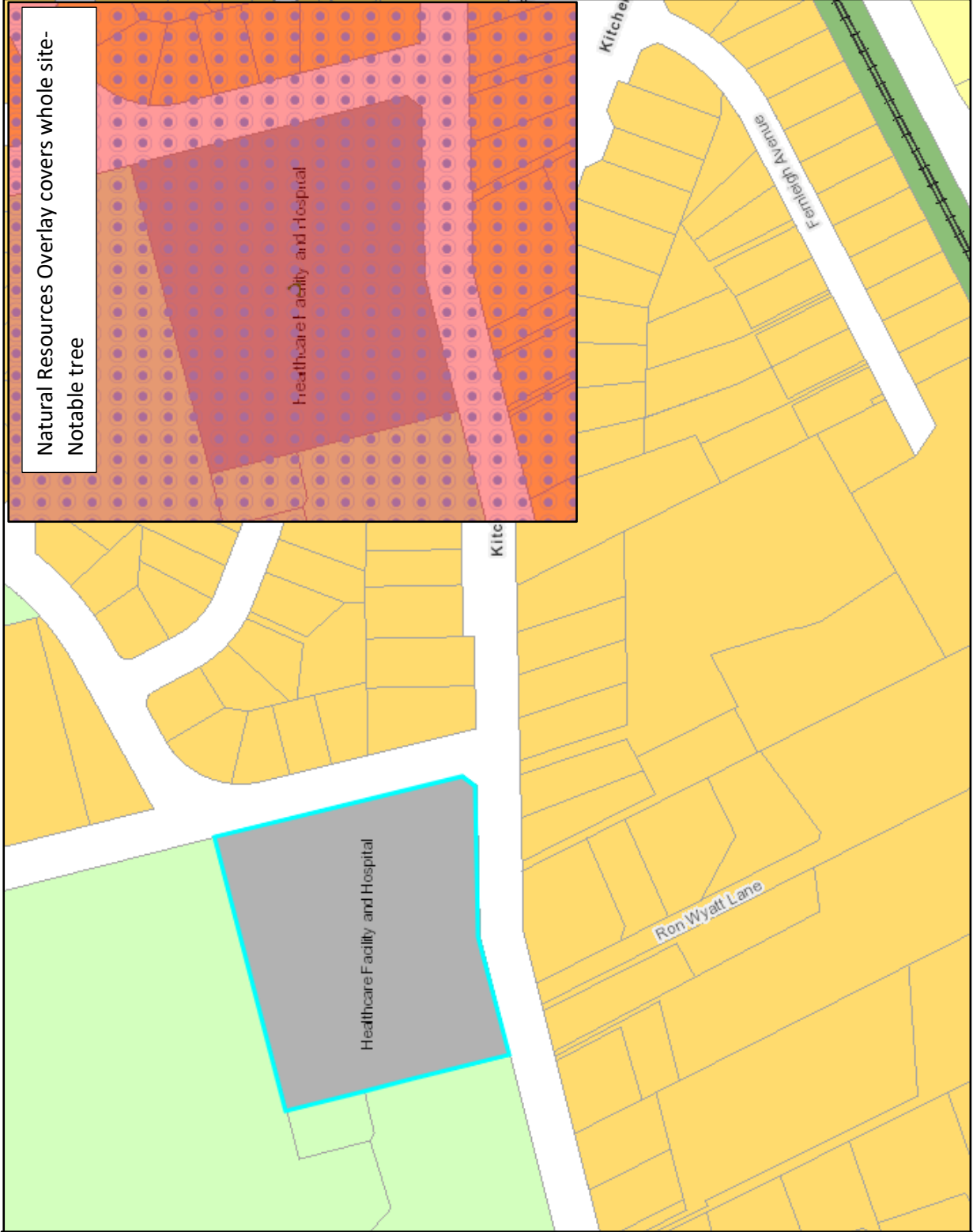
**Address**  
72 Kitchener Road Waiuku  
Auckland

**Zone**  
Special Purpose - Healthcare Facility and Hospital Zone

**Land Area**  
1.4ha

**Overlays**

- Natural Resources: High-Use Aquifer Management Areas Overlay [rp] - Waiuku Kaawa
- Natural Resources: High-Use Aquifer Management Areas Overlay [rp] - Glenbrook Volcanic
- Natural Resources: Quality-Sensitive Aquifer Management Areas Overlay [rp] - Franklin Volcanic Aquifer
- Natural Heritage: Notable Trees Overlay - 2156, Pohutukawa (2) & Holly Trees

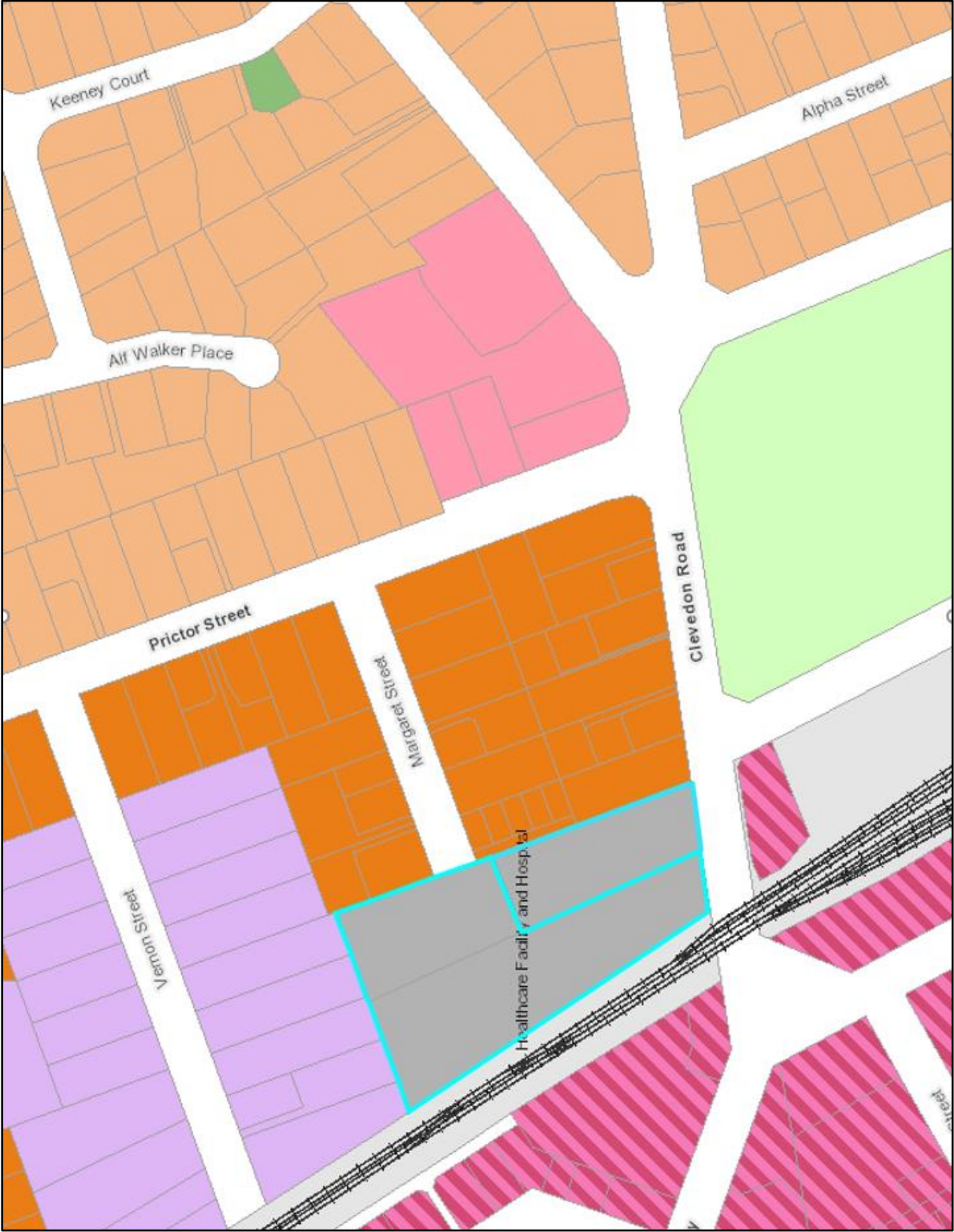




Aerial



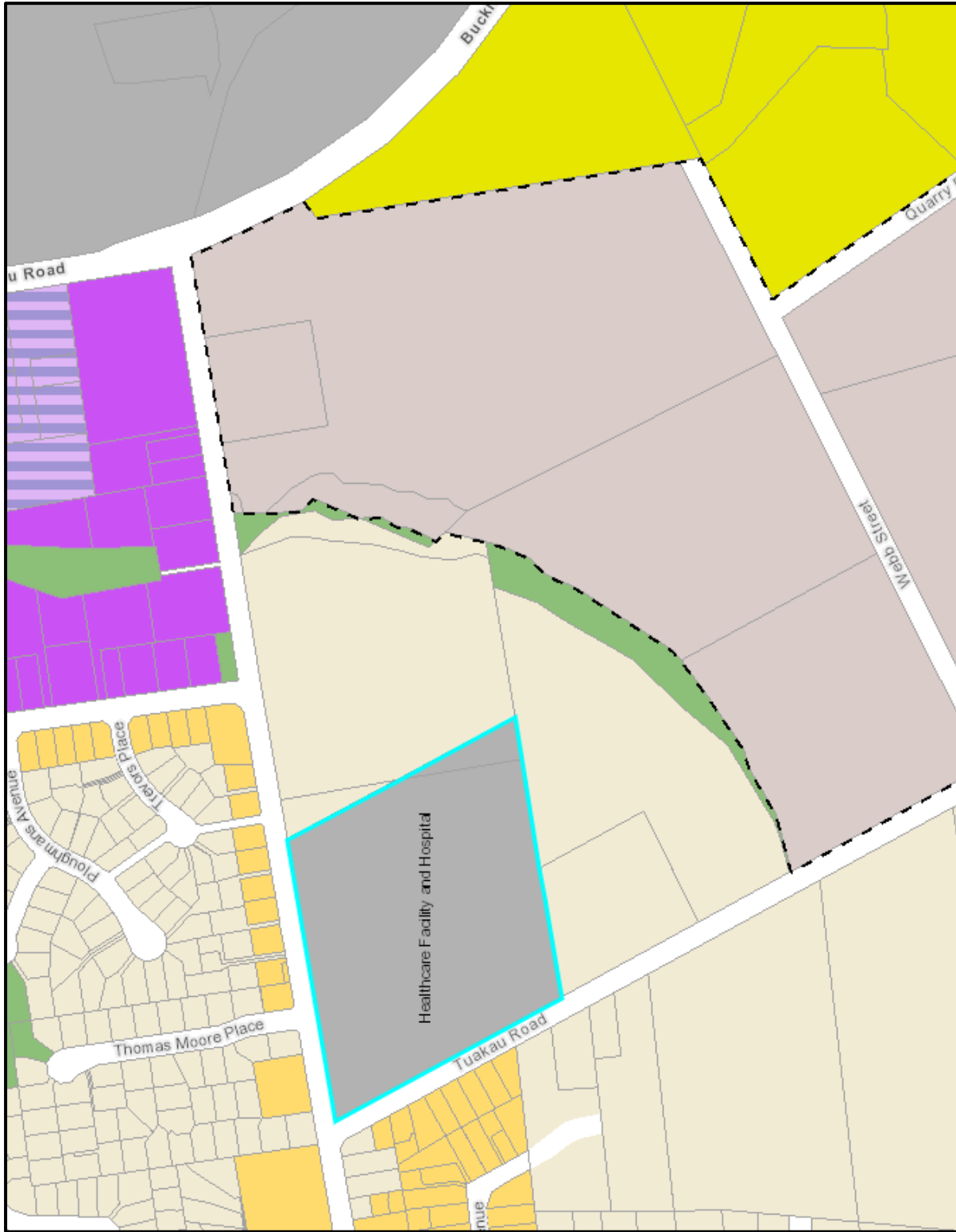




<b>Papakura Maternity</b>
<b>Address</b> 2-4 Clevedon Road Papakura
<b>Zone</b> Special purpose- Healthcare Facility and Hospital Zone
<b>Land Area</b> 1.19ha (estimated)
<b>Overlays</b> Natural Resources: High-Use Aquifer Management Areas Overlay [rp] - Clevedon West Waitemata Aquifer  Natural Heritage: Notable Trees Overlay - 2196, Olive







**Pukekohe Hospital**

**Address**

1 Tuakau Road  
Pukekohe 2677

**Zone**

Special Purpose -  
Healthcare Facility  
and Hospital Zone

**Land Area**

6ha

**Precincts**

Pukekohe Hill sub-  
precinct A, Sub-  
precinct

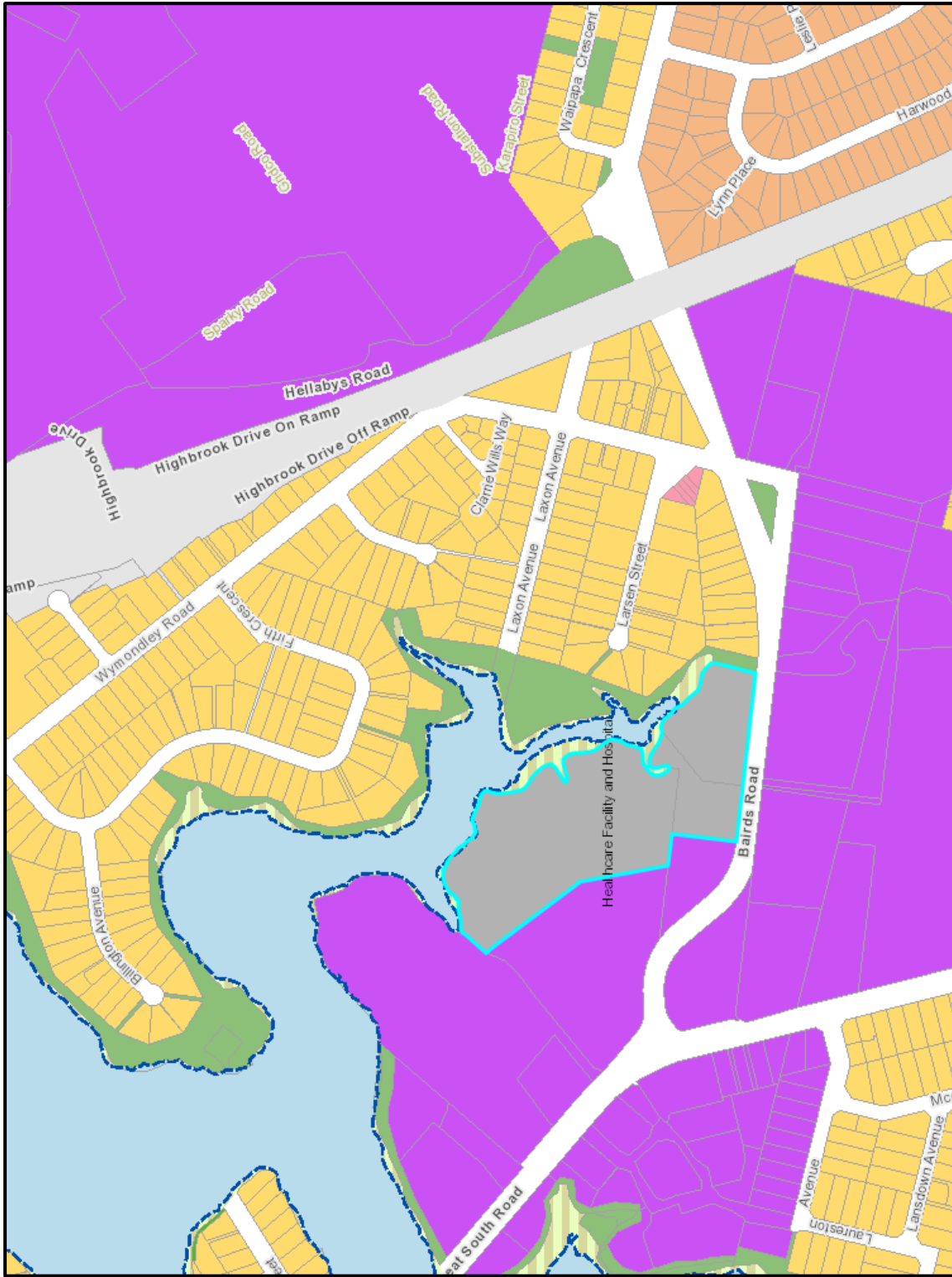
**Overlays**

Natural Resources:  
High-Use Aquifer  
Management Areas  
Overlay [rp] -  
Pukekohe Kaawa  
Aquifer, Pukekohe  
Central Volcanic,  
Quality-Sensitive  
Trees Overlay - 2646,  
Pohutukawa (2)



Aerial





<b>Spinal Rehabilitation Centre</b>	<b>Address</b>	<b>Zone</b>	<b>Special Purpose - Healthcare Facility and Hospital Zone</b>	<b>Land Area</b>
	30-40 Bairds Otara 2025			4.3ha

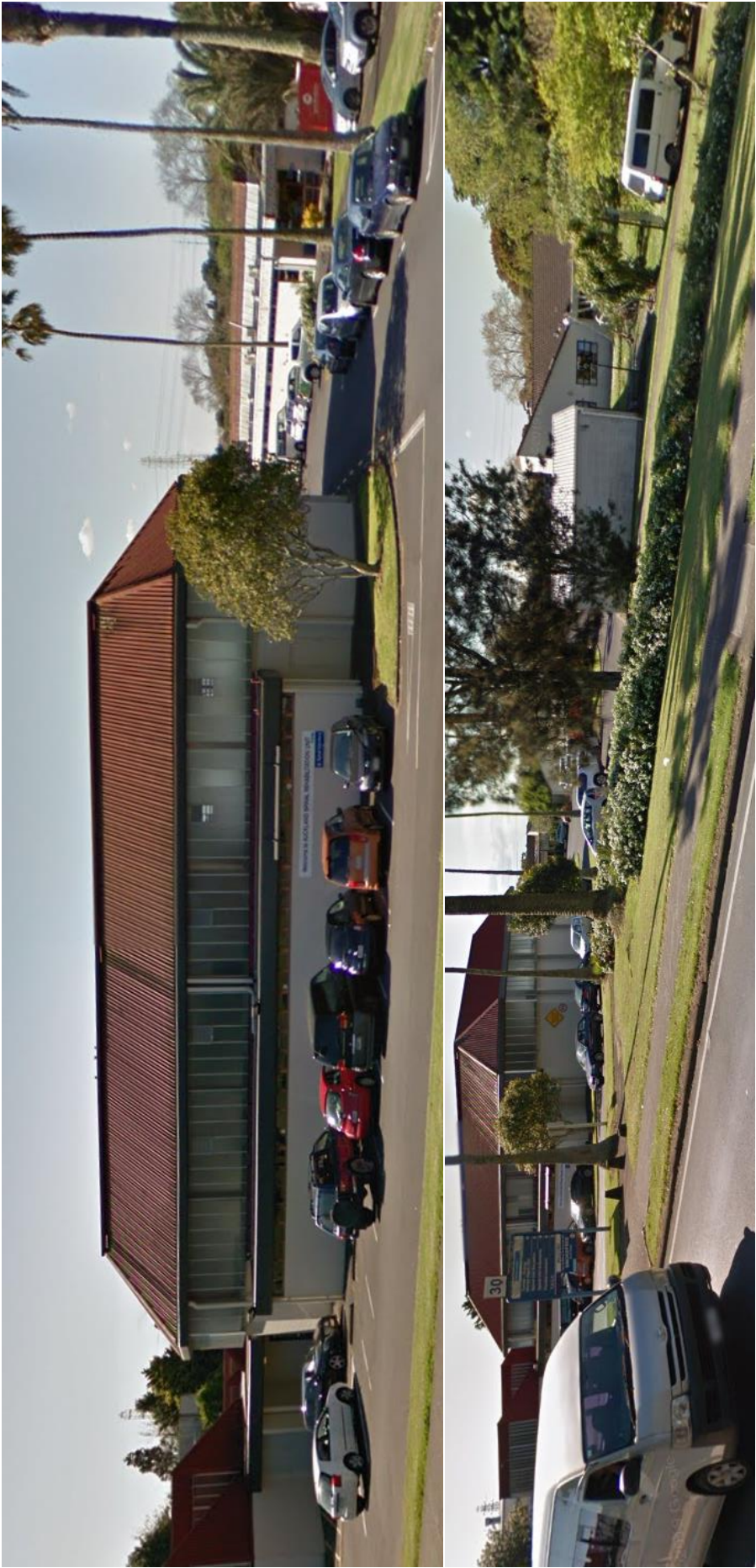


Aerial





Google Street View







# **ATTACHMENT SIX**

## **H25 Healthcare Facility and Hospital Zone Provisions**



## **H25. Special Purpose – Healthcare Facility and Hospital Zone**

### **H25.1. Zone description**

The Special Purpose – Healthcare Facility and Hospital Zone applies to several of Auckland’s hospitals and healthcare facilities. These are generally large, land-extensive facilities with a range of activities related to their primary function. The sites generally consist of extensive and highly visible buildings and substantial parking areas.

The zone enables a range of healthcare related and supporting activities to cater for the diverse requirements of the users, employees and visitors to the hospitals and healthcare facilities.

### **H25.2. Objectives**

- (1) The efficient operation and development of hospitals and healthcare facilities to support the community’s healthcare needs is enabled.
- (2) A comprehensive range of hospital and healthcare activities, buildings and infrastructure, and accessory buildings and activities are provided for.
- (3) The adverse effects of hospital and healthcare activities, buildings and infrastructure, and accessory buildings and activities on adjacent areas are avoided, remedied or mitigated.

### **H25.3. Policies**

- (1) Enable a range of hospital and healthcare facilities to meet the health and well-being needs of the community.
- (2) Enable for a range of non-healthcare activities provided they:
  - (a) do not compromise the efficient use of the zone for hospital and healthcare activities; and
  - (b) avoid, remedy or mitigate significant adverse effects, including traffic effects.
- (3) Minimise the effects of supporting activities and services on the amenity values of the adjacent land.
- (4) Minimise significant adverse effects of overshadowing, visual dominance and loss of visual privacy on adjacent properties by use of graduated building heights and by locating higher buildings away from the zone boundary.
- (5) Provide for additional building height in identified locations, where it:
  - (a) enables the efficient operation of the hospital or healthcare facility; and
  - (b) can be accommodated without significant adverse effects on adjacent properties.

(6) Require new buildings and significant additions to buildings that adjoin streets and public open spaces to be designed to contribute to the maintenance and enhancement of amenity values while enabling the efficient use of the site.

(7) Encourage new buildings to be designed to provide a high standard of amenity and safety.

#### H25.4. Activity table

Table H25.4.1 specifies the activity status of land use and development activities in the Special Purpose - Healthcare Facility and Hospital Zone pursuant to section 9(3) of the Resource Management Act 1991.

**Table H25.4.1 Activity Table**

Activity		Activity status
<b>Use</b>		
Accommodation		
(A1)	Boarding houses	RD
(A2)	Visitor accommodation	RD
(A3)	Dwellings accessory to healthcare facilities	P
(A4)	Supported residential care	P
(A5)	Dwellings not specified above	D
(A6)	Retirement villages	D
Community		
(A7)	Care centres	P
(A8)	Community facilities	P
(A9)	Education facilities	P
(A10)	Healthcare facilities	P
(A11)	Hospitals	P
(A12)	Informal recreation and leisure	P
(A13)	Organised sport and recreation	P
(A14)	Information facilities	P
(A15)	Public amenities	P
(A16)	Artworks	P
(A17)	Tertiary education facilities accessory to healthcare	P
<b>Development</b>		
(A18)	Buildings, alterations, additions and demolition unless otherwise specified below	P
(A19)	Conversion of buildings or part of buildings to dwellings	D
(A20)	New buildings or additions to existing buildings that increase the building footprint by more than 20 per cent, that are visible from and located within 10m of a public road or an open space zone	RD

(A21)	New parking buildings visible from and located within 10m of a public road or a residential zone or open space zone	RD
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### H25.5. Notification

- (1) Any application for resource consent for any of the following activities will be considered without public or limited notification or the need to obtain the written approval from affected parties unless the Council decides that special circumstances exist under section 95A(4) of the Resource Management Act 1991:
- (a) new buildings or additions to existing buildings that increase the building footprint by more than 20 per cent that are visible from and located within 10m of a public road or open space zone; and
  - (b) new parking buildings visible from and located within 10m of a public road or a residential zone or open space zone.
- (2) Any application for resource consent for an activity listed in Table H25.4.1 Activity table and which is not listed in H25.5(1) above will be subject to the normal tests for notification under the relevant sections of the Resource Management Act 1991.
- (3) When deciding who is an affected person in relation to any activity for the purposes of section 95E of the Resource Management Act 1991 the Council will give specific consideration to those persons listed in Rule C1.13(4).

### H25.6. Standards

All activities listed as a permitted or restricted discretionary activity in Table H25.4.1 Activity table must comply with the following standards.

Where a healthcare facility comprises multiple adjoining sites zoned Special Purpose – Healthcare Facility and Hospital Zone, the sites will be treated as a single site for the purposes of applying the following standards.

#### H25.6.1. Building height

- (1) Buildings heights are specified in Table H25.6.1.1 Building heights and Figure H25.6.1.1 Auckland Hospital permitted building heights.

**Table H25.6.1.1: Building heights**

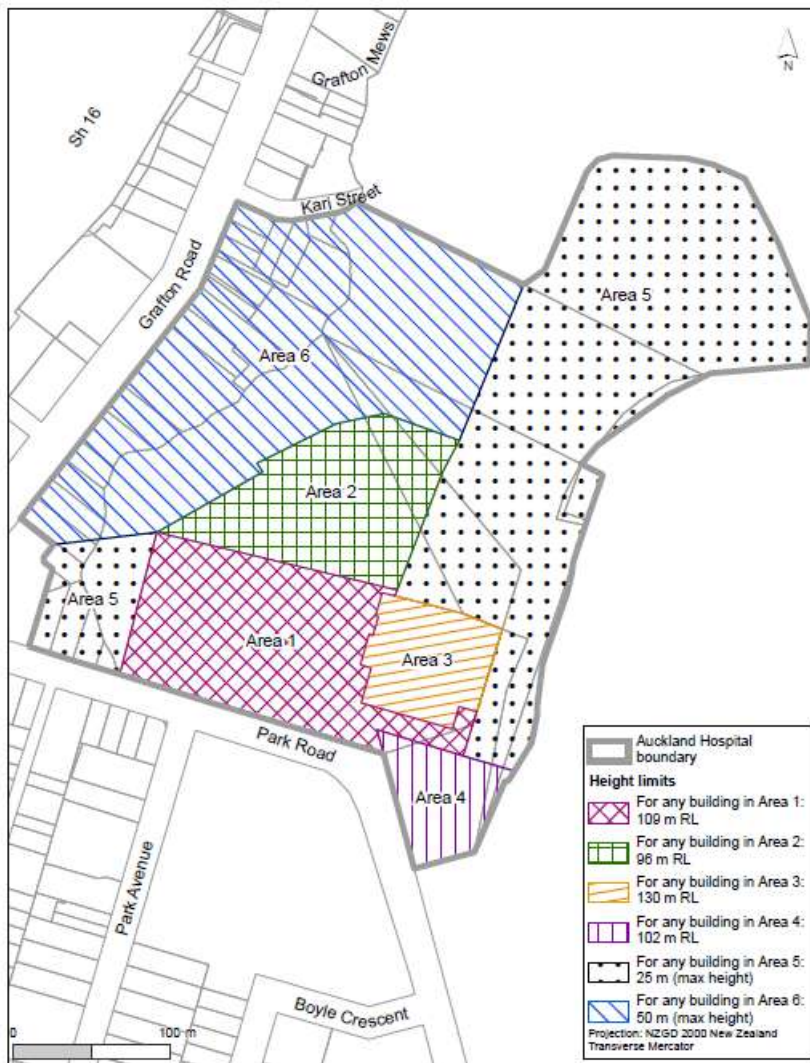
Site area	Permitted activity standard	Restricted discretionary activity standard	Discretionary activity standard
Sites with a total site area up to 4ha	Up to 16m	Between 16m and up to 25m	Greater than 25m
Sites with a total site area greater than 4ha	Up to 26m	Between 26m and up to 35m	Greater than 35m
Sites subject to the	Up to the	Infringements	Infringements to



H25 Special Purpose – Healthcare Facility and Hospital Zone

Height Variation Control	height specified on the Height Variation Control	to the Height Variation Control and up to 35m	the Height Variation Control and greater than 35m
Auckland Hospital buildings	Up to the height specified in Figure H25.6.1.1	Buildings infringing the height specified in Figure H25.6.2.1 and up to 35m	Buildings infringing the height specified in Figure H25.6.1.1 and greater than 35m

**Figure H25.6.1.1 Auckland Hospital permitted building heights**



(2) The building heights in Figure H25.6.1.1 Auckland Hospital permitted building heights for Areas 1 to 4 are measured using Reduced Levels (RL). Areas 5 and 6 are measured as per the Plan definition of height.

### H25.6.2. Height in relation to boundary

- (1) Where a site in the Special Purpose – Healthcare Facility and Hospital Zone directly adjoins a site in another zone, the height in relation to boundary standard that applies in the adjoining zone applies to the adjoining Special Purpose - Healthcare Facility and Hospital Zone boundary.
- (2) Where a site in the Special Purpose – Healthcare Facility and Hospital Zone directly adjoins a site in another zone that does not specify a height in relation to boundary standard, the yard and/or setback standard in the adjoining zone applies to the adjoining the Special Purpose – Healthcare Facility and Hospital Zone boundary.
- (3) Where a site in the Special Purpose – Healthcare Facility and Hospital Zone adjoins a site in an open space zone, buildings must not project beyond a 45 degree recession plane measured from a point 8.5m vertically above ground level along the open space zone boundary.

### H25.6.3. Yards

- (1) The yards in Table H25.6.3.1 must be provided.

**Table H25.6.3.1 Yards**

Yard	Dimension
Front yard, except where the properties adjoining the zone on that road frontage are in the Business – Mixed Use Zone or one of the business centre zones	3m
Side and rear yards - where the site adjoins a site in a residential zone, open space zone or the Future Urban Zone	3m
Riparian yard	5m from the edge of permanent and intermittent streams
Lake side yard	20m
Coastal protection yard	25m, or as otherwise specified in Appendix 6

### H25.6.4. Maximum impervious area

- (1) The maximum impervious area must not be greater than 80 per cent.

### H25.6.5. Screening

- (1) Any outdoor storage or rubbish collection areas that directly face and are visible from a residential zone or public open space adjoining a boundary with, or on the opposite side of the road from, a Special Purpose – Hospital and Healthcare Facility Zone, must be screened from those areas by a solid wall or fence at least 1.8m high.

### H25.6.6. Dwellings accessory to a healthcare activity

- (1) Detached dwellings accessory to a healthcare facility must comply with the following Residential – Mixed Housing Suburban Zone standards:

## H25 Special Purpose – Healthcare Facility and Hospital Zone

- (a) H4 Residential – Mixed Housing Suburban Zone – Standard H4.6.11;
  - (b) H4 Residential – Mixed Housing Suburban Zone – Standard H4.6.12; and
  - (c) H4 Residential – Mixed Housing Suburban Zone – Standard H4.6.13.
- (2) Attached dwellings accessory to a healthcare facility must comply with the following Residential – Terrace Housing and Apartment Buildings Zone standards:
- (a) H6 Residential – Terrace Housing and Apartment Buildings Zone – Standard H6.6.13;
  - (b) H6 Residential – Terrace Housing and Apartment Buildings Zone – Standard H6.6.14; and
  - (c) H6 Residential – Terrace Housing and Apartment Buildings Zone – Standard H6.6.15.

### **H25.7. Assessment – controlled activities**

There are no controlled activities in this section.

### **H25.8. Assessment – restricted discretionary activities**

#### **H25.8.1. Matters of discretion**

The Council will restrict its discretion to the following matters when assessing a restricted discretionary resource consent application.

- (1) Visitor accommodation and boarding houses:
  - (a) effects on adjoining properties, especially residential properties including effects of overshadowing and loss of privacy; and
  - (b) on-site amenity.
- (2) New buildings or additions to buildings that increase the building footprint by more than 20 per cent, that are visible from and located within 10m of a public road or an open space zone:
  - (a) the effects of the building design and external appearance on the adjoining streetscape and adjoining land zoned open space.
- (3) New parking buildings visible from and located within 10m of a public road or a residential zone or open space zone:
  - (a) the effects of the building design and external appearance on the adjoining streetscape and adjoining land zoned open space; and
  - (b) the adverse effects on amenity values of adjoining land zoned residential.

### **H25.8.2. Assessment criteria**

The Council will consider the relevant assessment criteria below for restricted discretionary activities:

- (1) Visitor accommodation and boarding houses:
  - (a) whether the development complies with H6 Residential - Terrace Housing and Apartment Buildings Zone – Rule H6.6.13 or meets the purpose of the standard.
- (2) New buildings or additions to buildings that increase the building footprint by more than 20 per cent, that are visible from and located within 10m of a public road or an open space zone:
  - (a) the extent to which design features can be used to break up the bulk of the building by, for example varying building elevations, setting parts of the building back, and the use of architectural features without compromising the functional requirements of the use of the building;
  - (b) the extent to which the visual effects of the building can be softened by landscaping; and
  - (c) the extent to which any service elements (roof plant, exhaust and intake units and roof equipment) that could be viewed from the road or public open space zone can be integrated as part of the façade or roof of the building.
- (3) New parking buildings visible from and located within 10m of a public road or a residential zone or open space zone:
  - (a) the extent to which design features can be used to break up the bulk of the building by, for example varying building elevations, setting parts of the building back, and the use of architectural features without compromising the functional requirements of the use of the building;
  - (b) the extent to which the visual effects of the building can be softened by landscaping; and
  - (c) the extent to which any service elements (roof plant, exhaust and intake units and roof equipment) that could be viewed from the road or public open space zone can be integrated as part of the façade or roof of the building.

### **H25.9. Special information requirements**

There are no special information requirements in this section.

