

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

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



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

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

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

Andi He

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

Address for service of Submitter

2/2 Brightside Road, Epsom

Telephone:

021-660345

Fax/Email:

grace.liu7380@gmail.com

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 21

Plan Change/Variation Name

3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

The specific provisions that my submission relates to are:

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

Plan provision(s)

THE PROPOSED PLAN CHANGE IN ITS ENTIRETY

Or

Property Address

Or

Map

Or

Other (specify)

Submission

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

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes No

Submission no 49

The reasons for my views are:


SEE ATTACHMENT

(continue on a separate sheet if necessary)

I seek the following decision by Council:

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

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


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

11.4.19
Date

Notes to person making submission:

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

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

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

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

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

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

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

Submission no 49

ATTACHMENT -- Reasons for Submission

1. **I/we oppose** Proposed Plan Change 21 (PC 21-private) for the following reasons:
 - (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
 - (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
 - (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
 - (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 D18 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, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. 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) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and

Submission no 49

purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

- (h) PC 21 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.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

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1. In addition, we also have these concerns and strongly oppose Proposed Plan Change

21 :

- Under Auckland Unitary Plan, the subject area is clearly classified as residential zoning, we totally don't understand how Southern Cross can seek to change the zoning to "Special Purpose—Healthcare Facility and Hospital Zoning" without consulting with any neighbours in that area? Our property is located at Brightside Road, Epsom and we have talked to many neighbours, but nobody knows South Cross's proposed plan until it is made known to public. If council will consider the proposal, does that mean in future anyone is encouraged to submit application to change existing zoning under Auckland Unitary Plan across Auckland ?
- The scale of the new hospital-- "a huge monstrosity" was a big worry, as were plans for blasting basalt rock. When Southern Cross expanded the hospital in the late 1990s, blasting caused "absolute mayhem" This is going to be a prolonged build, highly disruptive, and not just to residents in the community. It is on a major arterial (Gillies Ave) and you are going to have immense disruption when you think of the number of schools and traffic in the vicinity. I know there is a need for more hospital beds, but this is definitely not the place to do it.
- The proposal could be built as high as 25m, virtually more than triple the height limit in the current residential zone with very limited ability by the council to control what happens. This needs to be considered an unacceptable visual intrusion that will be easily visible from any directions, and in turn inflict privacy issues across a broader area.
- We're very concerned about the further loss of heritage homes. 3 heritage homes have already been lost 20 years ago when the first Southern Cross hospital was built. Now another 3 could be lost. This is wrong and unacceptable, council shall stop it. As Epsom-Eden enjoys a reputation that buildings in the area are with characterises, it's not only the community's obligation but also council's

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responsibility to protect heritage homes which are becoming less and less with time goes on.

- Auckland has a housing shortage issue, suburbs like Eden- Epsom are not exempt from this. The proposal is removing houses including a large boarding houses that provides for a wide range of people. In fact, the existing hospital shall be relocated and make land available for building more houses within a preferred inner-city residential area with good public transport and other social services for necessary people.

Submission no 50

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 11 April 2019 12:45 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Fred Blackley

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Fred Blackley

Organisation name:

Agent's full name:

Email address: fb378520@kings.net.nz

Contact phone number: 0210617444

Postal address:

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
PC21

Property address: 3 Brightside Road, 149,151 and 153 Gillies Ave

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

I live in the area and have done for my life. I oppose the demolition of houses that are sorely needed for my generation close to schools and university . Rentals are extremely difficult to find and are in short supply and we need houses for people not private hospitals that are a luxury of the wealthy not a necessity AND they can be built elsewhere particularly as Southern Cross has the option of using its other sites and its obviously abundant resources \$\$\$\$ to do this. We need houses and communities not private fee paying hospitals used occasionally in a lifetime by the very few wealthy who refuse to travel across a suburban to a already built facility. Demolition of much needed houses including those of character and one that has 30 residents for the wealthy few is frankly obscene. We need a council that prioritizes the people that vote for it and not the wealthy businesses that don't. We need to follow the unitary plan well thought out and planned with submissions and not discard it as soon as big business comes along

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with \$\$\$\$\$. Accepting this will make a complete mockery of the Unitary Plan and raises the question of why have it at all. Please reject this modification for the people of Auckland who need accommodation and not more private hospitals for the wealthy when they have plenty of options a short distance away. Thank you

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

Submission date: 11 April 2019

Attend a hearing

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

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

Declaration

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

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

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

Yes

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

Submission no 51

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 11 April 2019 2:45 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Gabriella Amies

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Gabriella Amies

Organisation name:

Agent's full name:

Email address:

Contact phone number:

Postal address:
37 Owens Road
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
PC 21

Property address: 3 Brightside Road, 149, 151, 153 Gillies Ave Epsom

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

I live in this area and I don't want houses demolished for a private hospital no one needs. I walk to school and the traffic is bad enough and i don't want blasting of rock and large trucks. I want houses for my friends. Mum and Dad are doctors and they don't want more hospitals My friends live in those houses and we need people and houses. Not big buildings and more cars and trucks. We need trees and birds and grass and people. We love Mt Eden. Don't destroy the area, please leave it for me and my friends. My Dad says we are the future. Please help protect where we live. People are important Thank you

Submission no 51

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

Submission date: 11 April 2019

Attend a hearing

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

Declaration

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

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

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

Yes

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

Submission no 52

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 11 April 2019 12:30 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Hugo Blackley

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Hugo Blackley

Organisation name:

Agent's full name:

Email address: hjlblackley@gmail.com

Contact phone number:

Postal address:

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
PC21

Property address: 3 Brightside Road,149,151,153 Gillies Ave Epsom

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

I oppose the plan in its entirety as it destroys the local houses and the character of Epsom that I have grown up in and continue to live in. It is against the unitary plan and the wishes of the community. It will irreversibly destroy the residential area that I as a young rate payer am part of. It will destroy the area for my children. I have lived in this area for my life of 22 years and I plan to continue to live here as my parents have done. This is a community and not a business zone. The Southern Cross hospitals has other options in industrial or commercial areas well identified by the unitary plan. They did not present their proposal to the unitary plan during its formation despite having, the knowledge, the resources and the option of doing so.

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

Submission no 52

Submission date: 11 April 2019

Attend a hearing

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

Declaration

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

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

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

Yes

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

Submission no 53

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 11 April 2019 1:30 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Sam Blackley

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Sam Blackley

Organisation name:

Agent's full name:

Email address: samblackley2000@gmail.com

Contact phone number: 021336736

Postal address:

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
PC21

Property address: 3 Brightside Road, 149,151 and 153 Gillies Ave

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

I oppose the whole plan to demolish houses 149,151 and 153 Gillies ave and alter the Unitary plan to build a large private hospital on this site. The unitary plan clearly states that this is a residential area and this was well planned several years ago and Southern Cross made no objection. This is my home and my residential area. I have gone to school in this area and I go to university in this area. WE NEED HOUSES not private hospitals. A commercial building of 16m or 25 m is not allowed in this zone and was deemed inappropriate in this Zone by the Unitary Plan. That is the Unitary Plan that we all discussed and had submissions over for years. So its not a discussion point and should not even be a discussion point. The answer is NO! Build elsewhere SC (Southern Cross) . You have other sites. You have the money. The Unitary Plan clearly shows where you can have commercial buildings. Southern Cross had its option like anyone else to put forward their submission in the deciding days of the Unitary Plan. That was only a few

Submission no 53

years ago. They DIDN'T. They didn't object despite knowing their plans to expandall businesses have a 1,5 and 10 year plan, do not tell me that a multi million dollar business like SC didn't. One might suspect that they didn't follow the rules knowing it would be turned down at the Unitary Planning level and now quietly they try to get it past. Why is this even being reviewed? Why does a big organization have a option of coming in lately and try and tear up the plan we all agreed to and abide by. They had that option in the unitary planning stage. They are a big company with big hospital developments, they are not naive, inexperienced, lacking in knowledge nor resources that they didn't have the foresight to request this. They have been buying up the houses know full well what they planned to do and will plan for the whole area around. As they have done elsewhere will devalue the other house by this monstrosity at 16 or 25 meters (yes they will go to this height in time when they bowl the older hospital) and then buy up those surrounding homes including mine as well. This is because of the 24/7 traffic and noise of staff and deliveries and patients and the towering building will destroy the privacy. This is big business at its worst, ignore the regulations, ignore the people, throw money at it and roll the Council and do what we like. THIS CAN NOT BE ACCEPTED RESPECT THE PLAN RESPECT THE PEOPLE WE NEED COMMUNITIES WE NEED HOUSES NOT PRIVATE COMMERCIAL BUILDINGS Southern Cross is a business venture with many other options. PEOPLE ARE IMPORTANT

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

Submission date: 11 April 2019

Attend a hearing

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

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

Declaration

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

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

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

Yes

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

Submission no 54

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Thursday, 11 April 2019 3:00 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Sophia Amies

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Sophia Amies

Organisation name:

Agent's full name:

Email address:

Contact phone number:

Postal address:
37 Owens Road
Epsom
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
PC 21

Property address: 3 Brightside Road, 149,151 and 153 Gillies Ave

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

Dear Mayor Goff Don't destroy these houses This is where I and my friends live This is where I go to school This is where I walk to school and these are the roads I cross We don't need a large hospital there is one done the road We don't need more traffic We don't need large buildings with shadow and noise No trees and No views We need trees, houses,gardens, birds and sunlight We need to love houses and people You adults need to protect the trees and houses for us children If you destroy the area you destroy our beautiful area and you destroy our future Tell Southern Cross to build their hospital somewhere else Thank you

Submission no 54

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

Submission date: 11 April 2019

Attend a hearing

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

Declaration

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

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

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

Yes

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

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

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



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

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

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

IAN KOHLER

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

IAN KOHLER ARCHITECT.

Address for service of Submitter

PO BOX 28710 REMUERA 1541

Telephone:

021 715 805

Fax/Email:

ik@ikarchitect.com.

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 21

Plan Change/Variation Name

3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

The specific provisions that my submission relates to are:

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

Plan provision(s)

THE ENTIRE PLAN CHANGE

Or

Property Address

Or

Map

Or

Other (specify)

Submission

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

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended

Yes

No

Submission no 55

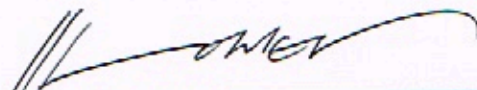
The reasons for my views are: REFER ATTACHMENTS

(continue on a separate sheet if necessary)

I seek the following decision by Council:

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

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


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

10 APRIL 2019.
Date

Notes to person making submission:

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

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

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

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

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

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

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

Submission no 55

ATTACHMENT – Reasons for Submission

1. **I/we oppose** Proposed Plan Change 21 (PC 21-private) for the following reasons:
 - (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
 - (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
 - (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
 - (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 D18 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, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. 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) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

Submission no 55

- (h) PC 21 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.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 55

2. Additional concerns.

a. Permitted maximum Bulk and Mass.

The proposal appears to indicate massing drawings and sunlight/shadowing drawings for a 15.00m building.

Under the requested zoning, it is possible to build to 25m, with little or no resident or Council input. Despite SX Hospitals indicating the lower height, this can be revised at any time should the rezoning occur.

Massing drawings should indicate the effect of a 25m building.

This will show an entirely different and detrimental effect, which cannot be mitigated by a few stone walls and existing trees. The effect of a 15.0m building alone in an area with an 8.0m height limit, is considerably more than 'minor' as noted in the submission.

Motu Design has noted in their submission, a separate Resource Consent application for the site which 'informs the assessment of this zone'. However, there is no documentation shown to which we can refer, and in any event, it is suspected that it relates only to a 15.0m high building which in itself is over twice the height of the surrounding zones.

b. Unitary Plan

SX Hospitals had ample opportunity to make a submission to the Unitary plan but elected not to submit these new sites for a Healthcare and Hospital zone. To request a rezoning so soon, or at all, after the promulgation of the Unitary plan undermines the whole process and intent of the new Plan.

c. Residential Zone

Despite the submissions in SX Hospitals proposal, a Healthcare facility of any size is NOT compatible with the character and form of the residential zone in the Epsom area. The Unitary Plan specifically recognises this by offering a Special Purposes-Healthcare Facility and Hospital Zone.

We have selected and lived in Epsom for its specific residential flavour and leafy/green character. This proposal [PC21] will allow a facility which is contrary to that character.

d. Construction and Excavation

A facility of the type being proposed, will have a construction time in excess of at least two years. This WILL produce significant impact on the surrounding residential area, in terms of vehicular/truck movements, noise, and pollution. This has not been significantly addressed in the submission, and in any event, it is suggested that the quantum of the disruption cannot be mitigated.

It is a significant omission from the FLOW traffic report, that construction traffic management is not discussed.

It is noted that there is expected to be excavation in excess of 15,000m³ during the construction of the complex. This will be in basalt rock and will be carried out by blasting. The health and safety issues, which give rise to the safe blasting in a residential area, cannot in my opinion be mitigated. During the last episode of this type of work on the site, and

Submission no 55

more recently, work on the southern motorway, it has been proven that blasting sirens, road blockages, dust, flying rock, and damage to surrounding buildings CANNOT be mitigated. Just the road blockages to the motorway feeder road, Gilles Ave, and through road access of Owens Rd will result in severe disruption to traffic.

Furthermore, it has been shown that no contractor/organisation can be found liable for this damage.

e. Safety of Children/Pedestrians

It is estimated that there can be up to 2,000 pedestrian movements along the boundaries of the site and at the Owens Rd/Gilles Ave intersections on a daily basis. The majority of these are school children.

Traffic movements and blasting works will provide a significant safety issue to these people, which in my opinion cannot be mitigated, and has not been shown to be sufficiently mitigated in PC21.

It is also noted that the FLOW report omits a significant facility, namely Auckland Grammar School from their list of surrounding or nearby facilities. This school itself generates significant pedestrian and vehicular movements.

f. Investigation into other suitable sites by SX Hospitals

When the unitary Plan was considered and enacted, suitable sites for various activities, including hospitals, were included in the plan.

The E & Y report states 'no suitable centrally located site has been found'. [pp2 of report] However, there is no discussion in the report as to whether other sites [other than SX Hospitals sites] have been investigated. There are numerous sites within the central city zoned for this activity.

S32 of the RMA specifically puts the onus on a prospective developer to canvas and examine a range of alternatives before applying for a change of zoning on a particular site. This application [PC21] has not demonstrated it has complied with S32 of the RMA, and on this basis alone the application should fail.

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

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



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

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

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms (Full Name) Deborah Wade.

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

Address for service of Submitter

P.O. Box 26-29, Epsom
16 Epsom Ave, Epsom.

Telephone: 09-6387315 Fax/Email: debbiewade@brantz.co.nz

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number PC 21

Plan Change/Variation Name 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

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

Plan provision(s) see attachment

Or
Property Address

Or
Map

Or
Other (specify)

Submission

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

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes No

Submission no 56

ATTACHMENT -- Reasons for Submission

1. I/we ~~oppose~~ Proposed Plan Change 21 (PC 21-private) for the following reasons:
 - (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
 - (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
 - (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
 - (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 D18 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, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. 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) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and

Submission no 56

purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

- (h) PC 21 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.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 56

The reasons for my views are:

... see Deborah Wade attachment.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

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

I wish to be heard in support of my submission

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

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

Deborah Wade

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

10.04.19
Date

Notes to person making submission:

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

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

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

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

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

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

(a) adversely affects the environment; and

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

Submission no 56

- (1) I am very concerned about the idea that a major commercial enterprise can come into a well established residential area that is clearly identified for residential activities only.
- (2) I do not understand how anything that is up to 25 metres tall can be considered appropriate within a residential area with no more than 8 metre tall dwellings. This has to be considered an unacceptable visual intrusion that will be highly visible from many directions, and in-turn inflict privacy issues across a large outlook area. Effectively this will establish a large commercial island within a large low-profile residential precinct.
- (3) There has been no consideration to an increase in traffic in a residential zone and the affects this has on our community in their everyday life.

Submission no 57

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

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



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

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

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss (Ms) Full
Name)

Xin Liu (Grace)

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

Address for service of Submitter

5/4 Brightside Rd, Epsom, Auckland

Telephone:

021-660345

Fax/Email:

grace.liu7380@gmail.com

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 21

Plan Change/Variation Name

3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

The specific provisions that my submission relates to are:

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

Plan provision(s)

THE PROPOSED PLAN CHANGE IN ITS ENTIRETY

Or

Property Address

Or

Map

Or

Other (specify)

Submission

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

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes No

Submission no 57

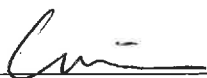
The reasons for my views are: PLEASE SEE ATTACHMENT

(continue on a separate sheet if necessary)

I seek the following decision by Council:

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

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



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

03. 04. 2019

Date

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If you could gain an advantage in trade competition through this submission please complete the following:
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(a) adversely affects the environment; and
(b) does not relate to trade competition or the effects of trade competition.

Submission no 57

ATTACHMENT -- Reasons for Submission

1. I oppose Proposed Plan Change 21 (PC 21-private) for the following reasons:

- (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
- (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
- (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
- (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 D18 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, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. 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) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

Submission no 57

- (h) PC 21 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.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 57

2. In addition, I also have the following concerns and oppose the Proposed Plan Change 21:

- We have been living on Brightside Road for over 10 years. It is a short road but is already very busy connecting Epsom, Mt Eden and New Market. During the daytime many commuters park their cars on the street and catch a bus or walk to work in New Market & City Fringe. Parents take this road to send their children to schools such as Epsom Girls, Auckland Grammar, Auckland Intermediate and some primary schools. In addition, many people take this road to drive to Gillies Ave and to Northern Motorway. We also observe that many hospital staff park their cars on the road and hospital contractors come to deliver goods and services on a frequent basis – e.g. food, cleaning, paint, plumbers etc. Brightside Road is already very busy and when we have visitors, it is quite hard to find a space to park on the road. The proposed construction and operation of the new 24/7 hospital will bring disasters to local residents, commuters and other people who drive this road frequently – in terms of increased traffic, car noises and limited off street carparks. This should not happen in a residential area and will make Brightside Road and surrounding affected streets become unpleasant places to live.
- The exterior wall of my house is plaster over concrete block and many properties on the street have the same exterior materials. Our properties are potentially at risk of damage from the continuous excavation/blasting for a prolonged period of time to establish a very huge and deep basement to proposed new structures. If there are damages to our or our neighbours' properties during the excavation/blasting, who will pay the cost to fix the damages? If there are some invisible damages on the properties such as on the foundation or inside the internal wall, and such damages are not exposed until after years, who will be responsible for these damages? SCHL or Auckland Council?
- Blasting the basalt rock in a residential zone for over 2 – 3 years duration is ridiculous. The explosive noise, dust and construction noise will bring many nuisances and health issues to local residents, especially the senior residents and children. In addition, safety issue is another serious concern of mine. It is predicted that 9,000 trucks are need to remove the broken rocks. Afterwards building construction will take another few years. Every day there are thousands of students (e.g. Kohia Primary, Epsom Girls, Auckland Grammar and St Peter's College) walk through the intersection between Gillies Ave and Owens Rd and many local resident walk their dogs and run on these streets. The blasting, rock removal and construction for years will put all local residents in danger, not to mention that after the operation of the new 24/7 hospital, there will be ambulance, vehicles to handle urgent patients and other emergencies. Therefore, the safety issue will be ongoing as long as the new hospital is in operation.
- I am not opposed to hospitals per se but I do think under the Unitary Plan there are suitable lands in Auckland with the appropriate zoning to accommodate this activity. But

Submission no 57

definitely not in Mt Eden-Epsom suburb, which are well established mature residential areas.

Submission no 58

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

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



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

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

Eva Ji

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

Address for service of Submitter

5/4 Brightside Rd, Epsom

Telephone:

021 065 0200

Fax/Email:

NEXINXIN@HOTMAIL.COM

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 21

Plan Change/Variation Name

3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

The specific provisions that my submission relates to are:

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

Plan provision(s)

THE PROPOSED PLAN CHANGE IN ITS ENTIRETY

Or

Property Address

Or

Map

Or

Other (specify)

Submission

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

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes No

Submission no 58

The reasons for my views are: SEE ATTACHMENT

(continue on a separate sheet if necessary)

I seek the following decision by Council:

- Accept the proposed plan change / variation
- Accept the proposed plan change / variation with amendments as outlined below
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- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at a hearing

Xuehua Ji

16.4.19

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

Date

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

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

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

Submission no 58

ATTACHMENT -- Reasons for Submission

1. **We oppose** Proposed Plan Change 21 (PC 21-private) for the following reasons:

- (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
- (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
- (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
- (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 D18 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, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. 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) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

Submission no 58

- (h) PC 21 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.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 58

2. In addition, we also have the following concerns and oppose the Proposed Plan Change 21:

- My husband and I are both in our mid 70's, and we have been living on Brightside Rd for over 10 years. We do have serious concerns about the health and safety issues that the blasting and construction will cause to us and all other local residents. I have diabetes and the doctor asks me to do regular exercise. Therefore, every day I walk twice along Gillies Ave, Owens Road and surrounding side streets – once in the morning and once after dinner. If blasting takes place along with 9,000 trucks coming and leaving Brightside Rd and Gillies Ave to remove the rocks, I will feel unsafe to walk on the streets as I walk slowly due to having arthritis. During the construction stage, which takes another few years more trucks will come. After the operation of the new hospital, the traffic will increase substantially from now with an ongoing basis and I am very concerned about local residents' safety issue. Many of my neighbours are senior citizens like us and there are many children in this area, who like playing outside their houses. We all enjoy the quiet and peaceful living environment and we do not want this to be damaged by a commercial intrusion. It is absolutely inappropriate to operate such a major commercial activity in a well-established residential area.
- We do not doubt there is a need for more hospital beds, but Eden-Epsom are not the places to do it. Under the Unitary Plan there are suitably zoned areas in Auckland which could accommodate this activity. Has Southern Cross Hospitals Limited reviewed and assessed the other options in Auckland?
- We are very concerned about the prospect of further loss of heritage homes. Three quality heritage homes have already been lost 20 years ago when the first Southern Cross hospital was built. Now another three could be lost. Mt Eden-Epsom are expensive suburbs with many beautiful, historic houses. The reputation should not be ruined by an intrusive commercial activity. My husband and I walk along the quiet resident streets every day and we do enjoy seeing many beautiful houses with special characters. We believe these houses should be retained to the most extent including the three on Gillies Ave.

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

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



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

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

ANDREW KOHLER

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

Address for service of Submitter

PO BOX 28718 REMUERA 1541

Telephone:

021411981

Fax/Email:

kandrew2302@gmail.com

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 21

Plan Change/Variation Name

3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

The specific provisions that my submission relates to are:

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

Plan provision(s)

THE ENTIRE PLAN CHANGE

Or

Property Address

Or

Map

Or

Other (specify)

Submission

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

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended

Yes

No

Submission no 59

The reasons for my views are:

REFER ATTACHMENTS

(continue on a separate sheet if necessary)

I seek the following decision by Council:

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

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

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

Date

14 APRIL 2019.

Notes to person making submission:

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

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

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

Submission no 59

ATTACHMENT -- Reasons for Submission

1. **I/we oppose** Proposed Plan Change 21 (PC 21-private) for the following reasons:
 - (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
 - (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
 - (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
 - (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 D18 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, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. 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) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

Submission no 59

- (h) PC 21 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.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 59

2. Additional concerns.

a. Residential Zone

Despite the submissions in SX Hospitals proposal, a Healthcare facility of any size is NOT compatible with the character and form of the residential zone in the Epsom area. The Unitary Plan specifically recognises this by offering a Special Purposes-Healthcare Facility and Hospital Zone.

We have selected and lived in Epsom for its specific residential flavour and leafy/green character. This proposal [PC21] will allow a facility which is contrary to that character.

b. Permitted maximum Bulk and Mass.

The proposal appears to indicate massing drawings and sunlight/shadowing drawings for a 15.00m building.

Under the requested zoning, it is possible to build to 25m, with little or no resident or Council input. Despite SX Hospitals indicating the lower height, this can be revised at any time should the rezoning occur.

Massing drawings should indicate the effect of a 25m building.

This will show an entirely different and detrimental effect, which cannot be mitigated by a few stone walls and existing trees. The effect of a 15.0m building alone in an area with an 8.0m height limit, is considerably more than 'minor' as noted in the submission.

Motu Design has noted in their submission, a separate Resource Consent application for the site which 'informs the assessment of this zone'. However, there is no documentation shown to which we can refer, and in any event, it is suspected that it relates only to a 15.0m high building which in itself is over twice the height of the surrounding zones.

c. Safety of Children/Pedestrians

It is estimated that there can be up to 2,000 pedestrian movements along the boundaries of the site and at the Owens Rd/Gilles Ave intersections on a daily basis. The majority of these are school children.

Traffic movements and blasting works will provide a significant safety issue to these people, which in my opinion cannot be mitigated, and has not been shown to be sufficiently mitigated in PC21.

It is also noted that the FLOW report omits a significant facility, namely Auckland Grammar School from their list of surrounding or nearby facilities. This school itself generates significant pedestrian and vehicular movements.

d. Construction and Excavation

A facility of the type being proposed, will have a construction time in excess of at least two years. This WILL produce significant impact on the surrounding residential area, in terms of vehicular/truck movements, noise, and pollution. This has not been significantly addressed in the submission, and in any event, it is suggested that the quantum of the disruption cannot be mitigated.

Submission no 59

It is a significant omission from the FLOW traffic report, that construction traffic management is not discussed.

It is noted that there is expected to be excavation in excess of 15,000m³ during the construction of the complex. This will be in basalt rock and will be carried out by blasting. The health and safety issues, which give rise to the safe blasting in a residential area, cannot in my opinion be mitigated. During the last episode of this type of work on the site, and more recently, work on the southern motorway, it has been proven that blasting sirens, road blockages, dust, flying rock, and damage to surrounding buildings CANNOT be mitigated. Just the road blockages to the motorway feeder road, Gilles Ave, and through road access of Owens Rd will result in severe disruption to traffic.

Furthermore, it has been shown that no contractor/organisation can be found liable for this damage.

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

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



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

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

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr./Mrs/Miss/Ms (Full Name)

LANCIA HICKS

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

Address for service of Submitter

PO BOX 28710 REMUERA 1541

Telephone:

021866595

Fax/Email:

lanciahicks@gmail.com

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 21

Plan Change/Variation Name

3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

The specific provisions that my submission relates to are:

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

Plan provision(s)

THE ENTIRE PLAN CHANGE

Or

Property Address

Or

Map

Or

Other (specify)

Submission

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

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended

Yes

No

Submission no 60

The reasons for my views are:

REFER ATTACHMENTS

(continue on a separate sheet if necessary)

I seek the following decision by Council:

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L. Hicks (L. Hicks) 14 APRIL 2019.
Signature of Submitter Date
(or person authorised to sign on behalf of submitter)

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Submission no 60

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Submission no 60

- (h) PC 21 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.
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Submission no 60

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It is also noted that the FLOW report omits a significant facility, namely Auckland Grammar School from their list of surrounding or nearby facilities. This school itself generates significant pedestrian and vehicular movements.

Submission no 61

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

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



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Auckland Council
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Private Bag 92300
Auckland 1142

For office use only Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)



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

Address for service of Submitter



Telephone:



Fax/Email:



Contact Person: (Name and designation, if applicable)

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PC 21

Plan Change/Variation Name

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The specific provisions that my submission relates to are:

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

Plan provision(s)

Or

Property Address

Or

Map

Or

Other (specify)

The whole plan change

Submission

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

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended

Yes

No

Submission no 61

The reasons for my views are:

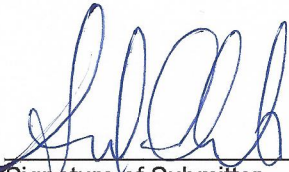
Please see attachment

(continue on a separate sheet if necessary)

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12/4/19
Date

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Submission no 61

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Submission no 61

purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

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Submission no 61

Further concerns I have along with the technical concerns attached include the following:

The excavation of the basalt rock

Basalt rock flows from the sites that Southern Cross Hospital Limited (SCHL) want the plan change to apply to, straight across Gillies Ave, and down under my home. When extending my home, basalt rock was dug out with a small digger, which means I have seen the rock myself. It was difficult to remove but on a small scale, manageable with small machinery and not a major concern. However, the scale of which SCHL will intend to dig out the rock if they get the plan change they are asking for will be significantly larger, and will take time to do so – maybe up to a few years. It will also involve large machinery, possible blasting and heavy trucks to come and go from the site. Given that my home is nearly 100 years old, this is of concern to me. Currently, heavy trucks and buses travelling along Gillies Ave have an effect on our home in that they cause vibrations that make certain floors and windows on the west side (the side closest to Gillies Ave) shake. The work that SCHL will undertake under the plan change, I believe will only make this worse as the vibrations from potential blasting will travel through the rock under our foundations, the trucks and machinery will drive by and around the site on an almost daily basis, and could therefore result in damage to my home. Work that was undertaken by NZTA on the Southern Motorway caused vibrations, and these were within the limits allowed. Yet it still caused damage to homes nearby. The old homes in this area will negatively feel the effect of vibrations too if semi-modern homes in South Auckland did. Those in that area are struggling to find a responsible party to help cover the costs of the remedial work. I believe, that the same will happen in this case too. Please consider this, and do not bring the potential of this burden to the residents around Epsom.

Noise

Another concern is the noise any construction under the zone change will bring, along with the development SCHL is proposing to build. This is generally a quiet residential area where the residents get to live in peace. This is one of the highlights of living in this suburb. However, one of the noises that I find wakes me often is the rubbish collection that occurs in the early hours of the morning for the current SCHL site. Under SCHL current proposal, the rubbish collection will be moved to Gillies Ave, thus only making the rubbish removal noises louder. The larger the hospital, the more bins required too so longer the noise remains. Increasing the scale of the hospital will also result in more cars going past, and more people around which will also cause more noise. Then there is the construction itself. Heavy machinery, construction crews, rock removal, the list of noise making items goes on, and each item further reduces the ability of the residents in the area and I to be allowed to enjoy the quiet characteristics that this residential area has to offer.

Visual Disruptions

Currently, we have been lucky enough to find a home that provides us with a lovely view looking up to Mount Eden, especially from the top floor of my home. With the potential development SCHL could do if they are provided with a plan change for the sites on Gillies Ave and Brightside Rd, this view will be blocked. They can build up to 16 meters, and with resource consent could go higher which means we would have no way of getting the lovely view back. On top of this, currently due to the location and surrounding homes restricted height, afternoon sun flows through the main and upper floors of my home. It remains in summer till nearly 8pm at times until setting behind Mount Eden. Based on SCHL reports presented to the Council, a permitted 16 meter development will result in us losing our sunlight before 6pm in summer,

Submission no 61

and significantly earlier in winter. Given resource consent, SCHL could go higher under the plan change they want, which means even losing sunlight potentially mid afternoon depending on how high they go. With an old villa home, afternoon sunlight is essential for the west side of the home. Quite frankly, this is important for any home. Given the proposed development, and therefore resulting lack of sunlight in the afternoon, our west side will essentially turn into another south side.

Privacy

Further to that mentioned above, I believe that the 16m development allowed and proposed under the plan change by SCHL will cause a privacy issue. Currently, despite trees surrounding the sites, our west side looks directly over the existing rock wall and allows us, and those across the road to see into each others homes. At the moment, the building across from us isn't even 10m high. Given a structure of at least 16m could be built across from us, a hospital as such which will have many windows, and multiple patients, visitors and staff accessing these rooms who will be able to see out of these windows. This becomes a privacy issue for me and my family. You cannot buy a 16 meter tree and it would take years to establish one if SCHL want to use foliage to hide the building view (which is one way to remedy this issue, albeit a unfeasible one at that). The area has no existing trees that will cover the entire building from view, and therefore protect neighbours of their privacy. I believe this is a significant issue. No one wants numerous people to be able to look through into their home from such heights.

Future Precedent

Currently businesses in the Epsom area are restricted in building height, they blend with the area somewhat seamlessly or at least without becoming a adverse sight amongst residential homes. Even Epsom Girls Grammar doesn't draw significant attention to its façade, from the Gillies Ave frontage. Additionally, I believe that Auckland Council has worked hard at planning and preparing a Auckland wide Unitary Plan that allows characteristics of areas to remain, yet allows reasonable development in areas that are suited to those kinds of developments. They heard submissions for years, adjusting the plan as needed to meet the needs of many. It has planned for things like hospitals and such. Yet SCHL never spoke up at the time. If it was any other individual, a home-buyer for example, essentially it would be too little to late and they would have to build accordingly within the parameters lined out under the plan or in a area where they would be allowed. SCHL could essentially move its business to a better-suited area under the plan the council has made, specifically in a less residential based area. Allowing SCHL to have the plan change they want, to allow such a development to occur in a heavily residential area to take place would set a negative precedent to any other commercial business in the future. It will ruin the special characteristics that have been maintained for years in residential suburbs. It will open the door, not just in Epsom but also in all of Auckland for such proposals to be made as one company has already been allowed it.

Finally, I ask you, the reader of this submission to consider how would you feel if there came a potential threat for a 16m hospital to be built across the road from your home. If you were faced with the same privacy issues, the several years of construction outside your door and the noise and problems that came with it, the removal of sunlight flowing into parts of your home that you have enjoyed for years, the potential for this building to reach 25meters, what would you want to happen? Would you allow it to happen?

Thank you for taking the time to consider my submission.

Submission no 62

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

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



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

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

For office use only Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms (Full Name)

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

Address for service of Submitter

Telephone:

Fax/Email:

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 21

Plan Change/Variation Name

3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

The specific provisions that my submission relates to are:

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

Plan provision(s)

Or

Property Address

Or

Map

Or

Other (specify)

The whole plan

Submission

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

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended

Yes

No

Submission no 62

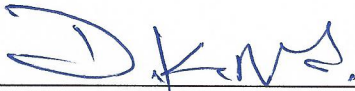
The reasons for my views are: please see attached papers

(continue on a separate sheet if necessary)

I seek the following decision by Council:

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

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
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Signature of Submitter
(or person authorised to sign on behalf of submitter)

12/4/2019
Date

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

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

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

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

Submission no 62

ATTACHMENT -- Reasons for Submission

1. **I/we oppose** Proposed Plan Change 21 (PC 21-private) for the following reasons:
 - (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
 - (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
 - (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
 - (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 D18 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, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. 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) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and

Submission no 62

purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

- (h) PC 21 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.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 62

Further to the technical concerns mentioned on the previous pages, I also have the following concerns.

(I) I chose to live in this area due the good schools and nice residential characteristics that Epsom has to offer. Having lived here for nearly 15 years or so, one of the aspects that I thoroughly enjoy is the fact that small-scale, mostly residential buildings surround me. These buildings are similar in height without large, commercial or industrial buildings over taking the visual field. The suburb is quiet and even the businesses that operate currently close by (two of which are owned by Southern Cross Hospital Limited – SCHL) do not protrude out visually or make a major commotion allowing for quiet enjoyment of the area in which I live. That is in essence the characteristic of Epsom – quiet, residential suburb full of greenery and historical homes blended subtly with somewhat modern home designs. The proposed plan change, and the development that that will allow do not fit into this characteristic at all, not only due to it's size and scale compared to the homes around it, but also due to the fact that it involves the demolition of historical sound residential homes that help make up the distinctive aspects of Epsom. Already SCHL removed three homes last time they built their Brightside Rd site. Now they want to remove another three that are costly and hard to replicate.

(II) Yes there are some commercial buildings mixed amongst the residential homes in Epsom. SCHL has given examples of such in their reports to Auckland Council. However, all these as mentioned above, seem to seamlessly fit into the area as they have kept the same height restrictions as most residential homes in the area in my opinion. They are not 16m monstrosities next to residential homes. They do not over shadow neighbouring historical properties, and do not draw attention to them selves as being 16 meters tall. Take for example, the current SCHL hospital on Brightside Rd. It is drawn away from the road and does not hinder the visual aspects of the area as it maintains the height restrictions and is surrounded by trees. These restrictions were put in place to maintain Epsom's charm as a residential suburb. Even the boarding homes that operate in the area do not remove the character of Epsom. They do not expand beyond the height to boundary rules currently in place, and do not diminish any views. They look like the homes found in the area, and to any one driving by, they would look like just another home.

(III) SCHL mention in their reports that the sites they have acquired on Gillies Ave are the only ones "marooned" in the Brightside Rd/Owens Rd/Gillies Ave area. Whilst this technically be true, that is a narrow band of properties. Extend the band to the right, right across the road on Brightside Rd, across from the existing hospital exists many homes that have the special character overlay. Are those sites really marooned? No! Furthermore, the reason for the special character overlay is to provide a form of protection is it not? To be protected from this very thing – being demolished by large commercial businesses. These homes are a part of Auckland history and they should continue to be. Built in the 1920's, those homes are costly to replicate, speaking from the viewpoint of an owner of a historical villa built also in the 1920's. They should be protected. On top of this, currently Auckland is suffering from a housing shortage and the government is working to build more homes. The answer shouldn't be to remove sound homes that are able to house people, especially many in the case of the boarding home that SCHL has acquired.

Submission no 62

Surely the Unitary plan provides for the zoning that SCHL are after. There must be other sites that could be considered rather than this narrow minded view of expanding a existing hospital right bang smack in the middle of a residential suburb. A site better suited that would not involve the demolition of historical buildings or trouble to the residents who live in the area.

(IV) The schools that Epsom has to offer are some of the top schools in Auckland. Every day you see hundreds of students walking to and from school via Gillies Ave. My daughter herself was on of them. There are many who still do. Epsom in general, and currently Gillies Ave is a safe main route that many parents allow their children to walk alone. I believe with the proposed plan change in place, and the potential expansion of the hospital, this will no longer be the case. With construction a major aspect of the safety concern, there will also be safety concerns after construction due to cars coming and going through the Gillies Ave entrance any possible hospital will have. Visitors, staff and patients will all be using the entrance to the hospital site, and each day, many children will have to cross their path. It is not the odd car from a residential site that children will have to be mindful of, but many cars coming and going.

(V) Currently, the property acquired by SCHL that sits directly opposite my home can be viewed without obstruction from any trees or the surrounding rock wall on both sides of Gillies Ave. The property is no more than 10m tall, if that. I believe this means that under the proposed plan change; any structure built (allowed to be 16m and SCHL plans to take full use of that height limit) will result in a privacy issue for my family and I who live directly across the road. A hospital needs to provide windows and at 16 meters tall and spanning three sites, this is a lot of windows, not just one or two that we are currently faced with. Staff, numerous patients and their families on a daily basis will access to these windows. Essentially these are all people who will be able to look down onto our property, and into it. No one wants numerous people to be able to look through into their home from such heights. There really would be no way for this to be remedied by SCHL as there are no existing trees that tall to provide coverage, nor can you buy a 16m tree.

(VI) In regards, to our views, another concern I have is that under the proposed plan change, any structure built will ruin our uninterrupted views of Mount Eden. I enjoy the view to Mount Eden that I have on a daily basis from the nearly 20m + of west side façade of my home (faces the three sites SCHL has acquired on Gillies Ave). I also enjoy the afternoon sun throughout the west side of our home. The proposed plan change asked by Southern Cross Hospital Limited will allow them to build to a minimum of 16m, and with a resource consent, could go up to 25m. This would completely cover our views of Mount Eden, and essentially mean we lose our afternoon sun across our whole west side facing façade. Once the sun hits the top of Mount Eden (which we can currently see) we then lose the sun. However, the building will substantially be taller over passing the view of Mount Eden blocking out sunlight sooner. Currently in summer our sunlight flows through till nearly 8pm at times. According to reports gathered by SCHL and submitted to the council, a building of 16m would change this to before 6pm. Winter would be even sooner. A 25 meter building (allowed with resource consent) would mean sunlight would disappear even more earlier.

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(VII) All my concerns mentioned above I believe will also result in a devaluation of my property. A loss of mountain views, which are then replaced with a view of the hospital, which then has windows that will overlook directly into our home thus creating a lack of privacy issue, and further a reduction in late afternoon sun are all things buyers consider when purchasing a property. None of these are appealing aspects to home buyers.

(VIII) Our home is an old villa dating back to the 1920s. Much of the original house still exists on the main floor. Under the foundations, flows the basalt rock from across the sites that Southern Cross Hospital Limited (SCHL) want the plan change to apply to. When extending my home, basalt rock was dug out with a small digger, which means I have seen the rock myself. It was difficult to remove but on a small scale, manageable with small machinery. However, the scale that SCHL will intend to dig out if they get the plan change they are asking for will be significantly larger and will take time to do so – maybe up to a few years. It will also involve large machinery, possible blasting and heavy trucks to come and go from the site. Given that my home is nearly 100 years old, this is of concern to me. Currently, heavy trucks and buses travelling along Gillies Ave have an effect on our home in that they cause vibrations that make certain floors and windows on the west side (the side closest to Gillies Ave) shake. The work that SCHL will undertake under the plan change. I believe will only make this worse as the vibrations from potential blasting will travel through the rock under our foundations, the trucks and machinery will drive by and around the site on an almost daily basis, and could therefore result in damage to my home. Work that was undertaken by NZTA on the Southern Motorway caused vibrations, and these were within the limits allowed. Yet it still caused damage to homes nearby. The old homes in this area will definitely feel the negative affects of vibrations too if semi-modern homes in South Auckland did. Those in that area are struggling to find a responsible party to help cover the costs of the remedial work. I believe, that the same will happen in this case too. Please consider this, and do not bring the potential of this burden to the residents around Epsom.

(IX) The noise brought on by the significant scale of construction is a further concern of mine. Heavy machinery, construction crews, rock removal, the list of noise making items goes on and each item further reduces the ability of the residents in the area and I to be allowed to enjoy the quiet characteristics that this residential area has to offer. I have elderly people living in the home with me too, and the construction noise, the vibrations as mentioned above will not be good for their health, or any of ours for that matter.

(X) Gillies Ave is also a major main road that is used heavily every day. The effect construction will have on the usage of Gillies Ave, both by pedestrians and cars/public transport is a concern for me. For example blasting of basalt rock to remove it (a method of rock removal that could be used by SCHL) would result in the roads being shut down prior to and after each blast. This seems like a major issue and concern to the users of Gillies Ave, which includes my family and I. Shutting down Gillies Ave and surrounding side streets will cause an increase of traffic to flow onto other already busy roads such as Manukau Rd. Heavy trucks and machinery needing access to the site will also cause a traffic problem. This will cause more delays at peak hours, particularly in the morning when many people including myself need to leave for work, and especially due to the motorway entrance and exit, to and from the city being on Gillies Ave.

Submission no 62

As a final request, I ask the reader of this submission to consider how would you feel if there came a potential threat for a 16m hospital to be built across the road from your home. If you were faced with the same privacy issues, the several years of construction outside your door and the noise and problems that came with it, the removal of sunlight flowing into parts of your home that you have enjoyed for years, the potential for this building to reach 25meters, what would you want to happen? Would you allow it to happen?

Thank you for providing your time to read and consider my submission.

11 APR 2019

ALBERT ST

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

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



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

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

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms (Full Name)

NAOMI ISOBEL DEXTER

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

Address for service of Submitter

43 OWENS RD- EPSOM

Telephone: 09-6300378

Fax/Email:

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number PC 21

Plan Change/Variation Name 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

The specific provisions that my submission relates to are:

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

Plan provision(s) The proposed plan change in its entirety

Or

Property Address

Or

Map

Or

Other (specify) The entire plan change

Submission

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

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes No

Submission no 63

The reasons for my views are:

See attachments

(continue on a separate sheet if necessary)

I seek the following decision by Council:

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

- I wish to be heard in support of my submission
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Signature of Submitter

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- (a) adversely affects the environment; and
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Submission no 63

ATTACHMENT – Reasons for Submission

1. I/we oppose Proposed Plan Change 21 (PC 21-private) for the following reasons:
 - (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
 - (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
 - (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
 - (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 D18 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, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. 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) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

Submission no 63

- (h) PC 21 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.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

1. My late husband was a Grammar
old boy and it was important to
him that our own sons followed suit.
We now have grandsons who we
hope will do the same - hence buying
in the '70's a home in the
"Grammar Zone".
2. Traffic down Owens Rd is now
diabolical - I do believe that
Senior School pupils are allowed
to drive their own cars to school -
hence parking is at a premium -
Try getting in or out of your
own driveway during school
times - more traffic in the area
is a No.
3. This area has long been
residential - we don't need this to
change - Cuck Hospital and
Mercy are both within walking
distance. and doing excellent
work

Naomi Dentes

Submission no 64

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

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



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For office use only
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Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms (Full Name) [REDACTED]

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

Address for service of Submitter

[REDACTED]

Telephone: [REDACTED] Fax/Email: [REDACTED]

Contact Person: (Name and designation, if applicable)

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Or
Property Address

Or
Map

Or
Other (specify) The whole plan change

Submission

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

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes No

Submission no 64

The reasons for my views are:

please see attachments

(continue on a separate sheet if necessary)

I seek the following decision by Council:

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

11/4/19
Date

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Submission no 64

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 - (g) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and

Submission no 64

purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

- (h) PC 21 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.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 64

In addition to the technical concerns, I also have the following concerns:

1) I have lived at my place of residence for nearly 15 years. I enjoy the residential family home characteristics that the general area of Epsom has. Most homes in this area pay homage to the early architectural designs in Auckland, whilst modern homes built in the area abide by the height restrictions placed on the mainly RESIDENTIAL area and do not detract or create a visual eye-sore. Even those sites across Gillies Ave, moving west/south into further Epsom and Mt Eden areas, maintain a level of visual consistency in the area. They blend in with other homes in the area and use foliage to ensure they do not ruin the characteristic of Epsom and Mt Eden. I believe this has been achieved/the characteristic of the area maintained by Auckland City Council through their current Unitary Plan and past District Plan zoning for the area. The plans control the height of structures (generally no more than eight meters) built in the area, place a special characteristic overlay on properties deemed to have special historical significance, and this generally tells those developing in the area to keep in mind the architecture of the past and the homes that remain from early to mid 1900's – my home included. By allowing Southern Cross Hospital Limited (SCHL) to change the zoning of the sites on Gillies Ave and Brightside Rd, they will be allowed to build up to 16 meters, and potentially with council consent go up to 25 meters. This will not fit the residential characteristics of the area. It will stand out and become an eye-sore. It will not blend in with the many homes that surround it. The zone change will open the door for Epsom to start being commercialised, large buildings to take over and ruin the special characteristics the area has, and has maintained through the last numerous decades. It will also allow SCHL to demolish two historical homes with special character overlay (which is supposed to provide them protection from such things) that have been around for nearly 100 years. Two sound, good condition homes that could stand for many more years to come. I believe that there is no need to destroy these homes, along with the old boarding home that sits directly opposite me. All provide adequate housing at a time when Auckland is already facing a housing shortage. Originally when SCHL built their existing hospital, three heritage homes were removed then too. Now they want to remove others. Food for thought even, SCHL could relocate their existing site to free up even more land in a highly sought after residential area, moving to a more appropriate and adequate zoned area where they would face no problems from residents in the area.

2) The street we live in (Kipling Ave) sits almost directly opposite the SCHL proposed development site. Kipling Ave along with Gillies Ave (both sides of the road) are a major thoroughfare for both students who walk to and from school, and their parents who use our street as a drop off zone for their children attending Epsom Girls Grammar School and Auckland Boys Grammar School. We also see small children walking to the local intermediate and primary schools in the area – Kohia Terrace, Auckland Normal Intermediate and Newmarket Primary School. I see it everyday as our house over looks both Kipling Ave and Gillies Ave. My son used to walk to and from school via Owens Rd and Gillies Ave daily for the last five years too and there are many more children who will continue to do so in the future. Having such a large scale construction site occurring right near the main walking route of students from multiple schools seems to me a needless major hazard. The type of construction SHCL has proposed could be done in an area that allows for large scale hospitals, would not interfere with significant amounts of children walking to and from school and could be built in an area allowed under the Unitary plan. They could consider other sites within Central Auckland I believe and it seems narrow minded to just stick to this one location, where their plan does not coincide with

Submission no 64

the residential characteristics of the area. Once construction finishes the final hospital will see staff, patients and their visitors coming and going on a daily basis off Gillies Ave at a much larger scale than currently seen, which means that many students will be crossing the entrance to the proposed development with many cars going in and out. I believe this also provides a further safety concern for many students who walk to and from school.

3) Already, the mornings and after school drop off and pick up times are a major traffic problem in the area on Gillies Ave. The morning school traffic already clashes with those needing to catch the motorway access off Gillies Ave to get to work in the city or those that work in the general area. Residents and such, myself included have had to deal with congestion to just get out of Kipling Ave, and right onto Gillies Ave in the morning. Adding a larger scale hospital zone to an already busy main traffic road will definitely have an impact. The survey of the traffic provided in the report by SCHL was done in March/April 2017 and early 2018. Not only is this already out of date, it was done during summer/when good weather was still occurring. Those that live in the area who see and deal with the traffic on a daily basis know that once winter kicks in, weather brings wind and rain, traffic on and around Gillies Ave gets even worse heading in all directions.

4) Parking is another concern. Already teachers, students and residents of the area park in side streets such as in the one I live. I see this on a daily basis and our street is generally always packed with cars. At times, these parked cars create problems for those that live in the area (myself included) by blocking access to resident's driveways and blocking views to fast turning traffic into side streets. Once the development is completed (this will take a few years) there will be parking provided at the site. However, construction workers during the build will need a place to park in an area already short of parking at times. If the construction workers get in early to find a parking space in side streets, this will be at the expense of those who live or go to school or already work in the area. Parking is already a problem and providing Southern Cross Hospital limited with this zone change, will only make the matter worse.

5) Furthermore, a major concern for me is the excavation of the basalt rock that flows from the SCHL development sites, across Gillies Ave, and down under my home. This excavation is not just limited to one site, but will occur over three large sites and will continue to do so for nearly two-three years. My home is nearly 100 years old and even heavy trucks or buses driving past on Gillies Ave result in the floor and windows rattling at times. To allow such a plan change will result in massive amounts of heavy machinery, trucks and such to pass by, and work directly opposite my home to occur. This will cause significantly more vibrations to travel through the rock, shaking the foundations and already vibration prone floors. This will undoubtable cause damage, both internal and external as seen by the complaints by residents over the vibrations made by the works on the Southern Motorway. Although NZTA has followed all the rules in terms of vibrations, homes which I'm sure aren't as old as those in the Epsom area were damaged and residents left with hefty bills to fix it all. A bill they cannot afford. Who will be held responsible in our case for damage caused to many homes by SCHL and their proposed plan change to build a large-scale hospital? Once the plan is changed, SCHL cannot be held responsible for damage as they will work within the zoning regulation, even if that results in damage. Auckland Council will also not be able to help, and nor will insurance providers....Who will then?

Thank you for taking the time to consider my submission.

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

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



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

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

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

ROBYN ANNE HAWKES

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

Address for service of Submitter

1/48A Owens Road
Epsom

Telephone: Fax/Email:

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

Plan Change/Variation Name

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

Plan provision(s)

Or
Property Address

Or
Map

Or
Other (specify)

Submission

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

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes No

Submission no 65

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

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

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

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

Submission no 65

The reasons for my views are: See attachments.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

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

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

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

15/4/19
Date

Notes to person making submission:

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

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

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

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

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

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

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

Submission no 65

ATTACHMENT -- Reasons for Submission

1. **I/we oppose Proposed Plan Change 21 (PC 21-private) for the following reasons:**
 - (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
 - (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
 - (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
 - (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 D18 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, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. 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) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and

Submission no 65

purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

- (h) PC 21 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.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

No 2 - In addition I also have these concerns:

As a geographer I understand and support the concept of land use zoning and overall urban planning to ensure a well functioning neighbourhood and city.

This proposal will compromise the integrity of the Epsom Zone - a residential part heritage zone. There are a multitude of more suitable sites for such a large commercial development.

Placing such a large commercial development will cause a deterioration in the nearby houses and overburden the existing infrastructure. I cannot support

this proposal and I am concerned that if it goes ahead the "meaning" of residential zoning will be diluted to mean it is actually commercial/residential mix and the neighbourhood concept is by no means secure.

Submission no 66

The reasons for my views are:

SEE ATTACHED

(continue on a separate sheet if necessary)

I seek the following decision by Council:

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

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

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

April 06 March 2019
Date

Notes to person making submission:

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

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

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

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

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

Submission no 66

ATTACHMENT – Reasons for Submission

1. **I/we oppose** Proposed Plan Change 21 (PC 21-private) for the following reasons:
 - (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
 - (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
 - (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
 - (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 D18 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, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. 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) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

Submission no 66

- (h) PC 21 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.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
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 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 66

1. The resulting traffic increase will be a hazard for the local school children. My grandchildren will be affected and the dangers of Work Vehicles, Machinery, noise levels and dust etc. will cause the chances of accidents to be very high.

2. The drilling and the vibrations for the underground work created for such a huge structure/structures will no doubt cause actual damage to houses in the radius of the Proposed Hospital.

We will have no option but to put the Council & Southern Cross on notice of a claim against them for the damages which will be caused to our house from the undergrounds drilling and other works.

3. These works are not within existing Unitary Plans. It is not in the character of Epsom (a Suburb with Many trees & Wildlife) to have such an industrial structure.

Most of the birds and wild life, historical trees and long term residents will disappear and Epsom will completely lose its, (until now) well Protected Historical character.

Vinay Deshpande
06 April 2019.

Submission no 67

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

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



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

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

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms (Full Name)

Richard George Hawkes

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

Address for service of Submitter

1/48 A Owens Road, Epsom, Auckland 1023

Telephone:

027-589-7194

Fax/Email:

rhawkes21@gmail.com

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 21

Plan Change/Variation Name

3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

The specific provisions that my submission relates to are:

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

Plan provision(s)

The proposed plan change in its entirety

Or

Property Address

Or

Map

Or

Other (specify)

Submission

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

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended

Yes

No

Submission no 67

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

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

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

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- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Submission no 67

The reasons for my views are: see attachments

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

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

I wish to be heard in support of my submission

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

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

Richard Hawkes

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

7/4/18
Date

Notes to person making submission:

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(a) adversely affects the environment; and

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

Submission no 67

ATTACHMENT -- Reasons for Submission

1. **I/we oppose** Proposed Plan Change 21 (PC 21-private) for the following reasons:
 - (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
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 - (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, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. Together, these actual and cumulative adverse effects confirm that the locality of PC 21 is unsuitable.
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Submission no 67

purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

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 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
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- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

2. In addition, I also have these concerns:

- a) We have lived in this area for more than twenty years. When we moved twelve years ago we purposely chose an area that had its character heritage environment protected under the current plan. This was because we had already witnessed the effect of the existing plan and its inability to stop the transformation from one of a street full of character homes to one that had every second home removed and replaced by boring sausage box homes with little or no character. We do not want the existing protection of the areas heritage and character given away in response to a commercial organisations choosing to ignore the current plan and protections.
- b) I am very concerned about the idea that a large commercial organisation can seek to change an area clearly identified for residential activities because it suits its purposes rather than follows the allowed and clearly articulated plan.
- c) I am worried that if this proposal can take place here then it sets a precedent for all of Auckland's residential zones and provides no protection of the existing zoning under the current unitary plan.

The first part of the document is a letter from the author to the editor. The author explains that the paper is a response to a recent article in the journal. The author discusses the importance of the topic and the need for further research. The author also mentions that the paper is a preliminary report and that the author is open to feedback and suggestions. The author concludes the letter by expressing hope that the editor will find the paper interesting and useful.

I am very concerned about the fact that a large number of researchers can look to claim on your behalf. This is not a good situation for the progress of the field. I am sure that you will find this situation very interesting and that you will be able to provide a very helpful response.

It is important that if the proposal can be placed here that it is a good one for all of the stakeholders involved. I am sure that you will find this situation very interesting and that you will be able to provide a very helpful response.

d) I do not understand how a building proposal that could be up to 25 metres tall can be considered "appropriate" within a residential area with no more than 8 metre tall dwellings. This has to be considered as an ~~an~~ unacceptable and inappropriate visual intrusion that will be highly visible from all directions and will inflict privacy issues across a large outlook area.

I have not understood how a building
 that could be up to 20
 meters tall was built
 near the base of a mountain. I
 think that the only way to
 build it was to be careful
 and use the best materials
 that were available at the
 time. All the work was done
 by hand.

Submission no 68

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

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

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

- It is frivolous or vexatious.
- It discloses no reasonable or relevant case.
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by

a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

How to Submit

1. Use the attached Auckland Council form and post to

Auckland Council, Unitary plan, Private Bag 92300, Auckland 1142 ;
Attention Planning Technician

2. In person using attached Auckland Council form to Auckland libraries or offices

3. Online

Search 'Auckland Council Plan change PC 21'. The link will come up.

4. By e mailing attached Auckland Council form to

unitaryplan@aucklandcouncil.govt.nz

SUBMIT BEFORE 5PM 18TH APRIL

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

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



Send your submission to unitaryplan/aucklandcouncil.govt.nz or post to :

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

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

KANAN DEOBHAKTA

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

Address for service of Submitter

27 DOMETT AVENUE, EPSOM

Telephone:

021 611 932

Fax/Email:

P.O. BOX 26403, EPSOM.

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 21

Plan Change/Variation Name

3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

The specific provisions that my submission relates to are:

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

Plan provision(s)

ALL OF THEM

Or

Property Address

Or

Map

Or

Other (specify)

Submission

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

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes No

Submission no 68

The reasons for my views are: SEE ATTACHMENT.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

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

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

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

06 April 2019
Date

Notes to person making submission:

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

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

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

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

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

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

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

Submission no 68

ATTACHMENT – Reasons for Submission

1. **I/we oppose Proposed Plan Change 21 (PC 21-private) for the following reasons:**
 - (a) The proposed plan change has failed to implement the basic direction, objectives and policies of the Auckland Regional Policy Statement (RPS) set out in Chapters B1 & B2. In particular the plan change has undermined the relationship within the intended compact urban form of Auckland between residential, historic, heritage and special character protection and urban intensification development initiatives as outlined in the RPS.
 - (b) While medical facilities are recognised as part of the social infrastructure of Auckland, their location relies on following the spatial objectives of the Special Purpose-Healthcare Facility and Hospital Zone. The subject site does not achieve those objectives or policies.
 - (c) The Special Purpose – Healthcare Facility and Hospital Zone (the “Hospital Zone”) is inappropriate for the subject sites because the sites and their locality do not meet the zone description, objectives or policies found in Chapter H25.1, .2 or .3. Overall the location and scale of the built outcome derived from PC21 undermines the integrity of the Hospital Zone.
 - (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 D18 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, the proposed reduction in required parking for the private hospital and the requirement for blasting to achieve underground parking. 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) The urban form depicted by the operative land use zone pattern covering the subject site and the surrounding neighbourhood firmly indicates the intention of low scale residential development consistent with the Special Character Overlay which covers part of the subject site and the neighbourhood. PC 21 is contrary to the integrity and purpose of the operative land use pattern and urban design outcomes represented by the operative land use zones.

Submission no 68

- (h) PC 21 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.
- (i) PC 21 has failed to protect the substantial trees over the subject area which contribute important landscape and vegetation amenity to the neighbourhood and is recognized in the Special Character Overlay.
- (j) Overall, PC21 has failed to provide the necessary justification required under s.32 of the Act to create the extent of change and modification to the operative planning provisions covering the subject area and the adjoining neighbourhood. In particular –
 - i. the evaluation of the objectives of PC 21 to achieve the purpose of the Act is inadequate,
 - ii. the appropriateness of PC 21 to achieve the relevant objectives having examined alternatives, assessed the efficiency and effectiveness of the proposal to achieve those objectives is not provided , and
 - iii. the summary of the reasons for deciding on PC 21 as the correct course of action does not follow the instruction of s32 RMA, and
 - iv. it has not been demonstrated that the objectives of the applicant cannot be met in appropriately zoned areas of the City.
- (k) The serious failure to address the requirements of s.32 RMA has fundamentally flawed the ability for PC 21 to be considered and assessed under the Act.
- (l) Accordingly, the failure to meet the requirements of s.32 RMA confirms that PC 21 is contrary to the purpose of the Act as set out in Part 2, in particular, it does not provide for the sustainable management of the urban environment of the subject site and the neighbourhood required by s5 RMA. For these reasons PC 21 fails to meet the purpose of the Act and accordingly cannot proceed.

Submission no 68

1. We have lived in Epsom for 39 years. What we like about the area is that we have the Mt. Eden Crater and the Eden Gardens – Tourism Auckland includes this as one of the historical sites “a must see attractions” in Auckland tours.

Epsom and Mt. Eden is well known for Auckland University second campus, Private and State Schools. Number of older generation have the joy of having their grand and great grandchildren following their footsteps to the surrounding schools.

The volume of machinery and added traffic will be a major hazard to all the surrounding school children.

2. The increasing traffic and the noise levels is a serious concern because the whole area is a very tranquil. Off peak times we hear & see the Tuies, Woodpigeons, doves and other species of birds during the day and night in our and surrounding gardens. Singing Cicadas in Summer.

3. My house has concrete/plaster components to it. Stone wall on the Gillies Avenue.

There is definitely a huge risk of damage from the continuous excavation/blasting for a prolonged period of time. A big risk of Substantial cracks in the house foundation, walls, as well as the Stone Wall on the Gillies Avenue.

We will have no option but to put the Council + Southern Cross on notice of a claim against them for the damages which will be caused our house.

4. The proposed new structure, Quarrying, which is what excavation is, Over 2-3 years duration within a residential area is never a good idea because of the sheer noise level the residents will have to live with, will affect their hearing, mental health, lack of sleep.

The very core of wellbeing will be denied to the residents surrounding the Proposed Hospital development.

Kanand Deshpande
6/4/2019.

Submission no 69

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Sunday, 14 April 2019 5:00 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Devendra Patel

Categories:

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Devendra Patel

Organisation name:

Agent's full name: JASHWANTY RATANJI BHIKHA

Email address: family@patel.co.nz

Contact phone number: 021512149

Postal address:
155 Mountain Road
EPSOM
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:

Property address: 149, 151 and 153 Gillies Avenue, Epsom

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

This development will create a very large commercial building and enterprise within a quiet leafy suburb with school children. Even before construction, it will create huge traffic issues at the corner of Mountain Road, Brightside, Owens, and Gilles Avenue. Volcanic rock is the foundation here and it will definitely damage our houses with the blasts to "dig" as we found out when our neighbour did the same for a garage. This hospital will be a 24/7 operation and only 20 meters from our house and we do not wish such a large commercial operation right at our doorstep. Southern Cross should easily be able to find light industrial or commercial zoned area for a new hospital. This is

Submission no 69

RESIDENTIAL and SCHOOLING area and we would like it keep it as such. Southern Cross should have made appropriate submissions a few years ago when the unitary plan was being drafted and engaged in the process. Please decline this plan modification.

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

Submission date: 14 April 2019

Attend a hearing

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

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

Declaration

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

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

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

Yes

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

Submission no 70

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Friday, 12 April 2019 4:46 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Gillian Anderson

Categories:

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Gillian Anderson

Organisation name:

Agent's full name: Peter Anderson

Email address: g.anderson5758@gmail.com

Contact phone number: 021 1272142

Postal address:
7 Domett Ave
Epsom
Auckland 1023
Epsom
Auckland 1023 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:
PC 21

Property address: 3 Brightside Road, 149,151,&153 Gillies Ave, Epsom

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

I have lived here for 32 Years & I do not feel a need to have a Hospital Zone in an area that has lots of heritage & outstanding homes.

Submission no 70

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

Submission date: 12 April 2019

Attend a hearing

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

Would you consider presenting a joint case at a hearing if others have made a similar submission? No

Declaration

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

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

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

Yes

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

Submission no 71

From: UnitaryPlanSubmissionForm@donotreply.aucklandcouncil.govt.nz
Sent: Sunday, 14 April 2019 5:15 PM
To: Unitary Plan
Subject: Unitary Plan Publicly Notified Submission - Plan change 21 - Jashwanty Patel

Categories:

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Jashwanty Patel

Organisation name:

Agent's full name: JASHWANTY RATANJI BHIKHA

Email address: jashu@patel.co.nz

Contact phone number: 0211581602

Postal address:
155 Mountain Road
EPSOM
Auckland 1023

Submission details

This is a submission to:

Plan modification number: Plan change 21

Plan modification name: PC 21 (Private): 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

My submission relates to

Rule or rules:

Property address: 3 Brightside Road, 149, 151 and 153 Gillies Avenue, Epsom

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

We do not want a 24/7 commercial hospital 20 meters from our house in a RESIDENTIAL & SCHOOL area! This will cause huge disruption before, during, and after such a high building is constructed right amongst our houses. There is bound to be traffic issues as well as school children being injured. Noise levels will also affect residents with backup generators, laundry and so on.

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

Submission no 71

Submission date: 14 April 2019

Attend a hearing

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

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

Declaration

Could you gain an advantage in trade competition through this submission? Yes

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

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

Yes

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