

Contact details

Full name of submitter: Lichun Gao

Organisation name:

Agent's full name: Toby Mandeno

Email address: toby@bslnz.com

Contact phone number: 0272371177

Postal address:
PO BOX 11139
Ellerslie
Auckland 1542

Submission details

This is a submission to:

Plan modification number: Plan change 5

Plan modification name: Whenuapai Plan Change

My submission relates to

Rule or rules:

The planning maps - sites being left out of Stage 1 when formerly shown as Stage 1E.

Property address: 84 Trig Road, Whenuapai

Map or maps:

Other provisions:

The planning maps - sites being left out of Stage 1 when formerly shown as Stage 1E.

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

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

The reason for my or our views are:

The planning maps - sites being left out of Stage 1 when formerly shown as Stage 1E.

I or we seek the following decision by council: Accept the plan modification with amendments | 44.1

Details of amendments: Refer to attached documents.

Submission date: 19 October 2017

Supporting documents

Submission-Whenuapai Plan Change - FINAL_20171019163516.110.pdf

Appendix A and B_20171019163519.282.pdf

J007XX Trig Road 181017_20171019163520.298.pdf

Attend a hearing

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

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

Declaration

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

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

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

No

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

SUBMISSION FORM

The following submission is made on the proposed Auckland Council Plan Change 5 – Whenuapai Plan Change prepared under the Resource Management Act 1991.

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

Submitter: Lichun Gao

Postal Address: 17 O’Neills Avenue, Takapuna, Auckland 0622

Phone: 021 560 366

Email: 63444444@qq.com

Submitter: Trig Road Investment Limited

Postal Address: 43 St Stephens Avenue, Parnell, Auckland 1052

Phone: 021 0202 5666

Email: johnny1986.lin@gmail.com

I am not a trade competitor for the purposes of the submission but the proposed plan has a direct impact on my ability to develop my property. If changes sought in the plan are adopted they may impact on others but I am not in direct trade competition with them.

Name of Agent: Toby Mandeno – Birch Surveyors Limited


Address: PO Box 475, Pukekohe 2340

Phone: 027 237 1177

Email: Toby@bslnz.com

I wish to be heard in support of this submission.

If others make similar submissions, I would consider presenting a joint case with them at the hearing.



Signature **Date**

19 October 2017

1.0 INTRODUCTION

Thank you for the opportunity to submit on Whenuapai Plan Change 5.

The specific parts of the Plan Change to which this submission relates to is:

- The reasons behind – and exclusion of – the properties on the western side of Trig Road bounded by Spedding Road to the north, and the State Highway 18 on-ramp to the south.

2.0 BACKGROUND

- 2.1 Our clients are the landowners of 84 and 90 Trig Road, Whenuapai, outlined in the Locality Map attached as Appendix A to this submission.
- 2.2 The land on the western side of Trig Road, south of Spedding Road was largely included in Stage 1 of the Whenuapai Structure Plan, noted as Stage 1E, shown in Figure 1, below. The inclusion within Stage 1E gave our clients a reasonable expectation that their land would be included within the Plan Change. However, in Council's s.32 report these sites were removed due to the uncertainty around the timing associated with the Northside Drive bridge and eastern extension being built.

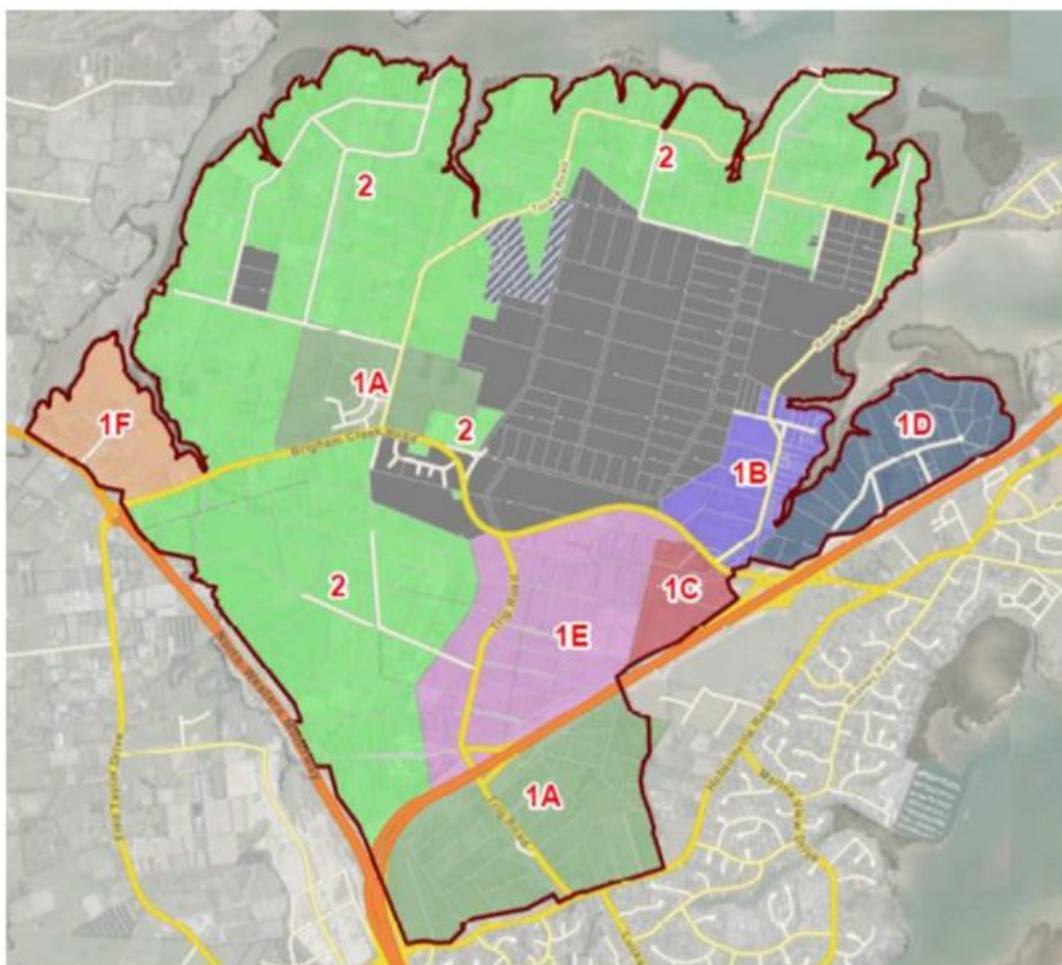


Figure 1: Whenuapai Structure Plan Staging (Source: Whenuapai Structure Plan Section 32 Report)

2.3 The alignment of Northside Drive appears to be fixed, with the road built on the north-western side, and the location of the bridge over State Highway (SH) 16 dictated by the installation of pillars that are already in place to support the future grade separation, as shown in Figure 2 and 3, below.

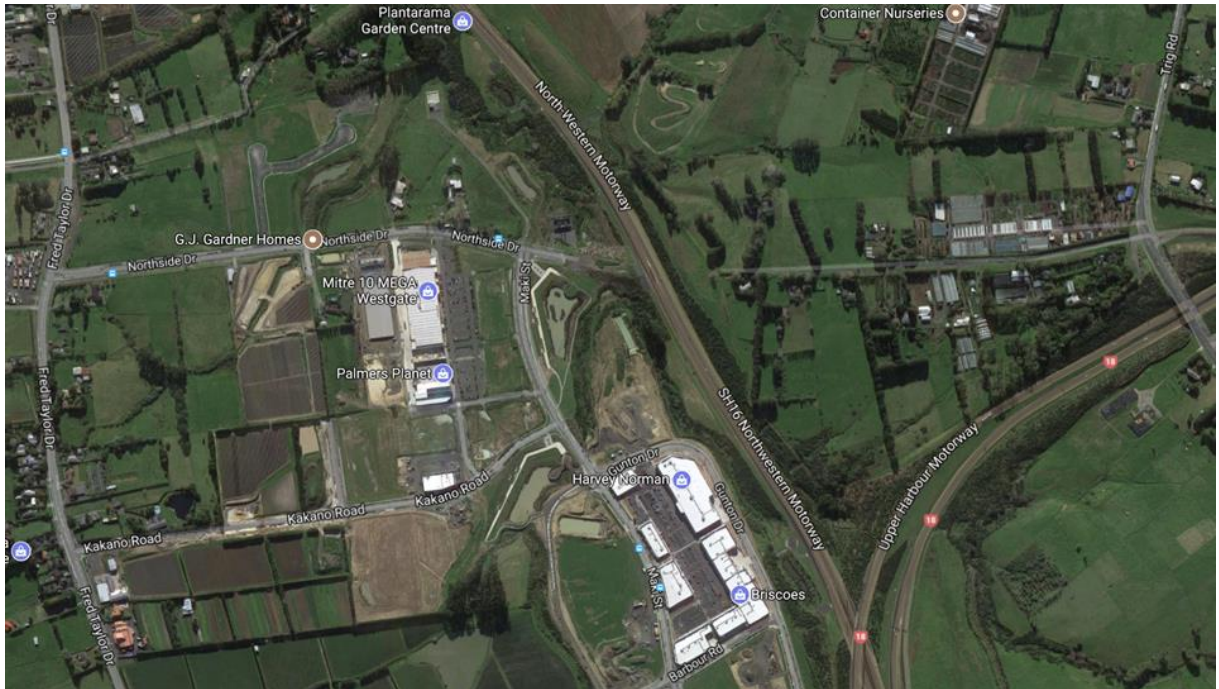


Figure 2: Aerial Photo showing Northside Drive established on the north-western side of SH 16 (Source: Google Maps)



Figure 3: Pillars located on State Highway 16 to support the future Northside Drive extension

- 2.4 The timing of the Northside Drive extension would have no impact on the future development of the properties located within 84-90 Trig Road. The Integrated Traffic Assessment Report (ITA) prepared by Flow Transportation Specialists Limited, dated July 2016 covers the Whenuapai Structure Plan area, not just the Plan Change area. Our clients' two (2) sites are located within the "Orange 4" modelling zone. The modelling undertaken within the ITA shows that part development of Orange 4 can and was enabled by the existing roading network without any upgrades or capacity issues as part of Stage 2a of the ITA.

3.0 SUBMISSION

- 3.1 Subject to the acceptance of the relief specified below, we generally support the proposed zoning of the Whenuapai Plan change area. 44.2
- 3.2 We seek the inclusion of the land at 84-90 Trig Road to be zoned Light Industrial, consistent with the plan change proposal for the properties immediately to the north and east of these sites. See map attached as Appendix B.
- 3.3 It is our position that Council has made an error of judgment within their s.32 report, by removing all of Orange 4 from Stage 1 with the only reason provided behind this decision not reflective of the traffic modelling completed within the TIA. Our position with respect to this matter is supported by Leo Hills, Traffic Engineer and Director of Commute Ltd who has provided supporting documentation to reflect this, attached as Appendix C.
- 3.4 We note that the exclusion of this area of Trig Road is based on the uncertainty around the timing of the future upgrade of Northside Drive. However, our position is that the early development of properties at 84-90 Trig Road will not compromise any future upgrade of this area.
- 3.5 The inclusion of these properties in Plan Change 5 will further facilitate and enable the upgrade of Trig Road, including the signalised intersection at Trig and Spedding Roads. We note that Council's own s.32 analysis has acknowledged these benefits, with such positive effects behind the inclusion of the land to the west of Trig Road and north of Spedding Road within the Plan Change. Please refer to the extract below;
- "The land on the west side of Trig Road and north of Spedding Road was included in the plan change area to enable development along both sides of the road, and to facilitate the required upgrade of Trig Road. Only properties to the west of Trig Road that connect to Trig Road were included."*
- 3.6 A key advantage of enabling developments on both sides of Trig Road is the ability for private development to assist in funding the required upgrade. The Stage 1 Technical Inputs document (which was recently released) has provided a proposed design for the Trig Road/Spedding Road intersection, as is shown in Figure 4, below:

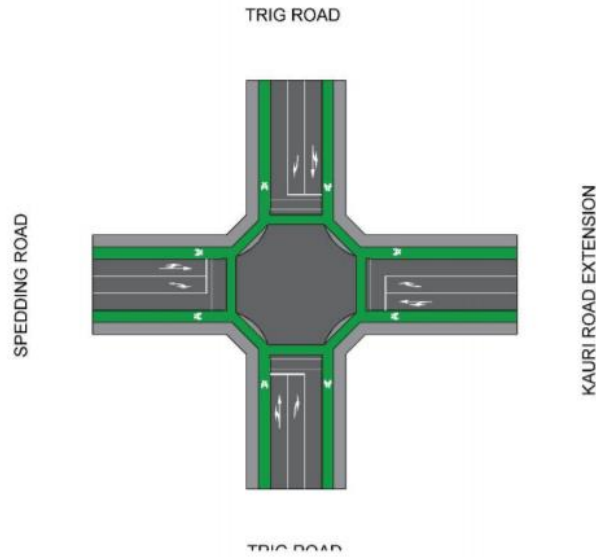


Figure 4: Proposed Intersection Design (Source Flow – Stage 1 Technical Input Report, 2017)

- 3.7 It becomes clear that additional land will be needed to support the construction of the above intersection. Completing this upgrade in isolation from the adjoining property does not – in my opinion – constitute a good planning outcome. The procurement and construction process is likely to suffer in terms of both cost and time.
- 3.8 This addendum to the ITA prepared by Flow Ltd, has identified different modelling scenarios from the ITA itself. Scenario 1e represents what has been considered for PC 5. Interestingly, the report (on page 21) identifies investment required as being the “*Urbanisation of Trig Road between Brigham Creek Road and SH18 Interchange*”. The trigger states that this is to achieve “*Any development fronting an existing road will need to upgrade it to urban standard and enable separated cycle facilities*”. By leaving our clients property out of Plan Change 5, this desired outcome cannot be achieved.
- 3.9 Early development will logically take place around the existing road network. To ensure suitable uptake of commercial and business land, priority must be given to live zoning land which adjoins the existing roading network. Failing to live zone our client’s sites which adjoin a key arterial road – is not in my opinion – a good planning outcome. Nor do I believe that this position can be justified on the basis provided within the s.32 Report.
- 3.10 We have reviewed all of the technical documentation provided with the Plan Change and believe that there is no reason why the proposed plan change could not accommodate the properties at 84-90 Trig Road. It is in our professional opinion that all of the sites subject to this submission can be serviced by the existing and future stormwater and sewer networks in conjunction with the remaining properties already contained within Plan Change 5.

4.0 RELIEF SOUGHT

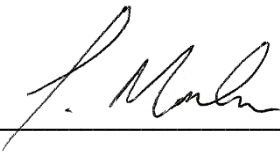
4.1 We request that the following properties are included within the Whenuapai Plan Change geographical area, zoned Light Industrial, for the reasons outlined in Section 3, above;

- 84 Trig Road, Whenuapai
- 86 Trig Road, Whenuapai
- 88 Trig Road, Whenuapai
- 90 Trig Road, Whenuapai

44.3

4.2 We note that whilst we do not act on behalf of the property owners of 86 and 88 Trig Road, they are aware of our submission, and are supportive of the relief sought.

Yours sincerely



Toby Mandeno

19 October 2017

MPlan, BSc, m.NZPI

Enclosed:

Appendix A: Locality Map

Appendix B: Submission Zone Map – Relief being Sought

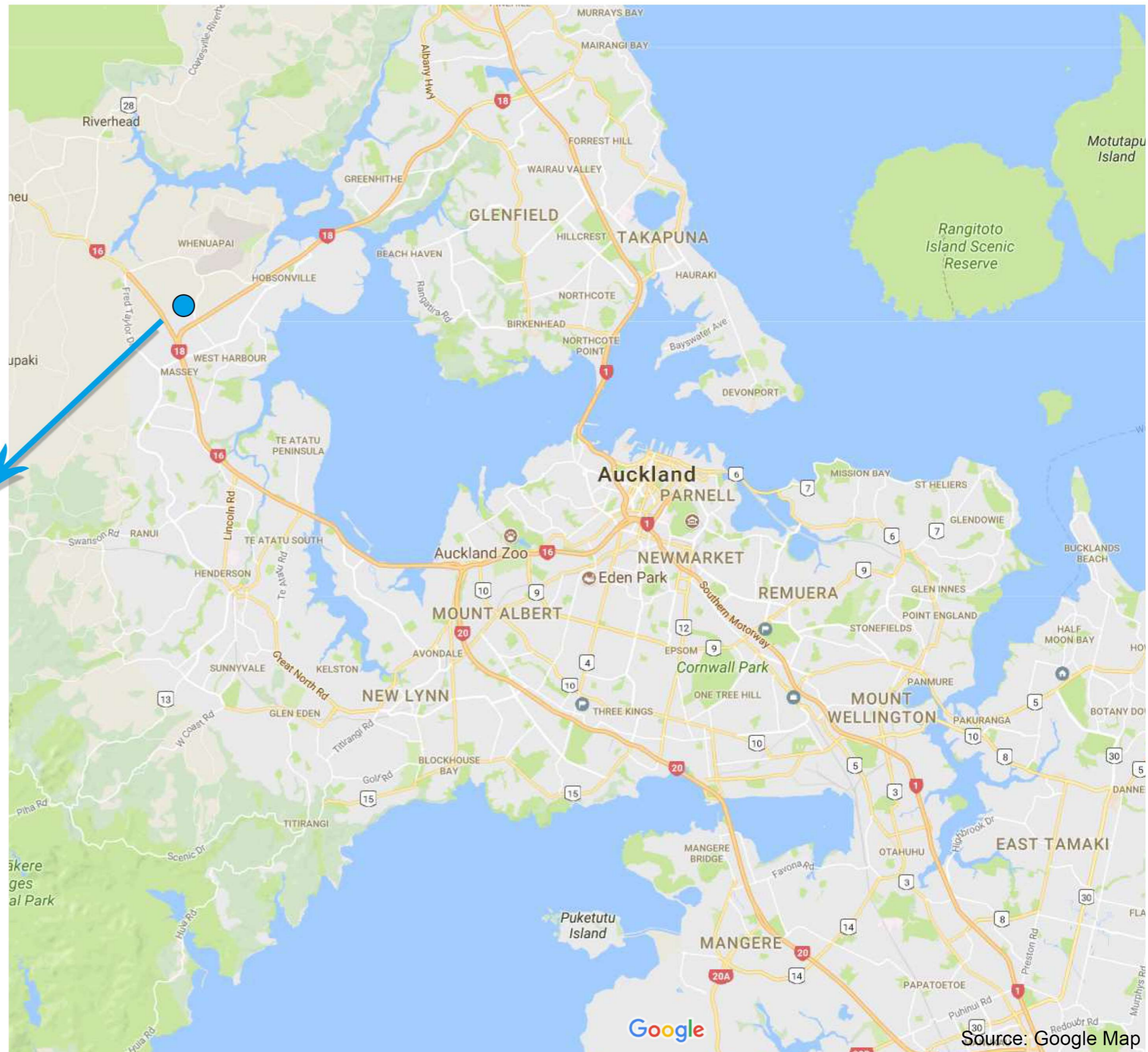
Appendix C: Traffic Engineer Memo

LOCALITY MAP OF SUBJECT SITES

Site Address: 84 & 90 Trig Road, Whenuapai

Site Area: 4.0469 Ha and 4.9574 Ha

Current Zoning: Future Urban Zone (Whenuapai Stage 2)



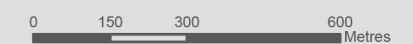
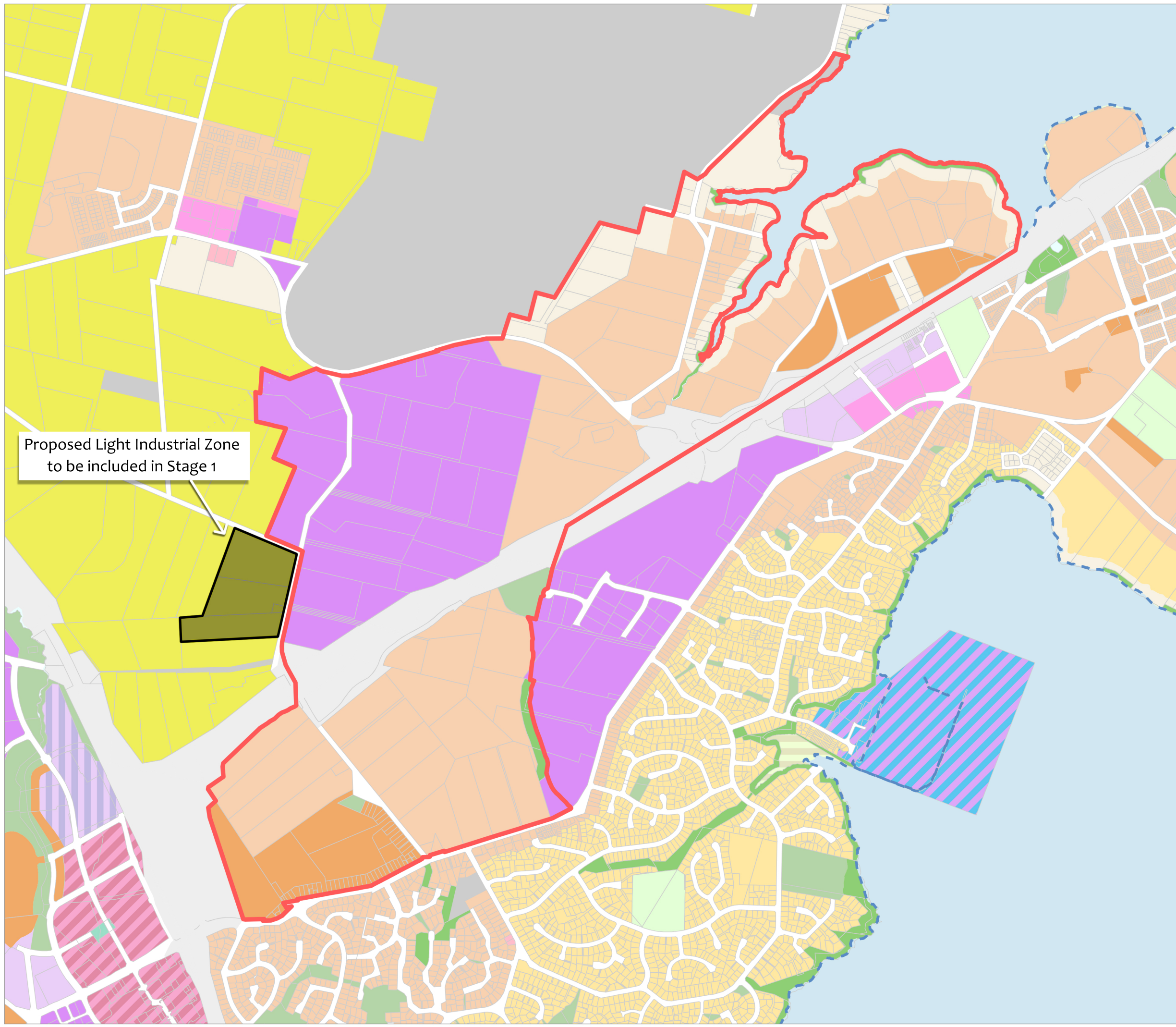
Source: Auckland Geomap

Source: Google Map

Proposed Zoning Map

- Land Parcels
- Whenuapai Zone change boundary
- Indicative Coastline
- Zones**
- Residential - Large Lot Zone
- Residential - Rural and Coastal Settlement Zone
- Residential - Single House Zone
- Residential - Mixed Housing Suburban Zone
- Residential - Mixed Housing Urban Zone
- Residential - Terrace Housing and Apartment Buildings Zone
- Open Space - Conservation Zone
- Open Space - Informal Recreation Zone
- Open Space - Sport and Active Recreation Zone
- Open Space - Civic Spaces Zone
- Open Space - Community Zone
- Business - City Centre Zone
- Business - Metropolitan Centre Zone
- Business - Town Centre Zone
- Business - Local Centre Zone
- Business - Neighbourhood Centre Zone
- Business - Mixed Use Zone
- Business - General Business Zone
- Business - Business Park Zone
- Business - Heavy Industry Zone
- Business - Light Industry Zone
- Future Urban Zone
- Green Infrastructure Corridor (Operative in some Special Housing Areas)
- Rural - Rural Production Zone
- Rural - Mixed Rural Zone
- Rural - Rural Coastal Zone
- Rural - Rural Conservation Zone
- Rural - Countryside Living Zone
- Rural - Waitakere Foothills Zone
- Rural - Waitakere Ranges Zone
- Strategic Transport Corridor Zone
- Special Purpose Zone
- Coastal - General Coastal Marine Zone [rcp]
- Coastal - Marina Zone [rcp/dp]
- Coastal - Mooring Zone [rcp]
- Coastal - Minor Port Zone [rcp/dp]
- Coastal - Ferry Terminal Zone [rcp/dp]
- Coastal - Defence Zone [rcp]
- Coastal - Coastal Transition Zone
- Water [i]
- Hauraki Gulf Islands
- Road [i]

Proposed Light Industrial Zone to be included in Stage 1



Whilst due care has been taken, Auckland Council gives no warranty as to the accuracy and completeness of any information on this map/plan and accepts no liability for any error, omission or use of the information.



Mr T Mandeno
Senior Planner
Birch Surveyors

19 October 2017

Copy via email: Toby@bslnz.com

Dear Toby,

TRIG ROAD - WHENUAPAI PLAN CHANGE 5

Further to your instruction, we are pleased to provide this transportation review of Plan Change 5 (PC5) (Whenuapai) in relation to 84 and 90 Trig Road.

1 S32 ASSESSMENT

We have reviewed the s32 analysis provided in the PC5 documentation. From a review of the s32 analysis, the only mention of this area is:

“The land on the west side of Trig Road and north of Spedding Road was included in the plan change area to enable development along both sides of the road, and to facilitate the required upgrade of Trig Road. Only properties to the west of Trig Road that connect to Trig Road were included. The land bounded by Spedding Road, State Highway 16, State Highway 18 and Trig Road is not part of this plan change due to the uncertainty around the timing of when the Northside Drive bridge and eastern extension will be built”

From this it appears that the timing of the Northside Drive extension is uncertain, and Northside Drive is needed in the area to relieve capacity issues. From this assessment all this area has been excluded from PC5.

2 ITA REVIEW

From a review of the ITA provided in the PC5 documentation, we have found the following in relation to the site:

- The modelling associated with the ITA that most closely matches the Plan Change (Scenario 2a) was based on the understanding that both sides of Trig Road will be developed. Of note the ITA states (section 7.7.3):

“For the purposes of assessment, it has been assumed that the industrial development will occur along the length of Brigham Creek Road and Trig Road, with side roads providing rear access to the development areas”.

- Scenario 2a is also the final model run before the Northside Drive extension was added to the model.
- The site is within “Orange 4” in the modelling. Scenario 2a assumes and enables the creation of 100 FTE jobs being developed in Orange 4. Importantly, the 100FTE’s are enabled without any Northside Drive extension.
- In contrast to Orange 4, Orange 5 (to the south of Northside Drive extension) was left out Scenario 2a of the ITA (it was included in the full development Scenario 3 which does have Northside Drive extension).
- The modelling shows that part development of Orange 4 can and was enabled by the existing roading network and associated improvements.
- It is therefore clear within the ITA that the construction of the Northside Drive is not required for at least some part of Orange 4 being developed.
- Finally, the ITA does not specifically limit the number of FTE employees in Orange 4 to 100 (rather it is simply an assumption in Orange 4). Indeed Figure 43 of the ITA, showing the Level of Service (LOS) plots for Scenario 2a, shows the intersections surrounding the sites / area are at LOS A or B indicating significant capacity remaining (the green dots are LOS C and the orange dots are LOS D). This figure is shown below together with the site(s) location. Therefore, based on the evidence provided, additional FTE’s appear to be able to be supported within Scenario 2a modelling without creating any additional capacity issues or being reliant upon the Northside Drive connection. To calculate the exact number that could be supported, additional traffic modelling would need to be undertaken.

Figure 43: Overall Intersection LOS Plots – Scenario 2a



We trust this answers your questions regarding the subject sites and PC5. If you have any further questions please do not hesitate in contacting me.

Yours sincerely

Commute Transportation Consultants

Leo Hills

Director

leo@commute.kiwi

RE: Whenuapai Plan Change 5

Submitters: Paul and Kaaren Batchelor

Address: 197 Kauri Road, Whenuapai, Auckland 0618

Contact: 0212544463

Email: weeheff@xtra.co.nz

Regarding the proposed Walking and Cycling Network for Whenuapai

We would like the development of the cycleway proposed for Kauri Road to be given a high priority. At present, we are NOT able to cycle safely until we reach a point in Totara Road where the cycleway starts. This means that from leaving our home, we cannot cycle to Hobsonville point safely, or the Whenuapai shops. So that is nearly 3km in either direction of very unsafe travel. Kauri Road (from the intersection onwards) and Puriri Road are particularly unsafe, with absolutely NO road shoulder, and dangerous drop-offs on both sides of the road. The white line for the most part is on the EDGE of the seal, and with it being a 70km/h road for the most part, there is nowhere to go, and no time to do it, in a compromised riding situation.

We have lived at our address for 21 years, and basically NOTHING has changed at all or improved in the areas specified. Now we see huge new development happening in other areas of Whenuapai, and these developments are being afforded new paths / cycleways / kerbed & channelled roading, and our area remains completely ignored or forgotten.

We have noted that improvements are proposed, but this has been way too long coming, and we propose an amendment to this plan to give priority to the aforementioned areas. We really feel this is just not good enough - we have waited long enough and paid many more thousands of dollars in rates than new housing owners in the area, and yet we have NO improvements to our roading / cycling infrastructure in the aforementioned areas, for more than 21 years.

Kauri Road and Puriri Road are a disgrace - these are Auckland suburban roads that look worse than remote Waikato farmland roads. Footpaths are very sub-standard, way too narrow with cracks, ruts, broken concrete, and overgrown areas. Further to this, the relatively 'new' footpath/cycleway section that has been completed on Totara Road is NOT well maintained, with a lot of overgrown areas that interfere with a safe cycle journey.

We agree with the proposal but with amendments as follows: | 45.1

Kauri Road footpath / cycleway to be brought forward (within 2 years, as currently this is NON-EXISTENT), and Puriri Road footpath to be widened and upgraded to accommodate cyclists, as it is VERY DANGEROUS to use either of these roads for cycling/walking at the present time. | 45.2

Yes – we would be happy to attend a hearing relating to this matter, and also happy to participate in a group hearing if there are similar views.

Please view the attached PDF for photos relating to this matter.

IMPORTANT: Please advise that you have received this email

Kind Regards,

Kaaren Batchelor

DESIGNER – KAAURI STUDIOS

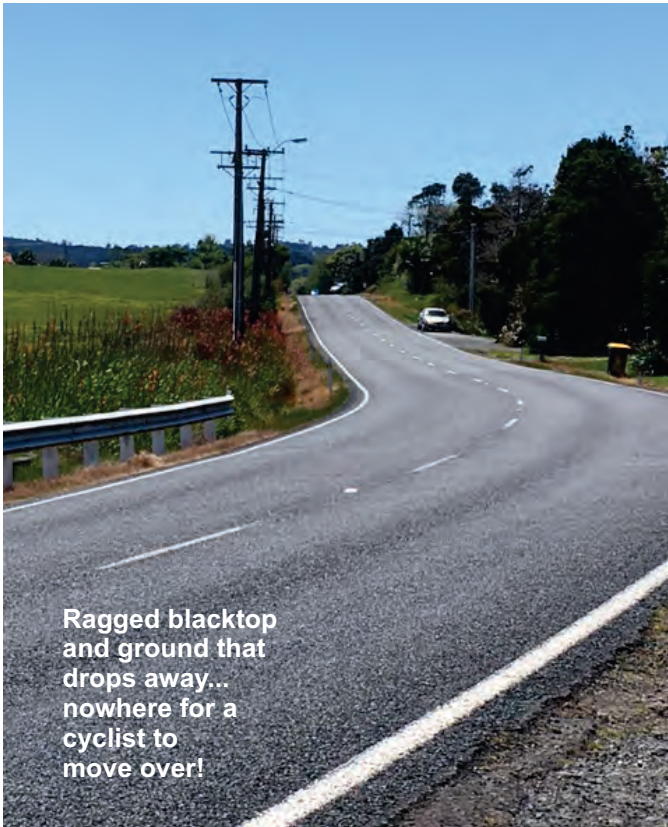
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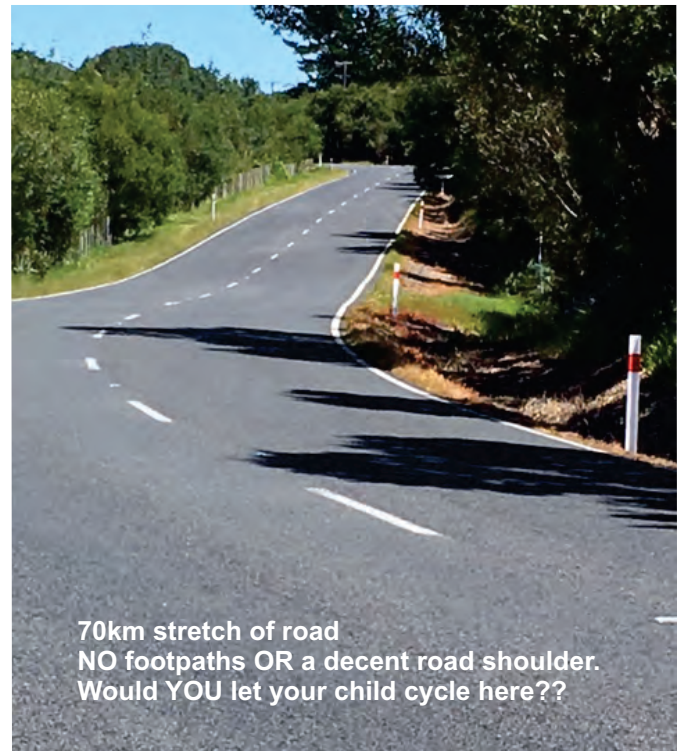
Dangerous drains
right on the edge
of the seal



Whenuapai 'Village'....?
Yet no footpaths!



Ragged blacktop
and ground that
drops away...
nowhere for a
cyclist to
move over!



70km stretch of road
NO footpaths OR a decent road shoulder.
Would YOU let your child cycle here??



Just an example of the POOR QUALITY of footpaths that DO exist in Whenuapai! Come on, Auckland Council!!

FORM 5

SUBMISSION ON PROPOSED PLAN CHANGE 5 (WHENUAPAI) – AUCKLAND UNITARY PLAN

To: Auckland Council
Private Bag 92300
Auckland 1142

Name of Submitter: Neil Construction Limited

Neil Construction Limited ('NCL') provides this submission on proposed Plan Change 5 ('PC5') to the Auckland Unitary Plan (Operative in Part).

The Submitter could not gain an advantage in trade competition through this submission. It is directly affected by the effects of PC5, some of which will adversely affect the environment and do not relate to trade competition or the effects of trade competition.

The Submitter has actively engaged in the Council's development process for PC5, having attended stakeholder meetings and provided written feedback on the draft Whenuapai Structure Plan and the draft plan change.

This submission relates to the entire PC5.

INTRODUCTION

NCL owns land at 150-152 Brigham Creek Road and 2-10 Kauri Road, and also has several other parcels of land under contract in the north-western part of the Whenuapai area.

The land currently owned by NCL collectively comprises 10.5023 hectares. Its location is illustrated in Figure 1 below.

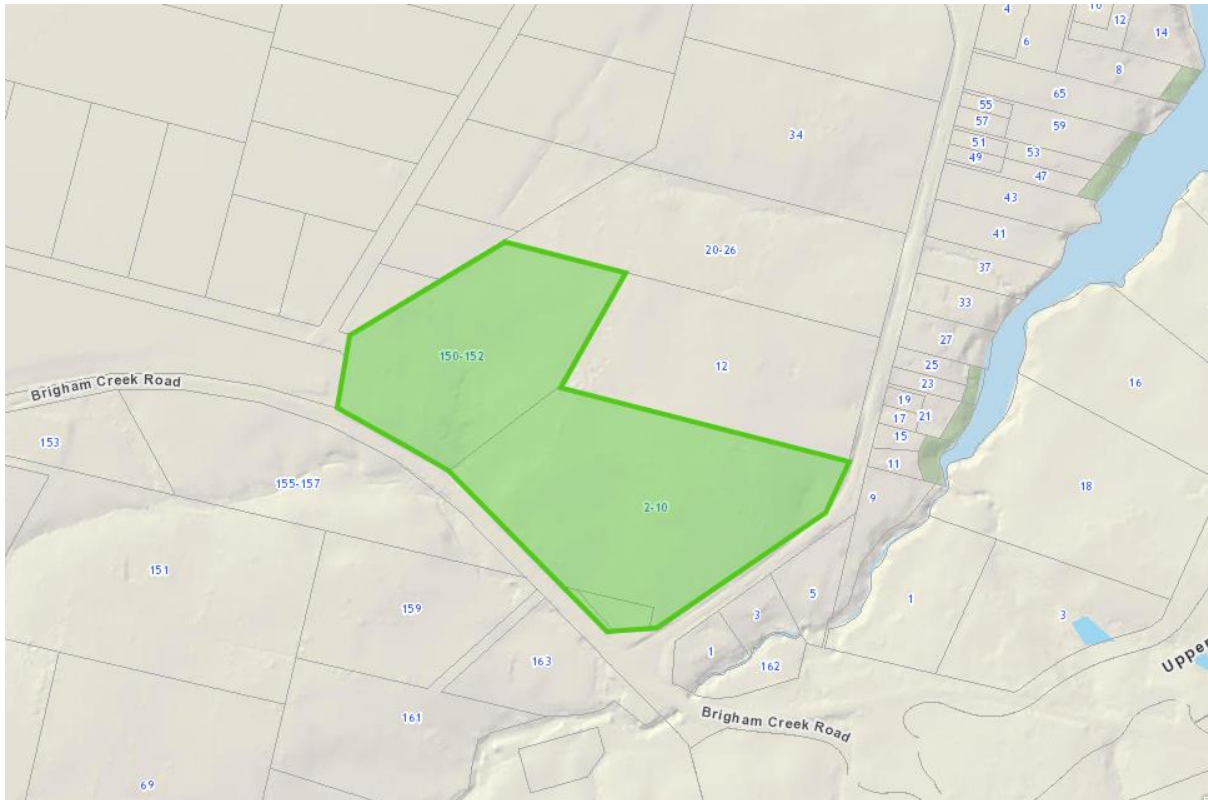


Figure 1 – location of NCL properties within the area subject to PC5

SUBMISSION

The Submitter has the following issues, concerns and comments in relation to PC5:

General

- PC5 is supported in principle, insofar as it facilitates urban development of land that is currently in the Future Urban zone. The Submitter considers that urbanisation of the land within the Whenuapai area will make a significant and important contribution to accommodating Auckland's need for additional residential and employment land, in a desirable location that is well-served by infrastructure;
- The Submitter's current landholdings within Brigham Creek Road and Kauri Road are located in close proximity to the existing urban area. The land can be readily developed, and the provision of appropriate infrastructure is both relatively straightforward and cost effective.

Zoning and Acoustic Issues

- The PC5 zoning map applies two zones across the Submitter's landholdings in the Kauri Road area. The western part of the land, including all of 150-152 Brigham Creek Road and part of

the other site, is proposed as Light Industry zone. The balance of the land, closest to Kauri Road, has been identified as Single House zone;

- The PC5 background documents note that the boundary between these two zones has been positioned to accommodate noise generated by engine testing at the RNZAF Whenuapai Airbase. The intention is that land within the predicted 65 dB Ldn engine testing noise boundary is zoned as Light Industry in order to avoid *activities sensitive to noise*¹, such as dwellings, from establishing in this area;
- A predicted 57 dB Ldn engine noise testing boundary is located further to the east and south, effectively encompassing all of the Submitter's land in this location. PC5 proposes to identify the balance of the Submitter's land as Single House zone, for the stated reason of limiting the number of people exposed to the noise²;
- The Submitter is strongly opposed to the identification of its land as Light Industry zone and Single House zone on the basis of the predicted engine testing noise boundaries. The Submitter considers that the engine testing noise boundaries should be removed from PC5 and its land identified as Mixed Housing Urban zone as was proposed in the draft plan change that was released for public feedback;
- There are a number of reasons that underpin the Submitter's opposition to the zoning pattern that is proposed in PC5. Foremost amongst these is that the proposed engine noise boundaries, and the restrictive zoning proposed as a consequence, is based on unlawful generation of noise on the Airbase that is in contravention of conditions imposed on the Whenuapai Airbase designation;
- Designation 4310³ includes a condition that *aircraft operations* on the RNZAF Airbase shall not exceed 65dB L_{dn} outside the Airnoise Boundary, and 55dB L_{dn} outside the Outer Control Boundary. This condition is not being complied with, and the noise being emitted by engine testing is therefore unlawful as it does not satisfy the conditions of the designation;
- 'Aircraft operations' are defined in the AUP. In addition to landing, take-off, and flight, the definition includes taxiing and surface movements of aircraft as would be required for engine testing. It is apparent therefore that the existing noise condition imposed on the designation applies to any noise generated by aircraft, whether in the air or on the ground;
- The Submitter considers that it is not appropriate to limit the development opportunities on its land in order to accommodate the adverse effects arising from contravention of conditions applying to activities occurring on neighbouring land. Rather, the appropriate response is for the Council to insist on compliance. In the absence of action in this regard by Council, any

¹ This term is defined in the AUP

² Section 6.8.2, s32 report

³ Designation 4310, Defence Purposes (Whenuapai Air Base)

person can apply to the Environment Court for an enforcement order that would require compliance with the conditions of the designation that are currently being breached;

- Without detracting from the fundamental issue discussed above, the Submitter also has concerns with a number of aspects of the acoustic assessment that has generated the proposed engine noise boundaries;
- The acoustic assessment that is relied on by the Council was prepared by Malcolm Hunt Associates for New Zealand Defence Force ('NZDF'). That assessment does not include any recording of actual engine testing noise levels at Whenuapai. Instead, it uses information from other sources to predict the noise levels that would arise from engine testing undertaken at the Airbase. The assumed noise levels generated by certain types of aircraft are then applied to the data supplied by NZDF from its 60-day engine testing trial to develop the noise boundaries. There is no evidence to confirm that the trial data was representative or typical of routine engine testing undertaken on the Airbase;
- Furthermore, the trial test locations are not obviously in positions that would deliver the best practicable option for mitigation of noise effects on neighbouring properties. For example, the test location 'C' seems unnecessarily close to the Submitter's property boundaries;
- The Submitter has engaged Marshall Day Acoustics Limited to review the acoustic assessment that has been relied on for establishment of the proposed engine testing noise boundaries. This review has highlighted several issues that are of concern to the Submitter;
- Firstly, the acoustic assessment undertaken by Malcolm Hunt Associates is labelled as 'draft' and notes that the information used as a basis for establishing engine testing noise is "*incomplete at this stage*"⁴. It is further stated that the data and information is considered to be "*a useful basis to proceed to the actual predictions*", and that the document "*has been prepared as a discussion document to establish an appropriate basis to undertake the actual predictions*"⁵. This suggests to the Submitter that the information is not of sufficient quality to be a foundation for important land use decisions;
- It is acknowledged that the Council has taken steps to peer review the acoustic information provided by NZDF. However, the review that was commissioned by the Council has simply accepted the (incorrect) premise that the engine noise is lawful. No apparent attempt has been made to determine whether the noise generated is an appropriate part of the existing environment. In addition, the peer review does not appear to have scrutinised the calculations underpinning the noise boundaries or the results;
- The engine testing noise boundaries have been calculated by Malcolm Hunt Associates using noise data for similar but different aircraft, rather than undertaking measurements of the actual aircraft that are tested at Whenuapai. The outcome is that the predictions are

⁴ Section 11, Malcolm Hunt Associates acoustic assessment

⁵ Section 1, Malcolm Hunt Associates acoustic assessment

“conservative”, meaning higher than expected in practice. The Submitter is concerned that the noise boundaries may be overly conservative. A more appropriate approach would have been to take measurements of the actual RNZAF aircraft and to locate the engine testing noise boundaries based on calculations from the measured data;

- Details of engine testing activity were recorded for a period of 60 days and the noise boundaries were based on the worst-case seven consecutive days over this time. There is no evidence to show that the recorded 60 days or the worst-case seven days are representative of ongoing regular maintenance at Whenuapai rather than infrequent major maintenance. The monitoring period should have been longer than 60 days (3–12 months) unless it can be demonstrated that the 60-day period is representative;
- Similarly, the details of the engine tests included in the calculation of the noise boundaries should have been scrutinised to determine which tests are controlling the location of the predicted engine testing noise boundaries. Those boundaries may be overly conservative if atypical testing was included in the predictions (for example, extensive high power testing that only occurs infrequently);
- The Submitter also notes that the engine testing noise boundaries contained in PC5 (Precinct Plan 3) do not correspond accurately with those provided in Figure 13 of the Malcolm Hunt Associates report. This is illustrated in Figure 2 below:

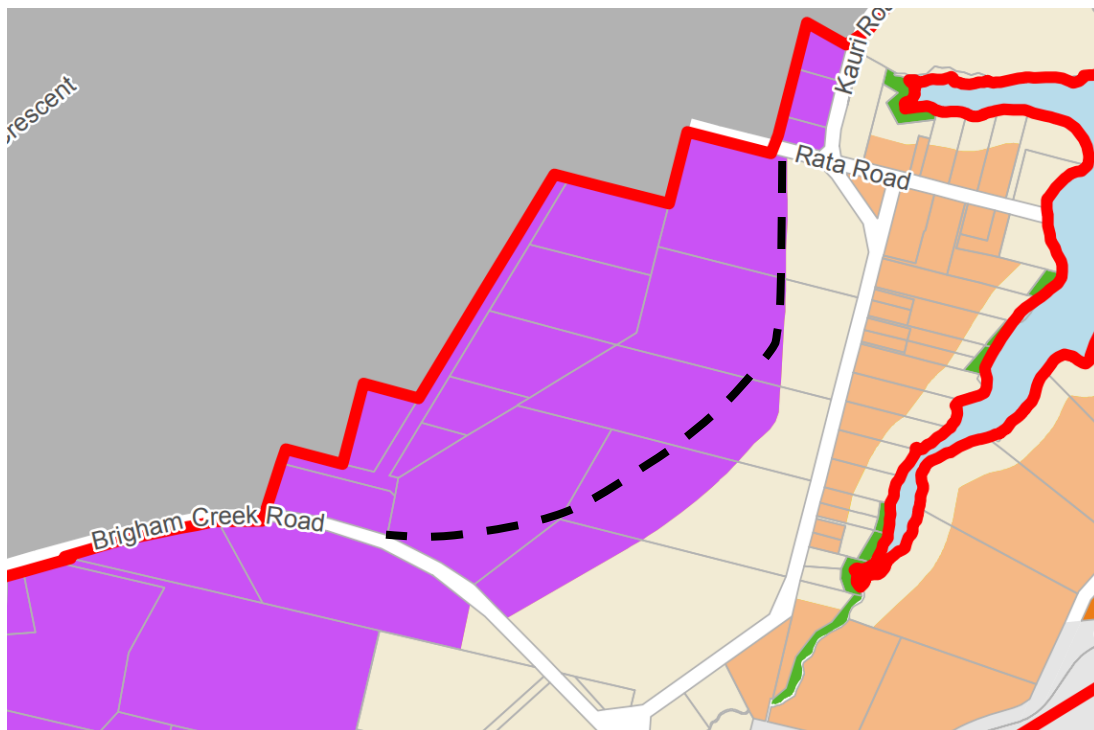


Figure 2 – location of Malcolm Hunt Associates 65 dB Ldn boundary (black dashed line)

- Even if the noise currently generated by engine testing is lawful (which is not accepted), there is still an obligation on NZDF to adopt a best practicable option approach to the management

of its effects on the environment. In the first instance, NZDF should be internalising engine testing noise as much as possible by undertaking tests in locations away from the Airbase boundaries. If that cannot satisfactorily mitigate engine testing noise alone then additional mitigation measures should be employed to reduce engine testing noise emissions. Such mitigation might include consideration of both operational measures and structural measures such as a Ground Run-up Enclosure (GRE) to reduce generated noise, or conducting engine tests within buildings or behind acoustic curtains. At the very least, measures should include careful positioning of aircraft during engine testing;

- It is incumbent on the Council under s32 of the RMA to consider all costs and benefits associated with land use planning decisions including those related to the proposals to substantially reduce the residential development potential of the Submitter's land;
- As currently proposed, the provision of additional Light Industry zone in PC5 would remove the potential for over 2,000 dwellings, relative to the residential yield proposed in the draft plan change⁶. Further residential potential would be lost through the increased use of Single House zone. These decisions give rise to substantial costs to the community, given the significant housing shortage that exists in Auckland at the current time. Moreover, the current PC5 proposal would lead to the inefficient use of a scarce and valuable resource, being serviced land close to transport links, employment, community facilities and other services. It would mean the loss of substantial construction value and related employment and economic activity, and would result in additional construction costs arising from acoustic attenuation of the remaining houses that can be built in the Single House zone. In any considered balancing exercise of costs and benefits, the Submitter believes that a more robust planning decision is to prioritise the creation of thousands more houses over the compliance costs to NZDF of mitigating its unlawful noise generation;
- There is no demonstrable need for the additional Light Industry zone land that is identified on the Submitter's land;
- There is one further matter that the Submitter takes issue with in respect to the zoning response to the engine testing noise. The Submitter considers that, even if there were lawful noise emissions of between 57dB Ldn and 65 dB Ldn affecting its land, then there is no compelling planning rationale to identify the land as Single House zone rather than Mixed Housing Urban zone;
- There are several reasons why the Submitter considers that the Mixed Housing Urban zone would be more appropriate than the Single House zone in the event that its land is impacted upon by lawful engine testing noise:
 - If appropriate acoustic insulation is in place, it should not matter how many people are present on the land;

⁶ Table 9, s32 report

- Higher density zoning will introduce building forms that provide inherent acoustic attenuation, such as through party walls and blocks of terraced buildings that break the line of sight to the noise source;
- Residents in the Mixed Housing Urban zone are likely to spend less time outdoors than their Single House zone counterparts because the latter would have a larger and more usable outdoor area; and
- This approach has not been utilised for other airports, such as for the Auckland International Airport approach paths where residential land that is subject to elevated noise levels has generally been identified as Mixed Housing Suburban zone, Mixed Housing Urban zone, and Terrace Housing and Apartment Buildings zone.

Drainage networks

- Proposals for restoration of natural streams are supported in principle, although it is considered that some of the areas of identified stream network are actually modified farm drainage systems;
- Precinct Plan 1 identifies a section of permanent stream on the Submitter's land. The Submitter has engaged Freshwater Solutions Limited, environmental consultants, to review the status of this watercourse in accordance with AUP criteria;
- The report prepared by Freshwater Solutions Limited is attached at **Appendix A**. It includes a conclusion that the watercourse identified on the Submitter's land is intermittent rather than permanent. This stream is fed by an artificial pond and includes piped sections.
- On the basis of this technical information, the Submitter considers that Precinct Plan 1 should be amended to correct the status of the watercourse on its land.

46.1

Parks and Open Space

- Precinct Plan 1 includes an area of *Indicative Open Space* to the north of the Submitter's Kauri Road land. The location of this indicative open space is considered to be appropriate and the Submitter supports its retention in the currently proposed location within PC5.

Extension of the area subject to PC5

- NCL owns (or has under contract) several parcels of land in the vicinity of Totara Road and Mckean Road, in the north-western part of the Whenuapai area. NCL is concerned with the sequencing of development proposed and seeks to have PC5 extended so that development of the north-western part of Whenuapai is enabled under the plan change;

- In particular, it is requested that PC5 be extended to include all land identified in Figure 3 below;

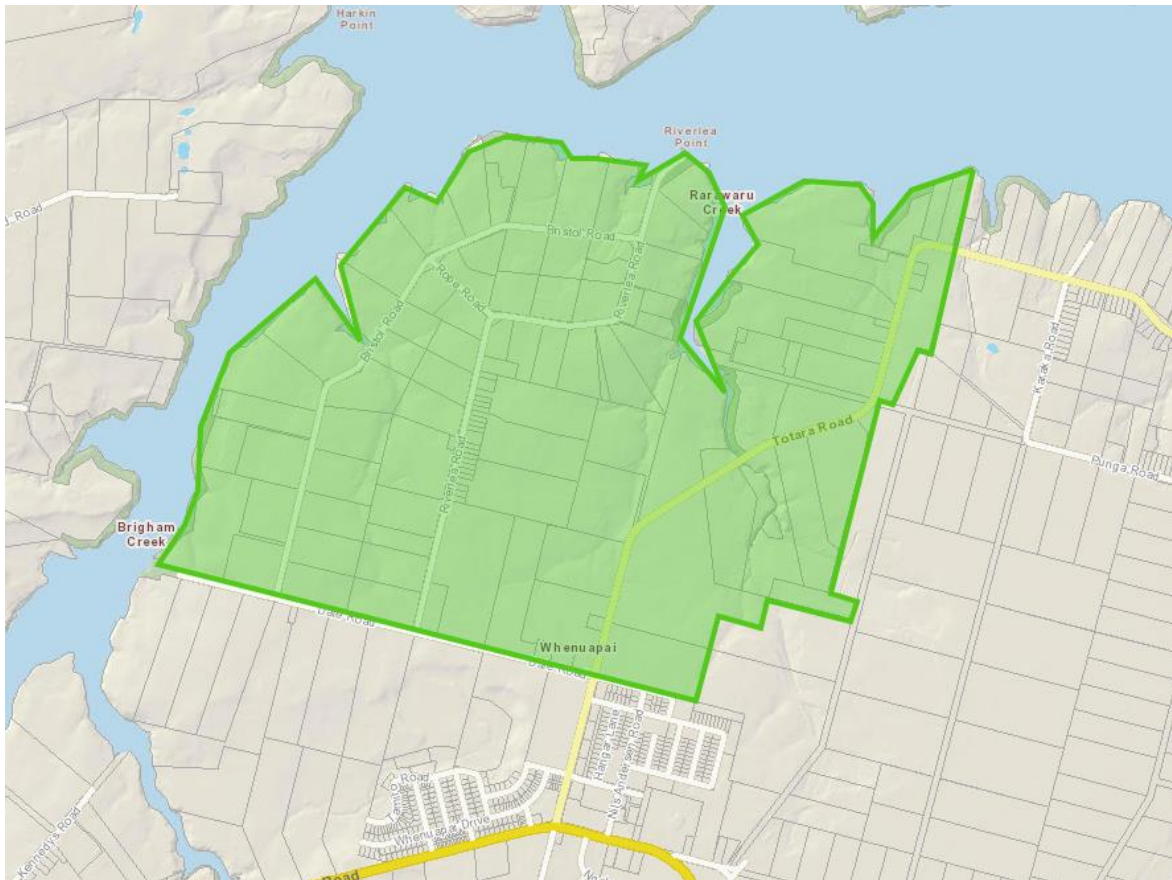


Figure 3 – Future Urban zone land sought to be included within the scope of PC5

- It appears from the technical reports and background information sitting behind PC5 that the deferral of development in the northern area of Whenuapai is based on assumptions about the cost and relative complexity of servicing that land. Locations where servicing can be undertaken more easily and efficiently are generally included within PC5;
- NCL has reviewed and considered the infrastructure that would be required to service the land identified in Figure 3. Drawing on its substantial land development experience, it considers that all the necessary additional infrastructure can be provided with relative ease and in a cost-effective manner;
- The current urbanisation of the Whenuapai Village Special Housing Area (SHA) to the south of the land in Figure 3 means that public wastewater and potable water reticulation currently exists in close proximity. A new pump station (referred to in the Whenuapai Structure Plan background infrastructure reports as WH-12) and rising main would be required in Totara Road, but most of the local network that drains to this pump station can be installed by developers as the land is readied for urban use;

- NCL understands that installation of a new 300mm water main now exists in Brigham Creek Road to serve the SHA, and that this water main has been sized to service the area coloured green in Figure 3. An extension of the Totara Road main would be sufficient to serve the north-western part of that area. As with wastewater, most of the local network can be installed by developers;
- Stormwater disposal is straightforward in this location, given its proximity to the coast. NCL anticipates that the emphasis would be on stormwater quality treatment rather than detention;
- Additional development in the western part of the Whenuapai area would contribute to the cost of network infrastructure provision through payment of development contributions, and would ensure sufficient flows in wastewater lines to support their effective operation and avoid gas build-up;
- Inclusion of the land identified in Figure 3 within PC5 will result in the availability of a greater area of development-ready land in Whenuapai at one time. This will encourage competition amongst developers and assist in delivering affordable residential land to the market.

Roads and other infrastructure

- Precinct Plan 2 proposes specified upgrades to existing collector roads, together with new indicative collector roads within Area 1B. The new roading layout includes upgraded and new intersections into Area 1C and 1E respectively, together with a collector road coming from Sinton Road and joining Kauri Road by way of a bridge over the Waiarohia Stream;
- The Submitter is opposed to the bridged connections, on the basis that it is unnecessary, excessively expensive to construct, and will encourage motorists to utilise it as a shortcut to avoid arterial roads that have been designed to accommodate that traffic;
- The proposed connection from Sinton Road to Kauri Road will traverse relatively steep slopes in the vicinity of the two streams that will need to be crossed. It will also likely require vegetation removal and earthworks within a Significant Ecological Area. These physical constraints and impediments, and the need for part of the connection to be in the form of a bridge, will give rise to substantial construction and compliance costs;
- Area 1B also contains other indicative collector roads. The Submitter considers that these are not collector roads as they have no significant connecting function for through traffic. They are local roads that would be established at the time of subdivision;
- Where upgrading of the existing roads is required, this should be clarified to confirm that it requires works only within that part of the road reserve extending from the developer's

property boundary to the opposite carriageway kerb. An appropriate amendment to Standard I616.6.8(1) should be made to clarify this matter.

- **Infrastructure funding**

- The Submitter considers that PC5 should provide greater certainty around transport projects, their costs and who is funding them;
- PC5 notes that upgrades identified in Table I616.6.2.1 are required to be in place prior to development going ahead, and that the cost should be proportionally shared across each area as development progresses⁷. The Submitter seeks that PC5 is clarified to confirm that transport upgrades occur concurrently with development occurring (rather than prior to its commencement) and that the cost sharing occurs across each of the identified development areas (as shown on Precinct Plan 2) to which the upgrades relate;
- Objective 3 should be amended to add the words “that is required to support the subdivision being proposed” immediately before the comma, in order to confirm the reason for the transport upgrade. Similarly, objective 6 should be amended by adding the words “(or provides for)” immediately after the word “implements” and by adding the words “in the applicable development area” after the word “elements”;
- The word “coordinated” in policy 4 is unnecessary, as the provisions that are proposed to be introduced by PC5 will provide for the necessary level of coordination. Policy 5 may also be unnecessary, as planned infrastructure should be appropriately sized and designed to accommodate development that is anticipated under the zoning provisions that apply. Certainly, the Submitter considers that trunk services should be delivered by Council and Watercare given that these costs are funded by development contributions;
- This point also touches on policy 6, and the Submitter seeks some assurances that provision of bulk services is not a cost that will be imposed on developers within the PC5 area. If policy 6 is to remain, it is requested that the intent be clarified by adding the words “development areas in the” be added immediately in front of the word “precinct”;
- Table I616.6.2.1 should be amended to ensure that Area 1C and 1E are also required to contribute equally to the upgraded and new intersections on Brigham Creek Road as those development areas obtain equal benefit from that infrastructure;
- It is also noted that PC5 relies on the precinct provisions to levy financial contributions under the RMA. The Submitters understand that this regime may no longer exist after April 2022, which is within the expected timeframe for implementation of development opportunities arising under PC5. This may raise questions about the ability for continued funding of

⁷ PC5, p3

infrastructure and the equitable apportionment of costs amongst developers commencing work at different times.

RELIEF

The Submitter seeks the following decision from Auckland Council in respect of PC5:

- That PC5 be confirmed to the extent that it enables urbanisation of land within its boundaries; | 46.2
- That the engine testing noise boundaries be removed from the Submitter's land; | 46.3
- That the Submitter's land be identified as Mixed Housing Urban zone; | 46.4
- That the identified location of Indicative Open Space in Kauri Road (as illustrated on Precinct Plan 1) be confirmed in PC5; | 46.5
- That Precinct Plan 1 be amended to reclassify the streams identified in Figure 4 below from 'permanent' to 'intermittent'; | 46.6



Figure 4 – location of stream to be reclassified from permanent to intermittent (orange arrow)

- That the area subject to PC5 be amended to include that land identified within Figure 3 in this submission; | 46.7
- That objective 13 be deleted; | 46.8

- That Precinct Plan 2 be amended by deleting the collector roads within Area 1B; | 46.9
- That Precinct Plan 2 be amended by deleting the proposed indicative collector road shown between Sinton Road and Kauri Road; | 46.10
- That PC5 (Standard I616.6.8(1)) be amended to clarify that, where roads are required to be upgraded, the upgrading works are required only within that part of the road reserve extending from the developer’s property boundary to the opposite carriageway kerb; | 46.11
- That PC5 is clarified to confirm that transport upgrades occur concurrently with development occurring (rather than prior to its commencement), and that the cost sharing occurs across each of the identified development areas (as shown on Precinct Plan 2) to which the upgrades relate; | 46.12
- That objective 3 should be amended to add the words “that is required to support the subdivision being proposed” immediately before the comma; | 46.13
- That objective 6 should be amended by adding the words “(or provides for)” immediately after the word “implements” and by adding the words “in the applicable development area” after the word “elements”; | 46.14
- That the word “coordinated” be deleted from policy 4; | 46.15
- That policy 6 be amended by adding the words “development areas in the” immediately in front of the word “precinct”; | 46.16
- That Table I616.6.2.1 be amended to impose an obligation for development in Area 1C and 1E to contribute equally to new and upgraded intersections on Brigham Creek Road; | 46.17
- Such other amendments to the objectives, policies, rules and other provisions of PC5 that are required to give effect to the matters raised in this submission. | 46.18

The Submitter wishes to be heard in support of this submission. If other parties make a similar submission, the Submitter would consider presenting a joint case with them at any hearing.

Phil Ainsworth
Chief Executive Officer
The Neil Group Limited
 For Neil Construction Limited

19 October 2017

Address for service:

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Chief Executive Officer

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Email: painsworth@neilgroup.co.nz

FORM 5

SUBMISSION ON PROPOSED PLAN CHANGE 5 (WHENUAPAI) – AUCKLAND UNITARY PLAN

To: Auckland Council
Private Bag 92300
Auckland 1142

Name of Submitter: Maraetai Land Development Limited

Maraetai Land Development Limited ('MLDL') provides this submission on proposed Plan Change 5 ('PC5') to the Auckland Unitary Plan (Operative in Part).

The Submitter could not gain an advantage in trade competition through this submission. It is directly affected by the effects of PC5, some of which will adversely affect the environment and do not relate to trade competition or the effects of trade competition.

The Submitter has actively engaged in the Council's development process for PC5, having attended stakeholder meetings and provided written feedback on the draft Whenuapai Structure Plan and the draft plan change.

This submission relates to the entire PC5.

INTRODUCTION

MLDL owns land at 12-18 Kauri Road and 34 Kauri Road. It also has several other parcels of land either owned or under contract in the north-western part of the Whenuapai area.

The land currently owned by MLDL collectively comprises 8.0945 hectares. Its location is illustrated in Figure 1 below.

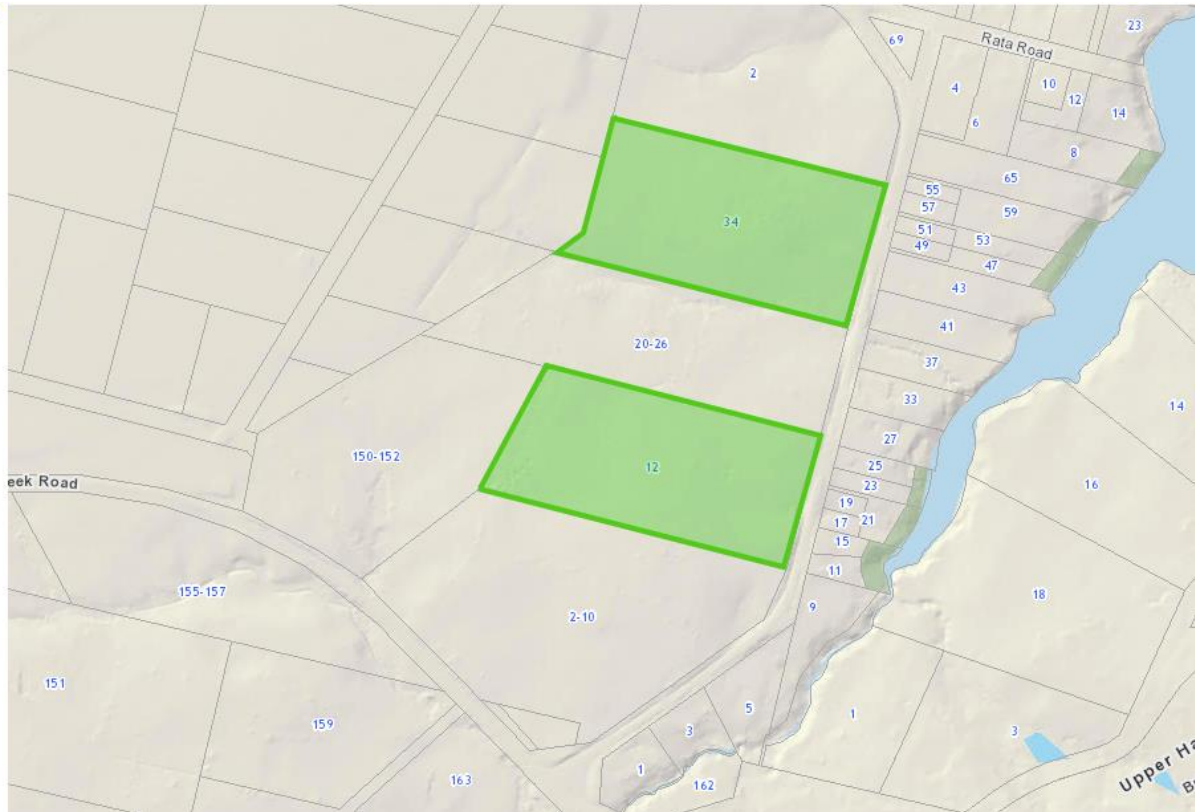


Figure 1 – location of MLDL properties within the area subject to PC5

SUBMISSION

The Submitter has the following issues, concerns and comments in relation to PC5:

General

- PC5 is supported in principle, insofar as it facilitates urban development of land that is currently in the Future Urban zone. The Submitter considers that urbanisation of the land within the Whenuapai area will make a significant and important contribution to accommodating Auckland's need for additional residential and employment land, in a desirable location that is well-served by infrastructure;
- The Submitter's current landholdings within Kauri Road are located in close proximity to the existing urban area. The land can be readily developed, and the provision of appropriate infrastructure is both relatively straightforward and cost effective.

Zoning and Acoustic Issues

- The PC5 zoning map applies two zones across the Submitter's landholdings in the Kauri Road area. The western part of the land is proposed as Light Industry zone. The balance of the land, closest to Kauri Road, has been identified as Single House zone;

- The PC5 background documents note that the boundary between these two zones has been positioned to accommodate noise generated by engine testing at the RNZAF Whenuapai Airbase. The intention is that land within the predicted 65 dB Ldn engine testing noise boundary is zoned as Light Industry in order to avoid *activities sensitive to noise*¹, such as dwellings, from establishing in this area;
- A predicted 57 dB Ldn engine noise testing boundary is located further to the east and south, effectively encompassing all of the Submitter's land in this location. PC5 proposes to identify the balance of the Submitter's land as Single House zone, for the stated reason of limiting the number of people exposed to the noise²;
- The Submitter is strongly opposed to the identification of its land as Light Industry zone and Single House zone on the basis of the predicted engine testing noise boundaries. The Submitter considers that the engine testing noise boundaries should be removed from PC5 and its land identified as Mixed Housing Urban zone as was proposed in the draft plan change that was released for public feedback;
- There are a number of reasons that underpin the Submitter's opposition to the zoning pattern that is proposed in PC5. Foremost amongst these is that the proposed engine noise boundaries, and the restrictive zoning proposed as a consequence, is based on unlawful generation of noise on the Airbase that is in contravention of conditions imposed on the Whenuapai Airbase designation;
- Designation 4310³ includes a condition that *aircraft operations* on the RNZAF Airbase shall not exceed 65dB L_{dn} outside the Airnoise Boundary, and 55dB L_{dn} outside the Outer Control Boundary. This condition is not being complied with, and the noise being emitted by engine testing is therefore unlawful as it does not satisfy the conditions of the designation;
- 'Aircraft operations' are defined in the AUP. In addition to landing, take-off, and flight, the definition includes taxiing and surface movements of aircraft as would be required for engine testing. It is apparent therefore that the existing noise condition imposed on the designation applies to any noise generated by aircraft, whether in the air or on the ground;
- The Submitter considers that it is not appropriate to limit the development opportunities on its land in order to accommodate the adverse effects arising from contravention of conditions applying to activities occurring on neighbouring land. Rather, the appropriate response is for the Council to insist on compliance. In the absence of action in this regard by Council, any person can apply to the Environment Court for an enforcement order that would require compliance with the conditions of the designation that are currently being breached;

¹ This term is defined in the AUP

² Section 6.8.2, s32 report

³ Designation 4310, Defence Purposes (Whenuapai Air Base)

- Without detracting from the fundamental issue discussed above, the Submitter also has concerns with a number of aspects of the acoustic assessment that has generated the proposed engine noise boundaries;
- The acoustic assessment that is relied on by the Council was prepared by Malcolm Hunt Associates for New Zealand Defence Force ('NZDF'). That assessment does not include any recording of actual engine testing noise levels at Whenuapai. Instead, it uses information from other sources to predict the noise levels that would arise from engine testing undertaken at the Airbase. The assumed noise levels generated by certain types of aircraft are then applied to the data supplied by NZDF from its 60-day engine testing trial to develop the noise boundaries. There is no evidence to confirm that the trial data was representative or typical of routine engine testing undertaken on the Airbase;
- Furthermore, the trial test locations are not obviously in positions that would deliver the best practicable option for mitigation of noise effects on neighbouring properties. For example, the test location 'C' seems unnecessarily close to the Submitter's property boundaries;
- The Submitter has engaged Marshall Day Acoustics Limited to review the acoustic assessment that has been relied on for establishment of the proposed engine testing noise boundaries. This review has highlighted several issues that are of concern to the Submitter;
- Firstly, the acoustic assessment undertaken by Malcolm Hunt Associates is labelled as 'draft' and notes that the information used as a basis for establishing engine testing noise is *"incomplete at this stage"*⁴. It is further stated that the data and information is considered to be *"a useful basis to proceed to the actual predictions"*, and that the document *"has been prepared as a discussion document to establish an appropriate basis to undertake the actual predictions"*⁵. This suggests to the Submitter that the information is not of sufficient quality to be a foundation for important land use decisions;
- It is acknowledged that the Council has taken steps to peer review the acoustic information provided by NZDF. However, the review that was commissioned by the Council has simply accepted the (incorrect) premise that the engine noise is lawful. No apparent attempt has been made to determine whether the noise generated is an appropriate part of the existing environment. In addition, the peer review does not appear to have scrutinised the calculations underpinning the noise boundaries or the results;
- The engine testing noise boundaries have been calculated by Malcolm Hunt Associates using noise data for similar but different aircraft, rather than undertaking measurements of the actual aircraft that are tested at Whenuapai. The outcome is that the predictions are *"conservative"*, meaning higher than expected in practice. The Submitter is concerned that the noise boundaries may be overly conservative. A more appropriate approach would have

⁴ Section 11, Malcolm Hunt Associates acoustic assessment

⁵ Section 1, Malcolm Hunt Associates acoustic assessment

been to take measurements of the actual RNZAF aircraft and to locate the engine testing noise boundaries based on calculations from the measured data;

- Details of engine testing activity were recorded for a period of 60 days and the noise boundaries were based on the worst-case seven consecutive days over this time. There is no evidence to show that the recorded 60 days or the worst-case seven days are representative of ongoing regular maintenance at Whenuapai rather than infrequent major maintenance. The monitoring period should have been longer than 60 days (3–12 months) unless it can be demonstrated that the 60-day period is representative;
- Similarly, the details of the engine tests included in the calculation of the noise boundaries should have been scrutinised to determine which tests are controlling the location of the predicted engine testing noise boundaries. Those boundaries may be overly conservative if atypical testing was included in the predictions (for example, extensive high power testing that only occurs infrequently);
- The Submitter also notes that the engine testing noise boundaries contained in PC5 (Precinct Plan 3) do not correspond accurately with those provided in Figure 13 of the Malcolm Hunt Associates report. This is illustrated in Figure 2 below:

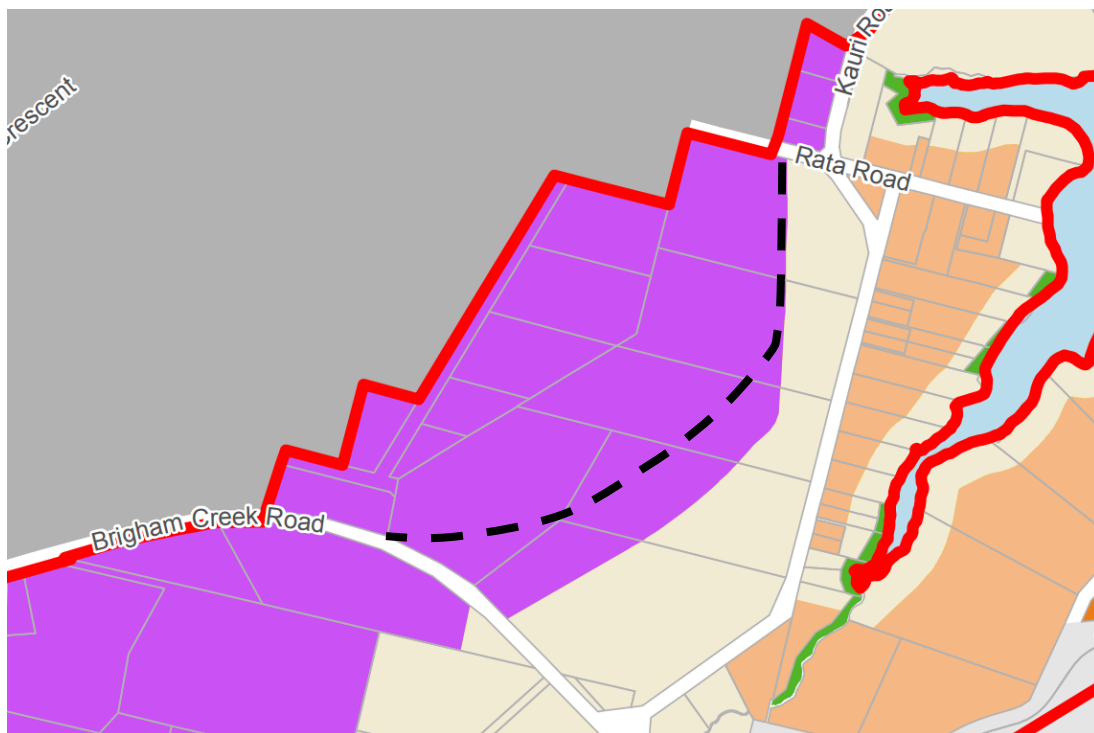


Figure 2 – location of Malcolm Hunt Associates 65 dB Ldn boundary (black dashed line)

- Even if the noise currently generated by engine testing is lawful (which is not accepted), there is still an obligation on NZDF to adopt a best practicable option approach to the management of its effects on the environment. In the first instance, NZDF should be internalising engine testing noise as much as possible by undertaking tests in locations away from the Airbase

boundaries. If that cannot satisfactorily mitigate engine testing noise alone then additional mitigation measures should be employed to reduce engine testing noise emissions. Such mitigation might include consideration of both operational measures and structural measures such as a Ground Run-up Enclosure (GRE) to reduce generated noise, or conducting engine tests within buildings or behind acoustic curtains. At the very least, measures should include careful positioning of aircraft during engine testing;

- It is incumbent on the Council under s32 of the RMA to consider all costs and benefits associated with land use planning decisions including those related to the proposals to substantially reduce the residential development potential of the Submitter's land;
- As currently proposed, the provision of additional Light Industry zone in PC5 would remove the potential for over 2,000 dwellings, relative to the residential yield proposed in the draft plan change⁶. Further residential potential would be lost through the increased use of Single House zone. These decisions give rise to substantial costs to the community, given the significant housing shortage that exists in Auckland at the current time. Moreover, the current PC5 proposal would lead to the inefficient use of a scarce and valuable resource, being serviced land close to transport links, employment, community facilities and other services. It would mean the loss of substantial construction value and related employment and economic activity, and would result in additional construction costs arising from acoustic attenuation of the remaining houses that can be built in the Single House zone. In any considered balancing exercise of costs and benefits, the Submitter believes that a more robust planning decision is to prioritise the creation of thousands more houses over the compliance costs to NZDF of mitigating its unlawful noise generation;
- There is no demonstrable need for the additional Light Industry zone land that is identified on the Submitter's land;
- There is one further matter that the Submitter takes issue with in respect to the zoning response to the engine testing noise. The Submitter considers that, even if there were lawful noise emissions of between 57dB Ldn and 65 dB Ldn affecting its land, then there is no compelling planning rationale to identify the land as Single House zone rather than Mixed Housing Urban zone;
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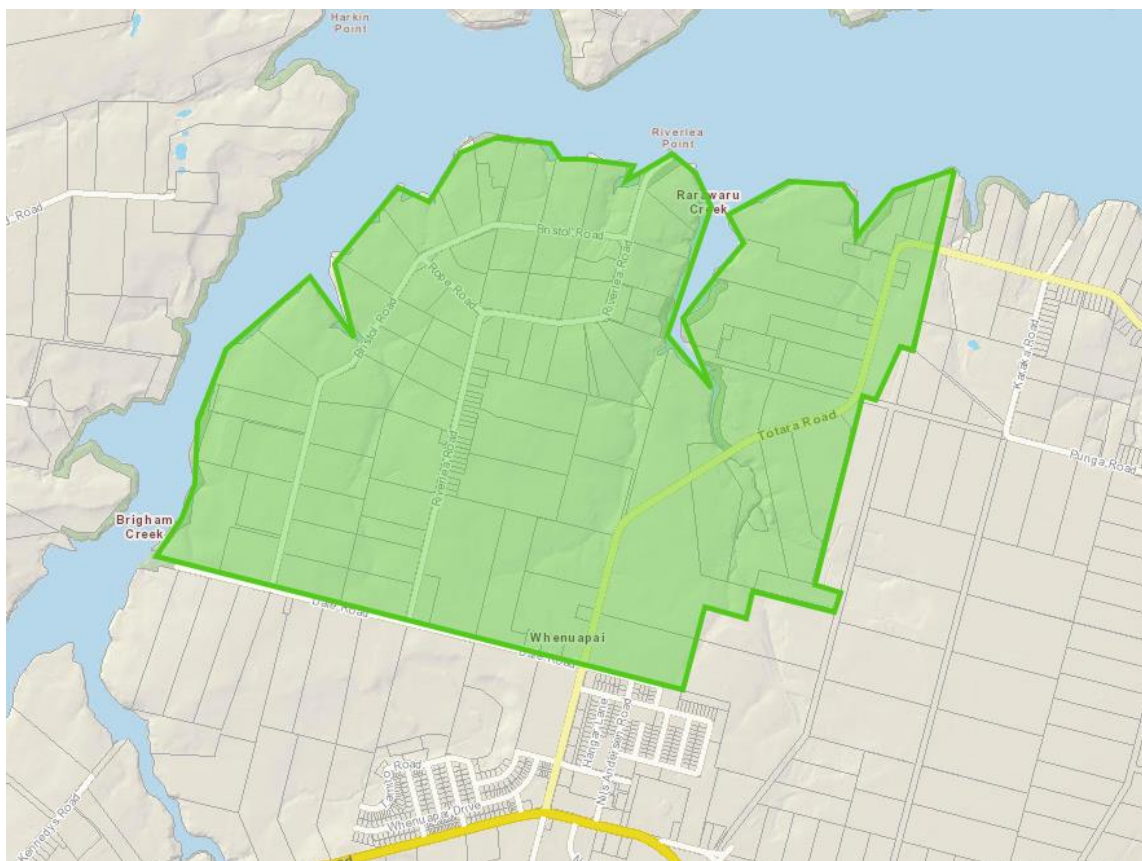


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RELIEF

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- That the Submitter's land be identified as Mixed Housing Urban zone; | 47.4
- That the identified location of Indicative Open Space in Kauri Road (as illustrated on Precinct Plan 1) be confirmed in PC5; | 47.5
- That Precinct Plan 1 be amended to reclassify the streams identified in Figure 4 below from 'permanent' to 'intermittent'; | 47.6



Figure 4 – location of stream to be reclassified from permanent to intermittent (orange arrow)

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- That objective 13 be deleted; | 47.8
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- That Table I616.6.2.1 be amended to impose an obligation for development in Area 1C and 1E to contribute equally to new and upgraded intersections on Brigham Creek Road; | 47.17
- Such other amendments to the objectives, policies, rules and other provisions of PC5 that are required to give effect to the matters raised in this submission. | 47.18

The Submitter wishes to be heard in support of this submission. If other parties make a similar submission, the Submitter would consider presenting a joint case with them at any hearing.

Phil Ainsworth
Chief Executive Officer
The Neil Group Limited
 For and on behalf of Maraetai Land Development Limited

19 October 2017

Address for service:

C/- The Neil Group Limited
PO Box 8751
Symonds Street
AUCKLAND 1150

Attention: Phil Ainsworth
Chief Executive Officer

Telephone: (09) 918 6565

Email: painsworth@neilgroup.co.nz

FORM 5

SUBMISSION ON PROPOSED PLAN CHANGE 5 (WHENUAPAI) – AUCKLAND UNITARY PLAN

To: Auckland Council
Private Bag 92300
Auckland 1142

Name of Submitters: Yuewen Zhang and Yue Liu

The Submitters provide this submission on proposed Plan Change 5 ('PC5') to the Auckland Unitary Plan (Operative in Part).

The Submitters could not gain an advantage in trade competition through this submission. They are directly affected by the effects of PC5, some of which will adversely affect the environment and do not relate to trade competition or the effects of trade competition.

This submission relates to the entire PC5.

INTRODUCTION

The Submitters own two adjoining properties at 10 Clarks Lane and 14 Clarks Lane, in Hobsonville (collectively referred to as the 'properties'). The site at 14 Clarks Lane is also known as 6 Sinton Road on Council's records.

The land currently owned by the Submitters collectively comprises 5.1099 hectares. Its location is illustrated in Figure 1 below.



Figure 1 – location of the properties within the area subject to PC5

SUBMISSION

The Submitters have the following issues, concerns and comments in relation to PC5:

General

- PC5 is supported in principle, insofar as it facilitates urban development of land that is currently in the Future Urban zone. The Submitters consider that urbanisation of the land within the Whenuapai area will make a significant and important contribution to accommodating Auckland's need for additional residential and employment land, in a desirable location that is well-served by infrastructure;
- The properties are located in close proximity to the existing urban area. They can be readily developed, and the provision of appropriate infrastructure is both relatively straightforward and cost effective.

Zoning Issues

- The PC5 zoning map applies two zones across the Submitters' properties. All of the land within 14 Clarks Lane and within the western part of 10 Clarks Lane is identified as Terrace Housing and Apartment Buildings zone, while the eastern part of 10 Clarks Lane falls within the Single

House zone. The specific zoning of the properties, as proposed under PC5, is supported by the Submitters.

Drainage networks

- Proposals for restoration of natural streams are supported in principle, although it is considered that some of the areas of identified stream network have not been correctly classified under PC5;
- Precinct Plan 1 identifies a section of permanent stream on the western part of the properties, and an intermittent stream within the road immediately north of 14 Clarks Lane;
- A substantial proportion of the 'permanent stream' is an artificial pond that was created as an ornamental garden feature. The Council has indicated that this feature can be removed and filled as it is a constructed pond rather than a natural system, and because it serves no required detention or water quality function. The Submitters wish to remove it at some point in the future to unlock the anticipated development potential on the land and would not wish to see the status of the pond as a 'permanent stream' become an impediment to that outcome. As a consequence, the permanent stream status of the pond should be deleted from PC5;
- The 'intermittent stream' in the Clarks Lane road reserve is a shallow roadside drain, although a significant proportion of it is piped. It appears to be part of the stormwater infrastructure in this location and is unlikely to meet the criteria for classification as a stream;
- For the reasons noted above, the Submitters consider that Precinct Plan 1 should be amended to correct the status of the watercourses on or adjacent to the properties.

48.1

Parks and Open Space

- Precinct Plan 1 includes an area of *Indicative Open Space* on the adjacent property at 17 Clarks Lane. The location of this indicative open space is considered to be appropriate and the Submitters support its retention in the currently proposed location within PC5.

Acoustic issues

- Precinct Plan 3 includes two small 'islands' of land within the proposed 57 dB Ldn engine testing noise boundary on 14 Clarks Lane and also on 15 Clarks Lane. These areas are not shown in the same locations as depicted on Figure 13 of the Malcolm Hunt Associates report and, in any event, are not of sufficient significance to justify a level of regulatory control. The Submitters consider that these two small areas of 57 dB Ldn boundary should be deleted from the Precinct Plan;

- The Submitters consider that objective 13 in PC5 is unnecessary as the noise generated from engine testing is required to comply with existing noise conditions imposed on the Whenuapai Airbase designation. Enforcement will ensure compliance and, as such, this objective should be deleted.

Roads and other infrastructure

- Precinct Plan 2 proposes specified upgrades to existing collector roads, together with new indicative collector roads within Area 1D. The new collector roads include a bridge connection across SH18 motorway to Hobsonville Road, and a bridge connection over two separate reaches of the Waiarohia Stream to Kauri Road;
- The Submitters are opposed to the two bridged connections, on the basis that they are unnecessary, excessively expensive to construct, and will encourage motorists to utilise them as a shortcut to avoid arterial roads that have been designed to accommodate that traffic;
- The proposed connection from Sinton Road to Kauri Road will traverse relatively steep slopes in the vicinity of the two streams that will need to be crossed. It will also likely require vegetation removal and earthworks within a Significant Ecological Area. These physical constraints and impediments, and the need for part of the connection to be in the form of a bridge, will give rise to substantial construction and compliance costs;
- The intended reason for the connection is to avoid congestion and traffic delays at the intersection of Brigham Creek Road and Sinton Road. However, it is considered that an alternative upgraded intersection can be provided in this area at substantially less cost, utilising existing public land that has been set aside for roading;
- Similarly, the cost of creating a new bridge across the motorway would be prohibitively expensive given the need to maintain levels of service on the motorway and because the ground level on the Sinton Road side would necessitate an extended ramp to attain sufficient clearance above the level of the motorway carriageway. The Submitters consider that the substantial costs cannot be justified in terms of the benefits. In addition, it is noted that the proposed connection is located outside of the PC5 area;
- Area 1D also contains other indicative collector roads, in the form of three culs-de-sac extending in a northerly direction from Clarks Lane. The Submitters consider that these are not collector roads as they have no connecting function for through traffic. They are local roads that would be established at the time of subdivision;
- Furthermore, Precinct Plan 2 identifies a length of 'proposed upgrade of existing collector road' to the east of the part of Clarks Lane that is oriented in a north-south direction. There is no existing road of any description in this exact location, although perhaps the Precinct Plan has inaccurately attempted to identify a road within the adjacent Ockleston Landing development. As a consequence, it is considered that the notation on the Precinct Plan should

be removed. Establishment of a new road along that alignment would create dual frontage for the existing Clarks Lane residential properties, which would not be a good urban design outcome. If the intention is to upgrade the existing Clarks Lane, then this is not considered to be an existing collector road and would conflict with the heritage area proposal for this part of Clarks Lane. The upgrading notation should be deleted;

- Where upgrading of the existing roads is required, this should be clarified to confirm that it requires works only within that part of the road reserve extending from the developer's property boundary to the opposite carriageway kerb. An appropriate amendment to Standard I616.6.8(1) should be made to clarify this matter.

Infrastructure funding

- The Submitters consider that PC5 should provide greater certainty around transport projects, their costs and who is funding them;
- PC5 notes that upgrades identified in Table I616.6.2.1 are required to be in place prior to development going ahead, and that the cost should be proportionally shared across each area as development progresses¹. The Submitters seek that PC5 is clarified to confirm that transport upgrades occur concurrently with development occurring (rather than prior to its commencement) and that the cost sharing occurs across each of the identified development areas (as shown on Precinct Plan 2) to which the upgrades relate;
- Objective 3 should be amended to add the words "that is required to support the subdivision being proposed" immediately before the comma, in order to confirm the reason for the transport upgrade. Similarly, objective 6 should be amended by adding the words "(or provides for)" immediately after the word "implements" and by adding the words "in the applicable development area" after the word "elements";
- The word "coordinated" in policy 4 is unnecessary, as the provisions that are proposed to be introduced by PC5 will provide for the necessary level of coordination. Policy 5 may also be unnecessary, as planned infrastructure should be appropriately sized and designed to accommodate development that is anticipated under the zoning provisions that apply. Certainly, the Submitters consider that trunk services should be delivered by Council and Watercare given that these costs are funded by development contributions;
- This point also touches on policy 6, and the Submitter seeks some assurances that provision of bulk services is not a cost that will be imposed on developers within the PC5 area. If policy 6 is to remain, it is requested that the intent be clarified by adding the words "development areas in the" be added immediately in front of the word "precinct";

¹ PC5, p3

- In order to give effect to issues raised elsewhere in this submission regarding the roading proposals for area 1D, Table I616.6.2.1 should be amended to delete the three items of local transport infrastructure required for area 1D. These could be replaced with a requirement to upgrade the intersection of Sinton Road and Brigham Creek Road;
- It is also noted that PC5 relies on the precinct provisions to levy financial contributions under the RMA. The Submitters understand that this regime may no longer exist after April 2022, which is within the expected timeframe for implementation of development opportunities arising under PC5. This may raise questions about the ability for continued funding of infrastructure and the equitable apportionment of costs amongst developers commencing work at different times.

RELIEF

The Submitters seek the following decision from Auckland Council in respect of PC5:

- That PC5 be confirmed to the extent that it enables urbanisation of land within its boundaries; | 48.2
- That the zoning of the Submitters' land be confirmed as Terrace Housing and Apartment Buildings zone; | 48.3
- That the identified location of Indicative Open Space in Clarks Lane (as illustrated on Precinct Plan 1) be confirmed in PC5; | 48.4
- That Precinct Plan 1 be amended to delete the intermittent stream adjacent to the northern boundary of 14 Clarks Lane (AKA 6 Sinton Road), and to delete that part of the permanent stream on the Submitters' site that falls within the artificial pond; | 48.5
- That Precinct Plan 3 be amended by deleting the two small areas of 57 dB Ldn engine testing noise boundaries located on 14 Clarks Lane and 15 Clarks Lane; | 48.6
- That objective 13 be deleted; | 48.7
- That Precinct Plan 2 be amended by deleting the length of 'proposed upgrade of existing collector road' adjoining the eastern boundaries of the sites at 3-9 Clarks Lane; | 48.8
- That Precinct Plan 2 be amended by deleting the three cul-de-sac sections of 'indicative collector road' extending to the north of Clarks Lane and Ockleston Landing; | 48.9
- That Precinct Plan 2 be amended by deleting the proposed indicative collector roads shown between Sinton Road and Kauri Road, and between Sinton Road and Sinton Road East; | 48.10

- That Precinct Plan 2 be amended by reinstating the direct link from Sinton Road to Brigham Creek Road; | 48.11
- That PC5 (Standard I616.6.8(1)) be amended to clarify that, where roads are required to be upgraded, the upgrading works are required only within that part of the road reserve extending from the developer’s property boundary to the opposite carriageway kerb; | 48.12
- That PC5 is clarified to confirm that transport upgrades occur concurrently with development occurring (rather than prior to its commencement), and that the cost sharing occurs across each of the identified development areas (as shown on Precinct Plan 2) to which the upgrades relate; | 48.13
- That objective 3 should be amended to add the words “that is required to support the subdivision being proposed” immediately before the comma; | 48.14
- That objective 6 should be amended by adding the words “(or provides for)” immediately after the word “implements” and by adding the words “in the applicable development area” after the word “elements”; | 48.15
- That the word “coordinated” be deleted from policy 4; | 48.16
- That policy 6 be amended by adding the words “development areas in the” immediately in front of the word “precinct”; | 48.17
- That Table I616.6.2.1 be amended by deleting the three items of local transport infrastructure required for area 1D; | 48.18
- That the two small areas of 57 dB Ldn boundary be deleted from Precinct Plan 3; | 48.19
- Such other amendments to the objectives, policies, rules and other provisions of PC5 that are required to give effect to the matters raised in this submission. | 48.20

The Submitters wish to be heard in support of this submission. If other parties make a similar submission, the Submitters would consider presenting a joint case with them at any hearing.

Phil Ainsworth
Chief Executive Officer
The Neil Group Limited

For and on behalf of Yuewen Zhang and Yue Liu

19 October 2017

Address for service:

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Attention: Phil Ainsworth
Chief Executive Officer

Telephone: (09) 918 6565

Email: painsworth@neilgroup.co.nz

FORM 5

SUBMISSION ON PROPOSED PLAN CHANGE 5 (WHENUAPAI) AUCKLAND UNITARY PLAN

To: Auckland Council
Private Bag 92300
Auckland 1142

Name of Submitter: Feng Tan

The Submitter provides this submission on proposed Plan Change 5 ('PC5') to the Auckland Unitary Plan (Operative in Part).

The Submitter could not gain an advantage in trade competition through this submission. The Submitter is directly affected by the scope of PC5.

This submission relates to the geographical area and scope of PC5.

INTRODUCTION

The Submitter is the owner of a property at 2 Riverlea Road, Whenuapai ('the property'). The property is 2.2698 hectares in area, and is relatively flat and rectangular in shape. It is a corner site, with its longest road frontage adjoining Dale Road. A small watercourse flows through the north-western corner of the site, forming part of the Riverlea Stream. The Submitter has owned the property since 2015.

Land immediately to the west is designated for Defence Purposes, and is developed as a radio communications facility associated with the Whenuapai Air Base. Diagonally opposite the property to the south-east is the Whenuapai Village Special Housing Area which is zoned 'Mixed Housing Urban' under the Auckland Unitary Plan. This land is currently in the process of being developed for intensive urban residential purposes. Other adjoining land uses are currently rural in nature.

The property is included within the land covered by the Whenuapai Structure Plan, under which it is proposed for medium density residential development. The property sits within the area of the

Whenuapai Structure Plan identified as Stage 2, which has more recently been excluded from the scope of PC5.

A plan showing the location of the property is below:



Figure 1 – location of 2 Riverlea Road, Whenuapai

SUBMISSION

The Submitter seeks that PC5 be extended to cover the property, and land with similar characteristics in its immediate vicinity. The Council’s original intention when preparing the Whenuapai Structure Plan was that this land would be subject to the plan change and there has been no compelling reason provided for diverting from that approach.

The Council has stated that PC5 has been reduced in scope because the infrastructure constraints for Stage 2 are significant and suitable infrastructure will not be available until at least 2026. It has suggested that a second plan change will occur closer to 2026 to rezone Stage 2.

It is acknowledged that there are infrastructure constraints at the present time. However, it is considered that in many cases these are not as significant as the Council has suggested and can be resolved at least in part by developer funding. It is also noted that key infrastructure may be available ahead of the timeframe advanced by the Council and, in any event, the Council has the opportunity

to impose development thresholds through PC5 that will avoid any prospect of urban development occurring in advance of required infrastructure being established.

With regard to servicing of the Submitter's property, water supply can be provided by extending the new 315mm bulk water supply main that has recently been installed to facilitate the development of the adjacent Whenuapai Village Special Housing Area. The water main could be extended along existing roads at a reasonable cost, which would be borne by future developers. Some water infrastructure is already established in roads immediately south and east of the property, including a 150mm water supply line. It appears that this could be readily utilised to service the land.

The establishment of a wastewater connection may be contingent on the proposed Northern Interceptor being completed from Rosedale through to Hobsonville. Watercare has stated that this is projected for completion by 2021, ahead of the 2026 date that the Council has suggested as the earliest date for the provision of bulk infrastructure. Some additional elements of the local reticulation network will need to be established, although these works could be funded jointly with developers in order to speed progress. Additionally, it is noted that a 315mm rising wastewater main passes the property along Dale Road. This line serves the Riverhead community. Assuming that sufficient capacity exists in this line, it is ideally located to provide a wastewater connection to serve the property.

Similarly, local improvements to the transport network could be funded by developers as work progresses, possibly through Infrastructure Funding Agreements with the Council. The exception to this approach arises in respect of the direct motorway link between State Highways 16 and 18, which is required to avoid congestion on Brigham Creek Road. This is an NZTA responsibility although it is understood that some land acquisition activity and designation is already underway to support the project.

In relation to all of these infrastructure requirements, the Council has the option of employing a 'trigger' mechanism consistent with that proposed in PC5 if it has concerns about the availability or capacity of infrastructure. That will provide the Council with confidence that development cannot occur without the necessary infrastructure being in place, and seems an appropriate mechanism given that a number of the infrastructure projects will occur earlier than projected and others can be funded by developers as land is developed.

There is no realistic prospect of this approach sending the wrong market signal or of purchasers buying zoned land under the mistaken assumption that it can be developed immediately. It is not credible to suggest that purchasers would invest substantial money in a property without first making some enquiries as to the rules and constraints that may apply to its development. All future purchasers of greenfields land in the Whenuapai area will be developers that will fully understand the situation and will pay a market price that reflects any constraints on development timeframes that may exist.

For the reasons noted above, the Submitter considers that his property (and surrounding land with similar characteristics) should be included within PC5, with the inclusion of appropriate infrastructure triggers if necessary, and seeks that outcome accordingly.

RELIEF SOUGHT

The Submitter seeks the following decision from Auckland Council in respect of PC5:

- That PC5 be extended to include the property at 2 Riverlea Road, together with surrounding land with similar characteristics.

49.1

The Submitter wishes to be heard in support of his submission. If other parties make a similar submission, the Submitter would consider presenting a joint case with them at any hearing.



Philip Brown

Director

Campbell Brown Planning Limited

For and on behalf of Feng Tan

19 October 2017

Address for service:

Feng Tan

C/- Campbell Brown Planning Limited

PO Box 147001

Ponsonby

AUCKLAND 1144

Attention: Philip Brown

Telephone: (09) 3941694

Email: philip@campbellbrown.co.nz

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

Clause 6 of First Schedule, 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 of Submitter or Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

Lu Hui Feng

Organisation Name (if submission is on behalf of Organisation)

Address for service of the Submitter

16 Onslow Ave, Epsom

Telephone:

021 190 0666

Email:

Contact Person: (Name and designation if applicable)

Scope of submission

This is a submission on:

Plan Change/Variation Number

PC 5: Whenuapai Plan Change

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

PC 5 Map Zone Change

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

The reasons for my views are:


(continue on a separate sheet if necessary)

I seek the following decision by Council:

- Accept the Plan Change/Variation | 50.1
- Accept the Plan Change/Variation with amendments as outlined below
- Decline the Plan Change/Variation
- If the Plan Change/Variation is not declined, then amend it as outlined below.

I 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)

20.10.2017

 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.

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 this submission that:

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

24 October 2017

Auckland Council

Unitary Plan Private Bag 92300

Auckland 1142

By post & email: unitaryplan@aucklandcouncil.govt.nz



NGĀ MAUNGA WHAKAHII O
KAIPARA
WHENUA HOKO HOLDINGS LTD

**Auckland Unitary Plan – Proposed plan change 5: Whenuapai –
Submission by Ngā Maunga Whakahii o Kaipara Whenua Hoko Holdings**

Ngā Maunga Whakahii o Kaipara Whenua Hoko Holdings Ltd ('Whenua Hoko') wishes to make a submission on Proposed Plan Change 5 to the Auckland Unitary Plan ('plan change').

The attached submission details Whenua Hoko's interest and position on the plan change.

Please contact the writer for communications and with any queries.

Nāku iti noa, nā

Daniel Clay
Tumuaki / Chief Executive

Ngā Maunga Whakahii o Kaipara Whenua Hoko Holdings Ltd
E | Daniel.Clay@kaiparamoana.com D | 09 281 4516 M | 021 470 181

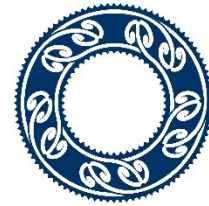
Submission on Proposed Plan Change 5

To: Auckland Council

From: Ngā Maunga Whakahii o Kaipara Whenua Hoko Holdings Ltd

Date: 23 October 2017

Subject : Proposed Plan Change 5 to the Auckland Unitary Plan



NGĀ MAUNGA WHAKAHII O
KAIPARA
WHENUA HOKO HOLDINGS LTD

The Submitter

1. The submitter is Ngā Maunga Whakahii o Kaipara Whenua Hoko Holdings Ltd ('Whenua Hoko').
2. The submitter's address for service is:

8/1 Te Pumanawa Square
Westgate
Auckland 0814
PO Box 84-016
Westgate 0657
Phone: 09 281 4512
Email: daniel.clay@kaiparamoana.com
3. Whenua Hoko is a property development company, and is part of the commercial investment entities of Ngā Maunga Whakahii o Kaipara Development Trust ('Ngā Maunga Whakahii'). Ngā Maunga Whakahii is the Post Treaty Settlement Governance Entity created to manage and grow the Treaty settlement assets of Ngāti Whātua o Kaipara, the financial benefits of which are used to support the cultural, economic and social wellbeing of the people of Ngāti Whātua o Kaipara.
4. Whenua Hoko's commercial property interests are primarily based in the northwest of Auckland, aligned with the exclusive rohe of the hapū of Ngāti Whātua o Kaipara. This area extends from Massey at the southern boundary of the rohe, to South Head, Helensville and Wellsford at the northern boundary.
5. Through its property subsidiary Te Uru Ltd, Whenua Hoko has acquired and is currently developing some 9ha of land at Hobsonville Point. This land is located within the 'Village Precinct' of Hobsonville Point, and is largely zoned for high density residential development. Over 400 residential units will be constructed, and will be done so within specific timeframes to ensure homes can be brought to the market in good time. A significant proportion of houses to be built as part of this development will be in the affordable category.
6. Under the Ngāti Whātua o Kaipara Claims Settlement Act 2013, Whenua Hoko (for Ngāti Whātua o Kaipara) has exclusive rights of first refusal ('RFR') for surplus Crown land in its rohe, including the Whenuapai and plan change area. These rights apply until 2182.

7. Whenua Hoko is also a party to the Housing Mahi Ngātahi Agreement between the Ministry of Business, Innovation and Employment ('MBIE') and some 13 iwi/hapū groups with interests in the wider Auckland area. The objective of this agreement is to develop housing on Crown land in Auckland at pace, while also providing for community and affordable housing. Whenua Hoko is working with MBIE to support the Crown Housing Programme by providing new housing on surplus Crown land, with a focus on the Whenuapai growth area.
8. The RFR and other rights to and interests in potentially surplus Crown land apply to large areas of land within the plan change area. This land is currently held or administered by three Crown entities; NZTA, Ministry of Education and NZ Defence Force (for the Whenuapai Airbase land ('Crown sites'). These are shown below¹:



¹ The sites are located at 13, 34a, and 52 Trig Road, 161 and 167 Brigham Creek Road, and the NZDF site shown in the second image on and to the south of Kauri Rd, Whenuapai.



9. Whenua Hoko could not gain an advantage in trade competition through this submission.

Submission Scope

10. This submission is on all of Proposed Plan Change 5 to the Auckland Unitary Plan ('plan change').
11. The specific provisions of the proposal that this submission relates to are:
- a) The zoning and other regulatory instruments and rules proposed for the Crown sites and adjacent sites which could influence the development potential of the Crown sites;
 - b) The proposed Single House Zone for the Crown sites on Brigham Creek Rd and Kauri Rd;
 - c) The provisions which relate to reverse sensitivity issues from the operation of the Whenuapai Airbase, particularly as it applies to the Crown sites and land on Kauri Rd. These include objective 13, Policies 22-25, Precinct Plan 1, Table I616.4.1 Rules A16-A18;
 - d) The provisions relating to the provision of infrastructure, including those proposing development prerequisites such as the provision of public roads. These include Objectives 3, 5, 6, Policies 1, 4 5 and 8, Precinct Plans 1 and 2, Table I616.4.1 Rules A2 and A17, the corresponding standards in clause I616.6(3), Table I616.6.2.1 nd clause I616.6.8, and assessment criteria.
 - e) The provisions relating to coastal setbacks particularly for the Crown site on Kauri Rd, including Objective 9, Policies 15 and 16, Precinct Plan 1 Table I616.4.1 Rules

A16 and A17, the corresponding standards in clause I616.6(3) and Table I616.6.2.1 and clause I616.6.5-7 and assessment criteria.

Submission details and decisions sought

- | | | |
|-----|--|------|
| 12. | Wheunau Hoko generally supports the plan change where it enables urban development in the Whenuapai area, and in particular housing development. The approach of the land areas with good proximity to State Highway 18 and the existing urban area and the infrastructure located in or which is accessible from that area, is supported and justifies the rezoning of such land for early urban development. | 51.1 |
| 13. | However, the zoning of the Crown sites and other sites with Single House Zone does not provide for the housing needs of the Whenuapai and wider community and should be rezoned to enable more houses to be provided (eg Mixed Housing Urban Zone). For instance, the Crown site on Brigham Creek Rd can and should provide for increased housing. | 51.2 |
| 14. | The roading requirements are unfair on land developers in many cases and go beyond the effects of a development. The proposed road alignments, classifications, requirements and links to development potential should be reviewed and amended or removed to provide a more balanced approach. This is especially the case for the Crown site on Brigham Creek Rd, and responsibility for providing (and protecting) future roads should be reviewed and the provisions amended or replaced accordingly. | 51.3 |
| 15. | The reverse sensitivity provisions should also be reviewed to ensure they are necessary and appropriate and recognise the need to provide for both the NZDF activities and community needs. The acoustic protection contours, and the provisions for activities within these, should be amended to ensure this balance is achieved. | 51.4 |
| 16. | The coast setback provisions appear unduly onerous, and the area protected reviewed and reduced and buildings within that setback (if justified) should be allowed in certain cases. | 51.5 |
| 17. | Whenua Hoko requests that the provisions in this submission be reviewed with a focus on the effects of development and the need to provide increased housing in the area, and amended or replaced as appropriate. | 51.6 |
| 18. | Whenua Hoko wishes to be heard in support of its submission. | |

Nāku iti noa, nā



Daniel Clay
Tumuaki / Chief Executive

Ngā Maunga Whakahii o Kaipara Whenua Hoko Holdings Ltd
E | Daniel.Clay@kaiparamoana.com D | 09 281 4516 M | 021 470 181