

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Ryan Sclanders  
**Date:** Friday, 17 May 2024 8:30:24 am  
**Attachments:** [Flooding\\_20240517081931.465.pdf](#)  
[Traffic.pdf](#)

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The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Ryan Sclanders

Organisation name:

Agent's full name:

Email address: ryansclanders@hotmail.com

Contact phone number: 0212264142

Postal address:  
4 Mill Grove  
Riverhead  
Auckland 0820

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:

Property address:

Map or maps: All Map sections in 04-pc100-app-2-pc-zoning-map

Other provisions:

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

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

The reason for my or our views are:

I am making my submission to highlight not necessarily the proposed subdivision but rather the lack of infrastructure upgrades needed to support the subdivision and the influx of people, schools, vehicles, and water drainage issues.

The plan proposes anywhere between 1450 to 1750 mixed residential dwellings without any Safety and capacity upgrades to State HW 16, Coatesville Riverhead highway, or residential roads other than around the development. Traffic is already horrendous in the mornings, taking an hour to an hour and a half to get into the city. Some (if not most) mornings the traffic is backed up from Hallertau to Boric. The traffic from Kumeu to Borich is even worse. This also happens on weekends when an event is hosted at the Kumeu showgrounds or temples in the area.

Furthermore, Coatesville Riverhead Highway looks at capacity by how poorly the roads are maintained (the Riverhead bridge is an example) and the vehicle size. The subdivision would add a lot more "heavy vehicle traffic" during construction and residential traffic (2900 - 3500 Vehicles if we

assume each dwelling has two vehicles) once complete.

The documents also state that "Kumeu, Huapai, and Riverhead are collectively designated 'development-ready' from 2028-2032, with the potential to accommodate 6,600 new dwellings!" Where will all the traffic go? Where are the plans to upgrade the Coatesville Riverhead highway and SHW 16 to accommodate all this development?

The developers' belief that the new subdivision will not contribute to the existing stormwater issues in Riverhead is a cause for concern. The stormwater drainage in our area is ineffective, and there are no visible plans to address this problem. The subdivision plans to direct most of the water into the northern river, which is already at capacity at times. Additionally, the western end of the subdivision will send water south, where we have witnessed the catchment area and drains overflowing in light to medium rain. This situation leaves our community vulnerable and in need of immediate solutions.

I disagree with the developer's assessment, considering my neighbours' houses and mine were flooded twice just over a year ago. Not just because the stormwater drains were inadequate but also because of the subdivision at the bottom of Duke Street (Which you, the council, approved!). They also said that their subdivision wouldn't affect our houses. Instead, the subdivision caused all the water to channel through the bottom of Mill Grove.

Schooling: Riverhead Primary School has more than doubled in size over the last five or so years. The school is constantly undergoing upgrades to handle capacity. There is no high school in the immediate area, and Riverhead is only zoned for Massey High School. I know the subdivision provides an area for a new primary school, but there are no plans from the MOE to build a new school. Where will all the kids go to school? How would they get there with all the traffic?

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested | 162.1

Details of amendments: Upgrade road infrastructure for increased capacity and safety. Review and fix the Storm water issues in Riverhead so that we don't have to worry about our houses each time it rains. Work with the MOE to build new schools in the area. | 162.2  
| 162.3  
| 162.4

Submission date: 17 May 2024

Supporting documents  
Flooding\_20240517081931.465.pdf  
Traffic.pdf

**Attend a hearing**

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

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

**Declaration**

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

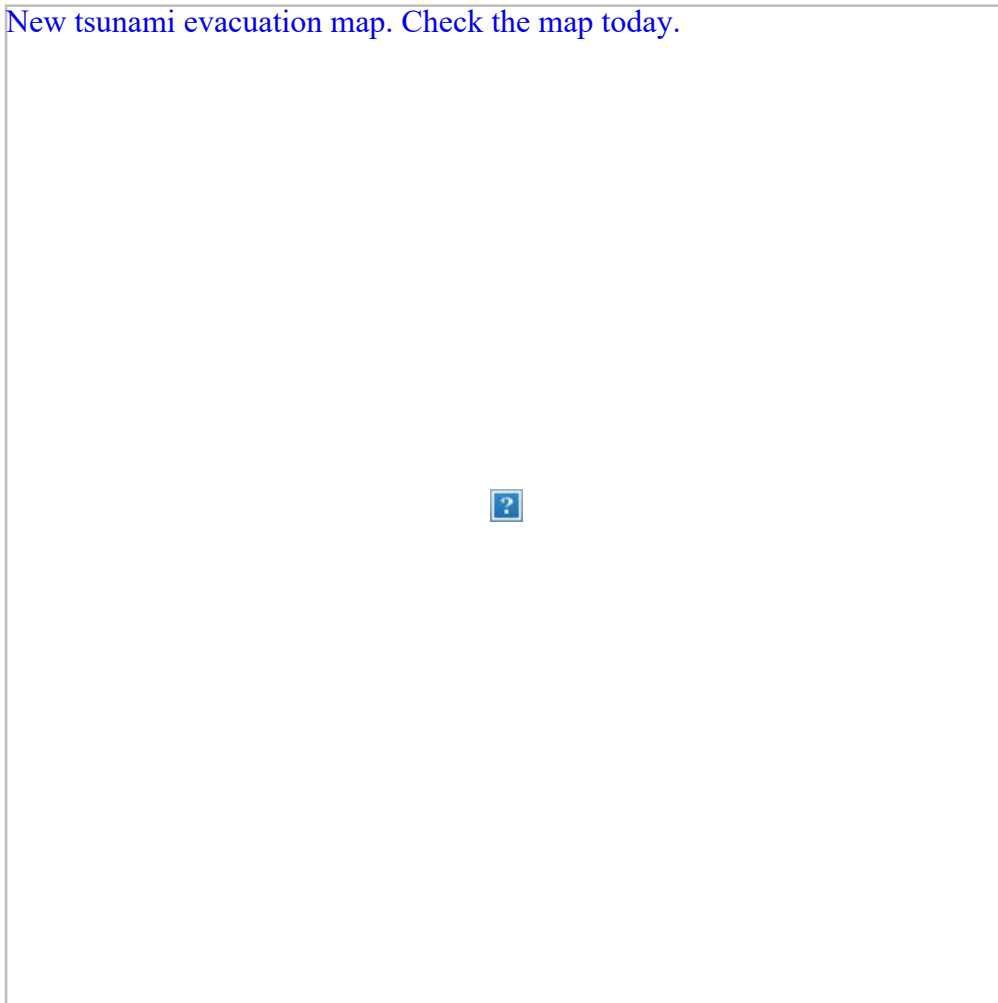
Are you directly affected by an effect of the subject matter of this submission that:

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Heather Hernandez  
**Date:** Friday, 17 May 2024 8:45:14 am

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The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Heather Hernandez

Organisation name:

Agent's full name: Heather Hernandez

Email address: heather4evernz@gmail.com

Contact phone number:

Postal address:

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:

Property address: Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

I am concerned about the increase in traffic in the local area, which will feed onto SH 16 which already is at a standstill on many occasions. SH 16 has not been upgraded to handle the increase in use nor are there good public transport options to the city or North Shore, rapid transport/park n rides or bike lanes. SH 16 is already at a standstill on many occasions, with the increase in noise & fumes affecting residents. With the large amount of land earmarked for development in the area, these improvements need to be made, along with drainage and flood mitigation plans, prior to further intensification.

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

163.1

Submission date: 17 May 2024

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Jennifer Caitlin Watson  
**Date:** Friday, 17 May 2024 9:15:20 am  
**Attachments:** [Plan Change.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Jennifer Caitlin Watson

Organisation name:

Agent's full name:

Email address: juniper.rev@gmail.com

Contact phone number: 0273293811

Postal address:  
4 Princes Street  
Riverhead  
Auckland 0820

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:  
All of it

Property address: 4 Princes Street, Riverhead

Map or maps: n/a

Other provisions:  
all of this is totally ridiculous

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:  
Please see attached document

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

164.1

Submission date: 17 May 2024

Supporting documents  
Plan Change.pdf

**Attend a hearing**

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

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

**Declaration**

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

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

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

Yes

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

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## Infrastructure Concerns

### Travel

Auckland Transport and Waka Kotahi as well as the residents of Riverhead do not believe the roading infrastructure is sufficient to handle the increased use caused by the planned development. An Auckland Transport document regarding Riverhead holds that “There is no funding in place to improve public transport services to support any urbanisation to align with the project’s delivery timeframe, with the development being car-oriented,” Further AT wrote, “There is no funding in place to improve public transport services to support any urbanisation to align with the project’s delivery timeframe, with the development being car-oriented.”

Indeed, the roading infrastructure currently does not handle the number of cars on the road well: Coatesville Riverhead Highway entrance onto 16 heading into Auckland has significant delays no matter the time of day and, of course, exacerbated by rush hour. At times, it takes more than ½ hour to go from Princes Street to the roundabout that feeds the highway into Auckland and Fred Taylor Drive. In several documents, the Council mentions road infrastructure “improvements,” and in one place it mentions being “fully funded “and finished in 2025, but no evidence of that work can be seen.

The Plan Change request and the development in Riverhead should be halted until roading development can handle the current and future increased numbers.

Improvement of mass transit (buses in this case) remains insufficient as well. Auckland Transport journey planner cites that the trip from Riverhead to Auckland CBD often takes 1 hour and 40 minutes (if buses are running perfectly) and can require using three different buses.

Consider me a single mother of two living on Princes Street with one child in daycare in Huapai and one at Riverhead School. Both the school and daycare will take children from 7:00 a.m. (if she pays for the before school programme) Assuming I transport my children by car as quickly as possible, I could (with no hiccups) catch the 7:26 bus, transfer twice and enter my office well after 9:00. A park and ride facility will not change that reality. A fast train, or dedicated bus lanes with express buses from Riverhead might.

The Plan Change request and the development in Riverhead should be halted until mass transit can efficiently handle the current and future increased numbers.

### Flooding

The Plan Change group indicates its flood control for the area within the development. However, the Council has not addressed the flooding that occurs on Princess Street. Having good infrastructure in a small portion of the town and not available within ½ block of the proposed development may create unnecessary friction between residents. Kia Ora Tāmaki Makaurau indicates the need for “holistic wellbeing for Tāmaki Makaurau,” which should mean resilient flood control for all residents.

The Plan Change Request and its development in Riverhead should be halted until all areas of Riverhead have good water management infrastructure.

## Electricity

Over the past several years, Princess Street has had power outages due to a transformer blowing and weather causing power lines to be ripped apart by trees. Might these outages affect the grid that the development is on, including the hospital? Electrical lines and the trees that down them should be addressed completely before developing further. (Please see a photo of the April tree involvement)

The Plan Change Request and its development in Riverhead should be halted until all areas of Riverhead have good, safe, robust electrical management infrastructure.



## Housing

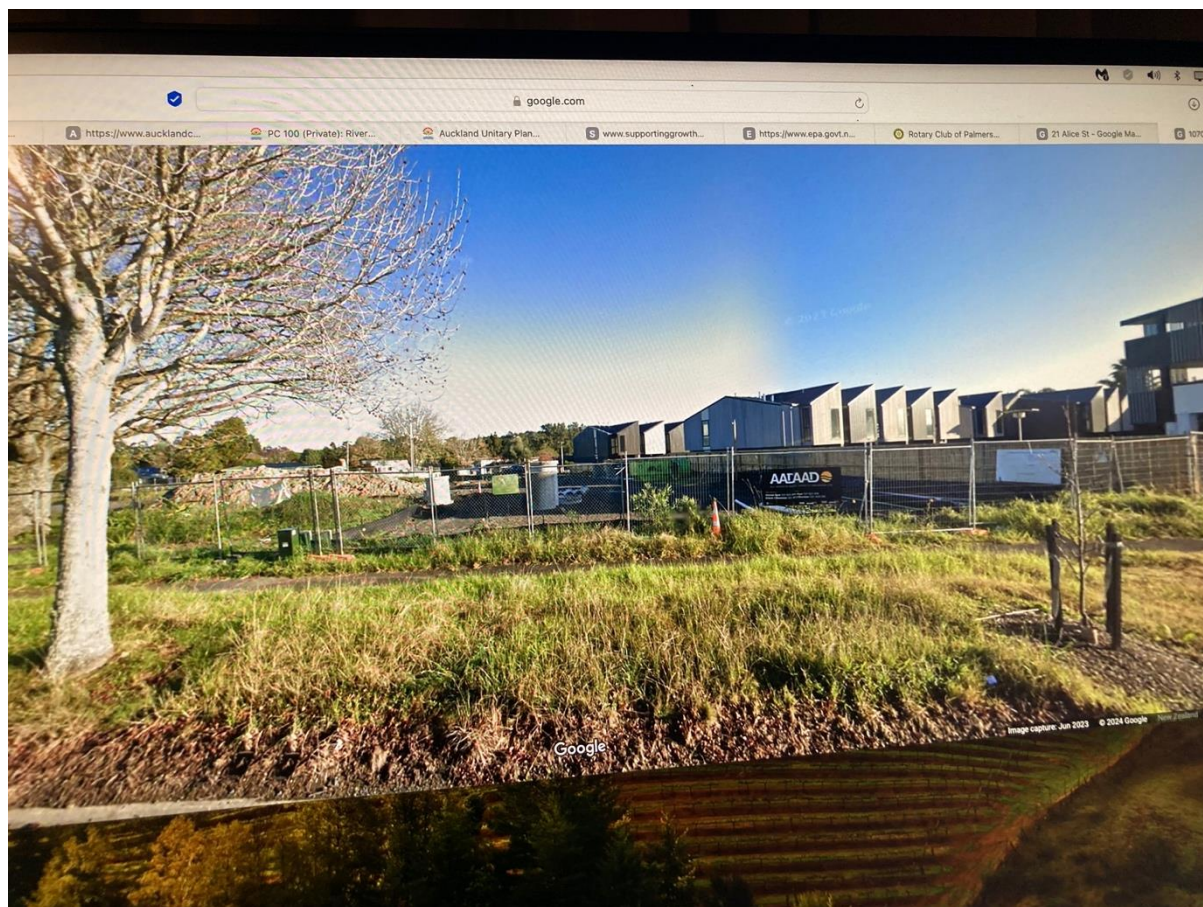
The proposed Plan Change touts adding terraced housing and apartments with a 4-storey structure.

The tall buildings will detract from the character of Riverhead. In addition, taller buildings may cut light from the houses nearby. A possible solution would be to move any 4-storey building to the corners furthest away from Coatesville Riverhead Highway where there are fewer houses affected. Move the orange Terrace Housing in Figure 4 to the left along Riverhead Road. Here, it will only affect rural land.

If the Plan Change is approved, no buildings taller than a main and 1<sup>st</sup> level should sit on Coatesville Riverhead Highway.

The Plan Change also hopes to “increase the amount of available housing.”

Currently Riverhead has several developments that have failed to progress: the area at 1066-1070 Coatesville Riverhead Highway has a partially developed lot with pipes unburied and no progress being made. This area (between Alice and Coatesville Riverhead Highway also has terraced housing --- mostly finished, but completely unoccupied. Construction for those terraced houses and the amenities they would bring began about 5 years ago and has sat in its current state for 3 or 4 years. Both sites are blights on the community. (Photo from Google maps) The area is the small purple area to the right of the RLG holdings shown in Figure 1.



The Plan Change Request and its development in Riverhead should be halted until the current developments that sit idle are finished and occupied. Perhaps the Plan Change proponents should first purchase and finish and rent/sell those units to ensure the demand exists before continuing with the Plan.

## Education

Riverhead School (primary school) stands near capacity. Adding more housing (and therefore families) directly affects the schools and their children. Riverhead, Kumeu, and Huapai do not have a secondary school. Students must travel up to an hour to get a high school education. That problem does not disappear with this plan.

The Plan Change Request and its development in Riverhead should be halted until educational resources coincide with the numbers of children of all ages in the area.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Sara Wheeler  
**Date:** Friday, 17 May 2024 10:00:51 am

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The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Sara Wheeler

Organisation name:

Agent's full name:

Email address:

Contact phone number:

Postal address:  
948 Old North Road  
Waimauku  
Auckland 0882

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:

Property address:

Map or maps:

Other provisions:

The number of homes proposed

The impact on the surrounding area

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

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

The reason for my or our views are:

This plan change constitutes a significant plan change that, if approved, would result in a departure from Auckland Council's own Future Development Strategy.

Riverhead and its surrounding areas have been subject to considerable residential development over the last ten years – however infrastructure has not kept up with demand. The proposed infrastructure contribution is meaningless in the context of the infrastructure deficit in the area. This is the sort of development that might be contemplated once the motorway extension to Waimauku has been completed. The congestion on SH16 caused by traffic entering from the Coatesville Riverhead Highway is already unacceptable.

Riverhead and surrounding area are not equipped to deal with the scale of development that this plan change would result in.

PC100 would result in an inappropriate development, that will ultimately result in higher vehicle and pressure on infrastructure that is already under resourced. There is insufficient public transport in

the area to support the development.

PC10's residential development occurring in land that is subject to natural hazards, which completely contradicts Auckland Council's own Future Development Strategy.

In the past three years, the Kumeu-Huapai and Riverhead areas have experienced three significant flood events that have resulted in extensive damage to homes and businesses. Avoiding further residential development in these areas in the future is vital, in light of more frequent and impactful weather events occurring as a result of climate change and the lack of stormwater infrastructure (that will not be addressed by simply providing for stormwater within the development).

I/we oppose PC100 and ask that Auckland Council declines the application.

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

165.1

Submission date: 17 May 2024

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Mary Midgley  
**Date:** Friday, 17 May 2024 10:15:28 am

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Mary Midgley

Organisation name:

Agent's full name:

Email address: [mmidgley@xtra.co.nz](mailto:mmidgley@xtra.co.nz)

Contact phone number:

Postal address:  
84 and 86 Riverland road,  
Kumeu  
Auckland 0892

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:  
Rezoning of 75.5ha of future urban /rural zone to residential/suburban/terrace and apartment housing.

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

Locals are seeking to live in Riverhead for its semi rural small town, village atmosphere. Already the riverhead new developments strain the infrastructure esp congested roads, poor maintenance of local roads. As pleasant as the area currently is there is minimal infrastructure to support the population living in the area. Homes have been built on flood plain which as weather events prove, has been drastically under considered with dire outcomes for many. Public transport is minimal, a car is a must for households. Further development would force people to leave area or face impossible commute times to work etc. We have developers failing to complete homes and commercial areas already. Such failures create eyesores and take the rural community feel away. Nothing should be developed or planned without robust plans for strong infrastructure across the board. Then a considered and well laid out area can be planned with a restriction on jamming apartments and terrace housing. As hindsight has proved people wanting to move to this area want a lifestyle not box living.



I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested | 166.1

Details of amendments: Infrastructure first to provide for what is already in place | 166.2

Submission date: 17 May 2024

**Attend a hearing**

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

**Declaration**

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

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

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

No

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

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NZ Transport Agency Waka Kotahi Reference: 2024-0473

17 May 2024

Auckland Council  
C/- Sarah El Karamany – Planning Technician  
Private Bag 92300  
Auckland 1142

Via Auckland Council submission portal

Dear Sarah,

**Submission on Plan Change 100 (Private) Riverhead**

Attached is the NZ Transport Agency Waka Kotahi (NZTA) submission on the proposed Plan Change 100 (Private) Riverhead.

We welcome the opportunity to discuss the contents of our submission with the applicant as required.

If you have any questions, please contact me.

Yours sincerely



Rosalind Cowen  
Senior Planner – Poutiaki Taiao / Environmental Planning  
System Design, Transport Services

Phone: 099565710

Email: [rosalind.cowen@nzta.govt.nz](mailto:rosalind.cowen@nzta.govt.nz)

**FORM 5, CLAUSE 6 OF SCHEDULE 1, RESOURCE MANAGEMENT ACT 1991**

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**Submission on Plan Change 100 (Private) Riverhead**

**To:** Auckland Council  
C/- Sarah El Karamany  
Private Bag 92300  
Auckland 1142

Via Auckland Council submission portal

**From:** NZ Transport Agency Waka Kotahi  
Private Bag 106602  
Auckland City  
Auckland 1143

---

**1. This is a submission on the following:**

Proposed Plan Change 100 (Private) Riverhead ("PC100").

**2. NZ Transport Agency Waka Kotahi (NZTA) could not gain an advantage in trade competition through this submission.**

**3. Role of NZTA**

NZTA is a Crown entity with its functions, powers and responsibilities set out in the Land Transport Management Act 2003 (LTMA) and the Government Rounding Powers Act 1989. The primary objective of NZTA under Section 94 of the LTMA is to contribute to an effective, efficient, and safe land transport system in the public interest.

An integrated approach to transport planning, funding and delivery is taken by NZTA. This includes investment in public transport, walking and cycling, local roads and the construction and operation of state highways.

**4. State highway environment and context**

The Proposed Plan Change is approximately 2km south of the State Highway 16 (SH16) and Coatesville Riverhead Road intersection.

As a note, NZTA's Stage 2 of the Brigham Creek to Waimauku Safety Improvements project, which includes the upgrade of the SH16/ Coatesville Riverhead Highway intersection, is currently on hold due to significant increases in forecasted costs. NZTA are currently working through internal processes to seek direction on funding and scope in light of the new draft Government Policy Statement on Land Transport (2024) and the development of the next National Land Transport Programme.

There are no assurances on funding for the project however if this is approved in the coming months the current programme is for construction to be completed mid-2029.

**5. The specific provisions of the proposal that this submission relates to are:**

The specific provisions of the proposal that this submission relates are associated with the proposed infrastructure upgrade provisions, notification provisions and consultation requirements with NZTA.

**6. The submission of NZTA is:**

NZTA oppose the Proposed Plan Change 100 (Private) Riverhead (“PC100”) until the relief as detailed below is addressed.

Plan Section	Plan Provision	Support / Oppose	Reasons	Relief Sought
Policies – Transport, Infrastructure and staging	<i>IX.3.(4) Require the occupation of buildings in the precinct to be coordinated with required transport infrastructure upgrades to minimise the adverse effects of development on the safety, efficiency and effectiveness of the surrounding road network.</i>	Support	NZTA support this policy as it will direct that any development within this plan change area will not be occupied until appropriate roading infrastructure has been constructed.	No relief sought.    167.1
Table IX.4.1 Activity table – Precinct-wide activities	(A4) Subdivision and development that does not comply with Standard IX.6.1(1) Staging of Development with Transport Upgrades  - Discretionary Activity	Oppose	NZTA consider that any subdivision and development that does not comply with Standard IX.6.1(1) should be a Non-Complying Activity. This is to ensure that the appropriate RMA gateway tests are applied to development that is out of sequence with the SH16/Coatesville Riverhead Road intersection upgrade.	To amend (A4) to a Non-Complying Activity. 167.2 
IX.5. Notification	(1) Any application for a restricted discretionary activity listed in Table IX.4.1 Activity table above, will be considered without public or limited notification or the need to obtain written approval from affected	Oppose	The applicant’s consultant has advised NZTA that “the precinct wording is consistent with the approach applied to all precincts under the AUP and adopts standard notification clauses (and does not preclude notification to NZTA).”	In order to remain consistent with the RMA, this provision should be amended from enabling applications to be considered without public or limited notification from a restricted discretionary activity to a controlled activity.    167.3

	<p>parties unless the Council decides that special circumstances exist under sections 95A(9) or 95B(10) of the Resource Management Act 1991.</p>		<p>NZTA do not agree that precincts typically enable a restricted discretionary activity to be considered without public or limited notification unless Council that special circumstances exist.</p> <p>The RMA precludes controlled activities from public and limited notification and only precludes a restricted discretionary activity if the activity is a boundary activity (s95A(5)(b)) which is not consistent with this proposed precinct provision.</p>	
IX.6.1. Standards	<p><i>IX.6.1. Staging of development with transport upgrades</i></p> <p><i>(1) Prior to occupation of a dwelling within the Riverhead Precinct, the following transport infrastructure must be constructed and operational:</i></p> <p><i>(a) Upgrade of the Coatesville-Riverhead Highway / Main Road (SH16) intersection to a roundabout, as part of the SH16 Brigham Creek to Waimauku project, led by Waka Kotahi NZ Transport Agency</i></p>	Support	<p>NZTA support this provision as it will manage future development in the plan change area in an efficient and safe manner with appropriate roading infrastructure being in place prior to occupation of any development.</p> <p>The proposed SH16 Coatesville-Riverhead Highway intersection upgrade <u>should</u> provide sufficient capacity to service the additional traffic generated from this plan change. Although, the applicant should be aware that if this intersection upgrade is to occur, it would be no earlier than mid-2029. This would be consistent with the Future Urban Land Supply Strategy 2017 (FULSS).</p> <p>The FULSS sets out the anticipated timeframes for 'development ready' areas over a 30-year period. It</p>	<p>No relief sought. 167.4</p>

			<p>helps to inform infrastructure asset planning and funding priorities, and to support development capacity to be provided in a coordinated and cost-efficient way via the release of 'development ready' land.</p> <p>Therefore, this plan change and intersection upgrade should enable development no earlier than 2028/9.</p>	
IX.9 Special Information Requirements	<p>(2) Consultation with Waka Kotahi NZ Transport Agency</p> <p>An application for development, excluding construction activities, which occurs prior to the upgrade of the Coatesville-Riverhead Highway / Main Road (SH16) intersection must be accompanied by a description of consultation undertaken with Waka Kotahi NZ Transport Agency and the outcomes of this consultation.</p>	Support	NZTA support consultation for any subdivision or development occurring prior to the SH16/ Coatesville Riverhead Highway intersection upgrade.	No relief sought. 167.5

**7. NZTA seeks the following decision from the local authority:**

- (i) NZTA seeks that Auckland Council decline this proposed plan change until all requested relief is sought as outlined in the above table.
- (ii) Any other relief that would provide for the adequate consideration of potential effects on the state highway network.

**8. NZTA does wish to be heard in support of this submission.**

**9. If others make a similar submission, NZTA will consider presenting a joint case with them at the hearing.**

**10. NZTA is willing to work with the applicant in advance of a hearing.**

Signature:



Rosalind Cowen  
Senior Planner – Poutiaki Taiao / Environmental Planning  
System Design, Transport Services  
Pursuant to an authority delegated by NZ Transport Agency Waka Kotahi

Date: 17 May 2024

Address for service: NZ Transport Agency Waka Kotahi  
Private Bag 106602  
Auckland City  
Auckland 1143

Contact Person: Rosalind Cowen  
Telephone Number: 099565710  
Alternate Email: [EnvironmentalPlanning@nzta.govt.nz](mailto:EnvironmentalPlanning@nzta.govt.nz)



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

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

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

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

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

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

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



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 16, 135 Albert Street  
Private Bag 92300  
Auckland 1142

For office use only

Submission No:

Receipt Date:

### Submitter details

#### Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Ms Angela Yelavich

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

#### Address for service of Submitter

51 Kent Terrace, Riverhead, Auckland 0820

Telephone:

211922212

Email:

angela.m.yelavich@gmail.com

Contact Person: (Name and designation, if applicable)

### Scope of submission

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

Plan Change/Variation Number

PC 100 (Private)

Plan Change/Variation Name

Riverhead

#### The specific provisions that my submission relates to are:

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

Plan provision(s)

Stormwater/Flooding, Traffic, Special Character

Or

Property Address

Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on the western side of Riverhead.

Or

Map

Or

**Other** (specify)

### Submission

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

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

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

168.1

I wish to be heard in support of my submission

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

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

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

05/16/2024  
Date

**Notes to person making submission:**  
If you are making a submission to the Environmental Protection Authority, you should use Form 16B.  
  
Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.  
  
If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.  
  
I could  /could not  gain an advantage in trade competition through this submission.  
**If you could gain an advantage in trade competition through this submission please complete the following:**  
I am  / am not  directly affected by an effect of the subject matter of the submission that:  
(a) adversely affects the environment; and  
(b) does not relate to trade competition or the effects of trade competition.

### Stormwater/Flooding

There are many reasons for my views, but briefly they are:

Twice in the last two years, the area adjacent to the proposed development i.e. Duke Street, Cambridge Terrace, Waititi Lane, Crabfields, has experienced significant major flooding. This was due to the already poor development planning. Given global warming and weather situations we are experiencing, it is unrealistic to plan for a “one in a hundred year” flood. More development of this area can only lead to further problems.

### Traffic

The traffic conditions experienced daily is of concern - you can hear for yourselves that the only road mentioned besides motorways, on multiple daily radio traffic reports, is for SH16. Proposed plans for something to be done at the Riverhead Coatesville road/SH16 turnoff were meant to be implemented years ago... and this is when the traffic was only a fraction of what it is now. Nothing has been done. How can a major housing/retirement village/commercial building development not increase current problems significantly?

### Special Character

Riverhead is a picturesque village with an important cultural and historic past. Surrounded by pine forests, the charming Rangitopuni River, and located so close to Auckland Central, it should be developed with its special character at the forefront. With market gardens, eating places, forest walks, river activities, and wineries nearby, it has a wonderful community vibe. In a city rapidly losing sight of what makes a place appealing to visitors, it would be shame if Riverhead’s uniqueness was lost.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Adrian Low  
**Date:** Friday, 17 May 2024 10:30:21 am  
**Attachments:** [20240516 Riverhead Plan Change Submission - Adrian Low.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Adrian Low

Organisation name:

Agent's full name:

Email address: [adrian@smlo.nz](mailto:adrian@smlo.nz)

Contact phone number: 021 999 449

Postal address:

Box 96177

Balmoral

Auckland 1342

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:

See Report Attached

Property address: All of Area

Map or maps: All of Area

Other provisions:

See attached Reports

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:

Support in principal to plan change however Opposition to Approval Timeframe. Plan Change requires widen of scope and area concerned to take into the full character and impacts of Riverhead for future.

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

169.1

Details of amendments: See Report Attached

Submission date: 17 May 2024

Supporting documents

20240516 Riverhead Plan Change Submission - Adrian Low.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?  
No

**Declaration**

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

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

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

No

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

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email may be those of the individual sender and may not necessarily reflect the views of Council.

# Submission on Proposed Plan Change PC100: Riverhead

16/5/2024

**From: Adrian Low, Jelas Drive, Riverhead**

Dear Council Members,

I am writing to express my concerns regarding the proposed plan change PC100 for Riverhead. While I support the principle of growth, I strongly advocate delaying immediate implementation until 2028-2032. This delay is crucial to resolving significant infrastructure, environmental, and community impact concerns, ensuring sustainable and well-planned development. The current plan appears to benefit specific properties rather than providing long-term benefits to the broader community and surrounding rural areas. I urge the Council to consider a comprehensive approach that integrates critical infrastructure, community needs, and sustainable growth for the entire Riverhead area.

## Key Concerns and Recommendations

### Opposition to Immediate Implementation

- **Support for Delay:** A delay until 2028-2032 will allow adequate planning, funding, and implementation of critical infrastructure, aligning with sustainable development principles.
- **Recommendations:** I urge you to delay the plan change, prioritize infrastructure planning, maintain Riverhead's rural character, and develop a single, integrated town centre.

#### 1. Undertake full review of the Master Plan Design and widen the scope to include the whole Riverhead area and surrounds

The master plan should be designed based on all overlapping issues, including existing trees, archaeological sites, stormwater protection, community impacts, commercial areas, and other environmental considerations. It is essential to create an integrated plan that:

- **Integrates well into the existing village and community** rather than being an independent development.
- **Preserves Existing Trees:** Protect and incorporate large trees and vegetation into the urban landscape.
- **Protects Archaeological Sites:** Identify and preserve significant archaeological sites, integrating them into public open spaces and ensuring ongoing monitoring.
- **Manages Stormwater:** Implement robust stormwater protection measures, considering maximum and peak flow events and integrating them with green infrastructure.
- **Supports Sustainability:** Ensure that all elements of the plan work together to promote long-term sustainability and resilience.
- **Has a staged approach** that will be in conjunction with other infrastructure programmes.

**By addressing these interconnected issues, the master plan will support a cohesive and sustainable approach to Riverhead's development, preserving its unique character while accommodating future growth.**

#### 2. Scope of Plan change is limited in relation to waiting for and solving area wide Infrastructure Concerns

- **Incomplete Infrastructure Development:** Current infrastructure, especially transport, education, wastewater, and water supply systems, is insufficient for the proposed urbanization.
  - **Transport:** Upgrades to SH16 and Coatesville-Riverhead Highway are needed.



- Water and Wastewater: A second water main and upgrades to the wastewater system, with specific projects outlined for completion are essential.
- Electricity: Updated supply assessments and underground installations are necessary.
- Education: Adequate planning and funding for educational facilities are critical before any development.

### 3. Environmental and Ecological Concerns

- Insufficient Environmental Impact Assessments: Current assessments do not fully address potential impacts on local ecosystems.
  - Recommendations: I recommend conducting comprehensive ecological surveys, updating stormwater management plans, and integrating green spaces into urban design.

### 4. Consultation and Community Engagement

- Inadequate Consultation: The consultation process has been insufficient, failing to engage all community stakeholders effectively.
  - Recommendations: Extend consultation periods, engage broader community groups, and incorporate community feedback into planning.

### 5. Urban Design and Character Preservation

- Maintaining Rural Character: Immediate urbanization could compromise Riverhead's rural character.
  - Recommendations: Redesign the structure plan for low to medium-density housing, preserve significant natural features, and establish clear growth boundaries.

### 6. Commercial Development

- Opposition to Large Retail Centres: A large retail centre is inappropriate and disregards existing infrastructure.
  - Recommendations: Develop a smaller, integrated retail centre in close proximity to the existing shops and conduct comprehensive community consultation.

### 7. Archaeological and Historical Preservation

- Inadequate Review: The current report lacks detailed analysis and preservation plans for significant archaeological sites.
  - Recommendations: Conduct comprehensive archaeological surveys and implement continuous monitoring and preservation efforts.

### 8. Contamination Risks

- Identified Contaminants: Presence of heavy metals, pesticides, TPH, PAHs, and asbestos poses significant health risks.
  - Recommendations: Conduct thorough testing and remediation before development and implement strict health and safety measures.

### 9. Geotechnical Issues

- Soil Stability Concerns: Predominantly clay soil requires significant stabilization efforts for high-density development.
  - Recommendations: Adopt phased development, use on-site soil treatment methods, and utilize geotextiles.

### 10. Landscape and Visual Effects

- Lower Density Development: To preserve rural character, lower density residential development is recommended.
  - Recommendations: Relocate commercial areas closer to the town centre and expand public open spaces.

11. Arboricultural Assets

- Tree Protection and Maintenance: The report lacks detailed plans for maintaining and protecting existing large trees and vegetation these should be retained and utilised within proposed open space areas as much as possible.
  - Recommendations: Develop comprehensive maintenance plans and establish tree protection zones during construction.

12. Bias toward specific properties

The proposed plan change appears limited to specific properties and does not encompass the wider community or surrounding rural areas. This specificity suggests that the plan change functions more as a resource or development consent application put forward by a developer, rather than a comprehensive plan designed to provide long-term benefits to the entire community.

- Concerns:
  - The plan change does not sufficiently address broader community needs and future growth.
  - It focuses on specific developments rather than integrating a vision for Riverhead's overall development.
- Recommendations:
  - Develop a more inclusive plan that considers the wider community and surrounding rural areas.
  - Ensure the plan change benefits current residents and future generations by providing a holistic approach to development.

Recommendations to Auckland Council

- Delay Implementation: Postpone the plan change until 2028-2032 to allow for comprehensive infrastructure upgrades and planning. | 169.2
- Widen the scope of the plan change to include all of the existing village and surrounding rural areas. | 169.3
- Prioritize Infrastructure: Ensure critical infrastructure, particularly transport, water, wastewater, and educational facilities, is fully planned and funded before development. | 169.4
- Enhance Consultation: Extend and deepen community engagement to ensure the plan reflects current needs and concerns. | 169.5
- Sustainability and Preservation: Redesign plans to emphasize low to medium-density development, maintain rural character, and protect ecological and historical assets. | 169.6
- Broaden Scope: Expand the plan change to include broader community benefits and integrate surrounding rural areas into the development vision. | 169.7

By addressing these issues and recommendations, we can ensure a sustainable, well-planned future for Riverhead that meets community needs and preserves its unique rural character. For benefit of the reader I have included below my review of all application material for Council to consider as part of this plan change process.

Thank you for considering my submission.

Sincerely,

Adrian Low  
Jelas Drive, Riverhead

## Consultation Document Review

Contents of Reviews undertaken below:

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## Review of Plan change and S32 Assessment

The S32 assessment has a clear focus on the development as opposed to the outcomes required under the District Plan. Therefore under this circumstance opposition to Immediate Implementation of Riverhead Plan Change is the best method forward allowing for detailed analysis and planning.

Future Consideration of the plan change should be made after Critical Infrastructure is completed.

### Introduction

Immediate implementation of the proposed plan change for Riverhead is not supported, while expressing support for revisiting the plan change between 2028 and 2032. The opposition is grounded in current uncertainties surrounding critical infrastructure, regional planning consistency, and community impact. These concerns must be resolved before the plan change proceeds to ensure sustainable development that aligns with the existing Auckland Unitary Plan (AUP) policies and community expectations.

### Summary

The proposed plan change for Riverhead aims to rezone 80.5 hectares for urban activities, which involves significant development and infrastructural commitments. While the plan has potential benefits, current uncertainties regarding region-wide transport, education, wastewater, and water supply infrastructure pose substantial risks. A delay in the plan change until 2028-2032 would allow for these critical infrastructure components to be adequately planned, funded, and implemented, ensuring a cohesive and sustainable approach to Riverhead's development. Additionally, a phased approach would maintain the rural character and village nature of the area, integrate a single town centre, and align with broader regional planning objectives.

### Reasons for Delay

#### 1. Infrastructure Certainty

**Transport:** The current transport network is insufficient to support the proposed scale of development. Confirmed implementation dates and budgets for necessary transport upgrades are essential.

**Education:** Adequate educational facilities must be planned and funded to meet the needs of a growing population.

**Wastewater and Water Supply:** Reliable and sustainable wastewater and water supply systems are critical. These systems require confirmed implementation plans and budgets before development can proceed.

#### 2. Alignment with Council Policies and Plans:

The AUP emphasizes the need for integrated infrastructure planning and sustainable urban development. Delaying the plan change until infrastructure plans are finalized ensures alignment with these policies.

Maintaining the rural character and village nature of Riverhead is a key objective. Immediate urbanization could compromise these values, whereas a phased approach allows for thoughtful, community-centred development.

#### 3. Integrated Town Centre:

The current proposal includes multiple local centres, which could fragment the community and dilute the economic and social vitality of Riverhead. Developing a single, integrated town centre would better serve the community and support sustainable growth.

### Recommendations

1. **Postpone the Plan Change:** Delay the Riverhead plan change until 2028-2032 to ensure critical infrastructure is in place. Use this period to finalize and secure funding and implementation dates for transport, education, wastewater, and water supply infrastructure.
2. **Infrastructure Planning:** Prioritize infrastructure planning and integration to support the future growth of Riverhead. Establish clear timelines and budgets for all necessary infrastructure upgrades.
3. **Maintain Rural Character:** Develop guidelines to ensure that any future development maintains the rural character and village nature of Riverhead. Focus on sustainable, community-centred design principles.
4. **Single Integrated Town Centre:** Plan for a single, cohesive town centre that serves as the social and economic hub of Riverhead. This will foster a stronger sense of community and support sustainable growth.

### Conclusion

While the proposed plan change for Riverhead presents potential benefits, current uncertainties around critical infrastructure necessitate a delay. Postponing the plan change until 2028-2032 will allow for the necessary planning, funding, and implementation of essential infrastructure, ensuring sustainable and community-centred development. This approach aligns with existing council policies and plans, maintaining the rural character and village nature of Riverhead while preparing for future growth in a controlled and integrated manner.

By addressing these concerns and recommendations, Auckland Council can ensure a sustainable, well-planned future for Riverhead that meets the needs of its residents and aligns with broader regional planning objectives.

# Support in Principle but Opposition to Immediate Implementation of Riverhead Structure Plan

## Introduction

The Riverhead Structure Plan proposes significant urban development within the existing rural village of Riverhead. While there is necessity of growth, this memo outlines opposition to the immediate implementation of the plan. We strongly advocate for delaying the plan change until critical infrastructure upgrades, comprehensive planning, and detailed consultation are undertaken. This delay is crucial to ensure the plan aligns with the community's needs and preserves the unique character of Riverhead.

## Points of Opposition and Requests for Delay

### 1. Incomplete Infrastructure Development

- Opposition: The current infrastructure in Riverhead, particularly transportation, wastewater, and water supply systems, is inadequate to support the proposed urbanization.
- Request: Delay the plan change until all necessary infrastructure upgrades are completed and verified to ensure they can handle the increased demand. This includes the detailed planning and funding of these upgrades.

### 2. Pending Transport Network Upgrades

- Opposition: Planned upgrades to key roads and transportation networks are not yet fully funded or specified. There is significant concern about increased traffic congestion and safety issues.
- Request: Postpone the plan change until all transport network upgrades are fully planned, funded, and detailed with clear completion timelines. This includes ensuring that the transport network improvements are in place before any significant development begins.

### 3. Inadequate Consultation and Engagement

- Opposition: The consultation process has been insufficient, failing to fully engage with all community stakeholders and address their concerns effectively.
- Request: Extend the consultation period to ensure thorough engagement with residents, local businesses, and other stakeholders, allowing ample opportunity for their input and concerns to be addressed comprehensively.

### 4. Premature Urban Form and Design Principles

- Opposition: The proposed urban form, including higher density housing, threatens the existing village character and may lead to future expansion beyond the current plan change area.
- Request: Redesign the structure plan to include strict controls that limit urbanization to the proposed boundaries and ensure no future expansion into rural zones.

### 5. Protection of Rural Zoning and Village Character

- Opposition: The proposed plan change risks future re-zoning of adjacent rural lands, further eroding the village's character.
- Request: Implement policies that permanently protect surrounding rural areas from future urban development to maintain the village character indefinitely.

### 6. Insufficient Environmental and Ecological Impact Assessment

- Opposition: The environmental assessments provided do not fully address the potential impacts on local ecosystems, particularly wetlands and indigenous vegetation.
- Request: Conduct comprehensive environmental impact assessments and implement robust protection and enhancement measures before proceeding with the plan change.

## 7. Lack of Detailed Sustainability Measures

- Opposition: The current plan does not adequately address long-term sustainability, including measures to reduce carbon emissions and enhance local biodiversity.
- Request: Develop a detailed sustainability plan that includes clear targets for carbon reduction, increased green spaces, and comprehensive measures to protect and promote local biodiversity.

### Conclusion

While we support the idea of planned growth, the immediate implementation of the Riverhead Structure Plan presents significant challenges and potential adverse impacts on the community. It is essential to delay the plan change until key infrastructure work is completed, more detailed planning is undertaken, and broader, more inclusive consultation is conducted. This delay will ensure that the plan truly reflects and respects the aspirations of the Riverhead community and preserves its unique character.

### Recommendations

1. Delay the plan change until comprehensive infrastructure upgrades are fully planned, funded, and detailed.
2. Extend the consultation period to ensure thorough engagement with all community stakeholders.
3. Redesign the structure plan to limit urbanization to the proposed boundaries with no future expansion.
4. Implement policies to permanently protect surrounding rural zones and maintain the village character.
5. Conduct comprehensive environmental impact assessments and include robust protection measures.
6. Develop a detailed sustainability plan addressing carbon reduction, increased green spaces, and biodiversity protection.

By addressing these concerns and delaying the plan change, the Riverhead Structure Plan can better align with the community's needs and preserve the unique character of the Riverhead village.

Thank you for considering these points of opposition. We look forward to a revised plan that truly reflects and respects the aspirations of the Riverhead community, ensuring a sustainable and well-integrated development for the future.

## Review of AUP Review by Barkers:

This memo outlines the reasons for opposing the proposed Riverhead Plan Change and delaying the plan change from being implemented. Upon review, several issues within the Auckland Unitary Plan (AUP) indicate that proceeding with this development now is premature and potentially harmful. Specific planning rules and policies highlight significant concerns that warrant delaying the project until they are adequately addressed.

### Planning Rules and Policies Justifying Delay:

- **Urban Growth and Form (B2.2):**
  - Policy B2.2.2(1): The proposal does not clearly demonstrate that there is sufficient land within the Rural Urban Boundary to accommodate seven years of projected growth. This could lead to unsustainable urban sprawl.
  - Policy B2.2.2(2): The development may not support efficient land use and transport integration, risking misaligned infrastructure and increased reliance on private vehicles.
- **Quality Built Environment (B2.3):**
  - Policy B2.3.2(1)(a-f): The current plan lacks detailed strategies to ensure pedestrian and cyclist safety and amenity, essential for a quality built environment.
- **Residential Growth (B2.4):**
  - Policy B2.4.2(6): Infrastructure assessments indicate the existing systems (water supply, wastewater) are inadequate for the proposed development, necessitating significant upgrades.
- **Infrastructure (B3.2):**
  - Policy B3.2.2(4): The current infrastructure cannot support the proposed development without causing adverse effects, indicating a need for pre-emptive upgrades.
  - Policy B3.2.2(5): Potential constraints on infrastructure development and maintenance highlight the need for more thorough planning.
- **Transport (B3.3):**
  - Policy B3.3.2(5)(b): The proposal may increase private vehicle reliance, as it does not sufficiently integrate with existing public transport networks, exacerbating traffic congestion.
- **Freshwater Systems (B7.3):**
  - Policy B7.3.2(1)(a-d): Stormwater management plans may not adequately address potential adverse effects on local freshwater systems, necessitating stronger mitigation strategies.
- **Natural Hazards and Climate Change (B10.2):**
  - Policy B10.2.2(5): The northern portion of the Plan Change area faces significant flood risk, requiring comprehensive mitigation before development can proceed.

### Conclusion and Recommendation:

Based on the outlined concerns, it is recommended to delay the Riverhead Plan Change proposal. This will allow time for addressing critical infrastructure needs, integrating public transport, enhancing Mana Whenua engagement, and developing robust strategies for managing natural hazards and protecting freshwater systems.

### Recommendation:

Delay the approval and implementation of the Riverhead Plan Change until the following issues are resolved:

- Comprehensive infrastructure assessments and necessary upgrades.
- Better integration with public transport networks.
- Thorough and meaningful engagement with Mana Whenua, including documented agreements.
- Detailed mitigation strategies for natural hazards and freshwater systems.

Addressing these concerns will ensure the development aligns with the AUP's objectives, leading to a sustainable and well-planned urban expansion.

## Review of Urban Design Report

The Urban Design Statement prepared by Urban Acumen Ltd lacks sufficient detail in several critical areas, including community outcomes, infrastructure planning, and ways to maintain the unique character of Riverhead. It also fails to establish a clear growth boundary, which is essential for sustainable development.

### Evaluation of Current Document

#### **Lack of Content Around Community Outcomes:**

**Shortcoming:** The report does not adequately address the outcomes required by the community, leaving out vital community needs and priorities.

**Impact:** Without addressing community outcomes, the plan risks alienating residents and failing to meet their needs, leading to potential opposition and dissatisfaction.

#### **Insufficient Infrastructure Planning:**

**Shortcoming:** The report lacks detailed planning for key infrastructure components, including stormwater, wastewater, archaeology, and the protection of existing vegetation and open space.

**Impact:** Inadequate infrastructure planning can lead to environmental degradation, increased flooding risks, insufficient wastewater management, and loss of historical and natural resources.

#### **Failure to Emphasize Unique Character and Establish Growth Limits:**

**Shortcoming:** The report does not sufficiently emphasize Riverhead's unique character or recommend this plan change as the definitive limit of growth.

**Impact:** Without preserving Riverhead's unique character and setting clear growth limits, there is a risk of overdevelopment, loss of community identity, and degradation of the surrounding rural landscape.

### Recommendations

#### **Address Community Outcomes:**

**Recommendation:** Enhance community consultation processes to gather and integrate detailed input on community needs into the Urban Design Statement.

**Implementation:**

- Conduct comprehensive surveys, town hall meetings, and online forums to gather diverse community input.
- Synthesize the feedback to identify community priorities and concerns, and update the Urban Design Statement to explicitly address these outcomes.

#### **Develop Comprehensive Infrastructure Plans:**

**Recommendation:** Create detailed plans for all critical infrastructure components, ensuring sustainable practices and protection of heritage and natural resources.

**Implementation:**

- Develop strategies for stormwater and wastewater management, incorporating sustainable practices.
- Conduct archaeological surveys and establish a comprehensive vegetation and open space management plan.
- Form a task force including engineers, environmental scientists, and heritage experts to oversee planning and implementation.



**Emphasize Unique Character and Establish Growth Limits:**

Recommendation: Highlight Riverhead's historical, cultural, and natural aspects in the Urban Design Statement. Establish a permanent growth boundary and ensure surrounding rural areas remain zoned as rural.

**Implementation:**

- Ensure design guidelines reflect and enhance Riverhead's existing aesthetic and cultural heritage.
- Clearly define and enforce a growth boundary, securing commitments from planning authorities to maintain these limits.
- Update zoning maps and local planning documents to reflect the established growth boundary and maintain the rural zoning of surrounding areas.

**Conclusion and Recommendation**

The current Urban Design Statement for the Riverhead Plan Change is inadequate as it fails to address crucial areas such as community outcomes, infrastructure planning, and maintaining Riverhead's unique character. It is essential to revise the document to include comprehensive community consultation, detailed infrastructure planning, and clear growth boundaries.

**Recommendation:**

The Riverhead Landowner Group should commission a revision of the Urban Design Statement to incorporate the recommendations outlined above. This will ensure the plan aligns with community needs, supports sustainable development, and preserves the unique character of Riverhead for future generations.

# Review of Proposed Retail Area in Riverhead

## Introduction

We oppose the conclusions and recommendations of the Riverhead Retail Assessment Report, which advocates for the development of a large retail centre in Riverhead. The proposed retail development disregards the existing community infrastructure and amenities, and lacks sufficient community consultation.

This opposition provides clear reasons why a large retail area is inappropriate and offers recommendations for a more community-centred approach.

## Key Reasons for Opposition

### Existing Infrastructure and Amenities:

- Riverhead already has significant community infrastructure, including public sports fields, open spaces, the RSA, a bowling club, petrol stations, tennis courts, existing shops, and other public amenities.
- A large retail centre separate from the existing assets and centre would disrupt the current balance and create an imbalance with existing facilities, leading to loss of the small-town charm that Riverhead residents value.

### Community Consultation:

- The original report lacks comprehensive community consultation. The voices and preferences of Riverhead residents should be central to any development plans.
- It is crucial to engage with the entire community to determine the appropriate size and types of retail shops needed and to decide on their optimal locations.

### Economic and Social Impact:

- A large retail centre could have adverse economic impacts on existing small businesses by diverting foot traffic and sales to larger stores.
- The social fabric of Riverhead could be negatively affected by increased traffic, noise, and potential environmental impacts associated with a larger development.

## Recommendations

### Smaller, Integrated Retail Centre:

- Develop a smaller retail centre next to the existing public sports fields, open spaces, RSA, bowling club, petrol stations, tennis courts, and other amenities.
- This approach would enhance the existing community infrastructure and provide convenience without overwhelming the local environment.

### Comprehensive Community Consultation:

- Initiate a thorough consultation process with all Riverhead residents to gather input on the desired scale and type of retail development.
- Use surveys, public meetings, and focus groups to ensure a wide range of opinions are considered.

### Full Review of the Existing Report:

- Conduct a full review of the current retail assessment report to address its shortcomings and biases.
- Ensure that the revised report incorporates community feedback and aligns with the long-term vision for Riverhead's development.

## Conclusion

The proposed large retail centre in Riverhead, as recommended in the Property Economics report, is inappropriate for the community's needs and disregards existing amenities and infrastructure. A smaller, community-integrated retail centre, developed through comprehensive consultation with Riverhead residents, is a more suitable approach. We call for a full review of the existing report to ensure future developments are truly reflective of the community's desires and sustainable growth.

## Review of Transportation Assessment

There is a significant lack of current roading infrastructure in Riverhead, which results in major capacity issues and congestion. The purpose is to summarize the findings from the road network assessment, outline proposed improvements and their timeline, and provide clear recommendations. Emphasis is placed on ensuring that no plan change or development should commence without first upgrading the major and minor arterial roads to guarantee network capacity and safety for locals and users.

### Existing Road Network Issues

#### Current Capacity and Safety Concerns:

- Congestion: State Highway 16 (SH16) and Coatesville-Riverhead Highway experience severe congestion during peak hours.
- Safety Issues: Several intersections, including SH16/Coatesville-Riverhead Highway, are prone to accidents due to high traffic volumes and inadequate road design.
- Insufficient Infrastructure: The existing road network lacks the capacity to support current traffic demands, let alone future growth from potential developments.

### Summary of proposed Improvements and Timeline

#### SH16 Brigham Creek to Waimauku Upgrade:

- Components: Four-lane expansion, new roundabout at Coatesville-Riverhead Highway/SH16 intersection, and a shared path from Brigham Creek Road to Kumeu.
- Status: Detailed design completed; resource consent and Notice of Requirement lodged.
- Timeline: Prioritized funding for 2021-2025, with completion expected by 2025.

#### SH16 Northwest Bus Improvements:

- Components: Introduction of a Northwest Express bus service, interim bus interchange facilities at key locations, and enhanced bus shoulder lanes.
- Long-term Vision: Development of a rapid transit solution for the Northwest corridor to Kumeu.
- Timeline: Initial improvements scheduled under the Regional Land Transport Plan (RLTP) 2021-2031.

#### Supporting Growth Programme:

- Components: Road and safety improvements on Coatesville-Riverhead Highway, focusing on route protection and future urban transition.
- Timeline: Designation process underway, but no immediate funding for construction; potential involvement of developers in early stages.

#### Internal Road Network and Design Philosophy:

- Guidelines: Adherence to Auckland Transport's Roads and Streets Framework (RASf) and Vision Zero principles.
- Speed Limit Reductions: Proposed reductions on key roads to improve safety.
- Road Typologies: Design of collector and local roads to ensure low-speed, safe environments for all users.

### Implementation Plan

- Phased Upgrades: Key infrastructure upgrades to be completed before the occupation of new developments.
- Developer Involvement: Opportunity for developers to take into account all proposed road infrastructure upgrades this will contribute to early-stage roading upgrades to mitigate impacts and ensure safety.

### Recommendations

#### Prioritize Safety and Capacity Upgrades:

- Major upgrades to SH16/Coatesville-Riverhead Highway intersection and surrounding road network must be completed before any new development begins.
- Implement road widening, new roundabouts at all major intersections in the surrounding area, enhance pedestrian and cycling facilities to alleviate congestion and improve safety.

**Conditional Development Approval:**

- No plan change or development should proceed without ensuring the completion of critical road network upgrades.
- Establish stringent criteria in the Precinct Plan provisions to enforce these requirements.

**Monitor and Adapt:**

- Continuously monitor traffic conditions and safety outcomes.
- Adjust the implementation plan as needed to address emerging issues and ensure alignment with long-term transport strategies.

**Conclusion**

The existing road network in Riverhead is currently inadequate, leading to significant congestion and safety issues. The proposed improvements are essential to support future growth and enhance the transport network's capacity and safety.

Therefore, it is crucial that these upgrades are prioritized and completed before any new developments commence. This approach will ensure a safe and efficient transport system for current and future residents.

## Review of Ecological Values Assessment

### Intensify and Specify Investigations

The report needs a more detailed and specific investigation. Conduct thorough mapping and high-resolution surveys of all ecological features, identifying significant areas for retention and protection. Seasonal assessments should be included to capture comprehensive biodiversity data.

### Enhance and Protect Ecological Areas

#### Streams and Wetlands:

- Establish buffer zones to protect water quality and habitats.
- Restore degraded areas with native vegetation and invasive species control.

#### Vegetation:

- Retain mature trees and indigenous vegetation.
- Protect these areas during construction and integrate them into the landscape.

#### Wildlife Habitats:

- Create wildlife corridors and natural features to support native fauna.
- Focus on habitats for copper skinks and bats.

### Incorporate Protection into Open Spaces

#### Open Spaces:

- Design parks around key ecological features for passive recreation and education.

#### Walkways and Cycleways:

- Develop paths that integrate with and protect ecological areas.
- Use interpretive signage to educate the public.

#### Biodiversity Retention:

- Preserve existing biodiversity, including stands of trees and significant flora.
- Implement management plans with regular monitoring and maintenance.

### Recommendations for Improvement

1. **Conduct Detailed Surveys:** Perform comprehensive, high-resolution ecological surveys.
2. **Develop Protection Plans:** Create detailed plans for streams, wetlands, and significant vegetation.
3. **Integrate with Urban Design:** Collaborate with urban planners to incorporate green spaces and ecological features.
4. **Engage Community:** Involve the local community in conservation efforts.
5. **Monitor and Adapt:** Establish a monitoring program to track and adjust conservation practices.

By following these recommendations, the Riverhead Private Plan Change can improve ecological outcomes, enhance biodiversity, and create a sustainable environment.

## Review of Stormwater Reporting

The current stormwater management plan for the Riverhead Future Urban Zone has major shortcomings in light of the overall plan change proposed. Given recent extreme weather events and ongoing infrastructure developments, the plan requires significant updates to address several shortcomings.

### Key Issues Identified

#### 1. Inadequate Consideration of Maximum and Peak Flow Events

The stormwater report does not adequately account for maximum and peak flow events, which have become more frequent and severe due to intensification and increased impervious surfaces. Recent events in Kumeu and surrounding areas have demonstrated the devastating impact of such flows, highlighting the need for more robust flood management strategies.

#### 2. Outdated Report

The report, dated March 2022, needs updating to reflect current data and conditions. The rapid pace of urban development and climate change necessitates more frequent reviews to ensure stormwater management strategies remain effective and relevant.

#### 3. Proposed Road Widening by NZTA

The report fails to account for the proposed road widening by the New Zealand Transport Agency (NZTA). This significant infrastructure change will alter surface runoff patterns and volumes, necessitating a reassessment of stormwater management strategies to mitigate potential impacts.

#### 4. Misalignment with Tree Protection, Archaeological Plans, and Open Spaces

The current plan does not align properly with tree protection and archaeological plans, nor does it integrate adequately with open space areas. Effective stormwater management must consider and incorporate these elements to ensure a holistic and sustainable approach.

#### 5. Downstream Consequences of Peak Flow Protection

The report does not sufficiently outline the downstream consequences of peak flow protection measures. Without a comprehensive understanding of these impacts, downstream areas may face increased flood risks, undermining the overall effectiveness of the stormwater management plan.

#### 6. Recent Flooding in Riverhead

Significant flooding in Riverhead from recent storm events has not been taken into account. This oversight suggests that the current stormwater management strategies are inadequate for dealing with such extreme weather conditions, necessitating a thorough review and update.

### Required Actions

1. **Comprehensive Update:** The stormwater management plan must be revised to incorporate data from recent peak flow events, reflecting the latest understanding of stormwater dynamics in the region.
2. **Integration with NZTA Plans:** Incorporate the proposed road widening by NZTA into the stormwater management strategy, assessing and mitigating any potential impacts.
3. **Alignment with Environmental and Heritage Plans:** Ensure the plan aligns with tree protection measures, archaeological considerations, and the integration of open spaces.
4. **Downstream Impact Assessment:** Conduct a detailed assessment of the downstream impacts of proposed peak flow protection measures, ensuring they do not exacerbate flood risks.
5. **Reflect Recent Flood Events:** Incorporate lessons learned from recent flooding in Riverhead to enhance the resilience and effectiveness of the stormwater management strategy.

### Conclusion

The current stormwater management plan for the Riverhead Future Urban Zone requires a significant review and update to address critical shortcomings. Incorporating recent data, aligning with infrastructure developments, and considering environmental and heritage plans are essential steps in developing a robust and sustainable stormwater management strategy.

# Review of Water and Wastewater supply issues

## 1. Water Supply: Existing Capacity and Required Infrastructure

### Existing Capacity

The current water supply network in Riverhead is inadequate for the proposed development, relying on a single pipeline that lacks the necessary capacity and resilience.

### Required Infrastructure

A second water main is required from the Reservoir at 403 Old North Road, Huapai, into Riverhead. This duplicate pipeline, recommended to run along Deacon Road and Riverhead Road, will provide the additional capacity and resilience needed. Local water reticulation must adhere to the Watercare Code of Practice, with detailed designs submitted for approval.

### Recommendations:

1. Construct a second water main from the Reservoir at 403 Old North Road, Huapai, into Riverhead, along Deacon Road and Riverhead Road. This watermain must be constructed prior to the commencement of any additional development in the area.
2. Ensure local water reticulation designs adhere to the Watercare Code of Practice and obtain necessary approvals.

## 2. Wastewater Supply: Existing Capacity and Required Infrastructure

### Existing Capacity

The existing Riverhead Wastewater Pump Station (WWPS) and rising main can service an additional 1,000 DUE after the abandonment of Tamiro WWPS (scheduled for October 2025). Prior to this, the network can only service up to 500 DUE.

### Required Infrastructure

To accommodate the proposed development, the following upgrades are essential:

- Installation of larger pumps to increase the pump duty point to 75 L/s at 69m pump head.
- Construction of an additional 150m<sup>3</sup> of operational storage.
- Implementation of a smart pressure sewer system for the retirement village, programmed to avoid peak periods, allowing for servicing an additional 1,000 DUE post-abandonment of Tamiro WWPS.

### Recommendations:

1. Install larger pumps at the Riverhead WWPS to increase the pump duty point to 75 L/s at 69m pump head.
2. Construct an additional 150m<sup>3</sup> of operational storage.
3. Implement a smart pressure sewer system for the retirement village, ensuring it operates outside peak periods.

## Conclusion

The current water and wastewater networks in Riverhead are inadequate for the proposed development of 1,861 DUE. Significant infrastructure upgrades are required:

- A second water main to ensure sufficient capacity and resilience.
- Upgrades to the wastewater system, including larger pumps, additional storage, and a smart pressure sewer system.

No residential development should proceed until these critical infrastructure upgrades are completed.

## Review of Electricity provision from Vector (and Transpower)

### Key Points:

#### Outdated Report:

- The current supply availability report from Vector Limited, dated 5 April 2022, is over two years old.
- An updated assessment is required to reflect any changes in the network capacity and to confirm the feasibility of the proposed electrical supply for our project.

#### Underground Installation Requirement:

- For safety, landscape, and aesthetic reasons, all new high voltage (HV) and low voltage (LV) lines must be installed underground.
- This measure is essential to enhance the overall appeal and safety of the development.

#### Cost Estimate:

- An updated cost estimate for the installation of underground HV and LV cables and equipment is needed.
- The estimate should cover the entire project, including the anticipated 1,000-1,500 residential dwellings, a 500-unit retirement village, a supermarket, other small retail units, and a school.

#### Safe Distances from National Grid Corridor:

- The development must comply with international standards for safe distances from high voltage transmission lines.
- Residential homes should be located at least 90 meters away from 240kV lines to ensure safety.
- No homes should be built within this 90-meter safety zone from the Transpower national grid corridor.
- The proposed plan change should ensure zoning reflects this safety element and zoning under or near these lines should be prioritised as part of the plan change process.

### Action Required:

- Vector Limited is requested to provide an updated supply availability report and a detailed cost estimate for the required underground installations.
- Contact and communication with Transpower. Confirmation of compliance with safe distance requirements from the Transpower national grid corridor.
- Please prioritize this issue to ensure the timely progression of the Riverhead development project.



# Review of Archaeological Sites Preservation during Development

## Introduction

The current archaeological report for the proposed Riverhead Structure Plan and Plan Change area lacks comprehensive content and detailed analysis, particularly regarding the identification and preservation of significant archaeological sites. To address these deficiencies and ensure thorough protection of the area's heritage, we propose the following actions.

## Intensive Archaeological Review and Search

### Comprehensive Archaeological Surveys:

- Conduct detailed subsurface testing and geophysical surveys across the entire development area before any construction begins to identify buried archaeological features that may not be visible on the surface.

### Ongoing Monitoring:

- Implement continuous archaeological monitoring during all ground-disturbing activities, ensuring any new finds are promptly identified and recorded.

### Focus on both Māori and European Settlement Sites:

- Prioritize the identification and preservation of sites related to both early Māori and European settlement. Significant sites already identified include:
  - Riverhead Mill Water Race (R10/721): Part of the mid-19th-century milling operations, crucial to understanding the industrial history of the area.
  - Former 19th-Century Ellis House Site (R10/1537): Provides insights into the residential patterns and lifestyle of early European settlers.
  - Te Taonga Waka Portage Route: A traditional Māori canoe portage of great cultural significance, traversing the northern half of the Plan Change area.
  - Other potential unrecorded Māori and European sites: Given the historical use of the area by both communities, efforts should be made to identify and preserve any additional sites that may be discovered during development.

## Incorporation into Open Space Areas

### Preservation of Identified Sites:

- Preserve any discovered archaeological sites in situ where feasible, incorporating them into open space areas within the development plan.

### Creation of Heritage Reserves:

- Designate specific areas as heritage reserves, especially around significant sites like the Riverhead Mill water race and the Ellis house, to protect these areas and enhance their cultural value.

## Information Signage and Historical Interpretation

### Informational Signage:

- Install signs and panels at key archaeological sites detailing their historical significance, focusing on the role of both Māori and European settlers.

### Educational Programs:

- Develop educational programs and guided tours to enhance public awareness and appreciation of the area's archaeological heritage.

## Key Actions and Implementation

### Detailed Archaeological Assessment:

- Conduct detailed assessments, including geophysical surveys and targeted excavations, before any development begins.

### Archaeological Management Plan:

- Develop an Archaeological Management Plan (AMP) outlining procedures for site monitoring, recording, and preservation during construction.

### Heritage Consultation:

- Engage with Heritage New Zealand Pouhere Taonga and local iwi to ensure compliance with national standards and respect for cultural values.

**Integration into Development Plans:**

- Modify development plans to incorporate identified archaeological sites into public open spaces and heritage reserves.

**Community Involvement:**

- Involve the local community in preservation efforts through public meetings, volunteer opportunities, and collaboration with local historical societies.

By implementing these recommendations, we can ensure the thorough protection and appreciation of Riverhead's rich archaeological heritage, particularly the significant sites related to both Māori and European settlement. This approach will protect valuable historical resources and enrich the cultural fabric of the community.

## Review of Contamination Investigation

The preliminary and detailed site investigation for the Riverhead development reveals several contaminants of concern: heavy metals, organochlorine pesticides, total petroleum hydrocarbons (TPH), polycyclic aromatic hydrocarbons (PAHs), and asbestos. These contaminants pose significant risks to residents, including severe health issues such as developmental problems, cancer, organ damage, and respiratory diseases.

### Risks of Contaminants to Residents

- **Heavy Metals:** Exposure can lead to serious health problems, including developmental issues in children, kidney damage, and neurological disorders.
- **Organochlorine Pesticides:** These chemicals pose high risks of cancer, reproductive disorders, and endocrine disruption, significantly impacting human health.
- **Total Petroleum Hydrocarbons (TPH):** Long-term exposure can cause liver and kidney damage, and several compounds within TPH are known to be carcinogenic.
- **Polycyclic Aromatic Hydrocarbons (PAHs):** These are potent carcinogens that can cause skin, lung, and bladder cancer, posing a severe risk to residents.
- **Asbestos:** Inhalation of asbestos fibers can result in deadly diseases such as lung cancer, mesothelioma, and asbestosis, making it highly dangerous for residential areas.

### Mitigation and Disposal Methods

- **Heavy Metals:** Mitigation methods include soil washing and stabilization, with contaminated soil requiring disposal at hazardous waste landfills.
- **Organochlorine Pesticides:** These can be managed through bioremediation and incineration to reduce their hazardous impact.
- **Total Petroleum Hydrocarbons (TPH):** Contamination can be addressed via bioremediation and soil vapor extraction, with disposal at designated facilities.
- **Polycyclic Aromatic Hydrocarbons (PAHs):** Bioremediation and thermal treatment are necessary, typically requiring incineration due to their carcinogenic nature.
- **Asbestos:** Effective mitigation involves encapsulation, controlled removal, and disposal at licensed sites to prevent exposure.

### Additional Testing Required

- **Soil Testing:** Comprehensive testing across the site to identify contamination hotspots, with periodic re-testing to ensure ongoing safety.
- **Groundwater Testing:** Regular monitoring to assess and prevent contamination of groundwater sources.
- **Air Quality Testing:** Monitoring for asbestos fibers and volatile organic compounds (VOCs) to protect air quality.
- **Surface Water Testing:** Ensuring that runoff water from the site does not carry harmful contaminants.

### Recommendations for Residential Use

1. **Land Use Planning:** Avoid residential development on highly contaminated areas unless thoroughly remediated.
2. **Health and Safety Measures:** Implement strict guidelines for construction workers and provide safety information to residents.
3. **Remediation Before Development:** Complete all necessary remediation activities before residential construction, verified by an independent environmental consultant.
4. **Post-Development Monitoring:** Establish a long-term environmental monitoring plan to ensure ongoing safety, with regular reviews and updates based on new data.
5. **Community Engagement:** Involve the community in the planning and remediation process, maintaining transparency about findings and actions taken.

## Review of Geotechnical Report by Byron Smith & Dave Ouwejan

### 1. Current Ground and Soil Condition

The current soil condition on the proposed 81-hectare land is predominantly clay with some sandy patches. The topsoil is relatively shallow, with a mix of organic material and clay, leading to moderate drainage issues.

### 2. Suitability and Impact of Residential Development

The intensity of residential development will require significant soil stabilization efforts due to the clay content, which can lead to foundation issues if not managed properly. High-density development will exacerbate these issues, requiring enhanced engineering solutions such as deep foundations or soil replacement. Low to medium density development is more suitable, minimizing soil disturbance and the need for extensive soil modification.

### 3. Estimation of Soil Removal

To make the 81 hectares suitable for residential housing, an estimated 400,000 cubic meters of soil may need to be excavated. This figure considers the removal of unsuitable clay layers and the replacement with more stable soil to ensure proper foundation support.

### 4. Disturbance from Truck Movements

The removal of 400,000 cubic meters of soil will result in approximately 25,000 truck trips, assuming each truck can carry 16 cubic meters of soil. This will cause significant disturbance, including noise, dust, and traffic congestion, particularly if the site is near residential or commercial areas.

### 5. Soil Retention Method

To retain soil volumes within the area and utilize them for open spaces:

- **Create Terraced Landscaping:** Use the excavated soil to create terraced parks and recreational areas within the development.
- **Fill for Green Spaces:** Use the soil for raising the level of parks, playgrounds, and other open spaces, reducing the need to transport soil off-site.
- **Construct Berms and Sound Barriers:** Utilize excess soil to build berms around the development, which can also serve as sound barriers against nearby traffic.

### Additional Recommendations

1. **Phased Development:** Implementing a phased development approach can minimize immediate soil disturbance and allow for gradual soil stabilization.
2. **On-site Soil Treatment:** Consider on-site soil treatment methods, such as lime stabilization, to improve the soil's load-bearing capacity without extensive removal.
3. **Use of Geotextiles:** Employ geotextiles and other modern engineering techniques to enhance soil stability and reduce the need for soil replacement.
4. **Community Engagement:** Engage with the community to inform them about the development process and mitigate concerns related to noise, dust, and traffic.
5. **Avoid any soil excavation or modifications around archaeological and vegetation areas or sites**

By adopting these measures, the development could proceed with reduced costs, minimized environmental impact, and lower disturbance to the surrounding area.

## Review of Landscape and Visual Effects report from Boffa Miskell

### Lower Density Development and Preservation of Rural Character

To align the proposed plan change with community aspirations and maintain the rural village character of Riverhead, we recommend the following key adjustments:

#### Lower Density Residential Development:

- **Adjust Zoning:** Remove the extent of Terraced Housing and Apartment Building Zone (THAB) and emphasize Mixed Housing Suburban (MHS) and Single House Zone (SHZ) to maintain lower density.
- **Transition Zones:** Implement a gradient of density, with higher-density housing close to the existing town centre, transitioning to lower-density housing at the rural periphery.

#### Relocate Commercial Areas:

- **Closer to Town Centre:** Move the proposed Business – Neighbourhood Centre Zone (BNC) and Business – Local Centre Zone (BLC) closer to the existing Riverhead Town Centre to consolidate commercial activities and strengthen the community hub.
- **Enhance Accessibility:** Ensure relocated commercial areas are accessible by pedestrians, cyclists, and public transport to reduce traffic congestion and enhance connectivity.

#### Maintain Rural Village Character:

- **Landscape Integration:** Preserve significant natural features and integrate them as green corridors and open spaces to provide ecological buffers.
- **Design and Form:** Encourage architectural styles and materials that reflect the rural character, using natural materials and designs sympathetic to the village scale.
- **Expand Open Spaces:** Increase public open spaces, parks, community gardens, and walking trails to maintain the rural atmosphere.

#### Retain Rural Character:

- **Vegetation and Planting:** Retain existing mature trees and incorporate new native planting, shelterbelts, and hedgerows to enhance biodiversity.
- **Building Setbacks:** Implement greater building setbacks from roads and property boundaries to maintain a sense of space and openness.
- **Preserve Agricultural Heritage:** Incorporate historical features and promote local history to preserve elements of the area's agricultural heritage.

#### Maintain Rural Buffer Zone:

- **Widen Plan Change:** Include a provision to maintain a significant area within a 5-10km radius as rural to preserve the village's rural form and character.
- **Rural Buffer:** Ensure that surrounding areas remain designated as rural to provide a clear boundary and transition from urban to rural landscapes, maintaining the village's identity and rural ambiance.

### Conclusion

By adopting these recommendations, the proposed development can better align with the existing rural village character of Riverhead, ensuring a cohesive, sustainable, and attractive community that respects its rural roots while accommodating future growth. Maintaining a significant rural buffer zone will further preserve the village's rural form and character.

## Response to the Arboricultural Assessment Report

The Report “Arboricultural Assessment for the Riverhead Plan Change” is comprehensive however excludes key advice about how to retain and protect key features of the Riverhead rural village character. I appreciate the detailed inventory of trees and vegetation and analysis provided.

However, there are several key issues that need further consideration to ensure the sustainable integration of the existing arboricultural assets into the development. Below are specific areas that require attention:

### 1. Maintenance of Large Trees, Stands of Trees, and Shelter Belts

Issue: The report lacks a detailed plan for the ongoing maintenance of large trees, stands of trees, and shelter belts.

Recommendations:

- **Maintenance Plans:** Develop comprehensive maintenance plans for large trees, stands of trees, and shelter belts to ensure their health and longevity. This should include regular pruning, pest control, soil management, and watering schedules.
- **Monitoring:** Implement a long-term monitoring program to regularly assess tree health and respond promptly to any signs of decline or disease.

### 2. Protection of Trees During Construction

Issue: While the report mentions the importance of tree protection, it does not detail the specific measures to be taken during the construction phase.

Recommendations:

- **Tree Protection Zones (TPZ):** Establish and enforce Tree Protection Zones around all significant trees and stands. These zones should be marked clearly on-site and in construction plans.
- **Physical Barriers:** Install physical barriers (e.g., fencing) around TPZs to prevent machinery and workers from entering these areas.
- **Construction Guidelines:** Provide specific guidelines to contractors regarding activities near TPZs, such as restricting excavation, avoiding heavy machinery traffic, and prohibiting storage of materials within these zones.
- **Arborist Supervision:** Require on-site supervision by a qualified arborist during critical construction phases to ensure compliance with tree protection measures.

### 3. Designing Transport Routes, Infrastructure, and Housing to Accommodate Trees

Issue: The report does not address how the design of transport routes, infrastructure, and housing will accommodate existing trees.

Recommendations:

- **Tree-Friendly Design:** Integrate existing trees into the design of transport routes and infrastructure. For example, roads and paths can be curved around significant trees rather than removing them.
- **Root Protection:** Use construction techniques that protect tree roots, such as bridging over root zones or using permeable materials to allow water and air to reach the roots.
- **Setbacks:** Ensure adequate setbacks of buildings from large trees to allow for root expansion and canopy growth without future conflicts.

### 4. Inclusion of Large Existing Trees in Public Open Spaces

Issue: The report does not provide a clear strategy for incorporating large existing trees into public open spaces.

Recommendations:

- **Public Space Design:** Design public open spaces to incorporate large existing trees as focal points, providing natural shade and enhancing the aesthetic and ecological value of the spaces.
- **Community Engagement:** Involve the community in planning public spaces to ensure that the preservation of large trees aligns with public preferences and recreational needs.
- **Interpretive Signage:** Install signage to educate the public about the importance and history of the existing trees, fostering a sense of stewardship and appreciation.

## Conclusion

Integrating these recommendations into the development plan will help ensure that the Riverhead Plan Change not only accommodates the existing arboricultural assets but also enhances the overall sustainability and livability of the area. We look forward to further collaboration and to seeing these considerations reflected in the final development plans.

## Concerns Regarding Consultation Process and Feedback

I have concerns regarding the consultation process detailed in the "Riverhead Structure Plan and Plan Change Consultation Summary Report" dated 5 December 2022. While the effort to engage with various stakeholders is appreciated, several critical issues need to be addressed to ensure comprehensive and inclusive community planning.

### 1. Issues Highlighted in the Feedback

#### 1. Lack of Schools in the area:

- Issue: The majority of the feedback expressed significant concerns about lack of education facilities to accommodate additional children and students.
- Recommendation: A detailed education capacity report in conjunction with Ministry of Education should be conducted, with clear plans and timelines for educational improvements

#### 2. Traffic and Infrastructure Concerns:

- Issue: The majority of the feedback expressed significant concerns about traffic congestion and the need for infrastructure upgrades to accommodate additional traffic volumes. Public transport provision and facilities for active modes such as cycling and walking were highlighted as critical priorities.
- Recommendation: A detailed traffic impact assessment should be conducted, with clear plans and timelines for infrastructure improvements. Additionally, increased collaboration with Auckland Transport and Waka Kotahi NZ Transport Agency is necessary to address these concerns effectively.

#### 3. High-Density Housing:

- Issue: There is strong opposition to high-density housing developments, with many residents expressing a desire to avoid becoming similar to areas like Hobsonville Point, Whenuapai, and Kumeu.
- Recommendation: The plan should include clear zoning regulations that limit high-density housing and prioritize low to medium-density developments that align with the existing character of Riverhead. Community workshops could be held to co-design housing plans with residents.

#### 4. Commercial Development:

- Issue: The community expressed strong opposition to 'strip mall' developments along Coatesville-Riverhead Highway, preferring commercial areas set back from the main highway.
- Recommendation: The commercial development plan should be revised to reflect community preferences, with input from urban design experts to ensure aesthetically pleasing and functional commercial spaces that blend with the village character.

### 2. Length of Time Since Consultation

Issue: The consultation process, as detailed, includes meetings dating back to early 2021. The significant time lapse between initial consultations and the finalization of the report could mean that some community concerns or priorities may have evolved.

Recommendation: A follow-up round of consultations should be conducted to ensure that the feedback is current and reflective of the community's present needs and concerns. This should include updates on how previous feedback has been incorporated into the planning process.

### 3. Lack of Wider Consultation with Different Community Groups

Issue: The report indicates limited engagement with broader community groups such as sports clubs, RSA (Returned Services Association), Bowling Club, and varying age demographics, particularly the elderly and youth.

Recommendation: A targeted outreach strategy should be implemented to engage these groups. This can include:

- Sports Clubs: Engage with local sports clubs to understand their needs for recreational spaces and facilities.
- RSA and Bowling Club: Consult with these organizations to incorporate their needs and preferences into the community planning.
- Youth and Elderly: Hold specific focus groups with youth organizations and elderly residents to gather their unique perspectives and requirements.

## Conclusion

Addressing these issues requires a more inclusive, updated, and comprehensive consultation approach. By actively involving all community segments and updating the plan based on current feedback, we can ensure that the Riverhead Structure Plan and Plan Change truly reflect the needs and aspirations of all its residents. Thank you for considering these concerns. I look forward to your response and a revised approach that includes wider community engagement and addresses the highlighted issues.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Roderick Bruce Simpson  
**Date:** Friday, 17 May 2024 10:45:19 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Roderick Bruce Simpson

Organisation name:

Agent's full name:

Email address: rodo.simpson@gmail.com

Contact phone number: 021664090

Postal address:  
2 Crabb Fields Lane  
Riverhead  
Auckland 0820

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:  
The land identified in private land change by Riverhead Land Owner Group

Property address: 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

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

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

The reason for my or our views are:  
The negative effects on transport, roading, character of Riverhead, sewerage reticulation and storm water reticulation.

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

170.1

Submission date: 17 May 2024

**Attend a hearing**

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

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



**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - John Armstrong  
**Date:** Friday, 17 May 2024 10:45:20 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: John Armstrong

Organisation name:

Agent's full name:

Email address: johnarmstrongconstruction2012@gmail.com

Contact phone number: 0272742717

Postal address:  
32 Crabbfields lane  
Riverhead  
Auckland 0820

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:  
Water control around the Wautaiti stream

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:  
I there is no remedy to clearing the stream there should be no further development None

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

| 171.1

Details of amendments: Water control | 171.2

Submission date: 17 May 2024

**Attend a hearing**

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

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

**Declaration**

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

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

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

Yes

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

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**From:** [Bernard Tye](#)  
**To:** [Unitary Plan](#)  
**Subject:** Make Submission  
**Date:** Friday, 17 May 2024 10:51:27 am

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Hello I wish to support the submission by the Riverhead Community Association to the proposed Riverhead North development .

I endorse all the requests asked by the RCA be seriously considered and the Auckland council a dear to the legal requirements to have a through assessment of the concerns of the aesthetic effects of the development and the mitigation of flooding from poor designed rain water management .

Regards Mr Bernard Tye

7 Kent Street Riverhead

Sent from my iPad

172.1

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Nathan Brown  
**Date:** Friday, 17 May 2024 11:00:32 am  
**Attachments:** [Riverhead Submission.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Nathan Brown

Organisation name:

Agent's full name: Nathan Brown

Email address: nathanbrown.nz@gmail.com

Contact phone number:

Postal address:  
13 Floyd Road  
Riverhead 0820  
Riverhead 0820  
Riverhead  
Riverhead 0820

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:  
Optional

Property address: OPTIONAL

Map or maps: OPTIONAL

Other provisions:  
OPTIONAL

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

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

The reason for my or our views are:  
Concern for the current residents and environment

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

173.1

Submission date: 17 May 2024

Supporting documents  
Riverhead Submission.pdf

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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While I am not inherently opposed to development of land, this needs to be met with caution particularly in Riverhead.

The developers intent is profit, not building a better Riverhead or surrounding NorthWest Auckland. Profit flies in the face of doing what is right for the community, as what is needed will cost money. This is obvious in their plans that do not have explicit and clearly defined intentions but vague wording that can later be scaled back.

We are already plagued with many infrastructure problems that will only be exasperated by rapid development.

### **Stormwater/Flooding**

The recent flooding events (3 in 2 years!) significantly impacted Riverhead residents of which we are one. Auckland Council representatives have told us in meetings that we need to expect more of these 1 in a 100 year events. The plan from the development group does nothing to address this increasing issue and will only exasperate the problem, turning permeable agriculture land into housing. All stormwater needs to be planned to be self contained within the development in the event of **more than 1 in 100 year event** as the current infrastructure and environment does not support these events without further development. Auckland Council has already used this as part of the initial rejection of this development plan, and little has been done to address this in this resubmission.

### **Wastewater**

Riverheads semi-self contained wastewater 'feature' often fails during moderate rain events. The entire network cannot cope due to poor design and limited scope of expansion. The plans need extensive provisions to improve this without additional burden to the current failing system. note, it costs residents \$150 every time the alarm goes off, unlike most other suburbs that use this system it is not managed by Watercare but is the resident/homeowners responsibility.

### **Transport**

The entire roading network in the north west has not been developed at the same pace as population growth. The main arterial route into Riverhead (Riverhead-Coatesville Highway) is the same design as it was 60 years ago. This arterial route has significant standstill blockages already (typically from 630 am – 930am!), not to mention SH16 which it feeds into is often at a standstill during peak times.

This development will require significant heavy vehicle movements for a long period of time. The areas congestion is already significant, and the condition of the roads deteriorates rapidly – as experienced when significant logging operations happening. We will experience years of development with this plan, of which the heavy vehicle movements and timings need to be planned and specifically designated, so that further impact on the already poor roading conditions and congestion is mitigated as part of the consent.

All of this is said before a single new occupant becomes part of our community.

Auckland Transport, along with Waka Kotahi NZTA need to ensure that the roading infrastructure in the local and surrounding area is PRIORITISE and EXPEDITED to accommodate, BEFORE any redesignation of land use is achieved. Proposals for improvement, particularly for the intersection of SH16 an CRH, need to be addressed with urgency (regardless of this proposed plan change)

The developers need significantly more detail in their proposals. From the previous rejection of this application, I believe the Council largely agrees with the sentiment of the combined response from the Riverhead Community Association (RCA) submission that there is significant mitigation to serious implications if this proposal is approved without modification.

Further community consultation and mitigation of concerns, with the likes of the RCA and other organised community groups (of with the developers are not) will go a long way to making this opportunity for development a success for all of Riverhead and the wider North West community.



**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Claire Walker  
**Date:** Friday, 17 May 2024 11:00:33 am  
**Attachments:** [PPC 100 - Riverhead\\_CW.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Claire Walker

Organisation name: N/A

Agent's full name: Claire Walker

Email address: [claire@wla.net.nz](mailto:claire@wla.net.nz)

Contact phone number: 021555158

Postal address:  
41 Great North Road  
Riverhead  
Auckland 0821

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:

Many aspects of the development. Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead. See attached PDF submission.

Property address: Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Map or maps: N/A

Other provisions:  
See attached PDF

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:  
As outlined in my submission.

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

174.1

Details of amendments: As outlined in my attached submission.

Submission date: 17 May 2024

Supporting documents

PPC 100 - Riverhead\_CW.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?  
No

**Declaration**

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

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

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

Yes

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

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email may be those of the individual sender and may not necessarily reflect the views of Council.

## Submission to PC 100 (Private): Riverhead

Claire Walker

41 Great North Road,

Riverhead

I have lived in Riverhead for 20 years. During this time, I have been very active in the community, a member of the Riverhead Residents and Ratepayers (now RCA), the founding member of the Riverhead Beautification Society and an advocate for many other improvement projects within our community. I have worked closely and respectfully with council and the Rodney Local Board during this time to achieve good outcomes for the community. I was actively involved in the 2006 Structure Plan Process and the resulting Plan Change for the area. I am a NZILA Registered Landscape Architect and have undertaken a lot of work within the wider Rodney area as a consultant for council. As a direct result of all of the above I have a good understanding of the many challenges that development brings to our region.

I am not anti-development. I am passionate about ensuring development is undertaken in a sustainable way that responds to the local cultural and environmental context. Development done well can enhance and strengthen existing communities.

I personally oppose the plan change for the reasons set out in this submission.

I wish to be heard.

### General Context

I understand council do not support the development proposal, mostly due to the infrastructure deficit and the lack of approved/allocated funding to deliver this. Even without the potential for Plan change 100 development we have an infrastructure deficit in existing Riverhead and surrounding communities. We have not yet caught up from the historic under provision from Rodney District Council days. Our community now pay urban rates. We still don't have footpaths on all our local streets, we have open drains on our roads that do not function properly, some of which are health and safety issues with high drop offs and narrow or no road shoulder. We have not been on council's radar for years, the only footpath upgrades have come from the targeted rate from the Rodney Local Board (whom we thank for putting this in place), our only bus route came about because the RLB funded a trial route. It quickly became evident how well used and finally AT woke up and started funding the route! Our community have asked for buses and footpaths for the entire 20 years I have lived here. We don't have a single bus shelter (our kids stand in the rain) and we have a single bus route which runs on the hour. I could provide many more examples about lack of basic provision, fundamentally we lack infrastructure. What is tiring is that for every small improvement we do get, we the community have had to lobby, sometimes for years to even get heard. Until we have 'caught up', I don't feel we are ready for more development. It is not equitable for current residents.

The wider Kumeu/Huapai/Riverhead community have witnessed two 'Special Housing Areas' obtain approval and subsequent development occur. This has resulted in significant issues for

the wider community around stormwater management, lack of pedestrian footpaths, lack of roading infrastructure. The community were told the Access Road intersection would be upgraded to manage growth for the Huapai Triangle development. It finally did, but not before the development traffic pressure occurred and the area came to a grinding halt. Budgets were found, cost estimates increased, funding was argued and debated, cost increased, all delaying what was promised at 'time of development'. A perfect example of a private development coming BEFORE infrastructure was developed, a perfect example of how we are affected when it is not delivered. I fear (and for good reason) that the same will happen here if Plan Change 100 is approved.

In a similar vein, when the Riverhead South Plan Change was approved our community was promised (by Rodney District Council) that old Riverhead would have the infrastructure upgrades forthcoming (footpaths, kerb and channel, underground drainage, street lights etc), it never came. We have no confidence that it will come this time.

Waka Kotahi does their own thing, MOE does their own thing, AT barely knows Riverhead exists. None of these silo's talk to one another. There is no integrated planning. The Plan Change 100 supporting documents do not paint a convincing picture that the local issues are well understood and appropriately responded to. Council is so under resourced they can't facilitate a public plan change process with effective and through consultation. We have no faith in any of the above because no body has any budgets, none of the required upgrades are in anyone's long term plan and budgets. We also appreciate the enormous pressure all of the above players have dealing with the scale and pace of growth in south Auckland. All of the problems above already being well played out there.

## Transport:

1. PC100 does not adequately recognise or propose the transport infrastructure upgrades required to manage adverse effects on the wider transport network. Many local roads are poorly constructed, narrow with no formed shoulder, there is little provision for walking and cycling. This is the road network which Riverhead and new development will rely on. The PC100 does not go anywhere near recognising the widespread under specification of the existing local roads, nor adequately proposes to resolve them, despite the significantly increased demand that would result from the development. It is reductionist to focus on the main vehicle routes to and from the development area. People live in the whole community, makes friends, go to school and enjoy the open spaces. People need to be able to walk safely around the whole neighbourhood.
2. PC100 does not recognise comprehensive local network transport improvements (within existing Riverhead) are warranted and necessary to manage adverse effects on local transport. If trucks start using our local roads which has lack of footpath and open drains, how do we safely navigate these during construction? Our kids walk on the roads! PC100 states the upgrades do not have to be in place prior to construction when the first traffic impacts start.

3. Riverhead has under-provisioned streets, often with open drains, a lack of footpaths, unformed carriageway edges and few street trees. Some blocks are poorly connected and contain unformed paper roads – a key one being in Cambridge Terrace, which the applicant has ignored. The development will increase pedestrian use over all of Riverhead, including to Riverhead School and to the two walkable pre-schools. All the realistic routes from the plan change area to destinations in Riverhead such as schools, pre-schools, shops, War Memorial Park and public walkways should be reviewed in terms of footpath provision and safety, and upgrades should be completed prior to the main development starting. This is to enable safe pedestrian movements for the existing and future people and children of Riverhead. This should not have to come from Rodney Local Board funding! It should also be done to the Auckland-wide standards, and not some woeful alternative for long forgotten Riverhead – which is what we have seen approved for many years. My question is ‘Would this happen in St Heliers?’ If not, then why is it ok for Riverhead? We all pay urban rates.
4. The huge development area will require extensive earthworks and civil construction, including thousands of truck and vehicle movements well before any residence is occupied. Traffic upgrades, such as turning bays and pedestrian networks need to be functional and safe before the heavy traffic begins. The current plan change proposal to require limited improvements prior to occupation of a dwelling fails to recognise and mitigate the adverse construction traffic effects which will be particularly severe at main access routes and where locations where site access is feasible.
5. New subdivisions often lack on street parking. Demand for parking would spill over into the existing community where there are no formed road edges and open stormwater drains. Adequate on street parking needs to be required. We need to acknowledge that Riverhead is a very long way off being serviced by adequate public transport options. We have no logical nearby train line, Swanson is a very long and non-direct commute to town. We are limited by a single route bus service making driving the only viable option for many. Two or 3 car families are the norm in Riverhead because of the isolation from significant transport and employment nodes. Driving everywhere is normal. If higher density is developed the lack of on-street carparking will become problematic.
6. It is unclear how the proposed retirement site fits into this PC100. Some consultants reference it, others ignore it. What is clear, is that if in place as per the previous scheme we have seen it will sever the existing and new communities of Riverhead. It is shown as 500m long block, without any east/west roading connections, and only one pedestrian connection that is privatised and only open during daylight hours. This does not result in a well interconnected community. The retirement village is a huge private gated community located between existing and proposed residential areas. It is not clear why such a negatively impactful private development with negative overall urban design outcomes can be acceptable. The result is that the plan change precinct sits uncomfortably around the retirement village. The result is a lack of cross site permeability and an island of private gated residences.

7. Waka Kotahi have plans for the roundabout at the (CRH)/ Main Road (SH16) intersection, but the delivery timing is uncertain. Waka Kotahi tells us that this project only deals with safety, and not capacity. Long dysfunctional queueing at CRH and SH16 will continue and only get worse with many hundreds more commuters on CRH. Wider network capacity issues need to be addressed before the development so that people can realistically commute to employment.
8. Overall, wider network projects need to be responsibly planned and timed in accordance with the strategic growth programme and designations, ad hoc upgrades would be an inefficient use of resources. These wider programmes are many years from being funded or delivered.

### ***Transport – remedies sought***

- |     |  |       |
|-----|--|-------|
| 9.  | Include provisions which state that development of the plan change area cannot proceed until wider network capacity and safety issues are addressed. SH16 is already dysfunctional at high demand times.   | 174.2 |
| 10. | Include provisions which state that development of the plan change area cannot proceed until comprehensive local road improvements have been completed, including function and safety assessments and any required upgrades to footpath routes and networks in Riverhead likely to be used by residents of the plan change area to access local destinations.  | 174.3 |
| 11. | The enormous retirement village privatised site creates pinch points of available connectivity between the plan change area and existing Riverhead. East/west road connections through this area are key – providing choice to residents, whether on foot, bike or car. These should be recognised and addressed by requirements for upgrades.   | 174.4 |
| 12. | Other routes within the community need addressing. For example, the road and pedestrian network of Te Roera Place and Duke Street do not show any proposed connectivity improvements or in fact any connection to the new Plan Change 100 area. This will be the route of choice for anyone going to Riverhead School and for those going north to Albany for work or shopping. Cambridge Road, Queen Street, Alice Street and King Street will all be well used routes for people moving in and out of the plan change area, as pedestrians and in vehicles. Cambridge Terrace paper road should be completed as a connecting road giving people choice and allowing traffic to disperse through our community. The development is putting the pressure on this road connection, so surely the developer should pay for this upgrade. | 174.5 |
| 13. | These roads, and further routes to Riverhead School all warrant assessment and specific upgrades to ensure they are functional and safe. Similarly, the connection between the plan change area and Riverhead War Memorial Park has not been recognised as a primary route which is restricted by the CRH and horribly by the retirement village development. The supporting urban design report accurately  | 175.6 |

describes War Memorial Park as the ‘heart of Riverhead’ but this recognition has not resulted in any meaningful response in PPC100. Specific provisions should also be applied to this area to ensure that development enables safe and logical east/west connections and road crossings over CRH. The tension is that the CRH is a significant commuter route, and every move which benefits pedestrians puts more strain on the function of this route for people moving west and east between Albany Highway and SH16.

14. Include provisions which require all required local and wider transport improvements to be in place prior to earthworks and related traffic impacts commencing. Leaving upgrades to be required until residential occupation does not mitigate the adverse effects of heavy vehicles and construction traffic required for the formative and civil works which will adversely impact our local roads.

174.7

## Commercial Zoning:

15. Back in the 2006 Structure Planning process the residents of Riverhead undertook a series of design workshops so that the council could understand what was important. At recent RCA meetings we discussed these key themes. Most agreed the key ideas remained consistent with today’s residents. Key to this was a village centre. No one ever said they wanted a rerun of the disaster of Kumeu, or Lincoln Road with a strip commercial development running the length of the community. Riverhead wants to retain a strong heart to our community. The War Memorial Park has been our civic heart for many years and the small grouping of shops near Maude Street has been our centre. We acknowledge the need for growth and the proposal for a new town centre around the roundabout is sound with a Local Centre zone proposed at the corner of Riverhead Road.
16. What is not sound urban planning is the proposed Neighbourhood Centre Zone proposed opposite Riverhead Point Drive (Hallertau). This encourages the ‘strip’ development our community so clearly does not support. The proposed zone does represent a defined area of FRL landholding which naturally raises the question as to whether this discrete proposed zone is motivated by commercial gain rather a demonstrated need or sound design principles. The Urban Design assessment (Appendix 6) shows that the main Local Centre Zone is within a 400m walkable catchment for all residents within the plan change area. So, the isolated Local Centre Zone it is not justified by pedestrian accessibility. AAs noted, the existing Riverhead centre supports two mini-marts or diaries, and major supermarkets are located on all routes west (Kumeu), South (Westgate) and east (Albany). We don’t need another supermarket or shops at a disconnected location along the highway!

## Commercial Zoning – remedies sought

17. I want any proposed commercial zoning to be justified by economic analysis that is based on a clear outline of existing zoning and activities in Riverhead, including under-utilising of zoned land and potential capacity, and recognition of the activities and services that would be provided by the retirement village (if it happens) and

174.8



commercial activities that can be undertaken in the THAB zone via resource consent.

18. I want any proposed commercial zoning to be justified by economic analysis that is based on a well-reasoned and justifiable customer catchment which recognises the commercial and retail centres of Kumeu, Westgate and Albany, and does not unrealistically anticipate that people who live near these centres would instead travel to Riverhead for their shopping needs. 174.9
19. I want any new business zoning to demonstrate a consolidated and legible town centre, not exacerbate strip commercial areas fronting the highway. Most importantly by removing the proposed Local Centre Zone opposite Riverhead Point Road. 174.10

### **Residential Zoning - Mixed Housing Suburban Zone:**

20. Most of the land is proposed as Mixed Housing Suburban Zone. This zone allows for two and three storey detached and attached housing in a variety of types and sizes. Up to three dwellings are permitted as of right subject to compliance with the standards. I support this density if undertaken well but balanced with requirements for onsite and street landscaping to mitigate the extent of built form and reflect Riverheads unique character.
21. In comparison, existing Riverhead is mostly Single House zone. The plan change will result in much more dense development and generally taller houses and lots of multi-unit townhouses. Existing Riverhead is characterised by many large trees on private properties. It is this character that people love and recognise. Any new development needs to work hard to incorporate this character whilst providing for density. PC100 proposes nothing to achieve an integrated or sympathetic 'treed' character.
22. Large trees would be infrequent in the proposed Mixed Housing Suburban Zone because it has minimal landscaping requirements (only 20% and this can be paved if there is canopy cover over (IX6.11. Landscaped area within the Mixed Housing Suburban Zone) and only a 2.5m front yard standard which is not adequate for a large growing tree. The outcome is that buildings will dominate the neighbourhood character. Overall, due to a lack of space or a requirement to plant trees on private sites, the neighbourhood character would be markedly different compared to existing Riverhead. We expect this difference in character to be noticeable and jarring, resulting in lower amenity. The green corridor cannot be relied upon to balance the built form outcome due to the provisions which support it being very vague non-specific and uncertain in terms of outcomes. We want any new development to be sympathetic to the existing urban fabric of our community which is characterized by a heavily treed appearance.
23. The current zoning and provisions will not result in the 'unique sense of place' described as an intension in the precinct description. Th development will have no distinct or unique character.

24. There is no requirement to provide adequate front yards to enable the planting of trees. This was a requirement of the Riverhead South development, which contributes to the 'treed' neighbourhood character established and respects the character of old Riverhead and the many prominent mature trees. This requirement should at least apply to the rural fringe parts of the site (for example 100m from a rural zone) and would also contribute overall to sense of transition between the rural and residential land uses.
25. There is no requirement to plant regular street trees on roads. Whilst often achieved during development, the supporting AUP policy context is vague. To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, we request minimum tree quantity outcomes are required for new roads. The density for the housing will result in no tree cover of value, so the work must be done in the streets.
26. Whilst being an opportunity to improve the 'treed character' there are no requirements for road reserve tree planting, leaving the street tree outcome uncertain or minimal. Even in the green corridor there are no measurable outcomes for ecology, vegetation cover or trees. Despite these being lofty policy outcomes of the green corridor, the teeth of the provisions fall short.
27. In my professional life I have witnessed the disconnect between the glossy green landscape plan at RC lodgement and the reality of the EPA approvals and outcomes. A combination of narrow streets, maximising of developable land, underground infrastructure, use of roads for swales/ stormwater function (trees and swales sometimes cannot be together) and the safety setbacks often result in a very limited number of street trees being physically able to be accommodated. Trees always come last – always!
28. The proposal fails to mention or adopt the council Auckland's Urban Ngahere (Forest) Strategy. The strategy recognises the social, environmental, economic, and cultural benefits of our urban ngahere (forest), and sets out a strategic approach to knowing, growing, and protecting it. It seeks to achieve increased canopy cover to 30 per cent across Auckland's urban area, and at least 15 per cent in every local board area. The proposed plan change should seek to provide overall canopy cover of 30% which would provide a range of health, social and economic benefits including reducing the urban heat effect of roads, buildings and impermeable surfaces. If adopted precinct wide it would provide for flexibility in implementation and also help integrate the old and the new.
29. Another formative design requirement of Riverhead South was a rule prohibiting tall front yard fences with developers also recognising this and largely placing covenants for no front yard fencing. This outcome can also be observed widely in Riverhead South and contributes significantly to a sense of spaciousness with buildings set back and front yard landscaping visible. The plan change seeks to remove the usual requirement for low or visually permeable front yard fences without any explanation as to why. (refer IX.6. Standards page 11). This may result in

a proliferation of tall front yard fences detrimental to a desired spacious character. Front yard fences also have negative effects on CPTED outcomes.

30. The zone also does not propose any design response to the proposed green corridor network, aside from a lonely fence height standard. There are no provisions proposed to give effect to the Urban Design recommendation for: “a high quality and vegetated interface for higher density development along the key movement routes and adjacent to existing residential development which contributes to the current landscaped character of streets in Riverhead.” There is also little detail on how this will be achieved, given council parks recent directive for no gardens within the streetscape we are left wondering what this ‘green corridor’ will contain.

### **Residential Zoning - Mixed Housing Suburban Zone – Relief sought**

- |     |  |        |
|-----|--|--------|
| 31. | Generally, we accept that density needs to be increased compared to the predominant Single house zone of Riverhead. But this should be balanced by stronger requirements for good urban design (for example, low front yard fences) and green infrastructure (for example requirements to plant trees on sites and on roads). Graduated density should be considered at the transition to rural zoning and higher density can be placed near the neighbourhood centre and open spaces. | 174.11 |
| 32. | I want front yards sized to be adequate for planting large trees. We want a requirement for each site in the zone to plant one tree capable of growing 6m plus in height.  | 174.12 |
| 33. | I want specific yard and landscape standards to apply at the rear of all sites which adjoin a rural zone to help establish a transition between the residential and rural environments.  | 174.13 |
| 34. | I want a front yard fence control applied which applies H5.6.15 Front, side and rear fences and walls.   | 174.14 |
| 35. | To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, I request minimum tree quantity outcomes are required for new roads. Trees are often the last consideration and underground infrastructure dominates the road corridor.  | 174.15 |
| 36. | Overall, our community wants the plan change to require sufficient private and public planted areas to give effect to the intent of Auckland's Urban Ngahere (Forest) Strategy. This will also help integrate the higher intensity development with the character of existing Riverhead and the rural interface.   | 174.16 |

### **Mixed Rural Zone:**

37. A mixed rural zone is proposed at the northern part of the plan change area. This is a response to the obvious flaw with the original (pre-notification but rejected by the council) proposal which proposed this flood plain area as suitable for residential development.
38. The main issue with this zoning is that the land will not be able to be further developed or subdivided. Due to flooding but also being poor-quality land for agriculture or horticulture it will most likely be left to deteriorate and form no meaningful part of the Riverhead village. This land has pretty much been abandoned, which unfortunately is partly the result of FUZ zoning, which simply facilitates land-banking and neglect of peri-urban land. The riparian area and beyond is rank with huge woody weeds and an environmental embarrassment, despite it being on the fringe of a stream which feeds the might but sensitive Waitemata.
39. Riverhead community have for many years sought to have better connection to the river. The outcome of the rural zoning is that the 'key move' of a green corridor extending to the river, and an esplanade reserve vested as public space to the council cannot be realised. The maintenance and enhancement of public access to and along rivers is a matter of national importance under the RMA. The current proposal fails to achieve this or recognise the shortcoming of not providing it. The site directly abuts a tributary stream to the Rangitopunui, and along with simply treating this area as a route for stormwater, the plan change must realise the opportunity for environmental restoration and public access connections.

### ***Mixed Rural Zone – relief sought***

40. I want provision to require the 20m margin of land from the stream to be zoned as public open space and vested to the council. Development should be required to deliver environmental restoration and improvements to the stream corridor. | 174.17
41. I want the green corridor to be extended to establish an open space esplanade reserve and be available for public access. The river is an important taonga for our community. | 174.18

### **Flooding and Stormwater:**

42. I am concerned that current best practice stormwater system design methodologies (as outlined within Appendix 10) would not adequately address adverse effects of the development. Council's current practice has failed Riverhead (and other recently developed areas in Kumeu) as evidenced in the Auckland Floods February 2023 where new developments designed to council's standards resulted in flooding harm.
43. I request robust peer review and an overall bottom-line requirement that stormwater will not cause upstream or downstream adverse effects.

- 44. Stormwater systems across the plan change area are proposed via a ‘central stormwater management treatment spine’ intended to be part of a ‘multi-purpose green corridor’ To ensure a coordinated delivery there needs to be a requirement for this to be designed and agreed prior to development commencing. A comprehensive development approach is required but the mixed landholdings risk a fragmented approach.
- 45. Without an overarching agreed plan for the stormwater corridor, it is not clear how an overall integrated stormwater system will result from development of multiple individual lots and/or staging would be decided. The risk is that fragmented and uncoordinated design and implementation would result due to a lack of overall clarity and responsibilities.
- 46. Despite a ‘designed’ stormwater spine system’ being proposed, zoning is not used to clarify the location and extent of the system. The extensive land required for this purpose is inappropriately zoned residential. Zoning would provide certainty of the land required for the stormwater and green corridor purposes. The community want certainty that this will be delivered, that it will be vested and looked after and that our existing (and future) housing will not flood. In general, it is not good practice for an enduring planning document (the AUP OP) to refer to a third-party report prepared in support of a plan change.
- 47. The supporting stormwater report was prepared when 22 Duke Street was proposed to be zoned for residential development. This land is now largely proposed to be zoned rural, and consequently could not be subdivided. This casts doubt as to whether this land can still be used for stormwater management and conveyance to the Rangitopuni tributary. It is not clear if this affects the integrity of the stormwater report findings. The report also relies upon specific stormwater outcomes at the Matvin site which may or may not actually occur.

***Flooding and Stormwater - relief sought***

- 48. I want robust peer review and an overall bottom-line requirement in the plan change provisions that stormwater will not cause upstream or downstream adverse effects. | 174.19
- 49. I want the clause of ‘as far as practicable’ to be removed from Objective (6), for example: *”Stormwater is managed to avoid, or minimise or adequately mitigate, adverse effects on the receiving environment.”*. Stormwater and flooding is a serious matter and the objective should not include wording which makes achieving expected outcomes optional. | 174.20
- 50. I want a requirement for the overall stormwater corridor system and green network design to be agreed with council prior to development and not incrementally addressed via multiple separate development proposals. This would likely require staging of development to align with development of the stormwater/green network corridor necessary to support that development. | 174.21

51. I want clarity of the intended use and function of 22 Duke Street with regard to stormwater, public access and environmental improvements. | 174.22

## Wastewater:

52. When it rains hard in Riverhead, we all hear the Ecoflow alarms going off. The current pressurised system does not cope. If you are unlucky enough to be at the end of the line, your property is the most impacted. So much so that Watercare don't charge these residents anymore to come and pump out the backflow, because it is the fault of the system failing during rain events and ingress of water into the council's system. The concern is that the existing poor performing system is not fit for purpose overall, and that expanding it over a large area with high groundwater will negatively impact current residents further.

## Wastewater – relief sought

53. I want provisions which ensure that the wastewater system is appropriate and fit for purpose, and that addition of the plan change area will not negatively impact existing and future users. | 174.23

## Parks and Reserves:

54. The 'multi-purpose green corridors' are defined in PC100 as a 'key move' from an urban design perspective. This outcome is agreed and supported in principle. However, there is no requirement that the green corridor be offered to council for vesting which is commonly required under existing AUPOP precinct plans to provide certainty for council and developers. In our mind, a green corridor is not a wider road with more street trees which the current proposal could result in.
55. Riparian margins are to be vested, but these are minimal and go nowhere near establishing the green corridor which needs to be located on a variety of land tenures. There needs to be a requirement that land necessary for the green network, but not accepted for vesting by council, is developed and held by an entity, like the proposal for riparian margins. Otherwise, parts of the network might not get delivered. There is a strong desire to protect and enhance our waterways in Riverhead, as is evidenced in the community involvement of the Riverhead Beautification Society which has to date planted over 7000 trees along a stream corridor. Given our location at the head of the harbour there are strong environmental reasons for this.
56. The intent of a contiguous open space network comprising of stormwater and passive open space functions is supported. Unfortunately, the provisions fail to define what the corridor will comprise of in real terms and do not require it to be delivered in practice. For example, what will be located in-between the stormwater ponds? How can we work on getting a contiguous canopy cover?

57. Policy (13)(d) suggests *“Co-locates smaller open spaces along the multi-purpose green corridor to achieve a connected network of open space.”*
58. This policy shows a lack of consideration that the separately proposed ‘neighbourhood parks’ are limited to 3 separate locations and a flawed presumption that council would accept ad-hoc vesting of a range of “smaller parks” required to join-up the green corridor network. The network may be partly on the road reserves, but if this is the intention, then that needs to be clear and also needs to be a requirement of the road design with specific, measurable outcomes and standards.
59. The policy fails to incorporate the depth of the description of the green corridor in the s32 report:
- “The central north-south multi-purpose green corridor is a key structuring component in both the Greenways Plan and the proposed Structure Plan. Along with the collector road, this green corridor accommodates both passive and active open spaces, footpaths and dedicated cycleways. It also incorporates an existing intermittent stream.”*
60. A clear description the intended corridor composition and the types of land it will occupy is required in the plan. As noted, it appears that parts of the green network would likely be upon road reserve. However, there are no provisions which explain this or require ‘linking roads’ to deviate from a standard design to perform this function. For example, to ensure that necessary roads are designed to be a width adequate to contain a high level of green infrastructure in a dedicated or protected zone within the road reserve.
61. Clear expectations are needed in the plan to ensure that the multiple components of the green networks are considered and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor. Without this being a clear directive it is likely that conventional design would be applied to the various parts, and overall, the green network would not be cohesively designed and delivered.
62. Overall, clear objectives, policies, standards and design/outcome expectations are required in the plan to ensure the overall ‘multi-purpose green corridors’ is delivered as anticipated. Policy 13 as drafted will not achieve this outcome.
63. The precinct description seeks to realise *“...the opportunity to establish green corridors through the precinct”*. Policy (13) only requires the council to encourage *“...the provision of a continuous and connected multi-purpose green corridor”*. The word ‘encourage’ is a weak and non-committal directive. Clauses (a) to (d) provide an unclear framework without specific detail of what is ‘required’ to be achieved. A stronger word such as ‘require’ is needed to ensure the overarching urban design ‘key move’ of the green corridor is delivered.
64. Policy 17 requires development and subdivision to provide *“.. a central stormwater management treatment spine through the precinct in general accordance with the*

*multi-purpose green corridor in the locations indicatively shown on IX.10.2 Riverhead: Precinct plan 2;*” This cannot be achieved in isolation of an overall agreed plan which spans the plan change area.

65. The supporting Stormwater and Flooding assessment contains a ‘Preliminary Masterplan’ which shows significant areas of land to be occupied by stormwater devices and green infrastructure, extending in area at some locations much further than shown on Precinct Plan 2.
66. If this drawing represents the modelled stormwater requirements, then the precinct plan should also include the same information so that developers and the community can understand what is required.

Auckland | A20405

Figure 10: Preliminary Master Plan - Version 10 (Source: Urban Acumen)



67. The supporting Urban Design report (Named Neighbourhood Design Statement) shows the multi-purpose green corridor extending via the land a 22 Duke Street to the Rangitopuni tributary and beyond via existing and potential future esplanade reserves alongside the stream and river.
68. We support the connection and an esplanade reserve alongside the tributary and note the extensive high quality esplanade reserve that has resulted from the Riverhead South network. A long-term aspiration is to have a complete network of coastal connections. The proposed zoning of 22 Duke Street as (predominantly) Mixed Rural removes the possibility of subdivision and vesting of esplanade reserve along the tributary. The small parts which are proposed to be residentially zoned would appear to still leave the parent site over 4HA, and therefore not trigger the esplanade reserve vesting upon subdivision. We expect that this is an unintended consequence of changing the proposed zoning. We request that the 20m margin of the tributary be zoned Open Space – Conservation, as part of the plan change, and that it's heavily weed infested margins be restored and planted, and that land be vested to the council. These are the outcomes which would have occurred if the



land was able to be subdivided and are necessary to secure a necessary part of the long-term aspirational esplanade reserve network.

69. Objectives, policies and standards are also required to achieve public access links from the development to the zoned esplanade reserve. If 22 Duke Street is available for stormwater management purposes, then this outcome should be easily achieved, especially if parcels are subdivided as drainage reserves, as this may trigger the 4Ha or less lot size adjacent to the tributary to trigger esplanade reserve vesting.



70. There is no direct requirement to deliver the 3 proposed neighbourhood parks, only an indirect reference to section E38. We seek a direct requirement to deliver the parks, presuming support from council parks division.
71. One high value (notable value) Beech tree is identified which is clustered with many impressive specimen trees (including a 13m tall Kauri). The Beech sits within a cluster of magnificent trees worthy of retention and is an obvious location for a Neighbourhood Park. Policy (12) seeks that the Beech tree is incorporated into an open space, but Precinct Plan 2 does not identify this location for a Neighbourhood Park. This inconsistency needs to be corrected. This cluster of trees, planted by a family who have been in Riverhead for multiple generations could further help connect the character of existing Riverhead to that of the plan change area.
72. The Beech tree and surrounds should not be compromised by stormwater functions which also appear to be proposed within this location (refer structure plan) page 8.
73. Policy 12 does not require the retention of 'other mature trees that are worthy of retention' by caveating the policy with '*where possible*'. I strongly suggest that the option to 'not retain worthy trees' be removed and more directive wording applied. The site is a huge greenfield area with a lot of flexibility for development locations.

Any trees of value should be required to be retained. The value of this cluster extends beyond the arboriculture assessment.

74. Large trees located near the CRH appear to not be recorded in the arboricultural report which appears to be an error.
75. The green corridor graphic, or 'east-west connections reflecting potential original portage routes promoting awa ki awa linkage' is shown on Precinct Plan 1 extending along and outside of the southern plan change boundary. Policy 19 contains an obtuse requirement for development to acknowledge key views and spiritual connections respond to identified on IX.10.1 Riverhead: Precinct plan 1 in the layout and/or design of development; in particular, sightlines to Te Ahu and Pukeharakeke, and connections to Papakoura Awa and Te Tōangaroa.
76. While I cannot speak for mana whenua I note there is very little reference to tangible outcomes relating to streets and public open spaces which reference and respect the Māori cultural landscape values. In reality, the proposed provisions will not achieve anything apparent in terms of recognising mana whenua values.

## Parks and Reserves – relief sought

- |     |   |        |
|-----|---|--------|
| 77. | I want the requirement and composition for the green corridor to be determined and agreed in principle with council prior to any development, so that the required environmental, stormwater and connectivity outcomes are understood and delivered appropriately and fully by each discrete development parcel or stage.                         | 174.24 |
| 78. | I seek that necessary parts of the green corridor infrastructure which do not comprise of roads, neighbourhood parks or drainage reserves are offered to council for vesting or protected and maintained in perpetuity by an appropriate legal mechanism (as per IX.6.3. Riparian margin).  | 174.25 |
| 79. | I want a clear description the intended composition corridor to be set out in the plan, including an explanation of how the multiple components of the green networks are to be determined and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor, and any other land that may be required. | 174.26 |
| 80. | I want the green corridor to extend to the Rangitopuni tributary and provide a public connection to a zoned open space esplanade reserve, and require environmental improvements to the degraded margins.   | 174.27 |
| 81. | Overall, clear objectives, polices, standards and design/outcome expectations are required in the plan to ensure the overall 'multi-purpose green corridors' is delivered as anticipated, because Policy 13 as drafted, will not achieve this outcome.  | 174.28 |

82. I want a neighbourhood park to be located to include the Beech tree and the adjacent grove of high value trees at this location. These trees represent remnant heritage features and are important to the Riverhead Community. They can provide a unique opportunity to establish some old Riverhead character in the new Riverhead development, along with established ecology and habitat.

### Retirement Village (Matvin Group land):

83. It is unclear what is going on with this land and proposal. It is noted in the s32 report but not in the plan change provisions. It is also noted in the urban design report as a consented development, containing buildings up to 5 stories tall, with 410 dwellings including 310 apartments. It is also included in the supporting stormwater report, which curiously does not provide a scenario for the retirement village not eventuating.
84. The plan change maps and provisions do not respond to the scale and poor urban design connectivity outcomes of the retirement village development. The only response is to propose zoning part of the site as THAB and the remainder as Mixed House Suburban, and Sub-Precinct B. This is of concern because the retirement village is located at the interface of the plan change area and existing Riverhead at Cambridge Road. It occupies a 500-metre-long flank and only provides for a single pedestrian cross connection, available during daylight hours only. It is effectively a gated community which turns it back on our village. The lack of expected connectivity appears to be a result of just accepting that the retirement village will occur.
85. PC100 should instead be prepared to stand alone from the retirement village proposal, and incorporate the key design drivers of the Urban Design applied over the entire plan change area, being:
- a connected physical environment
  - an integrated community
  - access to nature
  - vibrant and local
  - housing choice and affordability
  - proximity/convenience.
86. Concerningly, despite recognising the retirement village (by way of omitting expected outcomes such as a green corridor, local roads and pedestrian connectivity, and a considered interface at Cambridge Road) the plan change also does not propose any specific response to the retirement village form and function, should it go ahead.
87. For example, the Urban Design report recommends: “*a transition between taller buildings around the centre to lower densities and building forms in the remaining areas of the site*” (pg 51). Requiring roads and pedestrian routes to interface with the lone public route through the retirement village should also be required in the plan

change. The Sub-precincts which seek to provide some level of transition of buildings do not adjoin the retirement site but are contained within it.

88. Especially concerning is the detrimental impact that the retirement village will have on connectivity for the northern part of the plan change area and movements to and from the adjacent existing Riverhead. This matter is noted also in our transport section.

### ***Retirement Village (Matvin Group land) – remedies sought***

89. It is requested that the plan change be complete and robust in terms of dealing with the two scenarios of the retirement village being in place, or not. Requiring cross-site connectivity and local roads for the scenario of the retirement village not being built. The interface with the residential community at Cambridge Road should be addressed in terms of appropriate built form and interface outcomes.

174.30

### **Structure Plans and Consultation:**

90. Back in 2006, prior to being rezoned for development, Riverhead South also went through a plan change which was informed by a Structure Plan. This was Council led and involved the community through a series of consultation meetings including interactive design workshops.
91. The people of Riverhead were actively involved in a meaningful way over a carefully planned process. I was involved in the RRRA at this time. The outcomes from this highly engaged process were in the most part very positive. The design controls adopted recognised our community as being special, having a distinct character worthy of protection, retention/enhancement (new areas) and celebration.
92. The structure plan was adopted into the then Rodney District plan 'SPECIAL 30 (RIVERHEAD SOUTH) ZONE'. This included a comprehensive range of issues, objectives, policies, standards and assessment criteria to ensure that development reflected the needs of the community and council's intent, whilst providing for good quality development.
93. That document delivered a planning framework informed by community participation. A range of built form outcomes are visible in Riverhead South today which were a product of this community/council collaborative process. Most significantly there was an emphasis on dwellings being set back from the street and for low or no front fences. These create a sense of spaciousness and openness at the front of houses and make for safe streets with high levels of passive surveillance. A perimeter esplanade reserve open space network, along with a prominent coastal park at a heritage location, were also achieved.
94. In the recent meetings undertaken by the RCA the community were asked if they thought those basic desires for our community 'look and feel' still stood. Overwhelmingly the answer was yes.

95. These previously expressed community desires are not captured by the proposed plan change 'consultation', even though the RCA outlined these to the development consortium. The obvious outcome is that the character of the plan change area will be markedly different and not consistent with existing Riverhead. Density can be provided, but it should also be balanced with adequate and open front yards and a requirement for trees. Mature trees are a defining element of existing Riverhead, including Riverhead south where significant trees were retained and sites are large enough to accommodate new large growing species.
96. In stark contrast to the 2006 process the proposed 'Structure Plan' (refer Appendix 4) supporting the current plan change application was not prepared with meaningful community involvement. We were not involved in any meaningful way. We were not taken along on the journey. We were not listened to.
97. Community consultation involved a meeting over a coffee with some members of the RCA, 2 'drop-in community sessions and a summary of 'feedback'. In our view, these represent a token level of 'consultation' designed to 'tick the box'.
98. I do not understand how any part of what PC100 team claim as consultation can be called best practice or genuinely engaging. It has been superficial at best. Hurried and disingenuous. But it did not have to be like that. We are not against development; we just want the opportunity to be involved so that our concerns are recognised.
99. In closing, our community is special. People who live here have long known that which is why so many people stay for life. The fabric of our very tight community is built around a tight centre (commercial, civic and recreational) which keeps people together. We want any development to not only respect this but build on these principles. PC100 is prepared in isolation from meaningful community involvement, and this is obvious by the generic provisions proposed which do not recognise what is here and how development should appropriately respond.

174.31

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Tatiana Brown  
**Date:** Friday, 17 May 2024 11:00:56 am  
**Attachments:** [Riverhead Submission\\_20240517105719.417.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Tatiana Brown

Organisation name:

Agent's full name: Nathan Brown

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

Contact phone number:

Postal address:  
13 Floyd Road  
Riverhead 0820  
Riverhead 0820  
Riverhead  
Riverhead 0820

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:  
OPTIONAL

Property address: OPTIONAL

Map or maps: OPTIONAL

Other provisions:  
OPTIONAL

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:  
Severe impacts on community and environment before, during and after development with current proposal

I or we seek the following decision by council: Decline the plan change | 175.1

Submission date: 17 May 2024

Supporting documents  
[Riverhead Submission\\_20240517105719.417.pdf](#)

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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While I am not inherently opposed to development of land, this needs to be met with caution particularly in Riverhead.

The developers intent is profit, not building a better Riverhead or surrounding NorthWest Auckland. Profit flies in the face of doing what is right for the community, as what is needed will cost money. This is obvious in their plans that do not have explicit and clearly defined intentions but vague wording that can later be scaled back.

We are already plagued with many infrastructure problems that will only be exasperated by rapid development.

### **Stormwater/Flooding**

The recent flooding events (3 in 2 years!) significantly impacted Riverhead residents of which we are one. Auckland Council representatives have told us in meetings that we need to expect more of these 1 in a 100 year events. The plan from the development group does nothing to address this increasing issue and will only exasperate the problem, turning permeable agriculture land into housing. All stormwater needs to be planned to be self contained within the development in the event of **more than 1 in 100 year event** as the current infrastructure and environment does not support these events without further development. Auckland Council has already used this as part of the initial rejection of this development plan, and little has been done to address this in this resubmission.

### **Wastewater**

Riverheads semi-self contained wastewater 'feature' often fails during moderate rain events. The entire network cannot cope due to poor design and limited scope of expansion. The plans need extensive provisions to improve this without additional burden to the current failing system. note, it costs residents \$150 every time the alarm goes off, unlike most other suburbs that use this system it is not managed by Watercare but is the resident/homeowners responsibility.

### **Transport**

The entire roading network in the north west has not been developed at the same pace as population growth. The main arterial route into Riverhead (Riverhead-Coatesville Highway) is the same design as it was 60 years ago. This arterial route has significant standstill blockages already (typically from 630 am – 930am!), not to mention SH16 which it feeds into is often at a standstill during peak times.

This development will require significant heavy vehicle movements for a long period of time. The areas congestion is already significant, and the condition of the roads deteriorates rapidly – as experienced when significant logging operations happening. We will experience years of development with this plan, of which the heavy vehicle movements and timings need to be planned and specifically designated, so that further impact on the already poor roading conditions and congestion is mitigated as part of the consent.

All of this is said before a single new occupant becomes part of our community.

Auckland Transport, along with Waka Kotahi NZTA need to ensure that the roading infrastructure in the local and surrounding area is PRIORITISE and EXPEDITED to accommodate, BEFORE any redesignation of land use is achieved. Proposals for improvement, particularly for the intersection of SH16 an CRH, need to be addressed with urgency (regardless of this proposed plan change)



The developers need significantly more detail in their proposals. From the previous rejection of this application, I believe the Council largely agrees with the sentiment of the combined response from the Riverhead Community Association (RCA) submission that there is significant mitigation to serious implications if this proposal is approved without modification.

Further community consultation and mitigation of concerns, with the likes of the RCA and other organised community groups (of with the developers are not) will go a long way to making this opportunity for development a success for all of Riverhead and the wider North West community.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Jade Lacey  
**Date:** Friday, 17 May 2024 11:15:27 am  
**Attachments:** [PPC 100 - Riverhead Community Association Submission FINAL\\_20240517110239.434.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Jade Lacey  
Organisation name:  
Agent's full name:  
Email address: jadeandcam@outlook.com  
Contact phone number:  
Postal address:

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)  
Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:  
Land identified in the Private Plan Change by Riverhead Landowner Group  
Property address: 80.5 hectares on western side of Riverhead  
Map or maps:  
Other provisions:

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

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

The reason for my or our views are:  
As per attached.

I or we seek the following decision by council: Decline the plan change | 176.1

Submission date: 17 May 2024

Supporting documents  
PPC 100 - Riverhead Community Association Submission FINAL\_20240517110239.434.pdf

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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## **Riverhead Community Association submission to PC 100 (Private): Riverhead**

### **Introduction**

The Riverhead Community Association (RCA) is an incorporated society comprising of residents passionate about our community.

The RCA has 70 financial members and our Facebook group has 670 members, 170 of which have recently joined after the Plan Change 100 was put out for submissions.

The RCA provides a combined local voice and works collaboratively with Auckland Council and Auckland Transport on issues and projects which affect the Riverhead communities.

The RCA has a proven track record of advocating for community needs. From 2006 when Riverhead went through a plan change process for Riverhead South, RCA was at the table making a difference. We influenced the outcomes that were incorporated into the SPECIAL 30 (RIVERHEAD SOUTH) ZONE (legacy Rodney District Plan) which resulted in the spacious and attractive built form of Riverhead South.

The RCA has been active informing the community of PC100 via 2 public meetings and multiple topic Facebook updates. We have taken notice of key themes which have emerged, and these are compiled into this submission. In our view, this submission captures the major topics of concern consistently raised by the community at large.

The RCA is not anti-development.

We wish to be heard.

### **Council's Position Pre-Notification**

The RCA is cognisant of council's pre-notification reporting and the decision of the Planning, Environment and Parks Committee.

We concur in principle with council's description of the main issues, however, outline further matters of specific concern in this submission<sup>1</sup>.

*"The main issues will be the provision of infrastructure, whether the layout and provision for connections through the area are appropriate, the management of natural hazards and the intensity of development proposed. In respect of infrastructure, the applicant is proposing to provide new local transport upgrades as the land is developed. The extent to which these are sufficient can be considered through the analysis of submissions and*

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<sup>1</sup> Planning, Environment and Parks Committee, Agenda, Thursday 4 May, 2023, Paras. 72, 73



*detailed plan change review. It is noted that there are no committed or funded public transport service improvements at this time.”*

And

*“An important consideration is the effect of additional traffic from the potential new development enabled by the plan change on the wider transport network, and most notably the operation of SH16. NZTA Waka Kotahi are planning an upgrade to SH16 in the vicinity with the upgrade project to be completed in 2024/2025. The project extends from the end of the North Western Motorway from the Brigham Creek Road/Fred Taylor Drive/SH16 roundabout through to Waimauku - a 10km stretch. The section from Brigham Creek Road to the Taupaki roundabout will be four-laned with a new two-lane roundabout at the SH 16 /Coatesville Riverhead Highway intersection. It will also include wire rope median barriers and a 3-metre-wide shared path from Brigham Creek Road/Fred Taylor Drive/ SH 16 roundabout to Kumeu. The section from Huapai to Waimauku involves installation of wire rope median barriers and shoulder widening.”*

## **RCA – Position Overview**

The RCA opposes the plan change for the reasons set out in this submission.

The RCA welcomes the opportunity to work with the requestors and the council to resolve matters raised in this submission.

Matters of concern and remedies sought are listed below.

### **Transport:**

1. The plan change fails to adequately recognise and propose transport infrastructure upgrades required to manage adverse effects on the wider transport network. For example, SH16 is at times completely gridlocked with commuter traffic, the queue to get onto SH16 comes back to Hallertau at 6.30am! During weekends the line to Boric (the Coatesville Riverhead Highway (CRH)/SH16 intersection) is at the golf course. Another 3,000 residencies at Riverhead will exacerbate this greatly. There are very few local employment opportunities, most people will commute to work, and the single route bus is inadequate, inefficient and unreliable. The road has no capacity for walking or cycling to Westgate or Kumeu. Driving on roads is the only option.
2. Significantly, the development relies upon construction of a roundabout at the (CRH)/ Main Road (SH16) intersection to be built by Waka Kotahi NZ Transport Agency at some future time. Whilst this upgrade has been a long time coming it only addresses safety at the intersection. It will not improve capacity of the network which is already often dysfunctional. We also understand that this project is not currently programmed or funded.



3. The end of the NW motorway often backs up for a kilometre or more, and the roundabout intersection is routinely dysfunction creating huge traffic jams.
4. The plan change fails to recognise comprehensive local network transport improvements (within existing Riverhead) are warranted necessary to manage adverse effects on local transport.
5. The proposal is for limited local road 'upgrades'. But, to only deliver these in a fragmented and staged way based upon occupation of adjacent property. The upgrades do not have to be in place prior to construction when the first traffic impacts start.
6. Riverhead has under-provisioned streets, often with open drains, a lack of footpaths, unformed carriageway edges and few street trees. Some blocks are poorly connected and contain unformed paper roads. The development will increase pedestrian use over all of Riverhead, including to Riverhead School and to the two walkable pre-schools. All the realistic routes from the plan change area to destinations in Riverhead such as schools, pre-schools, shops, War Memorial Park and public walkways should be reviewed in terms of footpath provision and safety, and upgrades should be completed prior to the main development starting. This is to enable safety pedestrian movements for the existing and future people and children of Riverhead.
7. The plan change fails to recognise that local and wider transport upgrades are necessary to complete prior to development (earthworks and civil) commencement to manage the effects of construction traffic and safety.
8. The huge development area will require extensive earthworks and civil construction, including thousands of truck and vehicle movements well before any residence is occupied. Traffic upgrades, such as turning bays and pedestrian networks need to be functional and safe before the heavy traffic begins. The current plan change proposal to require limited improvements prior to occupation of a dwelling fails to recognise and mitigate the adverse construction traffic effects which will be particularly severed at main access routes and where locations where site access is feasible.
9. New subdivisions often lack on street parking. Demand for parking would spill over into the existing community where there are no formed road edges and open stormwater drains. Adequate on street parking needs to be required as we don't have the public transport options available.



### ***Transport – remedies sought***

10. Include provisions which state that development of the plan change area cannot proceed until wider network capacity and safety issues are addressed.
11. Include provisions which state that development of the plan change area cannot proceed until local road improvements have been completed, including function and safety assessments and any required upgrades to footpath routes and networks in Riverhead likely to be used by residents of the plan change area to access local destinations.
12. The enormous retirement village privatised site creates pinch points of available connectivity between the plan change area and existing Riverhead. These should be recognised and addressed by requirements for upgrades in the plan change provisions. For example, the road and pedestrian network of Te Roera Place, Duke Street, Cambridge Road, Queen Street, Alice Street and King Street will all be well used routes for people moving in and out of the plan change area, as pedestrians and in vehicles. These roads, and further routes to Riverhead School all warrant assessment and specific upgrades to ensure they are functional and safe. Similarly, the connection between the plan change area and Riverhead War Memorial Park has not been recognised as a primary route which is restricted by the CRH and the retirement village development. Specific provisions should also be applied to this area to ensure that development enables safe and logical east/west connections and road crossings.
13. Include provisions which require all required local and wider transport improvements to be in place prior to earthworks and related traffic impacts commencing.

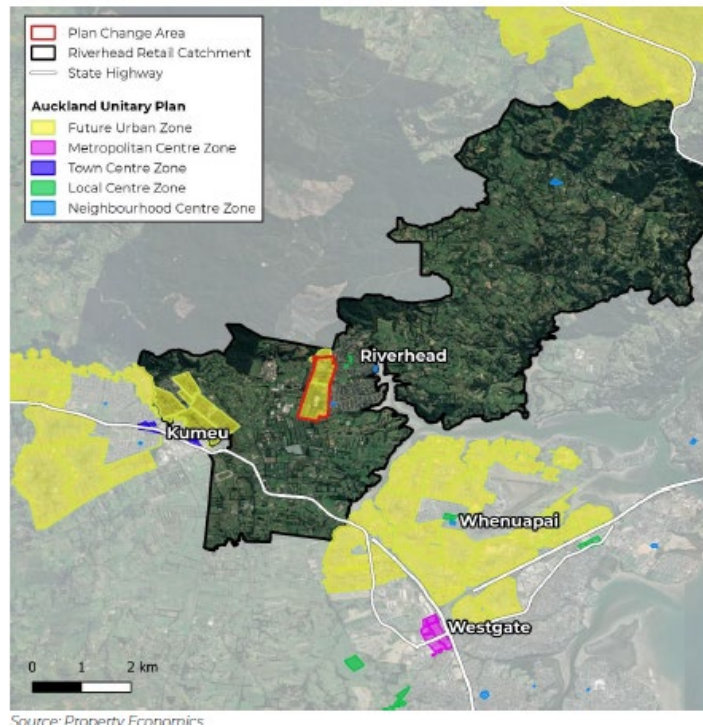
### **Commercial Zoning – Local Centre Zone and the Neighbourhood Centre Zone:**

14. A Local Centre zone is proposed at the corner of Riverhead Road and the CRH and a Neighbourhood Centre Zone is proposed opposite Riverhead Point Drive (Hallertau).
15. Riverhead already has a consolidated area of Business Mixed Use zone and Local Centre zones sites which house 2 mini-marts, a real estate office, a restaurant/bar, bottle shop and a vape shop and Heritage café/takeaways on School Road. There is also the local vet and two-preschools, Lulu's café, and other retail and commercial yard type activities. The mixed-use zoned triangle contains a development which when completed will include a series of ground level shop or business, and the final part of the triangle is also under development and also zoned Business Mixed Use, therefore, is also available for commercial use. Hallertau sits further down the CRH.

16. The basis for the proposed commercial zones is an economic report which predicts future demand (Appendix 7 – Centres Assessment). This report provides a cursory summary of the existing commercial activities and zoning. It also bases predicted demand on a ‘Riverhead Core Retail Catchment’. The report provides no basis for the extent of this catchment despite it being a formative assumption. Astonishingly, the catchment extends and wraps around Kumeu and goes all the way to the Dairy Flat Highway.

extent of Riverhead's core economic market.

FIGURE 1: RIVERHEAD CORE RETAIL CATCHMENT



17. Defining this as a catchment for Riverhead as a retail destination is ridiculous at both extents of the area shown. People in the Kumeu area have no incentive to travel to Riverhead for shopping. Kumeu is well served with a supermarket and a huge range of retail and commercial services. Council’s own consultation documents for Kumeu show the extensive land at Kumeu dedicated for these activities.

See below.





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18. People east of Coatesville are well served by old Albany and the Albany centre and beyond. Presuming that these people would also flock to Riverhead for shopping is not realistic because Albany is more accessible and contains a much greater range of shops and services.
19. The economic report also does not appear to consider the retirement village development and the hospitality, medical and other services it will contain which would be available to the residents and to the public. Restaurants, retail and healthcare facilities are specifically enabled by the proposed Sub-Precinct A within the retirement site.
20. The proposed THAB zoned areas also allows a range of commercial and service activities (via a RC). It is not clear why the economic report does not account for the possibility that the THAB zone can also contain businesses and retail, especially the area in proximity to the proposed Neighbourhood Centre zone where this development may be likely.
21. Another concern is that the proposed isolated Neighbourhood Centre Zone (adjacent Hallertau) will exacerbate an undesirable pattern of commercial strip development down the CRH.
22. A complete and justified basis for zoning this land as a Neighbourhood Centre Zone has not been provided. The proposed zone does represent a defined area of FRL landholding which naturally raises the question as to whether this discrete proposed zone is motivated by commercial gain rather a demonstrated need or sound design principles.
23. The original structure plan for Riverhead South reinforced the community's expectation of a defined centre. The existing Riverhead centre is located in a



relatively consolidated and logical manner, and also has connection to Riverhead War memorial Park.

24. The Urban Design assessment (Appendix 6) shows that the main Local Centre Zone is within a 400m walkable catchment for all residents within the plan change area. So, the isolated Local Centre Zone it is not justified by pedestrian accessibility. As noted, the existing Riverhead centre supports two min-marts or diaries, and major supermarkets are located on all routes west (Kumeu), South (Westgate) and east (Albany).

### ***Commercial Zoning – Local Centre Zone and the Neighbourhood Centre Zone – remedies sought***

25. We want any proposed commercial zoning to be justified by economic analysis that is based on a clear outline of existing zoning and activities in Riverhead, including under-utilising of zoned land and potential capacity, and recognition of the activities and services that would be provided by the retirement village and commercial activities that can be undertaken in the THAB zone via resource consent.
26. We want any proposed commercial zoning to be justified by economic analysis that is based on a well-reasoned and justifiable customer catchment which recognises the commercial and retail centres of Kumeu, Westgate and Albany, and does not unrealistically anticipate that people who live near these centres would instead travel to Riverhead for their shopping needs.
27. We want any new business zoning to demonstrate a consolidated and legible town centre, not exacerbate strip commercial areas fronting the highway. Most importantly by removing the proposed Local Centre Zone opposite Riverhead Point Road.

### **Residential Zoning - Mixed Housing Suburban Zone:**

28. Most of the land is proposed as Mixed Housing Suburban Zone. This zone allows for two and three storey detached and attached housing in a variety of types and sizes. Up to three dwellings are permitted as of right subject to compliance with the standards.
29. In comparison, existing Riverhead is mostly Single House zone. The plan change will result in much more dense development and generally taller houses and lots of multi-unit townhouses. Existing Riverhead is characterised by many large trees on private properties.
30. In contrast, large trees would be infrequent in the proposed Mixed Housing Suburban Zone which has minimal landscaping requirements (only 20% and this can be paved if there is canopy cover over (IX6.11. Landscaped area within the



Mixed Housing Suburban Zone) and only a 2.5m front yard standard which is not adequate for large growing tree. The outcome is that buildings will dominate the neighbourhood character. Overall, due to a lack of space or a requirement to plant trees on private sites, the neighbourhood character would be markedly different compared to existing Riverhead. We expect this difference in character to be noticeable and jarring, resulting in a lower quality of amenity. We want any new development to fit into the existing urban fabric of our community.

31. We are not sure that this character represents the 'unique sense of place' described as an intension in the precinct description.
32. No requirements for road reserve tree planting are proposed either, leaving the street tree outcome uncertain or minimal. Even in the green corridor there are no measurable outcomes for vegetation cover or trees.
33. The proposal fails to mention or adopt the council Auckland's Urban Ngahere (Forest) Strategy. The strategy recognises the social, environmental, economic, and cultural benefits of our urban ngahere (forest), and sets out a strategic approach to knowing, growing, and protecting it. It seeks to achieve increased canopy cover to 30 per cent across Auckland's urban area, and at least 15 per cent in every local board area. The proposed plan change should seek to provide overall canopy cover of 30% which would provide a range of health, social and economic benefits including reducing the urban heat effect of roads, buildings and impermeable surfaces. This could go some way to integrating the old and the new.
34. The precinct description also seeks to 'enable transition from the rural to the urban environment'. It achieves this outcome abruptly, rather than a smooth transition.
35. The zoning proposed does not provide any transition at the rural edge, for example, single house zoning could be applied to the outer 100 metres. There is little attempt to provide certainty of transition of scale or density, overall. Policies which direct this outcome adopt soft non-comital language, such as 'Encourage' (policies 15 and 16). It is not clear how 'encourage' has any real influence at the resource consent stage.
36. A 5 metre rear yard setback standard is proposed at the rural zone interface. This is to landscape or plant trees in the rear yard. A 5 metre yard would have no material visual difference to the abrupt transition between residential development and the rural environment. A larger rear yard, say 15m with a requirement to plant at least one large tree and a rural fence typology are obvious designs requirements that would go some way to achieving the intended transition outcome.
37. There is also no requirement to provide adequate front yards to enable the planting of trees. This was a requirement of the Riverhead South development, which contributes to the 'treed' neighbourhood character established and respects the character of old Riverhead and the many prominent mature trees. This requirement



should at least apply to the rural fringe parts of the site and would also contribute overall to sense of transition between the rural and residential land uses.

38. Another formative design requirement of Riverhead South was a rule prohibiting tall front yard fences. This outcome can also be observed widely in Riverhead South and contributes significantly to a sense of spaciousness with buildings set back and front yard landscaping visible. The plan change seeks to remove the usual requirement for low or visually permeable front yard fences without any explanation as to why. (refer IX.6. Standards page 11). This may result in a proliferation of tall front yard fences detrimental to a desired spacious character. It also has negative effects on CPTED outcomes.
39. There is no requirement to plant regular street trees on roads. Whilst often achieved during development, the supporting AUP policy context is vague. To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, we request minimum tree quantity outcomes are required for new roads. The density for the housing will result in no tree cover of value, so the work must be done in the streets.
40. The zone also does not propose any design response to the proposed green corridor network, aside from a lonely fence height standard. There are no provisions proposed to give effect to the Urban Design recommendation for: *“a high quality and vegetated interface for higher density development along the key movement routes and adjacent to existing residential development which contributes to the current landscaped character of streets in Riverhead.”* There is also little detail on how this will be achieved, given council parks recent directive for no gardens within the streetscape we are left wondering what this ‘green corridor’ will contain.

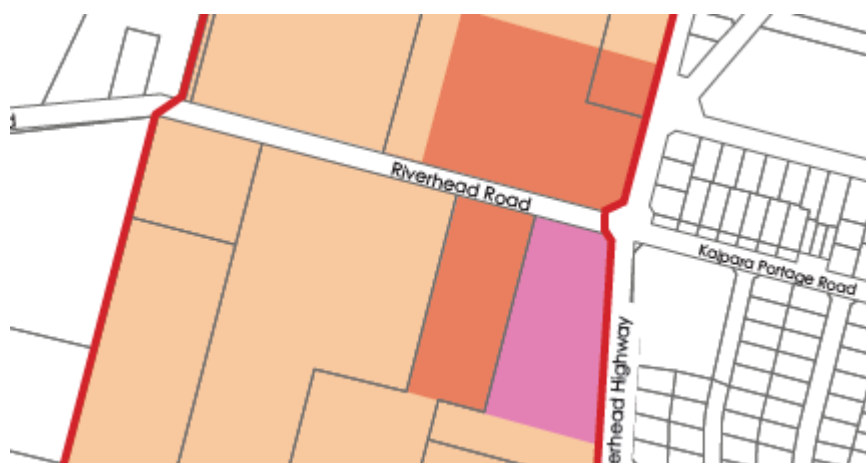
### ***Residential Zoning - Mixed Housing Suburban Zone – Relief sought***

41. Generally, we accept that density needs to be increased compared to the predominant Single house zone of Riverhead. But this should be balanced by stronger requirements for good urban design (for example, low front yard fences) and green infrastructure (for example requirements to plant trees on sites and on roads). Graduated density should be considered at the transition to rural zoning and higher density can be placed near the neighbourhood centre and open spaces.
42. We want front yards sized to be adequate for planting large trees, for example, 6 metres. We want a requirement for each site in the zone to plant one tree capable of growing 6m plus in height.
43. We want specific yard and landscape standards to apply at the rear of all sites which adjoin a rural zone to help establish a transition between the residential and rural environments.

- 44. We want a front yard fence control applied which applies H5.6.15 Front, side and rear fences and walls.
- 45. To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, we request minimum tree quantity outcomes are required for new roads. Trees are often the last consideration and underground infrastructure dominates the road corridor.
- 46. Overall, we want the plan change to require sufficient private and public planted areas to give effect to the intent of Auckland's Urban Ngahere (Forest) Strategy. This will also help integrate the higher intensity development with the character of existing Riverhead and the rural interface.

**Residential Zoning - Terrace Housing and Apartment Zone (THAB):**

- 47. The THAB zone provides for high intensity living in the form of terrace house and apartments and should be predominantly around centres and the public transport network to support the highest levels of intensification.
- 48. North of Riverhead Road this zone is located within the retirement village area. If that goes ahead this area of THAB zoned land would be developed with a retail/hospitality corner and privatised retirement apartments.
- 49. The other area of THAB zone that will be available for development and housing which is not privatised is immediately west of the Neighbourhood Centre zone at the corner of Riverhead Road and CRH. This is overlaid with Sub-Precinct B





50. There is very little reasoning provided for this discrete area of zoning proposed, and why it does not also front CRH, or warp around the south of the Local Centre zone. We do not think the proposed zoning reflects a land parcel, and this may be influencing the proposed location and extent of that zone.

### ***Residential Zoning - Terrace Housing and Apartment Zone (THAB)- remedies sought***

51. We want any THAB zone location and extent to be based on a reasoned analysis and reflect the intent of the zone which is to provide density around a transport hub and/or a town centre.
52. We want the transition edge of THAB to the Mixed House Suburban zone to contain a local road to create a natural transition space between the different densities and building scale/forms.

### **Mixed Rural Zone:**

53. A mixed rural zone is proposed at the northern part of the plan change area.
54. This is a response to the obvious flaw with the original (pre-notification but rejected by the council) proposal which proposed this flood plain area as suitable for residential development.
55. The main issue with this zoning is that the land will not be able to be further developed or subdivided.
56. The outcome is that the 'key move' of a green corridor extending to the river, and an esplanade reserve vested as public space to the council cannot be realised. The maintenance and enhancement of public access to and along rivers is a matter of national importance under the RMA. The current proposal fails to achieve this.

### ***Mixed Rural Zone – relief sought***

57. We want provision to require the 20m margin of land from the stream to be zoned as public open space and vested to the council.
58. We want the green corridor to be extended to the open space esplanade reserve and be available for public access. The river is an important taonga for our community. Previous development has turned its back to it.



## Flooding and Stormwater:

59. We are concerned that current best practice stormwater system design methodologies (as outlined within Appendix 10) would not adequately address adverse effects of the development. Council's current practice has failed Riverhead as evidenced in the Auckland Floods February 2023 where new developments designed to council's standards resulted in flooding harm.
60. We request robust peer review and an overall bottom line requirement that stormwater will not cause upstream or downstream adverse effects.
61. Objective (6) is very weak in that it that allows for the outcome of inadequate stormwater management:  
*(6) Stormwater is managed to avoid, as far as practicable, or otherwise minimise or mitigate, adverse effects on the receiving environment.*
62. In our view, if there is so much uncertainty that the requestor seeks scope for it to not be 'practicable to 'avoid, remedy or mitigate adverse stormwater effects', then this indicates a lack of confidence that stormwater issues can be appropriately addressed. We consider that the objective must be amended to remove the caveat 'as far as practicable' so the adverse stormwater effects must be avoided, remedied or mitigated.
63. Stormwater systems across the plan change area are proposed via a 'central stormwater management treatment spine' intended to be part of a 'multi-purpose green corridor' To ensure a coordinated delivery there needs to be a requirement for this to be designed and agreed prior to development.
64. Without an overarching agreed plan for the stormwater corridor, it is not clear how an overall integrated stormwater system will result from development of multiple individual lots and/or stages and what specific land parts must occur on. The risk is that fragmented and uncoordinated design and implementation would result due to a lack of design clarity and responsibilities.
65. Despite a 'designed' stormwater spine system' being proposed, zoning is not used to clarify the location and extent of the system. The extensive land required for this purpose is inappropriately zoned residential. Zoning would provide certainty of the land required for the stormwater and green corridor purposes.
66. A matter of significant concern is that the open space and stormwater functions of the corridor will be located over many separate parcels, landowners, and development stages. It is also located on parcels owned by parties not subject to the plan change.



67. There is no requirement for the overall green corridor to be designed prior to development. If this was a requirement then it would be clear what needs to occur and where. The lack of clarity will likely result in a fragmented outcome overall due to separate parties leading different parts of the development at different times.
68. It is recommended that a policy be added to require a clear overall design for the combined stormwater and open space corridor needs to be agreed by council prior to development within the precinct. We request objectives, policies and standards be included to define the corridor, its various functions, and require it to be implemented in a staged and coordinated manner.
69. Policy 17 states:  
*“(17) Require subdivision and development to be consistent with the water sensitive approach outlined in the **supporting stormwater management plan**, including: ...”*
- It is not appropriate for a plan change to require adherence to a document that has not been reviewed and accepted by the council. The report itself clarifies: *“This report has been prepared solely for the benefit of our client with respect to the particular brief and it may not be relied upon in other contexts for any other purpose without the express approval by CKL.”*
70. In general, it is not good practice for an enduring planning document (the AUP OP) to refer to a third party report prepared in support of a plan change.
71. The supporting stormwater report was prepared when 22 Duke Street was proposed to be zoned for residential development. This land is now largely proposed to be zoned rural, and consequently could not be subdivided. This casts doubt as to whether this land can still be used for stormwater management and conveyance to the Rangitopuni tributary. It is not clear if this affects the integrity of the stormwater report findings.

### ***Flooding and Stormwater - relief sought***

72. We want robust peer review and an overall bottom line requirement in the plan change provisions that stormwater will not cause upstream or downstream adverse effects.
73. We want the clause of ‘as far as practicable’ to be removed from Objective (6), for example: *“Stormwater is managed to avoid, or minimise or adequately mitigate, adverse effects on the receiving environment.”*
74. We want a requirement for the overall stormwater corridor system and green network design to be agreed with council prior to development and not incrementally addressed via multiple separate development proposals. This would





likely require staging of development to align with development of the stormwater/green network corridor necessary to support that development.

75. We want clarity of the intended use and function of 22 Duke Street with regard to stormwater.

## **Wastewater:**

76. Residents report that the existing system is prone to failure, often setting off alarms particularly during rain events, we understand due to groundwater and ingress of water into the council's system. The concern is that the existing poor performing system is not fit for purpose overall, and that expanding it over a large area with high groundwater will negatively impact everybody.

## ***Wastewater – relief sought***

77. We want provisions which ensure that the wastewater system is appropriate and fit for purpose, and that addition of the plan change area will not negatively impact existing and future users.

## **Parks and Reserves:**

78. The 'multi-purpose green corridors' are defined by the requestor as a 'key move' from an urban design perspective. This outcome agreed and supported in principle.
79. There is no requirement that the green corridor be offered to council for vesting, but this is commonly required under existing AUPOP precinct plans to provide certainty for council and developers. In our mind, a green corridor is not a wider road with more street trees.
80. Riparian margins are to be vested, but these are minimal and go nowhere near establishing the green corridor which needs to be located on a variety of land tenures. There needs to be a requirement that land necessary for the green network, but not accepted for vesting by council, is developed and held by an entity, like the proposal for riparian margins. Otherwise, parts of the network might not get delivered.
81. The intent of a contiguous open space network comprising of stormwater and passive open space functions is supported. Unfortunately, the provisions fail to define what the corridor will comprise of in real terms and do not require it to be delivered in practice. For example, what will be located in-between the stormwater ponds?
82. Policy (13)(d) suggests "*Co-locates smaller open spaces along the multi-purpose green corridor to achieve a connected network of open space.*"

83. This policy shows a lack of consideration that the separately proposed ‘neighbourhood parks’ are limited to 3 separate locations and a flawed presumption that council would accept ad-hoc vesting of a range of “smaller parks” required to join-up the green corridor network. The network may be partly on the road reserves, but if this is the intention, then that needs to be clear and also needs to be a requirement of the road design.
84. The policy fails to incorporate the depth of the description of the green corridor in the s32 report:
- “The central north-south multi-purpose green corridor is a key structuring component in both the Greenways Plan and the proposed Structure Plan. Along with the collector road, this green corridor accommodates both passive and active open spaces, footpaths and dedicated cycleways. It also incorporates an existing intermittent stream.”*
85. A clear description the intended corridor composition and the types of land it will occupy is required in the plan. As noted, it appears that parts of the green network would likely be upon road reserve. However, there are no provisions which explain this or require ‘linking roads’ to deviate from a standard design to perform this function. For example, to ensure that necessary roads are designed to be a width adequate to contain a high level of green infrastructure in a dedicated or protected zone within the road reserve.
86. Clear expectations are needed in the plan to ensure that the multiple components of the green networks are considered and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor. Without this being a clear directive it is likely that conventional design would be applied to the various parts, and overall the green network would not be cohesively designed and delivered.
87. Overall, clear objectives, polices, standards and design/outcome expectations are required in the plan to ensure the overall ‘multi-purpose green corridors’ is delivered as anticipated. Policy 13 as drafted will not achieve this outcome.
88. The precinct description seeks to realise “...the opportunity to establish green corridors through the precinct”. Policy (13) only requires the council to encourage “...the provision of a continuous and connected multi-purpose green corridor”. The word ‘encourage’ is a weak and non-committal directive. Clauses (a) to (d) provide an unclear framework without specific detail of what is ‘required’ to be achieved. A stronger word such as ‘require’ is needed to ensure the overarching urban design ‘key move’ of the green corridor is delivered.

- 89. Policy 17 requires development and subdivision to provide “.. a central stormwater management treatment spine through the precinct in general accordance with the multi-purpose green corridor in the locations indicatively shown on IX.10.2 Riverhead: Precinct plan 2;” This cannot be achieved in isolation of an overall agreed plan which spans the plan change area.
- 90. The supporting Stormwater and Flooding assessment contains a ‘Preliminary Masterplan’ which shows significant areas of land to be occupied by stormwater devices and green infrastructure, extending in area at some locations much further than shown on Precinct Plan 2.
- 91. If this drawing represents the modelled stormwater requirements, then the precinct plan should also include the same information so that developers and the community can understand what is required.

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Figure 10: Preliminary Master Plan - Version 10 (Source: Urban Actumen)



- 92. The supporting Urban Design report (Named Neighbourhood Design Statement) shows the multi-purpose green corridor extending via the land a 22 Duke Street to the Rangitopuni tributary and beyond via existing and potential future esplanade reserves alongside the stream and river.
- 93. We support the connection and the esplanade reserve alongside the tributary and note the extensive high quality esplanade reserve that has resulted from the Riverhead South network. A long term aspiration is to have a complete network of coastal connections. The proposed zoning of 22 Duke Street as (predominantly) Mixed Rural removes the possibility of subdivision and vesting of esplanade reserve along the tributary. The small parts which are proposed to be residentially zoned would appear to still leave the parent site over 4HA, and therefore not trigger the esplanade reserve vesting upon subdivision. We expect that this is an unintended consequence of changing the proposed zoning. We request that the 20m margin of

the tributary be zoned Open Space – Conservation, as part of the plan change, and that it's heavily weed infested margins be restored and planted, and that land be vested to the council. These are the outcomes which would have occurred if the land was able to be subdivided and are necessary to secure a necessary part of the long-term aspirational esplanade reserve network.

- 94. Objectives, policies and standards are also required to achieve public access links from the development to the zoned esplanade reserve. If 22 Duke Street is available for stormwater management purposes, then this outcome should be easily achieved, especially if parcels are subdivided as drainage reserves, as this may trigger the 4Ha or less lot size adjacent to the tributary to trigger esplanade reserve vesting.



- 95. There is no direct requirement to deliver the 3 proposed neighbourhood parks, only an indirect reference to section E38. We seek a direct requirement to deliver the parks, presuming support from council parks division.
- 96. One high value (notable value) Beech tree is identified which is clustered with many impressive specimen trees (including a 13m tall Kauri). The Beech sits within a cluster of magnificent trees worthy of retention and is an obvious location for a Neighbourhood Park. Policy (12) seeks that the Beech tree is incorporated into an open space, but Precinct Plan 2 does not identify this location for a Neighbourhood Park. This inconsistency needs to be corrected. This cluster of trees, planted by a family who have been in Riverhead for multiple generations could further help connect the character of existing Riverhead to that of the plan change area.
- 97. The Beech tree and surrounds should not be compromised by stormwater functions which also appear to be proposed within this location (refer structure plan) page 8.



98. Policy 12 does not require the retention of 'other mature trees that are worthy of retention' by caveating the policy with '*where possible*'. We seek that the option to 'not retain worthy trees' be removed and more directive wording applied. The site is a huge greenfield area with a lot of flexibility for development locations. Any trees of value should be required to be retained. The value of this cluster extends beyond the arboriculture assessment.
99. Large trees located near the CRH appear to not be recorded in the arboricultural report which appears to be an error.
100. The green corridor graphic, or 'east-west connections reflecting potential original portage routes promoting awa ki awa linkage' is shown on Precinct Plan 1 extending along and outside of the southern plan change boundary. Policy 19 contains an obtuse requirement for development to acknowledge key views and spiritual connections respond to identified on IX.10.1 Riverhead: Precinct plan 1 in the layout and/or design of development; in particular, sightlines to Te Ahu and Pukeharakeke, and connections to Papakoura Awa and Te Tōangaroa.
101. We of course cannot speak for mana whenua but note that the actual outcomes required are limited to locating and orientating streets and public open spaces to reference and respect the Māori cultural landscape values. This is unlikely to result in any material outcome in the development form. The proposed west-east roading pattern already adequately achieves the expected outcome. It is not clear how the development is required to respond to the southernmost connection, that is not even within the plan change area.

### ***Parks and Reserves – relief sought***

102. We want the requirement and composition for the green corridor to be determined and agreed in principle with council prior to any development, so that the required environmental, stormwater and connectivity outcomes are understood and delivered appropriately and fully by each discrete development parcel or stage.
103. We seek that necessary parts of the green corridor infrastructure which do not comprise of roads, neighbourhood parks or drainage reserves are offered to council for vesting or protected and maintained in perpetuity by an appropriate legal mechanism (as per IX.6.3. Riparian margin).
104. We want a clear description the intended corridor composition is required in the plan, and an explanation of how the multiple components of the green networks are to be determined and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor, and any other land that may be required.



105. We want the green corridor to extend to the Rangitopuni tributary and provide a public connection to a zoned open space esplanade reserve.
106. Overall, clear objectives, policies, standards and design/outcome expectations are required in the plan to ensure the overall 'multi-purpose green corridors' is delivered as anticipated, because Policy 13 as drafted will not achieve this outcome.
107. We want a neighbourhood park to be located to include the Beech tree and the overall grove of high value trees at this location.

### **Retirement Village (Matvin Group land):**

108. The technical approach of the plan change with respect to the Matvin retirement village land is unclear. It is noted in the s32 report but not in the plan change provisions. It is also noted in the urban design report as a consented development, containing buildings up to 5 stories tall, with 410 dwellings including 310 apartments. It is also included in the supporting stormwater report.
109. The plan change maps and provisions do not respond to the scale and poor urban design connectivity outcomes of the retirement village development. The only response is to propose zoning part of the site as THAB and the remainder as Mixed House Suburban, and Sub-Precinct B. This is of concern because the retirement village is located at the interface of the plan change area and existing Riverhead at Cambridge Road. It occupies a 500 metre long flank and only provides for a single pedestrian cross connection, available during daylight hours only.
110. The development of the retirement village is not certain to occur, however, the plan change proposal treats it as a certainty. Evidenced by the lack of local roads, pedestrian connectivity, or a considered interface with Cambridge Road, all of which would be expected on a greenfield area some 10 Hectares in area and positioned at a critical location. If the retirement village does not go ahead then the plan change should be able to provide a good practice development framework for this area consistent with the remainder of the plan change area, and adopting the key design drivers of the Urban Design report, being:
  - a connected physical environment
  - an integrated community
  - access to nature
  - vibrant and local
  - housing choice and affordability
  - proximity/convenience
111. Concerningly, despite recognising the retirement village (by way of omitting expected outcomes such as a green corridor, local roads and pedestrian connectivity, and a considered interface at Cambridge Road) the plan change also



does not propose any wider response to the retirement village form and function, should it go ahead.

112. For example, the Urban Design report recommends: *“a transition between taller buildings around the centre to lower densities and building forms in the remaining areas of the site”* (pg 51). Requiring roads and pedestrian routes to interface with the lone public route through the retirement village should also be required in the plan change. The Sub-precincts which seek to provide some level of transition of buildings do not adjoin the retirement site but are contained within it.
113. Especially concerning is the detrimental impact that the retirement village will have on connectivity for the northern part of the plan change area and movements to and from the adjacent existing Riverhead. This matter is noted also in our transport section.

### ***Retirement Village (Matvin Group land) – remedies sought***

114. It is requested that the plan change be complete and robust in terms of dealing with the two scenarios of the retirement village being in place or not. Requiring cross-site connectivity and local roads for the scenario of the retirement village not being built.

### **Structure Plans and Consultation:**

115. Back in 2006, prior to being rezoned for development, Riverhead South also went through a plan change which was informed by a Structure Plan. This was Council led and involved the community through a series of consultation meetings including interactive design workshops. The people of Riverhead were actively involved in a meaningful way over a carefully planned process.
116. The structure plan was adopted into the then Rodney District plan ‘SPECIAL 30 (RIVERHEAD SOUTH) ZONE’. This included a comprehensive range of issues, objectives, policies, standards and assessment criteria to ensure that development reflected the needs of the community and council’s intent, whilst providing for good quality development.
117. That document delivered a planning framework informed by community participation. A range of built form outcomes are visible in Riverhead South today which were a product of this community/council collaborative process. Most significantly there was an emphasis on dwellings being set back from the street and for low or no front fences. These create a sense of spaciousness and openness at the front of houses and make for safe streets with high levels of passive surveillance.
118. These previously expressed community desires are not captured by the proposed plan change. The obvious outcome is that the character of the plan change area will be markedly different and not consistent with existing Riverhead. Density can be

provided, but it can also be balanced with adequate and open front yards and a requirement for trees. Mature trees are a defining element of existing Riverhead, including Riverhead south where significant trees were retained and sites are large enough to accommodate new large growing species.

119. In stark contrast the 'Structure Plan' (refer Appendix 4) supporting the current plan change application was not prepared with meaningful community involvement. Community consultation involved a meeting over a coffee with some members of the RCA, 2 'drop in community sessions and a summary of 'feedback'. In our view, these represent a token level of consultation designed to 'tick the box'.
120. We do not understand why the previous council led (but developer funded) process was collaborative and genuinely engaging, and the current process has been superficial, how is that democratic?
121. The Quality Planning website outlines good practice consultation for structure planning. It says:

*Consultation with key stakeholders and the community affected is an important component of the structure plan development process. The number and type of stakeholders identified and consulted with for a structure plan will depend on the scale and characteristics of the area and the issues to be managed.*

*To assist with consultation, it is good practice to develop an overall consultation plan for all groups including key stakeholders, tangata whenua and the wider community. This helps to identify all stakeholder and ensure that consultation and communications are managed in an integrated and co-ordinated way. This can also help to provide certainty to stakeholders about the opportunities to input into the structure plan process and the how the various consultation processes will be integrated into the final output. It is important that the communication or consultation plan recognises the potential for land ownership to change during the course of the structure planning exercise and any subsequent RMA plan changes.*

*Commencing consultation early in the process is important, and can help with:*

- *obtaining stakeholder buy-in to the process;*
- *gauging community and stakeholder levels of acceptance to broad concepts (such as the overall level of development) being proposed;*
- *fulfilling statutory duties under the RMA, LGA and Land Transport Management Act;*
- *incorporating and working through stakeholder concerns and aspirations while there is flexibility in the process to do so;*
- *identifying constraints and opportunities.*





122. In our view the consultation process fell well short of best practice. This is evidenced by how poorly the current plan change portrays the concerns and aspirations of the community compared to the previous process which involved meaningful involvement and consultation.
123. We are not out to stop change or development, as evidenced by involvement in the previous planning process. Rather we seek to ensure that the good things promised (such as the green corridor and infrastructure improvements) are properly designed, will be delivered as described (and when needed prior to adverse construction effects), and that due consideration is given to simple changes that could better integrate the plan change area with existing Riverhead, such as adequate front yards and tree planting. We very much would have preferred this submission to say that the process has been collaborate and effective, rather than needing to write such an involved submission and speak to these issues at a hearing and appeals if it gets to that.
124. We welcome the opportunity to conference with the requestors to resolve any matters of difference pre-hearing.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Chris Ridley  
**Date:** Friday, 17 May 2024 11:15:43 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Chris Ridley  
Organisation name:  
Agent's full name:  
Email address: chris@streamlineelectrical.nz  
Contact phone number: 021488274  
Postal address:  
P.O. Box 81100  
Whenuapai  
Auckland 0618

**Submission details**

**This is a submission to:**  
Plan change number: Plan Change 100 (Private)  
Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:  
PC100

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:  
Will create massive overpopulation without sufficient infrastructure. How can this even be thought of at this stage?

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

177.1

Submission date: 17 May 2024

**Attend a hearing**

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

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Linda Margaret McFadyen  
**Date:** Friday, 17 May 2024 11:30:20 am

---

The following customer has submitted a Unitary Plan online submission.

#### Contact details

Full name of submitter: Linda Margaret McFadyen

Organisation name:

Agent's full name: Linda McFadyen

Email address: [lijaselu@hotmail.com](mailto:lijaselu@hotmail.com)

Contact phone number: 0212973352

Postal address:

7 Floyd Road

Auckland

Auckland 0820

#### Submission details

##### This is a submission to:

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### My submission relates to

Rule or rules:

Land identified in the Private Plan Change by Riverhead Landowner Group -

Property address: 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

My submission relates to the proposed development on 80.5 hectares on the western side of Riverhead Village.

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

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

The reason for my or our views are:

Lack of a plan to address the impact on the infrastructure, wastewater and stormwater in Riverhead which would be adversely affected and could not cope with the increase in housing proposed in the development.

Traffic flow is already impacted and long traffic queues are presently being experienced by Riverhead residents.

There is already a proposed Retirement Village consented for building which will also greatly affect Riverhead Village, its infrastructure and its residents.

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

178.1

Submission date: 17 May 2024

**Attend a hearing**

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

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

**Declaration**

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

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

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

Yes

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

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our email, or any effects our email may have on the recipient computer system or network. Any views expressed in this email may be those of the individual sender and may not necessarily reflect the views of Council.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Francesca Johnson  
**Date:** Friday, 17 May 2024 11:45:26 am  
**Attachments:** [PPC 100 - Riverhead Community Association Submission FINAL\\_20240517113715.609.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Francesca Johnson  
Organisation name:  
Agent's full name:  
Email address: francesca\_kumeu@hotmail.com  
Contact phone number:  
Postal address:

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)  
Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:  
Land identified in the Private Plan Change by Riverhead Landowner Group  
Property address: 80.5 hectares on western side of Riverhead  
Map or maps:  
Other provisions:

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

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

The reason for my or our views are:  
As per attached

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

179.1

Submission date: 17 May 2024

Supporting documents  
PPC 100 - Riverhead Community Association Submission FINAL\_20240517113715.609.pdf

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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## **Riverhead Community Association submission to PC 100 (Private): Riverhead**

### **Introduction**

The Riverhead Community Association (RCA) is an incorporated society comprising of residents passionate about our community.

The RCA has 70 financial members and our Facebook group has 670 members, 170 of which have recently joined after the Plan Change 100 was put out for submissions.

The RCA provides a combined local voice and works collaboratively with Auckland Council and Auckland Transport on issues and projects which affect the Riverhead communities.

The RCA has a proven track record of advocating for community needs. From 2006 when Riverhead went through a plan change process for Riverhead South, RCA was at the table making a difference. We influenced the outcomes that were incorporated into the SPECIAL 30 (RIVERHEAD SOUTH) ZONE (legacy Rodney District Plan) which resulted in the spacious and attractive built form of Riverhead South.

The RCA has been active informing the community of PC100 via 2 public meetings and multiple topic Facebook updates. We have taken notice of key themes which have emerged, and these are compiled into this submission. In our view, this submission captures the major topics of concern consistently raised by the community at large.

The RCA is not anti-development.

We wish to be heard.

### **Council's Position Pre-Notification**

The RCA is cognisant of council's pre-notification reporting and the decision of the Planning, Environment and Parks Committee.

We concur in principle with council's description of the main issues, however, outline further matters of specific concern in this submission<sup>1</sup>.

*"The main issues will be the provision of infrastructure, whether the layout and provision for connections through the area are appropriate, the management of natural hazards and the intensity of development proposed. In respect of infrastructure, the applicant is proposing to provide new local transport upgrades as the land is developed. The extent to which these are sufficient can be considered through the analysis of submissions and*

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<sup>1</sup> Planning, Environment and Parks Committee, Agenda, Thursday 4 May, 2023, Paras. 72, 73



*detailed plan change review. It is noted that there are no committed or funded public transport service improvements at this time.”*

And

*“An important consideration is the effect of additional traffic from the potential new development enabled by the plan change on the wider transport network, and most notably the operation of SH16. NZTA Waka Kotahi are planning an upgrade to SH16 in the vicinity with the upgrade project to be completed in 2024/2025. The project extends from the end of the North Western Motorway from the Brigham Creek Road/Fred Taylor Drive/SH16 roundabout through to Waimauku - a 10km stretch. The section from Brigham Creek Road to the Taupaki roundabout will be four-laned with a new two-lane roundabout at the SH 16 /Coatesville Riverhead Highway intersection. It will also include wire rope median barriers and a 3-metre-wide shared path from Brigham Creek Road/Fred Taylor Drive/ SH 16 roundabout to Kumeu. The section from Huapai to Waimauku involves installation of wire rope median barriers and shoulder widening.”*

## **RCA – Position Overview**

The RCA opposes the plan change for the reasons set out in this submission.

The RCA welcomes the opportunity to work with the requestors and the council to resolve matters raised in this submission.

Matters of concern and remedies sought are listed below.

### **Transport:**

1. The plan change fails to adequately recognise and propose transport infrastructure upgrades required to manage adverse effects on the wider transport network. For example, SH16 is at times completely gridlocked with commuter traffic, the queue to get onto SH16 comes back to Hallertau at 6.30am! During weekends the line to Boric (the Coatesville Riverhead Highway (CRH)/SH16 intersection) is at the golf course. Another 3,000 residencies at Riverhead will exacerbate this greatly. There are very few local employment opportunities, most people will commute to work, and the single route bus is inadequate, inefficient and unreliable. The road has no capacity for walking or cycling to Westgate or Kumeu. Driving on roads is the only option.
2. Significantly, the development relies upon construction of a roundabout at the (CRH)/ Main Road (SH16) intersection to be built by Waka Kotahi NZ Transport Agency at some future time. Whilst this upgrade has been a long time coming it only addresses safety at the intersection. It will not improve capacity of the network which is already often dysfunctional. We also understand that this project is not currently programmed or funded.



3. The end of the NW motorway often backs up for a kilometre or more, and the roundabout intersection is routinely dysfunction creating huge traffic jams.
4. The plan change fails to recognise comprehensive local network transport improvements (within existing Riverhead) are warranted necessary to manage adverse effects on local transport.
5. The proposal is for limited local road 'upgrades'. But, to only deliver these in a fragmented and staged way based upon occupation of adjacent property. The upgrades do not have to be in place prior to construction when the first traffic impacts start.
6. Riverhead has under-provisioned streets, often with open drains, a lack of footpaths, unformed carriageway edges and few street trees. Some blocks are poorly connected and contain unformed paper roads. The development will increase pedestrian use over all of Riverhead, including to Riverhead School and to the two walkable pre-schools. All the realistic routes from the plan change area to destinations in Riverhead such as schools, pre-schools, shops, War Memorial Park and public walkways should be reviewed in terms of footpath provision and safety, and upgrades should be completed prior to the main development starting. This is to enable safety pedestrian movements for the existing and future people and children of Riverhead.
7. The plan change fails to recognise that local and wider transport upgrades are necessary to complete prior to development (earthworks and civil) commencement to manage the effects of construction traffic and safety.
8. The huge development area will require extensive earthworks and civil construction, including thousands of truck and vehicle movements well before any residence is occupied. Traffic upgrades, such as turning bays and pedestrian networks need to be functional and safe before the heavy traffic begins. The current plan change proposal to require limited improvements prior to occupation of a dwelling fails to recognise and mitigate the adverse construction traffic effects which will be particularly severed at main access routes and where locations where site access is feasible.
9. New subdivisions often lack on street parking. Demand for parking would spill over into the existing community where there are no formed road edges and open stormwater drains. Adequate on street parking needs to be required as we don't have the public transport options available.



### ***Transport – remedies sought***

10. Include provisions which state that development of the plan change area cannot proceed until wider network capacity and safety issues are addressed.
11. Include provisions which state that development of the plan change area cannot proceed until local road improvements have been completed, including function and safety assessments and any required upgrades to footpath routes and networks in Riverhead likely to be used by residents of the plan change area to access local destinations.
12. The enormous retirement village privatised site creates pinch points of available connectivity between the plan change area and existing Riverhead. These should be recognised and addressed by requirements for upgrades in the plan change provisions. For example, the road and pedestrian network of Te Roera Place, Duke Street, Cambridge Road, Queen Street, Alice Street and King Street will all be well used routes for people moving in and out of the plan change area, as pedestrians and in vehicles. These roads, and further routes to Riverhead School all warrant assessment and specific upgrades to ensure they are functional and safe. Similarly, the connection between the plan change area and Riverhead War Memorial Park has not been recognised as a primary route which is restricted by the CRH and the retirement village development. Specific provisions should also be applied to this area to ensure that development enables safe and logical east/west connections and road crossings.
13. Include provisions which require all required local and wider transport improvements to be in place prior to earthworks and related traffic impacts commencing.

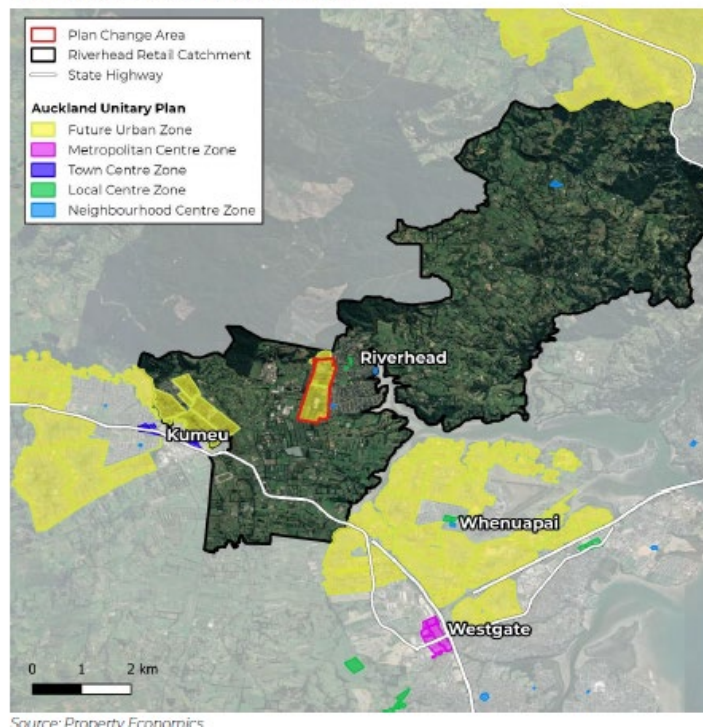
### **Commercial Zoning – Local Centre Zone and the Neighbourhood Centre Zone:**

14. A Local Centre zone is proposed at the corner of Riverhead Road and the CRH and a Neighbourhood Centre Zone is proposed opposite Riverhead Point Drive (Hallertau).
15. Riverhead already has a consolidated area of Business Mixed Use zone and Local Centre zones sites which house 2 mini-marts, a real estate office, a restaurant/bar, bottle shop and a vape shop and Heritage café/takeaways on School Road. There is also the local vet and two-preschools, Lulu's café, and other retail and commercial yard type activities. The mixed-use zoned triangle contains a development which when completed will include a series of ground level shop or business, and the final part of the triangle is also under development and also zoned Business Mixed Use, therefore, is also available for commercial use. Hallertau sits further down the CRH.

16. The basis for the proposed commercial zones is an economic report which predicts future demand (Appendix 7 – Centres Assessment). This report provides a cursory summary of the existing commercial activities and zoning. It also bases predicted demand on a ‘Riverhead Core Retail Catchment’. The report provides no basis for the extent of this catchment despite it being a formative assumption. Astonishingly, the catchment extends and wraps around Kumeu and goes all the way to the Dairy Flat Highway.

extent of Riverhead's core economic market.

FIGURE 1: RIVERHEAD CORE RETAIL CATCHMENT



17. Defining this as a catchment for Riverhead as a retail destination is ridiculous at both extents of the area shown. People in the Kumeu area have no incentive to travel to Riverhead for shopping. Kumeu is well served with a supermarket and a huge range of retail and commercial services. Council’s own consultation documents for Kumeu show the extensive land at Kumeu dedicated for these activities.

See below.



24 | KUMEŪ-HUAPAI CENTRE PLAN

18. People east of Coatesville are well served by old Albany and the Albany centre and beyond. Presuming that these people would also flock to Riverhead for shopping is not realistic because Albany is more accessible and contains a much greater range of shops and services.
19. The economic report also does not appear to consider the retirement village development and the hospitality, medical and other services it will contain which would be available to the residents and to the public. Restaurants, retail and healthcare facilities are specifically enabled by the proposed Sub-Precinct A within the retirement site.
20. The proposed THAB zoned areas also allows a range of commercial and service activities (via a RC). It is not clear why the economic report does not account for the possibility that the THAB zone can also contain businesses and retail, especially the area in proximity to the proposed Neighbourhood Centre zone where this development may be likely.
21. Another concern is that the proposed isolated Neighbourhood Centre Zone (adjacent Hallertau) will exacerbate an undesirable pattern of commercial strip development down the CRH.
22. A complete and justified basis for zoning this land as a Neighbourhood Centre Zone has not been provided. The proposed zone does represent a defined area of FRL landholding which naturally raises the question as to whether this discrete proposed zone is motivated by commercial gain rather a demonstrated need or sound design principles.
23. The original structure plan for Riverhead South reinforced the community's expectation of a defined centre. The existing Riverhead centre is located in a



relatively consolidated and logical manner, and also has connection to Riverhead War memorial Park.

24. The Urban Design assessment (Appendix 6) shows that the main Local Centre Zone is within a 400m walkable catchment for all residents within the plan change area. So, the isolated Local Centre Zone it is not justified by pedestrian accessibility. As noted, the existing Riverhead centre supports two min-marts or diaries, and major supermarkets are located on all routes west (Kumeu), South (Westgate) and east (Albany).

### ***Commercial Zoning – Local Centre Zone and the Neighbourhood Centre Zone – remedies sought***

25. We want any proposed commercial zoning to be justified by economic analysis that is based on a clear outline of existing zoning and activities in Riverhead, including under-utilising of zoned land and potential capacity, and recognition of the activities and services that would be provided by the retirement village and commercial activities that can be undertaken in the THAB zone via resource consent.
26. We want any proposed commercial zoning to be justified by economic analysis that is based on a well-reasoned and justifiable customer catchment which recognises the commercial and retail centres of Kumeu, Westgate and Albany, and does not unrealistically anticipate that people who live near these centres would instead travel to Riverhead for their shopping needs.
27. We want any new business zoning to demonstrate a consolidated and legible town centre, not exacerbate strip commercial areas fronting the highway. Most importantly by removing the proposed Local Centre Zone opposite Riverhead Point Road.

### **Residential Zoning - Mixed Housing Suburban Zone:**

28. Most of the land is proposed as Mixed Housing Suburban Zone. This zone allows for two and three storey detached and attached housing in a variety of types and sizes. Up to three dwellings are permitted as of right subject to compliance with the standards.
29. In comparison, existing Riverhead is mostly Single House zone. The plan change will result in much more dense development and generally taller houses and lots of multi-unit townhouses. Existing Riverhead is characterised by many large trees on private properties.
30. In contrast, large trees would be infrequent in the proposed Mixed Housing Suburban Zone which has minimal landscaping requirements (only 20% and this can be paved if there is canopy cover over (IX6.11. Landscaped area within the

Mixed Housing Suburban Zone) and only a 2.5m front yard standard which is not adequate for large growing tree. The outcome is that buildings will dominate the neighbourhood character. Overall, due to a lack of space or a requirement to plant trees on private sites, the neighbourhood character would be markedly different compared to existing Riverhead. We expect this difference in character to be noticeable and jarring, resulting in a lower quality of amenity. We want any new development to fit into the existing urban fabric of our community.

31. We are not sure that this character represents the 'unique sense of place' described as an intension in the precinct description.
32. No requirements for road reserve tree planting are proposed either, leaving the street tree outcome uncertain or minimal. Even in the green corridor there are no measurable outcomes for vegetation cover or trees.
33. The proposal fails to mention or adopt the council Auckland's Urban Ngahere (Forest) Strategy. The strategy recognises the social, environmental, economic, and cultural benefits of our urban ngahere (forest), and sets out a strategic approach to knowing, growing, and protecting it. It seeks to achieve increased canopy cover to 30 per cent across Auckland's urban area, and at least 15 per cent in every local board area. The proposed plan change should seek to provide overall canopy cover of 30% which would provide a range of health, social and economic benefits including reducing the urban heat effect of roads, buildings and impermeable surfaces. This could go some way to integrating the old and the new.
34. The precinct description also seeks to 'enable transition from the rural to the urban environment'. It achieves this outcome abruptly, rather than a smooth transition.
35. The zoning proposed does not provide any transition at the rural edge, for example, single house zoning could be applied to the outer 100 metres. There is little attempt to provide certainty of transition of scale or density, overall. Policies which direct this outcome adopt soft non-comital language, such as 'Encourage' (policies 15 and 16). It is not clear how 'encourage' has any real influence at the resource consent stage.
36. A 5 metre rear yard setback standard is proposed at the rural zone interface. This is to landscape or plant trees in the rear yard. A 5 metre yard would have no material visual difference to the abrupt transition between residential development and the rural environment. A larger rear yard, say 15m with a requirement to plant at least one large tree and a rural fence typology are obvious designs requirements that would go some way to achieving the intended transition outcome.
37. There is also no requirement to provide adequate front yards to enable the planting of trees. This was a requirement of the Riverhead South development, which contributes to the 'treed' neighbourhood character established and respects the character of old Riverhead and the many prominent mature trees. This requirement





should at least apply to the rural fringe parts of the site and would also contribute overall to sense of transition between the rural and residential land uses.

38. Another formative design requirement of Riverhead South was a rule prohibiting tall front yard fences. This outcome can also be observed widely in Riverhead South and contributes significantly to a sense of spaciousness with buildings set back and front yard landscaping visible. The plan change seeks to remove the usual requirement for low or visually permeable front yard fences without any explanation as to why. (refer IX.6. Standards page 11). This may result in a proliferation of tall front yard fences detrimental to a desired spacious character. It also has negative effects on CPTED outcomes.
39. There is no requirement to plant regular street trees on roads. Whilst often achieved during development, the supporting AUP policy context is vague. To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, we request minimum tree quantity outcomes are required for new roads. The density for the housing will result in no tree cover of value, so the work must be done in the streets.
40. The zone also does not propose any design response to the proposed green corridor network, aside from a lonely fence height standard. There are no provisions proposed to give effect to the Urban Design recommendation for: *“a high quality and vegetated interface for higher density development along the key movement routes and adjacent to existing residential development which contributes to the current landscaped character of streets in Riverhead.”* There is also little detail on how this will be achieved, given council parks recent directive for no gardens within the streetscape we are left wondering what this ‘green corridor’ will contain.

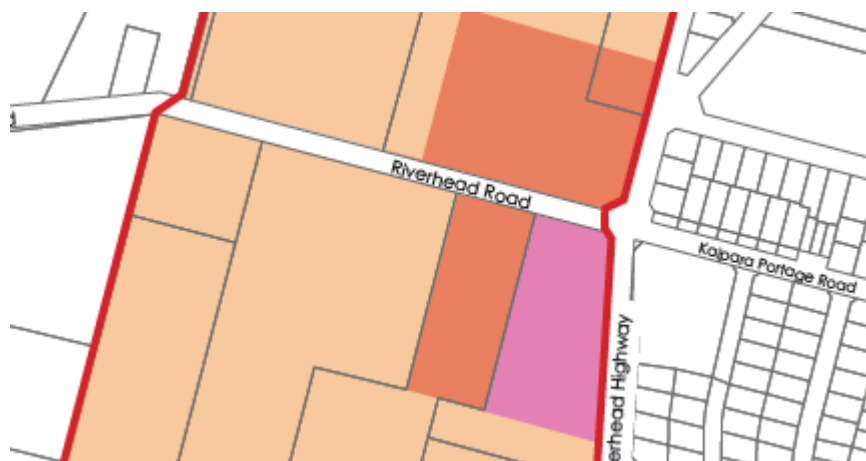
### ***Residential Zoning - Mixed Housing Suburban Zone – Relief sought***

41. Generally, we accept that density needs to be increased compared to the predominant Single house zone of Riverhead. But this should be balanced by stronger requirements for good urban design (for example, low front yard fences) and green infrastructure (for example requirements to plant trees on sites and on roads). Graduated density should be considered at the transition to rural zoning and higher density can be placed near the neighbourhood centre and open spaces.
42. We want front yards sized to be adequate for planting large trees, for example, 6 metres. We want a requirement for each site in the zone to plant one tree capable of growing 6m plus in height.
43. We want specific yard and landscape standards to apply at the rear of all sites which adjoin a rural zone to help establish a transition between the residential and rural environments.

- 44. We want a front yard fence control applied which applies H5.6.15 Front, side and rear fences and walls.
- 45. To partly compensate for the lack of site area capable of accommodating large trees, and to help integrate the plan change area with the character of existing Riverhead, we request minimum tree quantity outcomes are required for new roads. Trees are often the last consideration and underground infrastructure dominates the road corridor.
- 46. Overall, we want the plan change to require sufficient private and public planted areas to give effect to the intent of Auckland's Urban Ngahere (Forest) Strategy. This will also help integrate the higher intensity development with the character of existing Riverhead and the rural interface.

**Residential Zoning - Terrace Housing and Apartment Zone (THAB):**

- 47. The THAB zone provides for high intensity living in the form of terrace house and apartments and should be predominantly around centres and the public transport network to support the highest levels of intensification.
- 48. North of Riverhead Road this zone is located within the retirement village area. If that goes ahead this area of THAB zoned land would be developed with a retail/hospitality corner and privatised retirement apartments.
- 49. The other area of THAB zone that will be available for development and housing which is not privatised is immediately west of the Neighbourhood Centre zone at the corner of Riverhead Road and CRH. This is overlaid with Sub-Precinct B





50. There is very little reasoning provided for this discrete area of zoning proposed, and why it does not also front CRH, or warp around the south of the Local Centre zone. We do not think the proposed zoning reflects a land parcel, and this may be influencing the proposed location and extent of that zone.

### ***Residential Zoning - Terrace Housing and Apartment Zone (THAB)- remedies sought***

51. We want any THAB zone location and extent to be based on a reasoned analysis and reflect the intent of the zone which is to provide density around a transport hub and/or a town centre.
52. We want the transition edge of THAB to the Mixed House Suburban zone to contain a local road to create a natural transition space between the different densities and building scale/forms.

### **Mixed Rural Zone:**

53. A mixed rural zone is proposed at the northern part of the plan change area.
54. This is a response to the obvious flaw with the original (pre-notification but rejected by the council) proposal which proposed this flood plain area as suitable for residential development.
55. The main issue with this zoning is that the land will not be able to be further developed or subdivided.
56. The outcome is that the 'key move' of a green corridor extending to the river, and an esplanade reserve vested as public space to the council cannot be realised. The maintenance and enhancement of public access to and along rivers is a matter of national importance under the RMA. The current proposal fails to achieve this.

### ***Mixed Rural Zone – relief sought***

57. We want provision to require the 20m margin of land from the stream to be zoned as public open space and vested to the council.
58. We want the green corridor to be extended to the open space esplanade reserve and be available for public access. The river is an important taonga for our community. Previous development has turned its back to it.

## Flooding and Stormwater:

59. We are concerned that current best practice stormwater system design methodologies (as outlined within Appendix 10) would not adequately address adverse effects of the development. Council's current practice has failed Riverhead as evidenced in the Auckland Floods February 2023 where new developments designed to council's standards resulted in flooding harm.
60. We request robust peer review and an overall bottom line requirement that stormwater will not cause upstream or downstream adverse effects.
61. Objective (6) is very weak in that it that allows for the outcome of inadequate stormwater management:  
*(6) Stormwater is managed to avoid, as far as practicable, or otherwise minimise or mitigate, adverse effects on the receiving environment.*
62. In our view, if there is so much uncertainty that the requestor seeks scope for it to not be 'practicable to 'avoid, remedy or mitigate adverse stormwater effects', then this indicates a lack of confidence that stormwater issues can be appropriately addressed. We consider that the objective must be amended to remove the caveat 'as far as practicable' so the adverse stormwater effects must be avoided, remedied or mitigated.
63. Stormwater systems across the plan change area are proposed via a 'central stormwater management treatment spine' intended to be part of a 'multi-purpose green corridor' To ensure a coordinated delivery there needs to be a requirement for this to be designed and agreed prior to development.
64. Without an overarching agreed plan for the stormwater corridor, it is not clear how an overall integrated stormwater system will result from development of multiple individual lots and/or stages and what specific land parts must occur on. The risk is that fragmented and uncoordinated design and implementation would result due to a lack of design clarity and responsibilities.
65. Despite a 'designed' stormwater spine system' being proposed, zoning is not used to clarify the location and extent of the system. The extensive land required for this purpose is inappropriately zoned residential. Zoning would provide certainty of the land required for the stormwater and green corridor purposes.
66. A matter of significant concern is that the open space and stormwater functions of the corridor will be located over many separate parcels, landowners, and development stages. It is also located on parcels owned by parties not subject to the plan change.

67. There is no requirement for the overall green corridor to be designed prior to development. If this was a requirement then it would be clear what needs to occur and where. The lack of clarity will likely result in a fragmented outcome overall due to separate parties leading different parts of the development at different times.
68. It is recommended that a policy be added to require a clear overall design for the combined stormwater and open space corridor needs to be agreed by council prior to development within the precinct. We request objectives, policies and standards be included to define the corridor, its various functions, and require it to be implemented in a staged and coordinated manner.
69. Policy 17 states:  
*“(17) Require subdivision and development to be consistent with the water sensitive approach outlined in the **supporting stormwater management plan**, including: ...”*
- It is not appropriate for a plan change to require adherence to a document that has not been reviewed and accepted by the council. The report itself clarifies: *“This report has been prepared solely for the benefit of our client with respect to the particular brief and it may not be relied upon in other contexts for any other purpose without the express approval by CKL.”*
70. In general, it is not good practice for an enduring planning document (the AUP OP) to refer to a third party report prepared in support of a plan change.
71. The supporting stormwater report was prepared when 22 Duke Street was proposed to be zoned for residential development. This land is now largely proposed to be zoned rural, and consequently could not be subdivided. This casts doubt as to whether this land can still be used for stormwater management and conveyance to the Rangitopuni tributary. It is not clear if this affects the integrity of the stormwater report findings.

### ***Flooding and Stormwater - relief sought***

72. We want robust peer review and an overall bottom line requirement in the plan change provisions that stormwater will not cause upstream or downstream adverse effects.
73. We want the clause of ‘as far as practicable’ to be removed from Objective (6), for example: *“Stormwater is managed to avoid, or minimise or adequately mitigate, adverse effects on the receiving environment.”*
74. We want a requirement for the overall stormwater corridor system and green network design to be agreed with council prior to development and not incrementally addressed via multiple separate development proposals. This would



likely require staging of development to align with development of the stormwater/green network corridor necessary to support that development.

75. We want clarity of the intended use and function of 22 Duke Street with regard to stormwater.

## **Wastewater:**

76. Residents report that the existing system is prone to failure, often setting off alarms particularly during rain events, we understand due to groundwater and ingress of water into the council's system. The concern is that the existing poor performing system is not fit for purpose overall, and that expanding it over a large area with high groundwater will negatively impact everybody.

## ***Wastewater – relief sought***

77. We want provisions which ensure that the wastewater system is appropriate and fit for purpose, and that addition of the plan change area will not negatively impact existing and future users.

## **Parks and Reserves:**

78. The 'multi-purpose green corridors' are defined by the requestor as a 'key move' from an urban design perspective. This outcome agreed and supported in principle.
79. There is no requirement that the green corridor be offered to council for vesting, but this is commonly required under existing AUPOP precinct plans to provide certainty for council and developers. In our mind, a green corridor is not a wider road with more street trees.
80. Riparian margins are to be vested, but these are minimal and go nowhere near establishing the green corridor which needs to be located on a variety of land tenures. There needs to be a requirement that land necessary for the green network, but not accepted for vesting by council, is developed and held by an entity, like the proposal for riparian margins. Otherwise, parts of the network might not get delivered.
81. The intent of a contiguous open space network comprising of stormwater and passive open space functions is supported. Unfortunately, the provisions fail to define what the corridor will comprise of in real terms and do not require it to be delivered in practice. For example, what will be located in-between the stormwater ponds?
82. Policy (13)(d) suggests "*Co-locates smaller open spaces along the multi-purpose green corridor to achieve a connected network of open space.*"

83. This policy shows a lack of consideration that the separately proposed 'neighbourhood parks' are limited to 3 separate locations and a flawed presumption that council would accept ad-hoc vesting of a range of "smaller parks" required to join-up the green corridor network. The network may be partly on the road reserves, but if this is the intention, then that needs to be clear and also needs to be a requirement of the road design.
84. The policy fails to incorporate the depth of the description of the green corridor in the s32 report:
- "The central north-south multi-purpose green corridor is a key structuring component in both the Greenways Plan and the proposed Structure Plan. Along with the collector road, this green corridor accommodates both passive and active open spaces, footpaths and dedicated cycleways. It also incorporates an existing intermittent stream."*
85. A clear description the intended corridor composition and the types of land it will occupy is required in the plan. As noted, it appears that parts of the green network would likely be upon road reserve. However, there are no provisions which explain this or require 'linking roads' to deviate from a standard design to perform this function. For example, to ensure that necessary roads are designed to be a width adequate to contain a high level of green infrastructure in a dedicated or protected zone within the road reserve.
86. Clear expectations are needed in the plan to ensure that the multiple components of the green networks are considered and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor. Without this being a clear directive it is likely that conventional design would be applied to the various parts, and overall the green network would not be cohesively designed and delivered.
87. Overall, clear objectives, polices, standards and design/outcome expectations are required in the plan to ensure the overall 'multi-purpose green corridors' is delivered as anticipated. Policy 13 as drafted will not achieve this outcome.
88. The precinct description seeks to realise "...the opportunity to establish green corridors through the precinct". Policy (13) only requires the council to encourage "...the provision of a continuous and connected multi-purpose green corridor". The word 'encourage' is a weak and non-committal directive. Clauses (a) to (d) provide an unclear framework without specific detail of what is 'required' to be achieved. A stronger word such as 'require' is needed to ensure the overarching urban design 'key move' of the green corridor is delivered.

- 89. Policy 17 requires development and subdivision to provide “.. a central stormwater management treatment spine through the precinct in general accordance with the multi-purpose green corridor in the locations indicatively shown on IX.10.2 Riverhead: Precinct plan 2;” This cannot be achieved in isolation of an overall agreed plan which spans the plan change area.
- 90. The supporting Stormwater and Flooding assessment contains a ‘Preliminary Masterplan’ which shows significant areas of land to be occupied by stormwater devices and green infrastructure, extending in area at some locations much further than shown on Precinct Plan 2.
- 91. If this drawing represents the modelled stormwater requirements, then the precinct plan should also include the same information so that developers and the community can understand what is required.

Auckland | A20405

Figure 10: Preliminary Master Plan - Version 10 (Source: Urban Actumen)



- 92. The supporting Urban Design report (Named Neighbourhood Design Statement) shows the multi-purpose green corridor extending via the land a 22 Duke Street to the Rangitopuni tributary and beyond via existing and potential future esplanade reserves alongside the stream and river.
- 93. We support the connection and the esplanade reserve alongside the tributary and note the extensive high quality esplanade reserve that has resulted from the Riverhead South network. A long term aspiration is to have a complete network of coastal connections. The proposed zoning of 22 Duke Street as (predominantly) Mixed Rural removes the possibility of subdivision and vesting of esplanade reserve along the tributary. The small parts which are proposed to be residentially zoned would appear to still leave the parent site over 4HA, and therefore not trigger the esplanade reserve vesting upon subdivision. We expect that this is an unintended consequence of changing the proposed zoning. We request that the 20m margin of



the tributary be zoned Open Space – Conservation, as part of the plan change, and that it's heavily weed infested margins be restored and planted, and that land be vested to the council. These are the outcomes which would have occurred if the land was able to be subdivided and are necessary to secure a necessary part of the long-term aspirational esplanade reserve network.

- 94. Objectives, policies and standards are also required to achieve public access links from the development to the zoned esplanade reserve. If 22 Duke Street is available for stormwater management purposes, then this outcome should be easily achieved, especially if parcels are subdivided as drainage reserves, as this may trigger the 4Ha or less lot size adjacent to the tributary to trigger esplanade reserve vesting.



- 95. There is no direct requirement to deliver the 3 proposed neighbourhood parks, only an indirect reference to section E38. We seek a direct requirement to deliver the parks, presuming support from council parks division.
- 96. One high value (notable value) Beech tree is identified which is clustered with many impressive specimen trees (including a 13m tall Kauri). The Beech sits within a cluster of magnificent trees worthy of retention and is an obvious location for a Neighbourhood Park. Policy (12) seeks that the Beech tree is incorporated into an open space, but Precinct Plan 2 does not identify this location for a Neighbourhood Park. This inconsistency needs to be corrected. This cluster of trees, planted by a family who have been in Riverhead for multiple generations could further help connect the character of existing Riverhead to that of the plan change area.
- 97. The Beech tree and surrounds should not be compromised by stormwater functions which also appear to be proposed within this location (refer structure plan) page 8.



98. Policy 12 does not require the retention of 'other mature trees that are worthy of retention' by caveating the policy with '*where possible*'. We seek that the option to 'not retain worthy trees' be removed and more directive wording applied. The site is a huge greenfield area with a lot of flexibility for development locations. Any trees of value should be required to be retained. The value of this cluster extends beyond the arboriculture assessment.
99. Large trees located near the CRH appear to not be recorded in the arboricultural report which appears to be an error.
100. The green corridor graphic, or 'east-west connections reflecting potential original portage routes promoting *awa ki awa* linkage' is shown on Precinct Plan 1 extending along and outside of the southern plan change boundary. Policy 19 contains an obtuse requirement for development to acknowledge key views and spiritual connections respond to identified on IX.10.1 Riverhead: Precinct plan 1 in the layout and/or design of development; in particular, sightlines to Te Ahu and Pukeharakeke, and connections to Papakoura Awa and Te Tōangaroa.
101. We of course cannot speak for mana whenua but note that the actual outcomes required are limited to locating and orientating streets and public open spaces to reference and respect the Māori cultural landscape values. This is unlikely to result in any material outcome in the development form. The proposed west-east roading pattern already adequately achieves the expected outcome. It is not clear how the development is required to respond to the southernmost connection, that is not even within the plan change area.

### ***Parks and Reserves – relief sought***

102. We want the requirement and composition for the green corridor to be determined and agreed in principle with council prior to any development, so that the required environmental, stormwater and connectivity outcomes are understood and delivered appropriately and fully by each discrete development parcel or stage.
103. We seek that necessary parts of the green corridor infrastructure which do not comprise of roads, neighbourhood parks or drainage reserves are offered to council for vesting or protected and maintained in perpetuity by an appropriate legal mechanism (as per IX.6.3. Riparian margin).
104. We want a clear description the intended corridor composition is required in the plan, and an explanation of how the multiple components of the green networks are to be determined and delivered in the whole, from the perspectives of parks to vest, stormwater devices and the road corridor, and any other land that may be required.



105. We want the green corridor to extend to the Rangitopuni tributary and provide a public connection to a zoned open space esplanade reserve.
106. Overall, clear objectives, policies, standards and design/outcome expectations are required in the plan to ensure the overall 'multi-purpose green corridors' is delivered as anticipated, because Policy 13 as drafted will not achieve this outcome.
107. We want a neighbourhood park to be located to include the Beech tree and the overall grove of high value trees at this location.

### **Retirement Village (Matvin Group land):**

108. The technical approach of the plan change with respect to the Matvin retirement village land is unclear. It is noted in the s32 report but not in the plan change provisions. It is also noted in the urban design report as a consented development, containing buildings up to 5 stories tall, with 410 dwellings including 310 apartments. It is also included in the supporting stormwater report.
109. The plan change maps and provisions do not respond to the scale and poor urban design connectivity outcomes of the retirement village development. The only response is to propose zoning part of the site as THAB and the remainder as Mixed House Suburban, and Sub-Precinct B. This is of concern because the retirement village is located at the interface of the plan change area and existing Riverhead at Cambridge Road. It occupies a 500 metre long flank and only provides for a single pedestrian cross connection, available during daylight hours only.
110. The development of the retirement village is not certain to occur, however, the plan change proposal treats it as a certainty. Evidenced by the lack of local roads, pedestrian connectivity, or a considered interface with Cambridge Road, all of which would be expected on a greenfield area some 10 Hectares in area and positioned at a critical location. If the retirement village does not go ahead then the plan change should be able to provide a good practice development framework for this area consistent with the remainder of the plan change area, and adopting the key design drivers of the Urban Design report, being:
  - a connected physical environment
  - an integrated community
  - access to nature
  - vibrant and local
  - housing choice and affordability
  - proximity/convenience
111. Concerningly, despite recognising the retirement village (by way of omitting expected outcomes such as a green corridor, local roads and pedestrian connectivity, and a considered interface at Cambridge Road) the plan change also



does not propose any wider response to the retirement village form and function, should it go ahead.

112. For example, the Urban Design report recommends: *“a transition between taller buildings around the centre to lower densities and building forms in the remaining areas of the site”* (pg 51). Requiring roads and pedestrian routes to interface with the lone public route through the retirement village should also be required in the plan change. The Sub-precincts which seek to provide some level of transition of buildings do not adjoin the retirement site but are contained within it.
113. Especially concerning is the detrimental impact that the retirement village will have on connectivity for the northern part of the plan change area and movements to and from the adjacent existing Riverhead. This matter is noted also in our transport section.

### ***Retirement Village (Matvin Group land) – remedies sought***

114. It is requested that the plan change be complete and robust in terms of dealing with the two scenarios of the retirement village being in place or not. Requiring cross-site connectivity and local roads for the scenario of the retirement village not being built.

### **Structure Plans and Consultation:**

115. Back in 2006, prior to being rezoned for development, Riverhead South also went through a plan change which was informed by a Structure Plan. This was Council led and involved the community through a series of consultation meetings including interactive design workshops. The people of Riverhead were actively involved in a meaningful way over a carefully planned process.
116. The structure plan was adopted into the then Rodney District plan ‘SPECIAL 30 (RIVERHEAD SOUTH) ZONE’. This included a comprehensive range of issues, objectives, policies, standards and assessment criteria to ensure that development reflected the needs of the community and council’s intent, whilst providing for good quality development.
117. That document delivered a planning framework informed by community participation. A range of built form outcomes are visible in Riverhead South today which were a product of this community/council collaborative process. Most significantly there was an emphasis on dwellings being set back from the street and for low or no front fences. These create a sense of spaciousness and openness at the front of houses and make for safe streets with high levels of passive surveillance.
118. These previously expressed community desires are not captured by the proposed plan change. The obvious outcome is that the character of the plan change area will be markedly different and not consistent with existing Riverhead. Density can be

provided, but it can also be balanced with adequate and open front yards and a requirement for trees. Mature trees are a defining element of existing Riverhead, including Riverhead south where significant trees were retained and sites are large enough to accommodate new large growing species.

119. In stark contrast the 'Structure Plan' (refer Appendix 4) supporting the current plan change application was not prepared with meaningful community involvement. Community consultation involved a meeting over a coffee with some members of the RCA, 2 'drop in community sessions and a summary of 'feedback'. In our view, these represent a token level of consultation designed to 'tick the box'.
120. We do not understand why the previous council led (but developer funded) process was collaborative and genuinely engaging, and the current process has been superficial, how is that democratic?
121. The Quality Planning website outlines good practice consultation for structure planning. It says:

*Consultation with key stakeholders and the community affected is an important component of the structure plan development process. The number and type of stakeholders identified and consulted with for a structure plan will depend on the scale and characteristics of the area and the issues to be managed.*

*To assist with consultation, it is good practice to develop an overall consultation plan for all groups including key stakeholders, tangata whenua and the wider community. This helps to identify all stakeholder and ensure that consultation and communications are managed in an integrated and co-ordinated way. This can also help to provide certainty to stakeholders about the opportunities to input into the structure plan process and the how the various consultation processes will be integrated into the final output. It is important that the communication or consultation plan recognises the potential for land ownership to change during the course of the structure planning exercise and any subsequent RMA plan changes.*

*Commencing consultation early in the process is important, and can help with:*

- *obtaining stakeholder buy-in to the process;*
- *gauging community and stakeholder levels of acceptance to broad concepts (such as the overall level of development) being proposed;*
- *fulfilling statutory duties under the RMA, LGA and Land Transport Management Act;*
- *incorporating and working through stakeholder concerns and aspirations while there is flexibility in the process to do so;*
- *identifying constraints and opportunities.*



122. In our view the consultation process fell well short of best practice. This is evidenced by how poorly the current plan change portrays the concerns and aspirations of the community compared to the previous process which involved meaningful involvement and consultation.
123. We are not out to stop change or development, as evidenced by involvement in the previous planning process. Rather we seek to ensure that the good things promised (such as the green corridor and infrastructure improvements) are properly designed, will be delivered as described (and when needed prior to adverse construction effects), and that due consideration is given to simple changes that could better integrate the plan change area with existing Riverhead, such as adequate front yards and tree planting. We very much would have preferred this submission to say that the process has been collaborate and effective, rather than needing to write such an involved submission and speak to these issues at a hearing and appeals if it gets to that.
124. We welcome the opportunity to conference with the requestors to resolve any matters of difference pre-hearing.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Marc Garratt  
**Date:** Friday, 17 May 2024 11:45:30 am

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Marc Garratt

Organisation name:

Agent's full name:

Email address: marcg70@hotmail.com

Contact phone number: 0211592548

Postal address:  
37 Great North Road  
Riverhead  
Auckland 0820

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:

Property address: Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

I do not believe the proposal has sufficient grounding or information in a number of issues including,  
1) Storm water 2) Traffic management and infrastructure 3) Child/resident safety 4) Schooling 5) Housing density (graduated density better)

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

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

The reason for my or our views are:

I am a Riverhead resident and care about my community and don't want to see some quick fix management in place of a suitable and quality project.

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

180.1

Submission date: 17 May 2024

**Attend a hearing**

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

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

Yes

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Priya Khatri  
**Date:** Friday, 17 May 2024 12:00:54 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Priya Khatri

Organisation name:

Agent's full name:

Email address:

Contact phone number:

Postal address:

1 Wautaiti Drive  
Riverhead  
Auckland 0820

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:

1 Wautaiti Driver Riverhead

Property address:

Map or maps:

Other provisions:

Riverhead

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:

Before considering the commercial development Council needs to make infrastructure available such as 2 lanes from Coatesville Riverhead road to connect to the motorway, round about in the motorway as there are issues and people from the motor sometimes does not give way and we have to wait minimum of 30 mins to get on to the motorway during peak hours versus 5 mins at night quiet time.

There is also no proper and frequent and connected transportation available. Instead of spending millions on the Hamilton route train tracks, a must needed train tracks and train in Riverhead and Huapai would have reduce the congestion we face on daily basis.

Last year there was flooding in our streets, till date council has not taken any actions or made any changes to prevent this happening in the future.

These are the wider issues council needs to fix in first instance before looking into other things.

There is already few commercial activity like Golf and Strawberry picking and this adds to the existing congestion on the small road.

The streets are so small that once people park on street there is not enough space sometimes to go through.

You are always increasing the rates but in return we do not get anything. Simple thing like Courier also charges us extra for rural delivery which is unbelievable as our city rates are as much as the other urban rates. Plus the courier delivery take extra 2 days as we are RURAL. we do not get discounts for staying in rural area but rather a reap off from council rates and other services.

There is no high school for kids in riverhead. Why can't council first think of investing into these type of things rather than otherwise. Make the basic things available first!

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

181.1

Submission date: 17 May 2024

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Shannon Malcolm  
**Date:** Friday, 17 May 2024 12:15:23 pm

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Shannon Malcolm

Organisation name:

Agent's full name:

Email address: mailthemaalcolms@gmail.com

Contact phone number: 021335988

Postal address:

28 Elliot Street

Riverhead

Auckland 0820

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:

Property address: Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

My main concerns relate to the failure to provide for adequate infrastructure, connections, management of natural hazards, together with the overall size of the proposed development.

In relation to infrastructure, there is no commitment to arrange or fund adequate public transport service improvements to deal with the influx of people, and the effect of the additional traffic from the proposed new development on the roads (namely SH16 and the Coatesville-Riverhead Highway). The roads in the affected area are already completely gridlocked with commuter traffic and there is a complete lack of public transport options. The roading itself is in a terrible state, full of potholes and in parts completely unsafe for its current usage - let alone the proposed increase in use. Any proposed or current upgrades by Waka Kotahi NZ Transport Agency do not begin to account for this. The proposal fails to adequately account for the infrastructure that would be required to even in part deal with the proposed increase in traffic and people.

The current plan change proposal only seeks to make limited improvements prior to occupation of the new dwellings. The proposal completely fails to recognise and mitigate the adverse construction traffic effects on main access routes for the current Riverhead community, and does not make adequate provision for the safety of current residents (particularly the huge number of children in the area).

There is a complete lack of parking. There is already limited street parking which is insufficient to deal with the current residents.

The next issue is the proposed Local Centre Zone and Neighbourhood Centre Zone. There are already existing areas of such. Between the current Riverhead shops and businesses, Kumeu/Huapai, Westgate and Albany retail areas, there are already many options for residents. This proposal would only increase traffic, and put even more pressure on the area with no benefit to the residents.

Majority of the land is proposed as Mixed Housing Suburban Zone. Currently Riverhead is mostly Single House zone. The proposed plan change will result in a very dense development with lots of multi-unit townhouses. A complete disregard for the current character of the neighbourhood, and would lead to a huge increase in people and pressure on the existing neighbourhood resources, services and facilities.

My main concern is the current best practice stormwater system design methodologies (as outlined within Appendix 10). These completely fail to adequately address the negative effects of the development. There is already a very real failure by Council to provide and maintain sufficient services to Riverhead as evidenced in the Auckland Floods February 2023. I hold my breath every time there is rainfall now, as there are continuing stormwater runoff, drainage and water flow issues throughout the Riverhead neighbourhood affecting private residents, and the general public using public areas, that have not be dealt with. The proposed development will completely overwhelm what is already a failing system.

The current proposal fails to ensure that adequate stormwater management be required as part of the development. I refer to Objective (6) which must be revised to remove the caveat 'as far as practicable' so the adverse stormwater effects must be avoided, remedied or mitigated. I submit that the proposed stormwater systems across the plan change area via the 'central stormwater management treatment spine' which is part of a 'multi-purpose green corridor' must be designed and agreed with Council prior to commencement of the development.

I submit that the stormwater and wastewater systems must be appropriate and fit for purpose, and agreed upon in full with Council, prior to commencement of the development; and that the plan change area will not negatively impact existing and future users.

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

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

The reason for my or our views are:

I am a current resident of Riverhead. We have a young family, and are engaged members of the neighbourhood. We, along with many of our neighbours and friends, will be adversely affected by the plan change and this proposed development in its current form. This plan change fails miserably to account for what is required, at a bare minimum, to create a functioning and positive development. I am not against development or progress - but this plan change currently would only negatively affect the Riverhead community.

I or we seek the following decision by council: Decline the plan change | 182.1

Submission date: 17 May 2024

**Attend a hearing**

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

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Danielle Davies  
**Date:** Friday, 17 May 2024 12:15:37 pm

---

The following customer has submitted a Unitary Plan online submission.

#### **Contact details**

Full name of submitter: Danielle Davies

Organisation name:

Agent's full name:

Email address: danielle.davies@hotmail.co.nz

Contact phone number:

Postal address:

Kumeu  
Auckland 0891

#### **Submission details**

##### **This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

##### **My submission relates to**

Rule or rules:

Property address: 95 Station Road

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

I am a resident in Huapai and currently experience congestion issues coming in and out. The intersection of SH16 and CRH is one of the main sources of congestion for vehicles leaving and entering Kumeu; vehicles stop on SH16 to let people out of CRH. Adding more housing and businesses to Riverhead will exacerbate the problem further by adding more vehicle movements. I do not agree with the traffic assessment that people will stay local. Many well paying jobs are outside of this area and many travel into the CDB and beyond.

The intersection should be upgraded to allow for free flow of traffic through this intersection to and from Kumeu, for example merging lanes for vehicles coming out of CRH and 2 lanes all the way along SH16 from the Brigham creek round about to the Taupaki Road round about. The lane to turn right into CRH from SH16 should be removed completely and road users directed to the roundabout at Taupaki.

The Kumeu bypass has been delayed, this project should be brought forward before more development takes place in riverhead.

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

183.1

Submission date: 17 May 2024

**Attend a hearing**

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

**Declaration**

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

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

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

No

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

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

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

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

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

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

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

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



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 16, 135 Albert Street  
Private Bag 92300  
Auckland 1142

For office use only

Submission No:

Receipt Date:

### Submitter details

#### Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full  
Name)

Graham & Sunita Ramsey

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

#### Address for service of Submitter

75 Riverhead Point Drive, Riverhead

Telephone:

21888994

Email:

graham.ramsey.nz@gmail.com

Contact Person: (Name and designation, if applicable)

### Scope of submission

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

Plan Change/Variation Number

PC 100 (Private)

Plan Change/Variation Name

Riverhead

The specific provisions that my submission relates to are:

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

Plan provision(s)

PC 100 (Private)

Or

Property Address

Or

Map

Or

Other (specify)

### Submission

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

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

See accompanying information

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

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

184.1

See accompanying information

I wish to be heard in support of my submission

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

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

05/17/2024

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

Date

**Notes to person making submission:**

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

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

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

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

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

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

(a) adversely affects the environment; and

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

**From:** [graham.ramsey.nz@gmail.com](mailto:graham.ramsey.nz@gmail.com)  
**To:** [Unitary Plan](#)  
**Subject:** Submission on PC 100 (Private): Riverhead  
**Date:** Friday, 17 May 2024 1:04:37 pm  
**Attachments:** [pc100-form-5-signed.pdf](#)

---

Hi There

We oppose the Proposed Private Plan Change 100 in its current form.

Our objections are based around concerns about the proposed intensity of the development in an urban fringe location that is already underserved with inadequate infrastructure. We propose instead that:

- Any development should be primarily H3 Residential – Single House Zone in keeping the existing character of Riverhead. | 184.2
- Any request to rezone to H6 Residential - Terrace Housing and Apartment Buildings Zone should be rejected | 184.3
- No development should commence before the transport improvements needed to address safety and capacity issues on State Highway 16, and the completion of the Northern Interceptor have been complete. | 184.4
- The proposal lacks consideration about the long term suitability of the Coatesville-Riverhead Highway as an east-west link | 184.5
- Any further development to Riverhead should address the lack of capacity for schools | 184.6
- Any further development to Riverhead must fully address community concerns regarding flooding | 184.7

**Planning**

There is insufficient progressiveness between the low density, single dwelling, large lot housing on the eastern side of the Coatesville-Riverhead Highway and the proposed apartment buildings on the western side of the Highway. That such a “cliff-like” transition would be jarring and unpleasant should be self-apparent. In our opinion, density should favour inner city suburbs and not the urban fringe.

We note that the “recent” Stone Mill development is held up as an example of a mixed use, medium density housing development located along Coatesville-Riverhead Highway. However (as an outside observer, and for all extents and purposes), this development has stalled and has been sitting disused for years. This development continues to harm the community, not help it.

In our opinion, the property bounded by Alice St and Coatesville-Riverhead Highway should be designated as the local centre to respect the existing town centre. This proximity to the Memorial Park would promote pedestrian activity between the two, noting that Memorial Park is a busy and active sports venue. This area is the existing “heart” of Riverhead, the plan change seeks to transplant it by relocating to the corner of Riverhead Rd and the Coatesville-Riverhead Highway. | 184.8

We generally support the proposed multi-purpose green corridor links. Furthermore, and in our

opinion, we believe the proposal would benefit from the multi-purpose green corridor linking the proposed network directly to the Memorial Park. This would allow residents to enjoy the amenity of the park without being forced to walk along a busy roadway. We also noting the lack of safe (or any) footpaths for some existing residents to access the Memorial Park which we discuss further below.

### **Transport**

We generally support the provision objectives for active mode transport. The area is popular with cyclists and any changes should support their safety along Coatesville-Riverhead Highway (along its entirety) and Riverhead Road.

We consider the development of safe walking and cycling space between the roundabout of Coatesville-Riverhead Highway and Kaipara Portage Road on the eastern side of the road and alongside the Memorial Park as essential, noting that the footpath pushes pedestrians unacceptably close to a busy roadway. The lack of a complete footpath on the eastern end of Princes St requires residents and children to walk on the road if they wish to use the park. We also draw attention to the lack of safe walking spaces throughout Riverhead generally making it unsafe for children to walk to and from school – some of this is identified in the Plan Change documents.

We note that there have been several significant traffic incidents outside the assessment window of the Integrated Transport Assessment. This includes a child being struck by a car on the pedestrian crossing outside the Beekeepers while on their way to school.

We note that traffic along Coatesville-Riverhead Highway continues to get heavier with this road being used as a key east-west link. The plan change documents support this view. We argue that there is need to plan for a new east-west link between Kumeu/Huapai and Albany North. It seems unlikely that the Coatesville-Riverhead Highway will offer sufficient capacity in the future as a single lane roadway given development plans for North and North-West Auckland. We respectfully propose that any development should plan for a future integrated transport link/dual carriageway running to the west of the development before such a corridor is obstructed by further development. In the near term, we wish to emphasise the safety of residents and children having to cross the existing Coatesville-Riverhead Highway, in particular to access the school.

We consider public transport to and from Riverhead is substantially insufficient to support terraced housing and apartments. There is no ferry, no rail, and bus services are infrequent and require a significant journey before arriving to an interchange. Any development must recognise that the primary means of transportation will be by personal car simply because residents lack choice. We note that the limited bus transport that exists only does so because existing residents were willing to pay a levy on top of their rates for this service.

The Integrated Transport Assessment acknowledges (and understates) the 1.8km queues along Coatesville-Riverhead Highway. These queues can occur on weekends as well as weekdays. All references to use of the Westgate Town Centre must be considered in this context – if it is too difficult to get to Westgate, we shop elsewhere (i.e. Kumeu or Albany). Addressing this issue is critical to any future development.

We also note that the plan change reports do not identify parts of Coatesville-Riverhead Highway that are prone to flooding and can become impassible during heavy rain. We draw attention to the culverts nearer to the interchange between Coatesville-Riverhead Highway and State Highway 16.

**Schools**

The Riverhead area is underserved in terms of schooling. There is a single primary/intermediate school which is already overwhelmed from the influx of students following prior developments. There is no secondary school. In our opinion, further development would require development of a new intermediate school (to free up capacity at Riverhead School) and a new secondary school.

**Flooding**

We acknowledge that there are a significant number of properties within Riverhead that are affected by flooding (for instance, Riverhead Forest Stream downstream of Duke St). Our understanding of the planning documentation is that we are not personally directly affected by flooding; however, we support any concerns that the community has expressed in this regard. We oppose development on any land prone to flooding. We oppose any development that creates or exacerbates any flood hazards within the community. We reject the argument per 9.4.3 of the storm water report that the increase in flood depth should be considered “minor”.

Thank you for your consideration. Please do not hesitate to contact me if you require further information.

-----

Regards,  
Graham Ramsey  
Mob. 021 888 994

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Marcus Cook  
**Date:** Friday, 17 May 2024 1:15:28 pm  
**Attachments:** [PC100Submission.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Marcus Cook

Organisation name:

Agent's full name: Marcus Cook

Email address: marcusdavidcook@gmail.com

Contact phone number: 0211753205

Postal address:  
5 Te Roera Place  
Riverhead  
Riverhead 0820

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:

Property address:

Map or maps:

Other provisions:  
PC100 Riverhead

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

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

The reason for my or our views are:  
Please see attached

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

185.1

Submission date: 17 May 2024

Supporting documents  
PC100Submission.pdf

**Attend a hearing**

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



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

Yes

**Declaration**

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

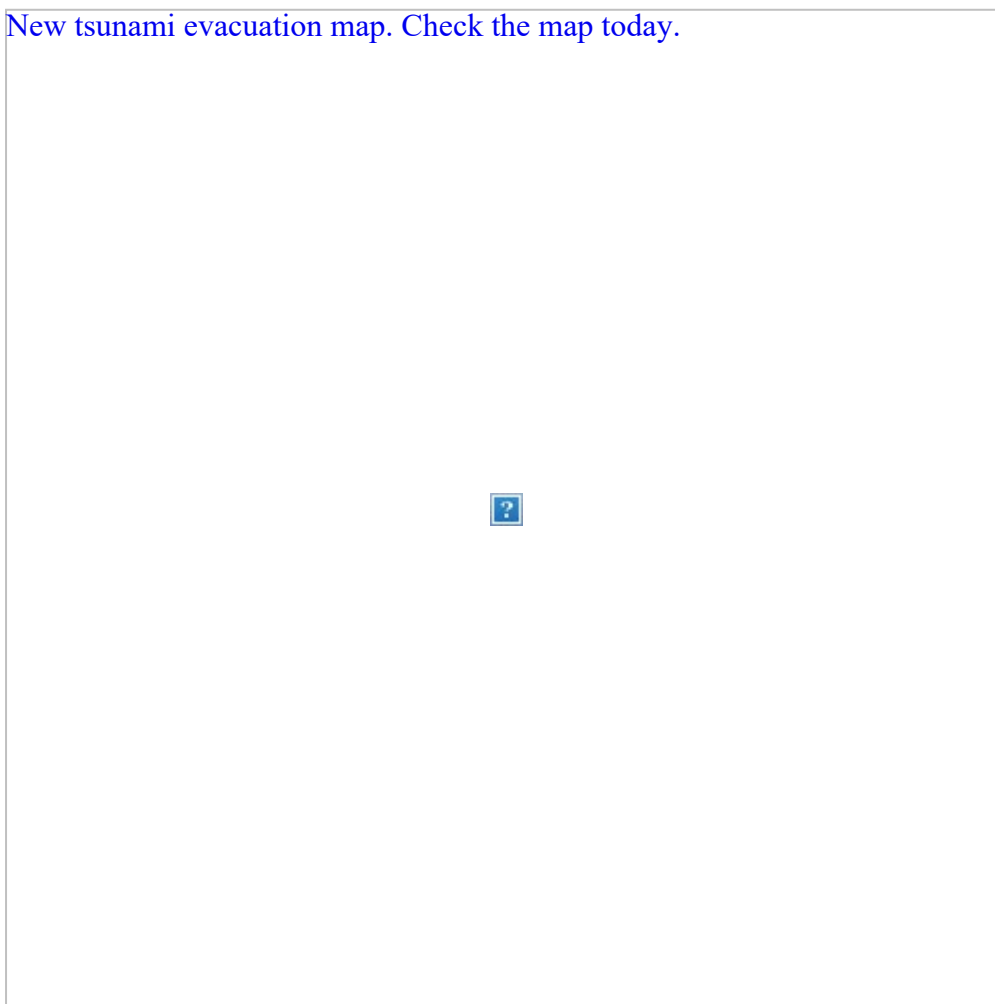
Are you directly affected by an effect of the subject matter of this submission that:

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

Yes

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

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PC 100 (Private) Submission in Opposition – Marcus Cook

## INTRODUCTION

While we understand the requirement for additional housing stock (albeit the wisdom of further expansion “out” rather than “up” is debatable), Riverhead’s infrastructure is woefully underprepared for yet another development – particularly of this size. In my opinion, PC100 is therefore wildly premature, and should be declined or significantly delayed. The reasons include:

### 1 – FLOODING RISK

We have only recently had residents able to move back into their homes following the 2023 flooding events – albeit those houses are in some cases still undergoing remediation.

Other residents have undertaken “temporary” repairs (to fences, etc.) as they recognize the futility of a permanent fix until flooding issues are resolved. Building adjacent to a floodplain, as opposed to directly on it, will do little to ease the concerns of residents due to the dramatic increase in impermeable area proposed. Indeed, some residents speak of children still anxious during even moderate and commonplace rainfall events. It would not be unreasonable to assume that serious rainfall events will continue and likely increase in both frequency and severity because of climate change.

I note the Flooding Assessment report attached to PC100 is dated March 2022, which predates the worst flooding at the beginning of 2023. It also states the additional flooding effect to the (Riverhead Stream discharging) Northern part of the PC100 site (specifically to the Duke St, Mill Grove, Te Roera Place area) will be “less than minor”, stated as 30mm – small comfort when your house is underwater.

We were fortunate to not have severe injury or loss of life in the area (to my knowledge) during the February 2023 flooding. We should not gamble on being this fortunate in the future.

Unless and until the flooding risk is adequately mitigated, I would urge this application to be declined. I’m given to understand that Healthy Waters are “working on this” currently.

### 2 – TRANSPORT AND TRAFFIC

Riverhead is intolerably congested currently. It’s not unusual for there to be a 2km queue from 6am weekdays for traffic turning left from Coatesville Riverhead Highway (CRH) into SH16 (also into SH16 from Old North Road, Old Railway Road, and Riverhead Road). This causes congestion North on SH16 back into Kumeu, Huapai, and beyond. I note the PC application refers to SH16 being upgraded by Waka Kotahi “by 2025”. This seems optimistic at best and should not be given any significant weight in considering this application in my opinion.

Additionally, CRH (which also floods in moderately heavy rain) needs upgrading entirely between SH16 and Riverhead Road. PC100 provides for upgrading adjacent to the Plan Change area, but nowhere else. My understanding is that there is no timeline for this project currently.

Riverhead has minimal public transport capacity (and no mass transport options) so private car trips are largely unavoidable. The limited bus services we have (which only exist because of a special levy on local ratepayers) are often caught up in the traffic. I note the Proposal states capacity for 1450-1750 additional dwellings. The proposal further submits this would result in an additional 4270 trips generated per weekday, with the associated Greenhouse Gas Emission increases, particularly by idling vehicles.

We have an incomplete and fragmented footpath network currently. RLG proposes to establish footpaths on CRH and Riverhead Road where its precinct is only. This leaves us with the absurdity that adjacent to the precinct we will have delightful paths which will end abruptly, presumably leaving pedestrians and cyclists to brave the roadway proper. We have the same situation on Duke Street (and, in fact, the opposite side of CRH from the PC100 area), where the developer laid footpath to the edge of their development only and there is no continued footpath, as well as unformed road edges and open drains. In addition to being an absurdity and a significant safety concern, this is another barrier to our disabled and less mobile community.

Congestion on CRH and SH16 is not merely a “rush hour” issue. A visit to the area during the weekend, for example, would almost certainly see a long queue on CRH, and heavy congestion Southbound on SH16 all the way down Brigham Creek Hill to the motorway.

The Proposal refers to several specific roading upgrades proposed which will reportedly mitigate the effects of the development. Unless and until these stated upgrades (as a minimum) have been completed (or at least physically started), I would again urge this application to be declined.

### 3 – SCHOOL CAPACITY

Riverhead School is near capacity already. We have lost approximately half of the school field for temporary Portacom classrooms to be placed.

We have no intermediate or secondary schools locally (MOE are part way through ongoing negotiations for a local secondary school site, which will likely still be many years away).

Our secondary students therefore need to be transported in and out of Riverhead (our zoned High School is approximately 15km away). This contributes to our minimal bus services (referred to in Point 2) often being at capacity and indeed students (and non-students) have been unable to be collected at times.

I understand empirically the Riverhead Landowners Group (RLG) propose to set aside land for a school within the Plan Change area, albeit I can't find reference to it in the Section 32 report. I'm led to believe that this is an additional Primary School whereas a secondary school is a more pressing need at this time. It would not appear that RLG are proposing to build this school, the cost of which would presumably fall to the MOE to fund from their budget.

It would be reasonable to assume the additional dwellings resulting from the proposed rezoning would result in additional students – and those students requiring secondary schooling would also have to be transported into and out of the area.

## 4 – STORMWATER AND WASTEWATER

Despite the reports contained within the PC100 documents, the current stormwater infrastructure is unable to cope with the current load (let alone with the forecast increased flow). All houses are required to have a sewage pump, and these will often error and trip in even a moderate rain event. Empirically, this is because the stormwater system overflows and creates back pressure in the wastewater system.

Residents have been advised by the pump service agents, in the case of sewage pump failure, that this is caused by back pressure in the system burning out the pumps. The (not insignificant) cost of replacement or repair is of course borne by the property owner.

Logically, if the stormwater is mixing into the wastewater system, it would follow that untreated wastewater would also be ending up in our stormwater system to be discharged into the environment.

These concerns are in addition to the flooding concerns referred to above.

### SUMMARY

In summary, Riverhead's infrastructure (both Council and Central Government responsibilities) is the victim of approximately 30 years of underinvestment, and simply unable to acceptably cope even with the current population. This raises serious safety and environmental concerns were PC100 to proceed at this time. Documents lodged in support of PC100 refer to proposed or future required upgrades to the inadequate infrastructure and services. This would suggest that PC100 is premature and should be declined at this time.

Note is taken (at IX.6.1.) that RLG intends not to "occupy" dwellings or buildings until certain stated upgrades are in place. This does not address any other required upgrades (i.e. Coatesville-Riverhead Highway itself for the entire distance back to SH16). This too suggests the Plan Change is premature and, perhaps cynically, raises suspicions in the community that this requirement may be lobbied to be changed in the future if the proposed site is rezoned at this time. It also fails to account for the (no doubt) thousands of cubic meters of topsoil which will need to be removed (raising additional concerns for flooding, as any stormwater controls proposed would not be operational during this time) as well as building materials brought in, with the associated vehicle movements, noise, and pollution. Most (if not all) of our roads are unsuitable for the repeated and concentrated heavy vehicle use which will no doubt be required for the building works. As mentioned, Coatesville Riverhead Highway (south of the PC100 Precinct) is sub-par, has no planned works and dozens of heavy vehicle movements would inevitably hasten the wear to the road and further endanger safety.

Many of these upgrades should have been completed before previous developments were permitted by previous Councils. I would strongly urge Council not to repeat the same mistakes, and to decline PC100 entirely until at least the stated improvements have been made to all relevant parts of the infrastructure.

It is worth noting that Riverhead infrastructure is underprepared in far more areas than PC100 indicates would require to be upgraded before “occupying” the area. The very real fear within the community is that these “extra” upgrades would again be overlooked or deferred.

The Riverhead community as a whole is not vehemently opposed to development in general and understands that this site will be developed at some point in the future. We’re simply asking for common sense to prevail and for our beleaguered infrastructure (both local and central government responsibilities) to be upgraded to an acceptable level before PC100 is accepted.

If PC 100 is not declined outright, I submit it should only be approved with the explicit condition that no development work of any kind is permitted to commence at all in the rezoned area until all the required infrastructure upgrades (not just those referred to in the proposal) are completed, unless that work is directly required for those upgrades. In this case, we would urge Council to work with RLG to ensure the upgrades are completed in the most efficient way possible to minimize disruption to the community.

185.2

**IN THE MATTER** of the Resource  
Management Act (**RMA**)

**A N D**

**IN THE MATTER** of a submission under  
clause 6 of the First  
Schedule to the RMA on  
Private Plan Change 100:  
Riverhead

**SUBMISSION ON NOTIFIED PROPOSAL FOR PRIVATE PLAN CHANGE 100  
TO THE AUCKLAND UNITARY PLAN (OPERATIVE IN PART)**

**To:** Auckland Council

**Name of submitter:** Auckland Council  
(contact: Craig Cairncross)

**Address for service:** 35 Albert Street  
Private Bag 92300  
Auckland 1142

**INTRODUCTION**

1. This is a submission on Private Plan Change 100: Riverhead (the **plan change**) to the Auckland Unitary Plan (Operative in Part) (**AUP**) by Riverhead Landowner Group (the **Applicant**).
2. This submission by Auckland Council is in its capacity as submitter (**ACS**).
3. ACS could not gain an advantage in trade competition through this submission.

## THE SPECIFIC PROVISIONS OF THE PROPOSAL THE SUBMISSION RELATES TO

4. The submission relates to the plan change in its entirety and all provisions including:
  - a. The Riverhead Precinct (the **Precinct**); and
  - b. The Auckland Unitary Plan Maps.

## SUBMISSION

5. ACS is concerned that the proposed zoning and plan change provisions are not the most appropriate to achieve the purpose of the RMA, given the potential flood hazard to infrastructure and property downstream of the plan change area, lack of public transport serving Riverhead and likely timing for delivery of the infrastructure prerequisites identified in the Auckland Future Development Strategy 2023 - 2053 (**FDS**).
6. ACS opposes the plan change, unless the matters raised in this submission are addressed.

### Strategic context

7. The National Policy Statement on Urban Development (**NPS-UD**) and Auckland Regional Policy Statement (**RPS**) Chapters B2 and B3 of the AUP contain objectives and policies that place strong emphasis on the importance of ensuring the integration of infrastructure, including transport infrastructure, with land use / urbanisation. There is also an emphasis on contributing to a well-functioning urban environment and quality compact urban form. Section 75(3) of the RMA requires the plan change to “give effect to” these higher order provisions.
8. Examples of these provisions include:
  - a) Objective 6 of the NPS-UD which requires local authority decisions on urban development that affect urban environments to be “*Integrated with infrastructure planning and funding decisions*”.
  - b) Policy 1 of the NPS-UD which requires planning decision to contribute to well-functioning urban environments that as a minimum have “*good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport*”.
  - c) RPS provisions in chapters B2 and B3, including B2.2.1(1); B2.2.2(2)(c) and (d); B2.2.2(4) and (7); B3.3.1(1)(b); B3.3.2(5). These provisions relate to growth occurring in a way that contributes to a well-functioning urban environment and integrates with the provisions of infrastructure.

9. Policy B2.2.2(7)<sup>1</sup> is directly relevant to the plan change as it applies to Future Urban Zoned land.

*B2.2.2(7) Enable rezoning of land within the Rural Urban Boundary or other land zoned future urban to accommodate urban growth in ways that contribute to a well-functioning urban environment and that do all of the following:*

- (a) support a quality compact urban form;*
- (b) provide for a range of housing types and employment choices for the area;*
- (c) integrate with the provision of infrastructure;*
- (caa) provide good accessibility, including by way of efficient and effective public or active transport;*
- (ca) incorporate improved resilience to the effects of climate change;*
- (d) follow the structure plan guidelines as set out in Appendix 1; and*
- (e) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets.*

10. B2.9 Explanation and Principal Reasons for Adoption of the objectives and policies, states:

*In addressing the effects of growth, a key factor is enabling sufficient development capacity in the urban area and sufficient land for new housing and businesses over the next 30 years. The objectives and policies guide the location of urban growth areas. They identify how greenfield land which is suitable for urbanisation will be managed until it is re-zoned for urban development. They encourage provision for Mana Whenua to develop and use their resources. They also set out the process to be followed to ensure that urban development is supported by infrastructure on a timely and efficient basis.*

*They should be considered in conjunction with the Council's other principal strategic plans such as the Auckland Plan, the Long-term plan and the Regional Land Transport Plan. The strategies and asset management plans of infrastructure providers will also be highly relevant.*

---

<sup>1</sup> As amended by decision on Plan Change 80



11. The explanatory text at B3.5 of the RPS confirms the intention that *“development, especially that associated with growth in greenfield areas, must be integrated and co-ordinated with the provision of infrastructure and the extension of networks”*.

### **Future Development Strategy**

12. Auckland Council recently adopted the FDS. This replaces the Future Urban Land Supply Strategy (2023-2027). Preparation of an FDS is a mandatory requirement for Tier 1 urban authorities (such as Auckland Council) under clause 3.13 NPS-UD. Subclause (1) of clause 3.13 states the purpose of an FDS is as follows:

*(a) to promote long-term strategic planning by setting out how a local authority intends to:*

*(i) achieve well-functioning urban environments in its existing and future urban areas; and*

*(ii) provide at least sufficient development capacity, as required by clauses 3.2 and 3.3, over the next 30 years to meet expected demand; and*

*(b) assist the integration of planning decisions under the Act with infrastructure planning and funding decisions.*

13. While the plan change was lodged prior to the FDS being finalised, it is relevant to consideration of the plan change, particularly in terms of whether urbanisation of the plan change land will integrate with the planning and funding of requisite infrastructure requirements.

### **Infrastructure prerequisites**

14. The FDS introduces infrastructure prerequisites, linked to the development readiness of areas. This is to ensure that bulk infrastructure for development is well-coordinated and is able to provide a safe, sustainable environment on which communities can be based. In the previous strategy the plan change area was identified as being development ready in the first half of decade two between 2028-2032. The FDS identifies the timing for the plan change area is now not before 2050+. The infrastructure prerequisites<sup>2</sup> identified for the Kumeu-Huapai-Riverhead Future Urban Areas are:

- Brigham to Waimauku SH16 Upgrade
- SH16 Main Road Upgrade
- Alternative State Highway

<sup>2</sup> Auckland Future Development Strategy 2023-2053, Appendix 6 Future urban infrastructure prerequisites, at p39

- Access Road upgrade
  - Coatesville-Riverhead Highway upgrades
  - Northwest Rapid Transit extension to Huapai
  - Riverhead separation from the KHR WW Main
15. Matters concerning the provision, timing and funding of infrastructure are directly relevant to decisions on zoning. It is not sound resource management practice and contrary to the purpose of the RMA to zone land for an activity when the infrastructure necessary to allow that activity to occur without adverse effects on the environment does not exist, or there is a high degree of uncertainty as to whether that infrastructure will be provided in a timely and efficient way.<sup>3</sup>
16. Where infrastructure needed to support a plan change is not planned for in the Long Term Plan and Regional Land Transport Plan<sup>4</sup>, it is incumbent on the Applicant to show how the infrastructure needed to service the development would be provided.
17. A key concern for ACS is therefore that the plan change must adequately provide for the strategic integration of transport, water and wastewater infrastructure, and the planning / funding of such infrastructure, with land use, otherwise it would be contrary to the principles of the FDS and the relevant provisions of the NPS-UD and RPS.
18. ACS understands that Watercare Services Limited (**Watercare**) intends to file a submission addressing the impacts on its existing and planned water and wastewater networks. For the purposes of its submission, ACS notes that the Kumeu-Huapai-Riverhead wastewater main is not planned to be delivered until 2050 or later, which is not within the horizon of this plan change.
19. Te Tupu Ngātahi Supporting Growth Alliance has lodged Notices of Requirement on behalf of Auckland Transport and Waka Kotahi New Zealand Transport Agency for route protection of planned transport projects in the North-West. These projects are not currently funded and there is no certainty on the timing/delivery of these projects. Moreover, the Notices of Requirement did not include the upgrade of Riverhead Road. Riverhead Road bisects the plan change area. While the Precinct provisions include a standard to enable the future road widening of Riverhead Road, there is no funding in the Regional Land Transport Plan for this project. The plan change includes Precinct provisions to require upgrades to nearby intersections and part of Coatesville-Riverhead Highway in the vicinity of the plan change area but does not address improvements to the wider network. ACS is concerned that urbanisation of the Riverhead future urban

<sup>3</sup> See, for instance, *Foreworld Developments Ltd v Napier City Council* EnvC Wellington W8/2005, 2 February 2005.

<sup>4</sup> Documents to which regard must be had under section 74(2)(b)(i) of the RMA.

area is premature and risks the area becoming an island of development connected to the wider transport network by rural roads with existing road safety issues. ACS understands that Auckland Transport (AT) intends to file a submission addressing the transport infrastructure upgrades and public transport services that would be necessary to support this plan change.

20. The FDS recognises there may be times where alternative funding methods or partners enable all or parts of these future urban areas to be live zoned earlier than where the provision of infrastructure solely rely on council funding. At this time, there are no Infrastructure Funding Agreements in place to deliver the required infrastructure earlier than what is provided for in the FDS.
21. ACS acknowledges that the Applicant has gone some way to address issues relating to infrastructure prerequisites. Specifically, the Precinct provisions include a standard relating to the staging of development to coincide with some identified transport upgrades in the vicinity of the plan change area. However, ACS is concerned that the provisions are not sufficient to address the funding and delivery of all the necessary transport and wastewater infrastructure prerequisites. ACS consider this is fundamental to enabling land zoned Future Urban to be rezoned for development ahead of the areas prioritised for investment in the FDS.

#### **Stormwater management and flood risk**

22. The Section 32 Assessment Report identifies that the plan change area is traversed by a number of overland flow paths and that the northern portion is subject to flooding. A Stormwater Management and Flood Risk Assessment has been prepared in support of the plan change.
23. ACS acknowledges that part of the plan change area has been identified as subject to flooding and therefore not suitable for urbanisation and is proposed to be rezoned Rural – Mixed Rural. However, this area appears to be reduced in extent when compared to the area shown in the FDS for removal from the future urban area.<sup>5</sup> Furthermore, it does not align with the 100 year proposed flood extents shown in the Stormwater Management and Flood Risk Assessment.<sup>6</sup> ACS wishes to understand the basis for how the extent of the Rural – Mixed Rural zone was determined.
24. The Stormwater Management and Flood Risk Assessment recommends the application of the Stormwater Management Area Control – Flow 1 across the majority of the plan change area. ACS supports this.

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<sup>5</sup> Future Development Strategy, Appendix 7, Figure 45 at p48

<sup>6</sup> At Appendix 1 Sheet A20405, Drawing 004

25. Additional information is required to understand changes in potential flood hazard to infrastructure and property downstream of the plan change area. This assessment should consider duration and frequency of flooding and potential impacts on the downstream network capacity. There are known flooding areas identified on the northern boundary of the plan change area, and potential flood risk to property downstream. Greater detail is required on the flood risk through the design storm profiles and not just concentrated on peak flood levels. In the absence of this information, ACS maintains significant concerns regarding potential flooding impacts resulting from the proposed land use change and the stormwater management approach. Urban environments that are resilient to the likely current and future effects of climate change are a minimum requirement under Policy 1(f) of the NPS-UD.

### **National Grid**

26. There is an 110kV transmission line traversing the northwest corner of the plan change land. The AUP applies the National Grid Corridor overlay to an area measuring 34 metres in width, with additional areas applying around the transmission towers. The National Grid Yard (Uncompromised) applies to an area within the overlay measuring 24 metres in width. The structure plan is inconsistent with policy D26.3(2) which directs that structure plans take into account the National Grid Corridor overlay to ensure the national grid is not compromised by reverse sensitivity and other effects. Rezoning land for residential activities within the National Grid Yard has the potential to compromise the national grid.
27. The plan change proposes that land subject to the National Grid Corridor Overlay is rezoned Mixed Rural and Mixed Housing Suburban Zone. Rezoning this land for residential use is contrary to AUP policies D26.3(1)(h) and D26.3(1)(j) which direct that establishment of activities sensitive to transmission lines are to be avoided in the National Grid Yard, as are new structures and buildings in the National Grid Yard (Uncompromised).

### **Well-functioning urban environment**

28. ACS has concerns about enabling this level of intensification at Riverhead and the extent to which it will contribute to a well-functioning urban environment. In addition to the concerns discussed earlier in this submission in relation to the strategic integration of transport and wastewater infrastructure, ACS is concerned about the level of accessibility for future residents of this area to employment, schools and services and the potential increase in greenhouse gas emissions. The minimum requirements of a well-functioning urban environment are set out in Policy 1 of the NPS-UD and include good accessibility and an urban environment that supports reductions in greenhouse gas emissions.

- 29. Riverhead is not served by a rapid transit network or frequent transit network, nor is it within a walkable catchment. ACS understands that there is no funding available to improve public transport services to Riverhead. While the Precinct provisions would deliver walking and cycling infrastructure within the plan change area, the funding and timing for delivery of improvements to connect Riverhead and Kumeu is not confirmed. The development of this area to the intensity proposed will result in an increase in vehicle trips due to the lack of planned and funded public transport and cycling infrastructure. This in turn will contribute to an increase in greenhouse gas emissions generated by additional road users.

**DECISION SOUGHT**

- 30. ACS seeks the that the plan change is declined in its entirety, unless the matters raised in this submission are addressed. | 186.1
  
- 31. In the alternative to the primary relief, ACS seeks the following decisions if the plan change is approved:
  - a. Amend the zoning of the land within the plan change so that:
    - i. The extent of the Rural – Mixed Rural zone encompasses all land in the plan change area that is within areas subject to significant risk of flooding and/or the National Grid Yard (Uncompromised). | 186.2
  - b. Retain the extent of the Stormwater Management Flow 1 area. | 186.3
  - c. Amend the Precinct description to identify that there are transport upgrades and bulk water supply and wastewater infrastructure required prior to subdivision and development. | 186.4
  - d. Amend the Precinct to add new objectives and policies to only enable subdivision and development to occur once upgrades to transport infrastructure and necessary bulk water supply and wastewater infrastructure are operational. | 186.5
  - e. Amend the Precinct to add new rules and standards to classify subdivision and development in advance of transport upgrades and necessary bulk water supply and wastewater infrastructure as a non-complying activity. | 186.6
  - f. Amend the Precinct to add new objectives, policies and rules to ensure downstream hazards are not exacerbated and to require appropriate mitigation. | 186.7

- g. Amend the Precinct to add a special information requirement to require all applications for two or more dwellings and subdivision to provide a Wastewater Infrastructure Capacity Assessment. | 186.8
- h. Amend the Precinct to address concerns in this submission relating to the adverse stormwater effects of urbanisation and downstream flooding. | 186.9
- i. Any other alternative or consequential amendments to address the matters outlined in this submission. | 186.10

**APPEARANCES AT THE HEARING**

- 32. ACS wishes to be heard in support of its submission.
- 33. If others make a similar submission, ACS will consider presenting a joint case with them at the hearing.

**DATED** 17 May 2024

On behalf of Auckland Council as submitter:



---

Craig Cairncross, Manager Central South (Acting), Plans and Places

Address for service:

Craig Cairncross  
Email: craig.cairncross@aucklandcouncil.govt.nz  
Telephone: 09 301 0101

Postal address:  
Auckland Council  
135 Albert Street  
Private Bag 92300  
Auckland 1142

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Kirsten Mills  
**Date:** Friday, 17 May 2024 1:45:15 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Kirsten Mills

Organisation name: -

Agent's full name:

Email address: k.l.mills@hotmail.com

Contact phone number:

Postal address:

ALbert Street

Riverhead

Auckland 0820

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:

Full plan change 100

Property address: Riverhead

Map or maps: Riverhead

Other provisions:

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

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

The reason for my or our views are:

The specific note of no occupancy of the development until the SH16/Riverhead highway 'upgrade' is insufficient. The current road plan is a safety upgrade and will not address the already existing congestion issue. Additional pressure on the road network will make the area un-livable and the developer(s) and NZTA need to take sufficient future planning action to alleviate the issue.

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

187.1

Submission date: 17 May 2024

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Brett James Dickie  
**Date:** Friday, 17 May 2024 1:45:15 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Brett James Dickie

Organisation name: N/A

Agent's full name: N/A

Email address: bdickie178@hotmail.com

Contact phone number: 021 751 966

Postal address:  
20 Tauwaka Crescent  
Riverhead  
Auckland 0820

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:  
Change to zoning, allowing an increase of housing, resulting in an increase of vehicles on already burdened vehicle traffic infrastructure.

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:  
The extra physical impact on time resulting from the already high traveling times in, around or through Riverhead, resulting from the extra vehicles that the proposed housing will put on the road. The roading to and from this area is already under substantial pressure and unrealistic wait times on the road, this proposed increase in housing will increase this to a level that is unsustainable for most people in the area to get to Work/schooling.

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

188.1

Submission date: 17 May 2024

**Attend a hearing**

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

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

**Declaration**

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

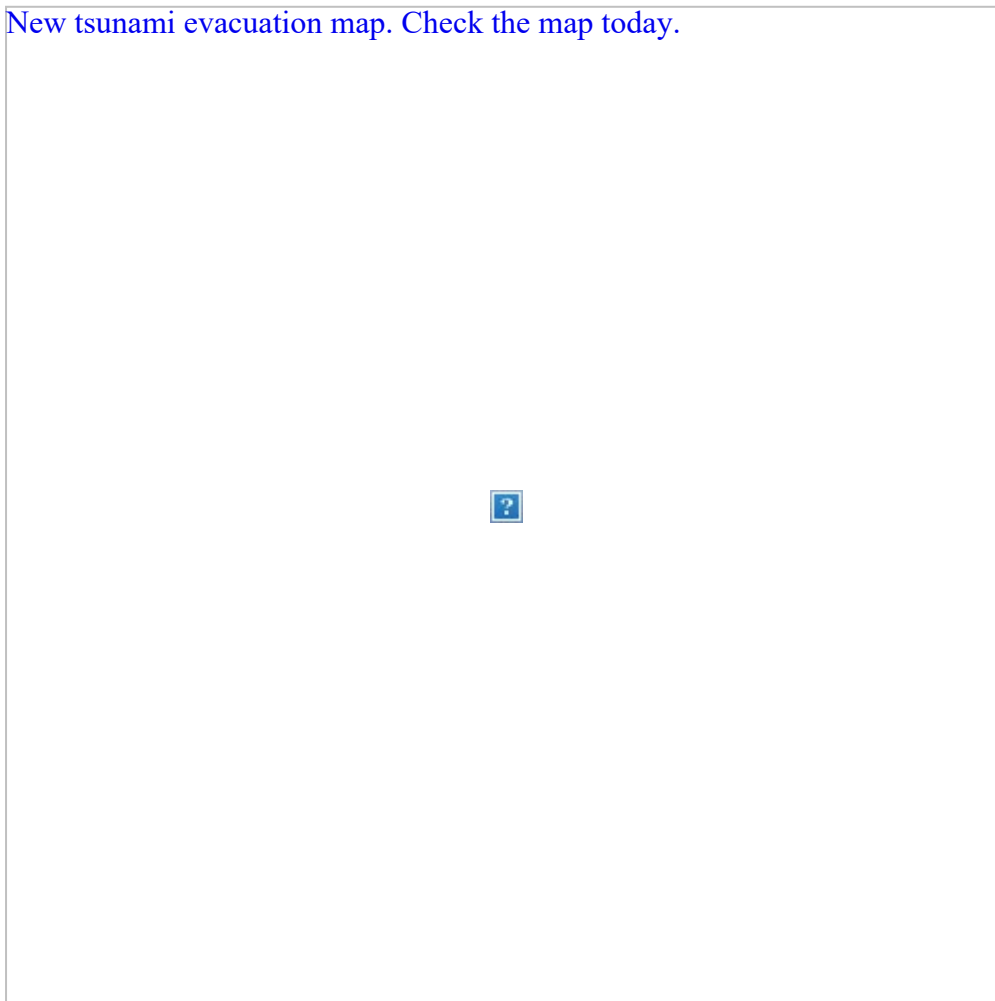
Are you directly affected by an effect of the subject matter of this submission that:

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Anne Clarke  
**Date:** Friday, 17 May 2024 1:45:18 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Anne Clarke  
Organisation name:  
Agent's full name: Anne Clarke  
Email address: [anneclarke198@gmail.com](mailto:anneclarke198@gmail.com)  
Contact phone number:  
Postal address:  
22 Rosella Grove WAIMAUKU 0812  
Waimauku  
Waimauku 0812

**Submission details**

**This is a submission to:**  
Plan change number: Plan Change 100 (Private)  
Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:  
Property address: Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

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

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

The reason for my or our views are:  
This massive multi-story apartment development will effectively double the population of Riverhead and add to our traffic (and flooding woes). It will also ruin the character of Old Riverhead.

Roading issues from Kumeu to the motorway - especially the Coatesville Riverhead Highway intersection - MUST be sorted BEFORE this development goes in.

More thought needs to be given to stormwater than what they have provided. This concrete jungle will add more pressure to storm water issues for our community, who have already suffered greatly from flooding 3x during the "once in a hundred year" floods.

Where are all these kids going to go to school? We've been asking for a high-school for decades. Massey High is at capacity now! How much further out will we need to send our children as they get older.

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

189.1

Submission date: 17 May 2024

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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email may be those of the individual sender and may not necessarily reflect the views of Council.

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Michelle Gillespie  
**Date:** Friday, 17 May 2024 2:00:20 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Michelle Gillespie

Organisation name:

Agent's full name:

Email address: mcnairm@hotmail.com

Contact phone number:

Postal address:  
11 William Blake Way  
Riverhead  
Auckland 0820

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:

The plan change requests is frivolous or vexatious Clause 25(4)(a); The plan change request is not in accordance with the sound resource management practice

Property address: All

Map or maps: All

Other provisions:

Lack of infrastructure, including emergency services, roading, schools, public transport etc. The report mention character of Riverhead describing it as workings man environment and a satellite area - contradicts itself by suggesting the urban growth inline with what has occurred in Kumeu/Huapai.

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

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

The reason for my or our views are:

The current road infrastructure struggles to accommodate current road users, with peak times being some of the worst in Auckland. The area has limited police, ambulance presence and is supported by a volunteer fire station in kumeu.

Riverhead lacks adequate safe footpaths, street lighting and has many open drains.

School options are limited with many of the local children once reaching intermediate having to travel over an hour each way to be able to access decent education options.

With more green space being taken up by higher density housing (small sections, townhouses, apartments) where there is little ability for the ground to absorb the rain during the downpours more

chances of greater flooding to the surrounding areas.

I or we seek the following decision by council: Approve the plan change without any amendments | 190.1

Details of amendments:

Submission date: 17 May 2024

**Attend a hearing**

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

**Declaration**

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

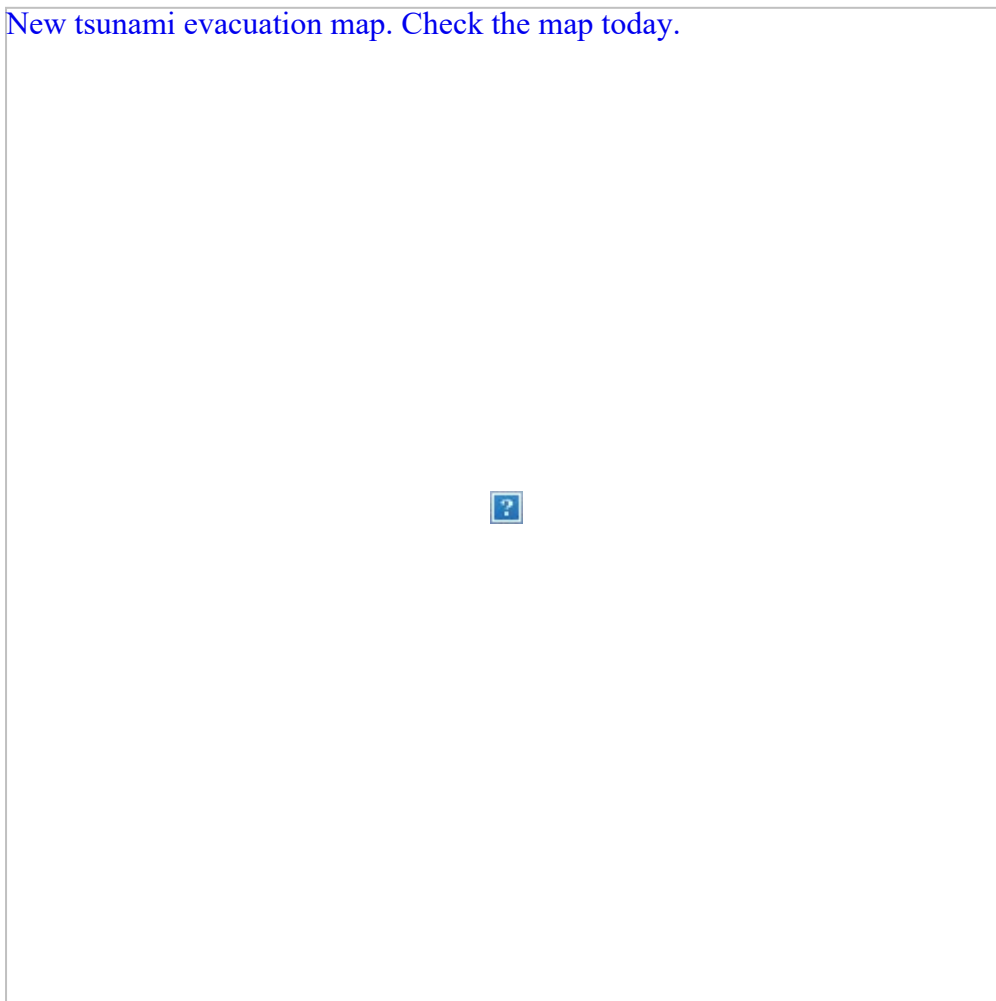
Are you directly affected by an effect of the subject matter of this submission that:

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Glen MacKellaig  
**Date:** Friday, 17 May 2024 2:00:35 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Glen MacKellaig

Organisation name:

Agent's full name:

Email address: glen@mackellaig.com

Contact phone number: 02102798384

Postal address:  
14 Maude Street  
Riverhead  
Auckland 0840

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:  
Land identified in the Private Plan Change by Riverhead Landowner Group, 80.5 hectares on western side of Riverhead

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:  
As a resident for over 12 years, I can't believe the lack of investment in infrastructure and schools in the area. Traffic is already a nightmare and to consider this development going ahead is a joke. No High Schools in Kumeu/Riverhead- Riverhead zoned for Massey High School??? Unbelievable.

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

191.1

Submission date: 17 May 2024

**Attend a hearing**

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

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

**Declaration**

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

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

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

Yes

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

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

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

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

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

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

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

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



Send your submission to [unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz) or post to :

Attn: Planning Technician  
Auckland Council  
Level 16, 135 Albert Street  
Private Bag 92300  
Auckland 1142

For office use only
Submission No:
Receipt Date:

## Submitter details

### Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Olga Sakey

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

Kumeu Community Action but officially known as The Kumeu-Huapai Residents and Ratepayers Association Incorporated

### Address for service of Submitter

30 Matatea Road R D 1 Waimauku, Auckland 0881.

Telephone:  Email:

Contact Person: (Name and designation, if applicable)

## Scope of submission

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

Plan Change/Variation Number

Plan Change/Variation Name

### The specific provisions that my submission relates to are:

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

Plan provision(s)

Or

Property Address

Or

Map

Or

Other (specify)

## Submission

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

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended Yes  No

The reasons for my views are:

Refer to attached submission.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

192.1

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

Refer to the attached submission.

I wish to be heard in support of my submission

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

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

17/05/2024

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

Date

**Notes to person making submission:**

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

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

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

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

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

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

(a) adversely affects the environment; and

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

## Submission on Private Plan Change 100: Riverhead

### 1. Introduction

- 1.1. This document forms part of Kumeu Community Action's (officially known as The Kumeu-Huapai Residents & Ratepayers Association Inc) (KCA) submission to Auckland Council on Private Plan Change 100 Riverhead (PC100).
- 1.2. KCA consists of residents and ratepayers in the Kumeu-Huapai and surrounding areas. The purpose of our group is to represent the views and interest of residents in the area, with a particular focus on improving infrastructure, public transport, public services and ensuring the coordinated planning and design of development and intensification.
- 1.3. KCA's interest in PC100 relates to ensuring future urban land is suitably identified in areas that are outside of natural hazards and that can be serviced with the appropriate level of infrastructure required.

### 2. Matters of Interest to KCA

#### *Lack of Infrastructure*

- 2.1. PC100 aims to rezone 6 ha of land in Riverhead from Future Urban to Rural-Mixed Rural zone and 75.5 ha of land to a mix of Residential-Mixed Housing Suburban and Residential – Terrace Housing and Apartment Building, Business-Local Centre and Business-Neighbourhood Centre zones. PC100 also proposes shifting the Rural Urban Boundary to align with the boundary between the proposed Rural Mixed Rural zoning and the urban zones.
- 2.2. Of interest to KCA, this plan change constitutes a significant plan change that, if approved, would result in a departure from Auckland Council's own Future Development Strategy.
- 2.3. As KCA has noted in previous submissions and feedback to Council, Riverhead and its surrounding areas have been subject to considerable residential development over the last ten years – however infrastructure has not kept up with demand. PC100 involves 75.5 ha of land being rezoned to a high density zoning, which will result in thousands of houses and more pressure on roading and social infrastructure that is already under pressure.
- 2.4. This issue was noted by Auckland Council when they put forward the Draft Future Development Strategy (now adopted). The Riverhead and surrounding area are not equipped to deal with the scale of development that this plan change would result in.
- 2.5. It is also noted that this plan change will result in higher vehicle kilometres travelled (VKT) and transport-related emissions, compared to other future urban areas currently zoned, as public transport and employment opportunities in Riverhead and Kumeu / Huapai remain limited.

2.6. On that basis, KCA considers that PC100 would result in inappropriate development, that will ultimately result in higher VKT and pressure on infrastructure that is already under resourced.

**Natural Hazards**

2.7. PC100 involves rezoning land to Future Urban that are in identified 1% AEP floodplains.

2.8. This will result in residential development occurring in land that is subject to natural hazards, which completely contradicts Auckland Council's own Future Development Strategy.

2.9. In the past two years, the Kumeu-Huapai and Riverhead areas have experienced three significant flood events that have resulted in extensive damage to homes and businesses. Avoiding further residential development in these areas in the future is vital, in light of more frequent and impactful weather events occurring as a result of climate change. PC100 will result in inappropriate residential development occurring in land that is subject to natural hazards, which not only endangers property but ultimately poses a risk to people and lives.

**3. Conclusion**

KCA **opposes** PC100 and seeks that Auckland Council **declines** the application.

KCA wishes to be **heard** in support of their submission.

Yours sincerely,



Olga Sakey

**Deputy Chair**

**Kumeu Community Action** (The Kumeu-Huapai Residents & Ratepayers Association Inc)

[www.kumeucommunityaction.org.nz](http://www.kumeucommunityaction.org.nz)

Dated 17 May 2024

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Olga Sakey  
**Date:** Friday, 17 May 2024 2:45:19 pm  
**Attachments:** [KCA Submission on PC100 - Final.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Olga Sakey

Organisation name: Kumeu Community Action (The Kumeu-Huapai Residents and Ratepayers Association Incorporated)

Agent's full name: Olga Sakey (Deputy Chairperson)

Email address: olga.sakey@gmail.com

Contact phone number: 021774784

Postal address:  
30 Matatea Road  
Waimuaku  
Auckland 0881

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:

Property address: All the land identified in Private Change 100 by Riverhead Landowner Group, 80.5 hectares on Western side of Riverhead.

Map or maps:

Other provisions:

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

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

The reason for my or our views are:  
Refer to attached submission paper.

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

Submission date: 17 May 2024

Supporting documents  
KCA Submission on PC100 - Final.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.

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## Submission on Private Plan Change 100: Riverhead

### 1. Introduction

- 1.1. This document forms part of Kumeu Community Action's (officially known as The Kumeu-Huapai Residents & Ratepayers Association Inc) (KCA) submission to Auckland Council on Private Plan Change 100 Riverhead (PC100).
- 1.2. KCA consists of residents and ratepayers in the Kumeu-Huapai and surrounding areas. The purpose of our group is to represent the views and interest of residents in the area, with a particular focus on improving infrastructure, public transport, public services and ensuring the coordinated planning and design of development and intensification.
- 1.3. KCA's interest in PC100 relates to ensuring future urban land is suitably identified in areas that are outside of natural hazards and that can be serviced with the appropriate level of infrastructure required.

### 2. Matters of Interest to KCA

#### *Lack of Infrastructure*

- 2.1. PC100 aims to rezone 6 ha of land in Riverhead from Future Urban to Rural-Mixed Rural zone and 75.5 ha of land to a mix of Residential-Mixed Housing Suburban and Residential – Terrace Housing and Apartment Building, Business-Local Centre and Business-Neighbourhood Centre zones. PC100 also proposes shifting the Rural Urban Boundary to align with the boundary between the proposed Rural Mixed Rural zoning and the urban zones.
- 2.2. Of interest to KCA, this plan change constitutes a significant plan change that, if approved, would result in a departure from Auckland Council's own Future Development Strategy.
- 2.3. As KCA has noted in previous submissions and feedback to Council, Riverhead and its surrounding areas have been subject to considerable residential development over the last ten years – however infrastructure has not kept up with demand. PC100 involves 75.5 ha of land being rezoned to a high density zoning, which will result in thousands of houses and more pressure on roading and social infrastructure that is already under pressure.
- 2.4. This issue was noted by Auckland Council when they put forward the Draft Future Development Strategy (now adopted). The Riverhead and surrounding area are not equipped to deal with the scale of development that this plan change would result in.
- 2.5. It is also noted that this plan change will result in higher vehicle kilometres travelled (VKT) and transport-related emissions, compared to other future urban areas currently zoned, as public transport and employment opportunities in Riverhead and Kumeu / Huapai remain limited.

2.6. On that basis, KCA considers that PC100 would result in inappropriate development, that will ultimately result in higher VKT and pressure on infrastructure that is already under resourced.

**Natural Hazards**

2.7. PC100 involves rezoning land to Future Urban that are in identified 1% AEP floodplains.

2.8. This will result in residential development occurring in land that is subject to natural hazards, which completely contradicts Auckland Council's own Future Development Strategy.

2.9. In the past two years, the Kumeu-Huapai and Riverhead areas have experienced three significant flood events that have resulted in extensive damage to homes and businesses. Avoiding further residential development in these areas in the future is vital, in light of more frequent and impactful weather events occurring as a result of climate change. PC100 will result in inappropriate residential development occurring in land that is subject to natural hazards, which not only endangers property but ultimately poses a risk to people and lives.

**3. Conclusion**

KCA **opposes** PC100 and seeks that Auckland Council **declines** the application.

KCA wishes to be **heard** in support of their submission.

Yours sincerely,



Olga Sakey

**Deputy Chair**

**Kumeu Community Action** (The Kumeu-Huapai Residents & Ratepayers Association Inc)

[www.kumeucommunityaction.org.nz](http://www.kumeucommunityaction.org.nz)

Dated 17 May 2024

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Christopher James Redditt  
**Date:** Friday, 17 May 2024 2:15:20 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Christopher James Redditt

Organisation name:

Agent's full name: Christopher Redditt

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

Contact phone number: 0274749952

Postal address:  
17 Princes Street  
Riverhead  
Auckland 0820

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:  
Proposed Plan Change 100 (Private)

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

The stormwater analysis conducted for the proposed development predates 2023 and fails to adequately address recent significant rain and hydrological events, including those contributing to the 2023 Auckland Anniversary floods in Riverhead. The current Annual Exceedance Probability (AEP) calculations likely underestimate the impact on surrounding areas. If the development proceeds, Auckland Council may face liability for exacerbating local floods and causing further damage to nearby properties, potentially leading to loss of property and life. Additionally, forthcoming flood mapping data from Niwa needs consideration. It's my belief that diverting additional stormwater downstream, given the current infrastructure and anticipated climate changes, poses significant challenges.

Additionally, the infrastructure in Riverhead, including roads, public transport, and schooling, is ill-equipped to handle a doubling of the population. The roads are already over capacity, not just in Riverhead but also in the neighbouring communities of Kumeu and Huapai, with traffic from all three

areas converging on a single carriageway highway. Riverhead School, the only primary school in the neighbourhood, is already nearing capacity, and the nearest high school is 15km away. Most high school students face a 1.5-hour bus journey to schools on the North Shore. Thus, Riverhead is not prepared for a significant population increase.

The land in question is arable farmland. Within the Auckland region, we have overdeveloped similar land, particularly in the Pukekohe area. It is crucial to preserve arable land for food production, especially considering the impact of climate change on food production overseas.

I or we seek the following decision by council: Decline the plan change | 193.1

Submission date: 17 May 2024

**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

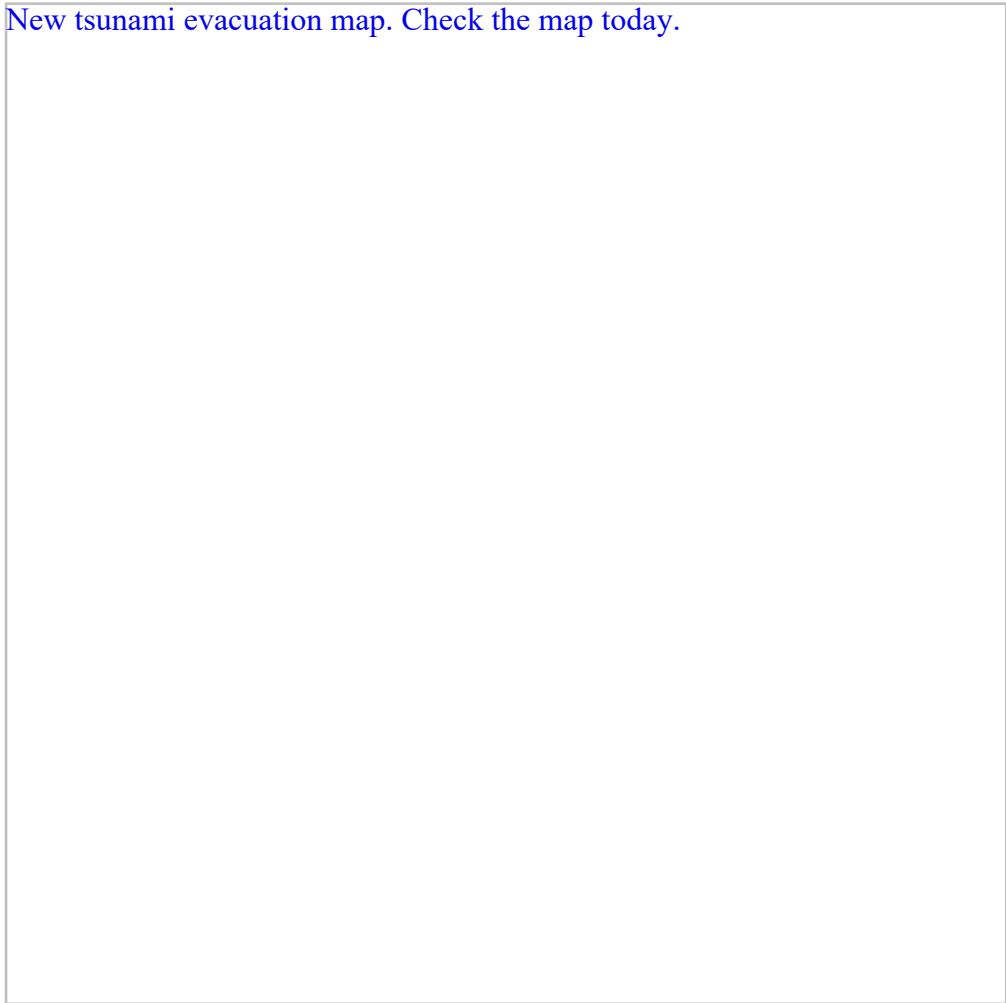
Are you directly affected by an effect of the subject matter of this submission that:

- 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.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Rachel Spencer  
**Date:** Friday, 17 May 2024 2:30:23 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Rachel Spencer

Organisation name:

Agent's full name:

Email address: riverheadrachel@icloud.com

Contact phone number:

Postal address:  
37 Great North Rd  
Riverhead  
Auckland 0820

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:  
Land Use  
Traffic  
Stormwater/ flooding

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:  
The conversion of fertile agricultural land into housing exacerbates Auckland's urban sprawl issues. Instead, Auckland Council should consider compulsory acquisition of sizable privately owned residential estates in central suburbs like Parnell and Remuera to promote urban intensification. Developers should prioritize these areas over green belts.

Due to past inadequate development strategies, whenever there is rain of any significance, homes in the area on the cusp of the proposed development, being Duke St, Wautiti Lane, and Crabfields Lane, are prone to flooding. It's implausible to assert that further development in this region won't exacerbate the existing issues. The developers' assurances lack credibility; engineering solutions alone cannot resolve these challenges.

The current road infrastructure around Riverhead, especially the connection from the town to SH16 and onto the North-western motorway, is deficient, with the Coatesville Riverhead Highway as a single lane road connecting the North Shore to SH16 via Riverhead. The traffic volumes, aside from Riverhead commuters, is enormous as people from the whole region use this connection for their daily travel. Any increase in housing development will exacerbate this problem. There is also inadequate public transport, with no direct bus route from Riverhead to Auckland City.

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

194.1

Submission date: 17 May 2024

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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



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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Sandra Wyatt  
**Date:** Friday, 17 May 2024 2:30:27 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Sandra Wyatt

Organisation name:

Agent's full name: Racheal Wyatt

Email address: happtdays@yahoo.com

Contact phone number:

Postal address:  
44 Forestry Road  
Riverhead  
Auckland 0892

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:  
land identified in the private plan change landowner group

Property address: 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

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

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

The reason for my or our views are:  
Infrastructure need to be upgrade. traffic is at capacity. Also storm water waste water is already at capacity. we need a another school as numbers are growing there too

I or we seek the following decision by council: Decline the plan change | 195.1

Submission date: 17 May 2024

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Jen Mein  
**Date:** Friday, 17 May 2024 2:30:39 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Jen Mein

Organisation name:

Agent's full name:

Email address: jen.mein@icloud.com

Contact phone number: 021380883

Postal address:  
177 Oraha Road  
Kumeu  
Auckland 0892

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:

Property address: All the land identified in the Private Plan Change (PC100) by Riverhead Landowner Group, namely 80.5 hectares on Western Sign of Riverhead)

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

No infrastructure to support this and there has been no infrastructure to support the past 15 years of huge growth in Riverhead, Kumeu and Huapai. We basically have one road only to get us out of Riverhead and Norwest to head South. It can take upwards of 30 minutes or more just to get out of Riverhead and Kumeu at the current time which has been like this for some years. Nothing has been actioned to date, only plans to change this. It's not good enough, it's a waste of personal time, fuel, and stress to approve a plan change to add more housing to a dysfunctional roading and transport system. It really does not work and it won't work for a very long time. The bottle necks that form even on SH16 after leaving Riverhead-Coatesville Road is extreme - from 6am until well past 10am in the mornings.

In the afternoon we have the home coming problem of the huge back log of cars then heading north west from the end of the North Western Motorway can be as long as 1 kilometre to get to the roundabout where it meets Brigham Creek Roundabout, it's sadly again a waste of time, fuel, and

adds to a huge amount of stress even as things stand. Once you add at least another 2000-3000 vehicles to this if the private plan change to build a significantly huge amount of housing which is what the Riverhead Landowners Group wish to do, it will physically bring to a halt movements in, out and around Riverhead and the North west.

Another issue to be addressed is the truck movements in and out of the area should the private plan change be approved, as previously stated we have had no roading infrastructure upgrades, we have numerous potholes forming weekly, having the huge amount of truck movements that would be required to undertake all the development being proposed would destroy our roads, is a huge safety concern for all of those living and driving in the area. Riverhead does not have the infrastructure, roading network or roading and transport capacity to support such a plan change.

The other issue is the significant flooding that has occurred on the land that is proposed for the plan change. It is Council's responsibility to not let any further building occur around or on these areas which in turn would put the current housing already there and any new housing at risk of flooding damage. It is irresponsible after all the significant flooding we have had to approve such a plan change knowing that this will impact Riverhead with further flooding.

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

196.1

Submission date: 17 May 2024

**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.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Christoper Wyatt  
**Date:** Friday, 17 May 2024 2:45:19 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Christoper Wyatt

Organisation name:

Agent's full name: Racheal Wyatt

Email address: wyattutp@xtra.co.nz

Contact phone number:

Postal address:  
44 Forestry Road  
Riverhaed  
Auckland 0892

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:  
Private plan change by Riverhead Landowner Group

Property address: 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:  
Infrastructure need to be upgrade. traffic is at capacity. Also storm water waste water is already at capacity. we need a another school as numbers are growing there too

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

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

The reason for my or our views are:  
traffic is at capacity Infrastructure need to be upgrade. traffic is at capacity. Also storm water waste water is already at capacity. we need a another school as numbers are growing there too

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

Submission date: 17 May 2024

197.1

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - James Anthony Hendra  
**Date:** Friday, 17 May 2024 2:45:31 pm  
**Attachments:** [Submission to PC 100 James Hendra.pdf](#)

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: James Anthony Hendra

Organisation name:

Agent's full name:

Email address: james@wla.net.nz

Contact phone number: 021347348

Postal address:  
41 Great North Rd  
Riverhead  
Auckland 0820

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:  
objectives, policies, rules, s32

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:  
attached

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

198.1

Details of amendments: attached

Submission date: 17 May 2024

Supporting documents  
Submission to PC 100 James Hendra.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?  
No

**Declaration**

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

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

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

Yes

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

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## Submission to PC 100 (Private): Riverhead

Submitter: James Hendra

41 Great North Road, Riverhead.

Overall, I oppose the plan change for the reasons set out. I consider the plan change should be refused unless significant changes are made to address the matters set out in this submission.

I wish to be heard.

I am an independent planner and a member of the NZPI. Whilst this brings an ability to understand the context and process of a plan change request, I am submitting as a community member.

I have lived in Riverhead for 20 years. A decade ago, I served as a member and chair of the Riverhead Residents and Ratepayers (now RCA) for a 7-year term. My children have grown up and been schooled here, this is our home. This is the place we are grounded. This is the place where many of our friends live, within walking distance of each other. We are there for each other. This is a place of community. I know this place.

How development in the FUZ land is enabled and is provided for under a plan change, should it be approved, matters a great deal to me. I am not prepared to accept generic or incomplete analysis, superseded or partially accurate supporting reports, aspirational neighbourhood and urban design visions which fail to be realised by policy and rules in application, or new zones without clear and rational basis. I am also not prepared to accept that the presence of the Matvin land within the FUZ area is a basis to dismiss the logical and good practice planning outcomes which should be proposed on such a large and strategically positioned parcel of land.

I am not convinced that the aspirational green corridor network will be delivered in practice due to a lack of clarity of what it should comprise and how it would be delivered and owned as a cohesive whole. Similarly, the comprehensive stormwater proposal, which integrates with the green corridor, also suffers from the reality of needing to be designed in the whole but is without an overall comprehensive method to ensure it is delivered in this way. Both of these site-wide features are at risk of inconsistent delivery and fragmented staged development. There is no overall cohesive proposal to define and deliver these fundamental components.

The transport improvements proposed are not framed with an acceptance that SH16 is already at capacity and further development will add to the dysfunction. Morning CRH to SH16 commuter queues are routinely to the golf club or beyond to Hallertau. Riverhead is a dormitory suburb, poorly serviced by a single bus route which is timed to not even support a working day in the city. The upgrade of the Boric roundabout by Waka Kotahi is a safety improvement and will not address capacity of the highways. The SGA

programme of works is still at the designation stage, with eventual capacity and rapid transit being 20 to 30 years in the future.

The local transport projects proposed do not acknowledge the under provisioned state of many Riverhead local roads, nor that the development of the plan change area would place further strain and put people's safety at risk. The proposed timing of the projects, related to occupation of specific areas of land, will not address the effects overall, or those effects which will occur as soon as earthworks and civil works begin.

The lack of provisions to require the green corridor to extend to the Rangitopuni tributary fails to maintain and enhance access to the Rangitopuni River and coastal environment. A matter of national importance.

The justification of the extent of business zoned land is not convincing, based upon a very wide catchment area. The intended transition of scale and density is likely to be inconsistent in delivery.

The plan change has virtually no requirement to integrate the new development with Riverhead by way of physical connections or development typologies. Recognising the challenge of the bisecting CRH, the Cambridge Road interface and north of this are the key areas where the development area intersects with existing Riverhead. Consideration should be given to the treatment of Cambridge Road, connecting pedestrian and cycle routes, and sympathetic development controls to provide some level of transition.

The entire enormous Matvin land holding is clearly under provisioned for local roads and pedestrian permeability. The plan change proposal is to retain this land as a large privatised development void of integration with existing Riverhead and the new development area, creating an isolated area of new development to the north.

The key node at Riverhead Road and CRH provides the logical place for a public space/transition to the Riverhead War Memorial Park (the heart of Riverhead). However, simple business zoning is proposed at the node with no requirement to enhance the relationship between the new and the existing.

The residential zones will result in dense development with few trees. The character will therefore be very different to the spacious and treed character of Riverhead, including Riverhead South which was guided by a planning framework which has allowed sufficient space at the front and rear of sites for large trees.

In closing, I assisted the RCA in preparation of their submission and concur with the comments and requests made in that submission. I also intend to be heard on behalf for the RCA at the hearings, and as such do not repeat the matters and relief sought. For clarity, please consider this submission to also contain the same in content as the RCA submission.

198.2

**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Racheal Wyatt  
**Date:** Friday, 17 May 2024 3:00:19 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Racheal Wyatt  
Organisation name:  
Agent's full name: Racheal Wyatt  
Email address: rachealwyatt95@gmail.com  
Contact phone number: 0211466410  
Postal address:  
44 Forestry Road  
Riverhead  
Kumeu 0892

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)  
Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:  
Land identified in the Private Plane Change by Riverhead Landowner Group

Property address: 80.5 hectares on western side of Riverhead

Map or maps:

Other provisions:

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

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

The reason for my or our views are:  
The roading infrastructure is not suited to another 4000 homes in the community. Its bad enough as it is. Riverhead school is the only school in the area and there would need to be another school built in the area.

I or we seek the following decision by council: Decline the plan change | 199.1

Submission date: 17 May 2024

**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.

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Danielle Jordan  
**Date:** Friday, 17 May 2024 3:00:23 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Danielle Jordan

Organisation name:

Agent's full name:

Email address: danielle.p.egan@gmail.com

Contact phone number: 0274665899

Postal address:  
126 Worrall Road  
Kumeu  
Auckland 0891

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:

Property address: The entire development area.

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

I'm concerned about the lack of infrastructure in place. Traffic on State Highway 16 mostly at the Coatesville Riverhead Highway is shockingly bad. Adding additional traffic into and already overwhelmed area will not be good. This is not good for people who are stuck spending hours in traffic that shouldn't be there. The north western area namely Kumeu, Riverhead etc needs a massive amount of roading upgrades before any further developments are considered.

I would also be concerned about flooding in the area, surely the floods in the last few years and cyclone Gabriel have been enough to realise that the area is far too overdeveloped housing wise and not enough areas like wet lands etc. Please see reason here and do not allow this to go through.

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

200.1

Submission date: 17 May 2024

**Attend a hearing**

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

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

**Declaration**

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

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

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

Yes

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

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**From:** [Unitary Plan](#)  
**To:** [Unitary Plan](#)  
**Subject:** Unitary Plan Publicly Notified Submission - Plan Change 100 (Private) - Junaid Shaik  
**Date:** Friday, 17 May 2024 3:15:30 pm

---

The following customer has submitted a Unitary Plan online submission.

**Contact details**

Full name of submitter: Junaid Shaik

Organisation name:

Agent's full name:

Email address: ahmedjunaid7842@gmail.com

Contact phone number:

Postal address:  
50 Pohutukawa Parade Riverhead  
Riverhead  
Auckland 0820

**Submission details**

**This is a submission to:**

Plan change number: Plan Change 100 (Private)

Plan change name: PC 100 (Private): Riverhead

**My submission relates to**

Rule or rules:  
I'm not happy with the rules

Property address: 50 Pohutukawa Parade Riverhead

Map or maps:

Other provisions:

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

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

The reason for my or our views are:  
More infrastructure development

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

201.1

Details of amendments: More infrastructure development before any housing development

201.2

Submission date: 17 May 2024

**Attend a hearing**

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

**Declaration**

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

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

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

Yes

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

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## SUBMISSION ON A NOTIFIED PROPOSAL FOR POLICY STATEMENT OR PLAN, CHANGE OR VARIATION

### CLAUSE 6 OF SCHEDULE 1, RESOURCE MANAGEMENT ACT 1991

**To:** Auckland Council  
Private Bag 92300  
Victoria Street West  
Auckland 1142  
[unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

**Name of submitter:** F Boric & Sons ("**Boric**") on behalf of the Boric Food Market, Blossoms Café and tenants/residents on the site

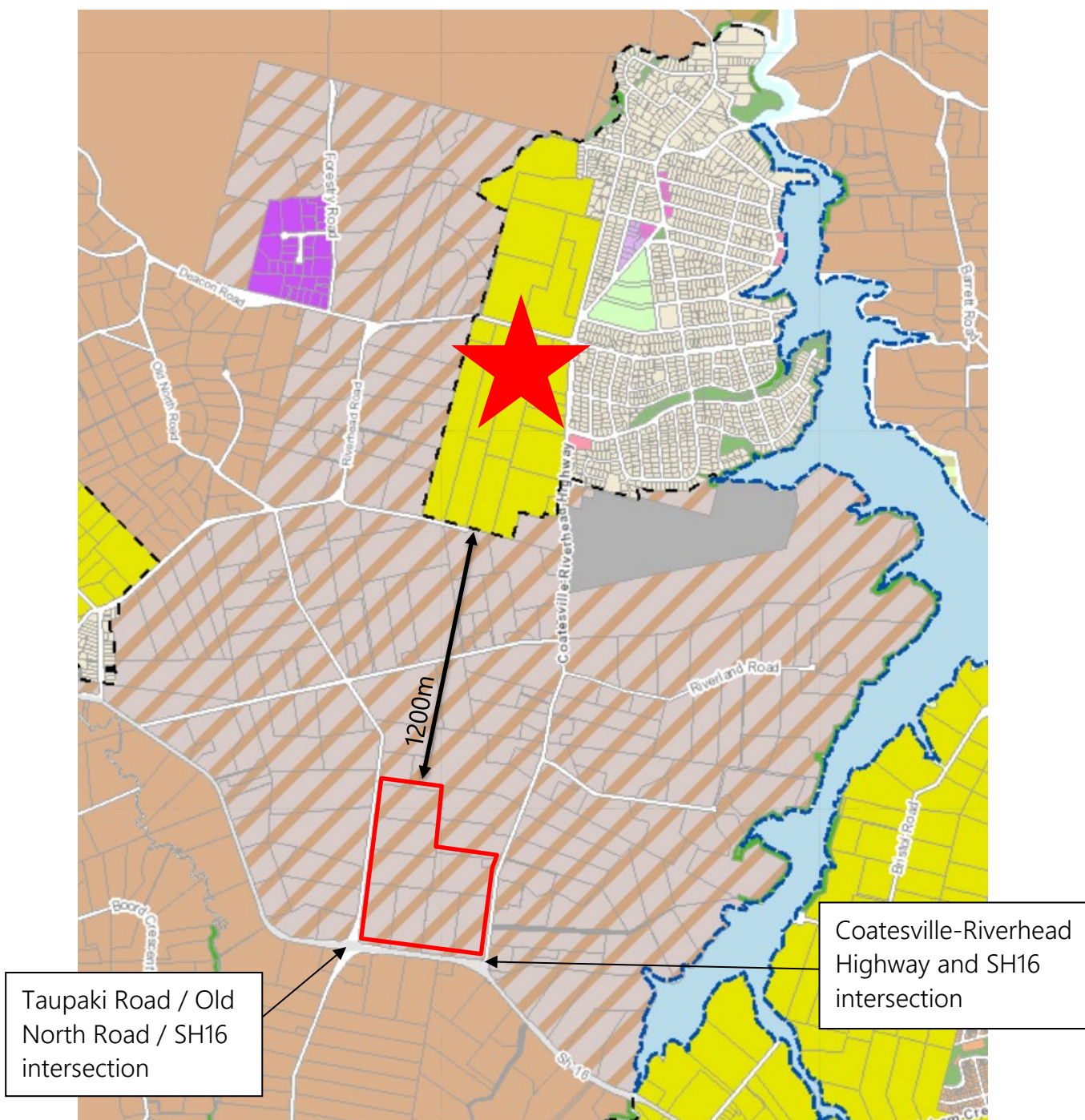
#### Introduction

1. This is a submission on the application for Private Plan Change 100 ("**PC100**") to the Auckland Unitary Plan (Operative in Part) ("**AUP**") by Riverhead Landowner Group ("**Applicant**").
2. The Applicant proposes to rezone land in Riverhead from Future Urban to a mix of zones, as follows: approximately 6ha of land to Rural – Mixed Rural zone, and 75.5ha to a mix of Residential – Mixed Housing Suburban, Residential – Terrace Housing and Apartment Building, Business – Local Centre and Business – Neighbourhood Centre zones, with associated precinct provisions. The request also seeks to shift the Rural Urban Boundary ("**RUB**") to align with the boundary between the newly proposed Rural – Mixed Rural zoning and the urban zones.
3. Boric has operated an orchard at the land bound by Coatesville-Riverhead Highway, SH16 and Old North Road since 1962. The Boric landholding is located 1200m to the south of the plan change area, as shown at Figure 1 and termed "**the Boric Site**" throughout this submission. As well as operating the orchard, Boric has established a cafe (Blossoms Café, 1998) and a food retail business (Boric Food Market, 2012). Access to the café and food retail activities is taken from the southern end of the site's eastern frontage to Coatesville-Riverhead Highway. As such, the Boric family is a longstanding part of the Riverhead, Kumeū and Huapai communities and has observed increased growth and associated traffic generation effects over this time.
4. Boric has actively participated in the Supporting Growth Alliance's Notice of Requirement process for the North West region, specifically in respect of proposed

upgrades to Coatesville-Riverhead Highway (NOR R1). A copy of that submission is attached at **Appendix 1** for context.

- 5. Boric has also engaged with Waka Kotahi for several years in respect of the design of SH16 Brigham Creek to Waimauku - Stage 2 works in relation to its landholdings, the southern frontage and access arrangements of which are impacted by the proposed upgrade.

**Figure 1 – F Boric & Sons Landholdings (shown in red; PC100 at red star)**





Existing access to café and food retail activities shown at red arrows



### Scope and Reasons for Submission

6. Boric's key concerns relate to the traffic effects generated by the proposed plan change, and the associated impact this may have on access to, from, and into, the Boric Food Market. Boric **supports** the Application on the basis that, if the matters raised in this submission are addressed, the Application:
  - a) will promote the sustainable management of resources and therefore will achieve the purpose and principles of the RMA;
  - b) is generally consistent with Part 2 and other provisions of the RMA;
  - c) will meet the reasonably foreseeable needs of the future generations;
  - d) will enable social, economic and cultural wellbeing;
  - e) is generally consistent with the purposes and provisions of the relevant statutory planning instruments, including the Unitary Plan;
  - f) will avoid, remedy or mitigate adverse environmental effects, including on the surrounding road network and the Boric Site.
7. Boric is not a trade competitor for the purposes of the Resource Management Act 1991 ("**RMA**") and in any event is directly affected by an effect of the proposal.
8. The following comments are made in particular without derogating from the generality of the above.
9. The following provides relevant background to and sets out Boric's submission accordingly.

### Submission

#### Infrastructure prerequisites

#### *Rule IX.4.1(A4)*

10. Boric understands from attending the community meeting with the Applicant in early May 2024 that, in principle, it is the Applicant's intent that no dwellings or buildings within the plan change area will be occupied prior to the proposed roundabout at the intersection of SH16 and Coatesville-Riverhead Highway being constructed and operational.
11. It is clear from Rule IX.4.1(A4) that the roundabout is required to be delivered prior to occupation of the first dwelling within the precinct.

12. However, there appears to be a gap in the precinct provisions as notified, whereby a commercial building or other non-residential building could be occupied prior to construction and operation of this roundabout. It is unclear whether this is intentional, but regardless, would enable the occupation of non-residential buildings prior to delivery of the roundabout, with the potential to generate significant adverse traffic safety and operational effects on the intersection of SH16 and Coatesville-Riverhead Highway, especially in a cumulative sense on top of existing capacity issues with this network. There is no traffic modelling demonstrating these effects or any assessment in the plan change application. Boric considers this gap could be resolved by replacing the reference to 'dwelling' with 'building' at Standard IX.6.1(1). | 202.2
  
13. Proposed Rule IX.4.1(A4) proposes discretionary activity status to infringe Standard IX.6.1(1), triggered in the event that a dwelling (or as Boric proposes, any building) is occupied prior to delivery of the above-mentioned roundabout and upgrades to the intersection of Coatesville-Riverhead Highway and Old Railway Road, and Coatesville-Riverhead Highway and Riverland Road. However, recent plan changes in the vicinity of Riverhead (Precinct I616 Spedding Block Precinct, and the recently approved Brigham Creek Road precinct) as well various precincts in Drury, demonstrate that the delivery of infrastructure is integral to unlocking greenfield land, and therefore, a non-complying activity status has been applied in these instances. This approach is intended to provide Council and submitters a high degree of certainty that the necessary mitigation will be in place before the Applicant is genuinely able to commence development. Likewise, Boric considers a non-complying activity status is appropriate in respect of Rule IX.4.1(A4). | 202,3
  
14. Also consistent with these recent examples, "subdivision and development" are typically separated into two separate activities within the Activity Table, whereas in PC100 both are grouped under the "subdivision" sub-heading at (A4) and (A5) which may cause confusion as to the applicability of the rule where only one or the other is proposed (i.e. if development is proposed, but not subdivision). A suggested approach is provided below from I616 Spedding Block Precinct: | 202.4

Table I616.4.1 Activity table

Activity		Activity status
Use and development		
(A1)	Activities listed as permitted or restricted discretionary activities in Table H17.4.1 ActivityTable in the Business Light Industry Zone.	
(A2)	Use and development that does not comply with Standard I616.6(1)	NC
(A3)	Use and development that does not comply with Standard I616.6(2)	NC
Subdivision		
(A4)	Subdivision listed in Chapter E38 Subdivision	
(A5)	Subdivision that does not comply with Standard I616.6(4)(a)-(c)	NC

*Standard IX.6.1 Staging of development with transport upgrades*

15. Standard IX.6.1(1) requires the construction and completion of a roundabout at SH16 and Coatesville-Riverhead Highway prior to occupation of the first dwelling within the precinct. The roundabout is part of Stage 2 of the Waka Kotahi project referred to as “SH16 Brigham Creek to Waimauku”, the full scope of which includes:<sup>1</sup>
- *“Between Brigham Creek and Kumeū we are creating a dedicated shared path for people who walk and cycle to provide genuine travel choice.*
  - *Installing road safety barriers in the middle of the road and roadside, to prevent drivers from leaving their lane before hitting something harder like other vehicles, trees, poles or ditches, except between Taupaki and Kumeū.*
  - *Adding extra lanes between Brigham Creek and Taupaki roundabout from two lanes to four (two in each direction) to make travelling along SH16 more efficient in the short-term.*
  - *Installing a flush median between Taupaki and Kumeū, which is a painted area in the middle of the road to give you more room and a safe place to wait before turning, while traffic can continue to flow.*
  - *Putting in a roundabout at the SH16/Coatesville Riverhead Highway intersection to help traffic flow better and make it safer to turn.”*
16. These works will require changes to the frontage and access arrangements to the Boric site. By way of background and as stated above, Boric has engaged with

<sup>1</sup> <https://www.nzta.govt.nz/projects/sh16-brigham-creek-and-waimauku/>



Waka Kotahi for several years in respect of the design and layout of the Stage 2 works as it affects their landholding. In addition to this, the eastern boundary of the Boric site is affected by the Supporting Growth Alliance’s NOR R1, the Hearing Panel for which has recently recommended be accepted subject to changes to conditions. These numerous planned changes to the wider road network are occurring on the ‘doorstep’ of the Boric site, directly interacting with people’s ability to travel to, and access, the café and food market, all of which interact with PC100 and the traffic it is anticipated to generate.

17. The Integrated Transport Assessment appears to rely on the implementation of the full suite of Stage 2 works to appropriately mitigate the operational and safety effects of the traffic that is anticipated to be generated. However, only the roundabout is identified as an infrastructure prerequisite at Standard IX.6.1(1). Without the full suite of safety upgrades, particularly “four laning” SH16 between the Brigham Creek and Taupaki Road roundabouts, there is a risk of greater adverse effects on the road network which have not been assessed. Therefore, Boric considers the full extent of works comprised in Stage 2 should be constructed and operational prior to occupation of the first dwelling (or ideally, building), and the triggers in PC100 should be updated accordingly.

202.5

18. Similarly, the assessment criteria at IX.8.2(g) (in respect of an infringement to standards IX.6.1(2)-(4)) should require an assessment against the progress made towards the full suite of works within Stage 2, rather than simply the intersection of SH16 and Coatesville-Riverhead Highway.

202.6

Commencement of construction prior to roundabout delivery

19. As set out above, Standard IX.6.1(1) requires the construction and operation of various transport upgrades prior to occupation of the first dwelling. If the upgrade works are required to mitigate the effects of a single dwelling which may generate around 8 vehicle movements per day, the construction of that dwelling would also require the same upgrades to be in place, as traffic associated with the construction of that dwelling (and any bulk earthworks and infrastructure preceding house construction) could generate greater vehicle movements. Further, if those construction vehicles were to access the precinct area from SH16 at the same time as the Waka Kotahi Stage 2 works and roundabout were under construction, the cumulative traffic effects would be significant, beyond that which could be reasonably managed via a Construction Traffic Management Plan given the intersection is already heavily congested and unsafe. The Integrated Transportation Assessment does not assess the potential effects arising from these scenarios, nor

is there sufficient information to comfortably rely on a management plan to mitigate the potential effects in this regard. Without further analysis, civil, infrastructure and construction work within the precinct should be delayed until the full suite of Waka Kotahi's Stage 2 works are constructed and operational. | 202.7

Traffic modelling – signalised pedestrian crossings

20. The Integrated Transport Assessment does not appear to have made allowance in the traffic modelling for the pedestrian crossings proposed at the roundabout of SH16 and Coatesville-Riverhead Highway, as part of the Stage 2 works. Waka Kotahi proposes to install a signalised pedestrian crossing immediately south of the roundabout plus a standard zebra crossing on the Coatesville-Riverhead Highway approach. Without including these crossings in the modelling, the performance of the roundabout may be overstated, and the queues on the northern approach and Coatesville-Riverhead Highway approach may be longer, especially during peak times. Insufficient information has been provided to readily assess the effects of the plan change on the future SH16 roundabout. Increases in the length of times there are queues on Coatesville-Riverhead Highway approach directly impact on the Boric Food Market access. | 202.8

Weekend trip generation

21. The Integrated Transport Assessment states at section 7.3 (page 52) "As the weekend includes a number of discretionary trips, our focus is on weekdays...". However, Boric frequently witnesses queues up to 2km long on Coatesville-Riverhead Highway on weekend days, with drivers waiting to turn onto SH16. The ITA also indicates that flows on weekends along SH16 are higher than a typical weekday. While Waka Kotahi's Stage 2 works are expected to improve this, the Integrated Transport Assessment does not sufficiently assess weekend traffic to confirm the effect additional traffic may have on the intersection of SH16 / Coatesville-Riverhead Highway. This queue runs along the frontage of the Boric Food Market and affects access to, and into, the Site.
22. Similarly, the intersection of SH16 / Taupaki Road experiences long queues on weekends from vehicles travelling north along Taupaki Road. The same analysis is required in this regard.
23. Further analysis is required to understand the effects the proposal will have on weekend traffic volumes. | 202.9

**Relief Sought**

- 24. Boric seeks that the Plan Change is approved, subject to resolution of the matters | 202.1 outlined in this submission.
- 25. Boric wishes to be heard in support of its submission.
- 26. Boric would consider presenting a joint case with others at the hearing.

**DATED** at Auckland this 17th day of **May 2024**

**Signature:**

F Boric & Sons

1404 Coatesville-Riverhead Highway  
Kumeū  
Auckland  
[hello@boricfoodmarket.co.nz](mailto:hello@boricfoodmarket.co.nz)

## APPENDIX 1

Boric submission on North West Local Network: Coatesville – Riverhead Highway  
(NoR R1) Auckland Transport

**SUBMISSION ON A REQUIREMENT FOR A DESIGNATION SUBJECT TO  
FULL NOTIFICATION**

**FORM 21, SECTIONS 168A, 169, 181, 189A, 190 AND 195A OF THE  
RESOURCE MANAGEMENT ACT 1991**

**To:** Auckland Council  
Private Bag 92300  
Auckland 1142

**Attention:** Planning Technician  
[unitaryplan@aucklandcouncil.govt.nz](mailto:unitaryplan@aucklandcouncil.govt.nz)

**Name of submitter:** F. Boric and Sons Limited (“the submitter”)

**Introduction**

1. This is a submission on the Notice of Requirement requested by Auckland Transport as Requiring Authority for a new designation in relation to Northwest Local Network: Coatesville-Riverhead Highway, in the Auckland Unitary Plan (“AUP”), being the upgrade and widening of Coatesville-Riverhead Highway between SH16 in the south and Riverhead in the north.
2. The site affected is 1368 - 1404 Coatesville-Riverhead Highway comprised of eight lots together shown in blue below, including the Boric Food Market on the corner of SH16 and Coatesville-Riverhead Highway. The NoR affects the eastern boundary of the site.





LEGEND GENERAL		LEGEND STORMWATER		LEGEND EXISTING UTILITIES	
	CONTROL LINE AND CHAINAGE		PROPOSED WETLAND		VODAFONE TRENCH
	EXISTING PROPERTY BOUNDARY		PROPOSED CULVERT (SUBJECT TO RESOURCE CONSENT)		GAS
	PROPOSED DESIGNATION BOUNDARY		PROPOSED SW PIPE INDICATIVE FLOW DIRECTION		WATERCARE (MAIN)
	PROPOSED ROAD CORRIDOR		PROPOSED SWALE		WASTE WATER (MAIN)
	PROPOSED FOOTPATH		PROPOSED DIVERSION DRAIN		VECTOR ELECTRICITY
	PROPOSED CYCLEWAY		EXISTING CULVERT		FIBRE OPTIC
	PROPOSED BERM		EXISTING OVERLAND FLOW PATH		TRANSPOWER OVERHEAD LINES
	PROPOSED FLUSH MEDIAN, RAISED MEDIAN OR TRAFFIC ISLAND		EXISTING STORMWATER (MAIN)		TRANSPOWER PYLON
	FILL BATTER		PROPOSED RETAINING WALL		SPARK INTERNATIONAL CABLE
	CUT BATTER				
	PROPOSED CROSSING OVER STREAM OR ROAD				
	PROPOSED RETAINING WALL				
	PROPOSED SWALE				

**Reasons for Submission**

- The Submitter supports the NoR subject to amendments which reduce the overall width of land required along the frontage of 1368 - 1404 Coatesville-Riverhead Highway. The reasons for the Submitter’s view are as follows.
- The Assessment of Transport Effects states that it is proposed to upgrade the southern section of the corridor between SH16 and Short Road (including the eastern boundary of the subject site) to a 33m-wide two-lane low speed rural arterial with active mode space on the western side, as illustrated below.

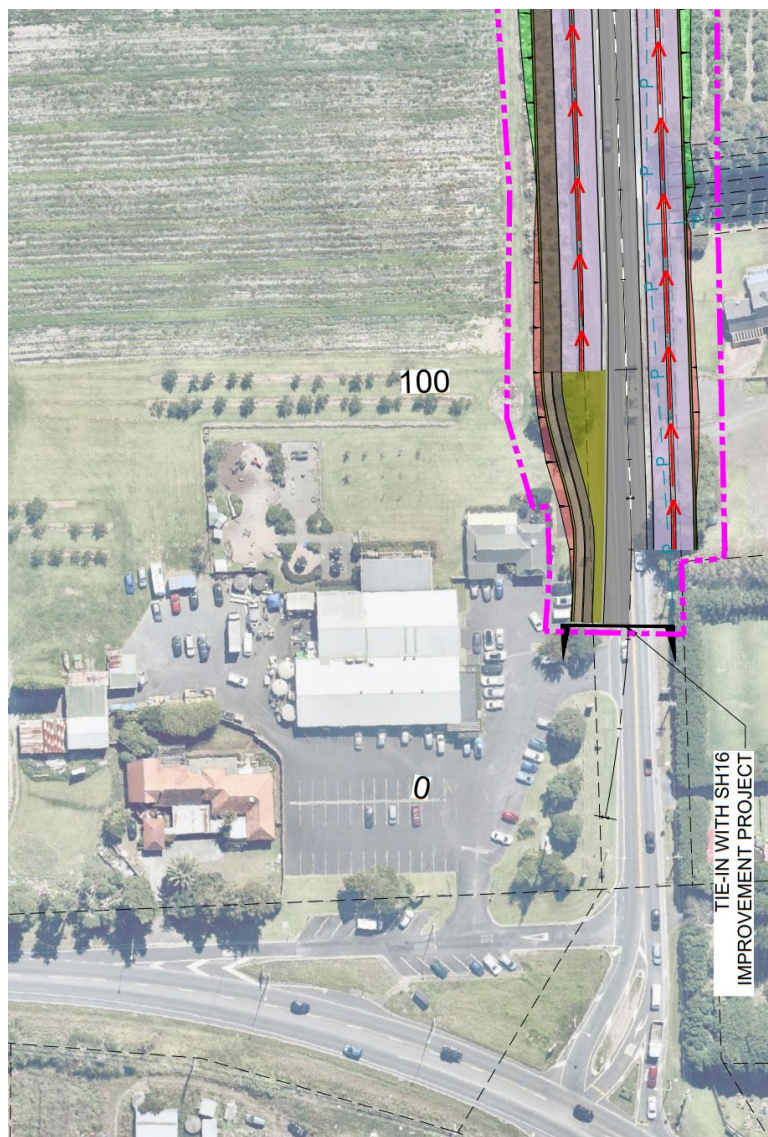
**Figure 8-2: Indicative future Coatesville Riverhead Highway corridor design between SH16 and Short Road (adjoining eastern boundary)**



Implications of NoR on Boric Food Market

- Firstly, the southern end of the land to which this NoR relates culminates on the northern edge of the existing vehicle crossing to the Boric Food Market. The southern end will tie into the future roundabout at SH16 as part of the Waka Kotahi SH16 Safety Improvements Project, which is understood to be the subject of a separate (yet to be notified) application. Without understanding how both NoR applications will tie in together, it is difficult to understand and assess the potential effects the proposal will have on the existing access arrangement, being the main vehicle access to the commercial activity on the site. In particular, the potential

impacts from the proposed active mode path on the western side of the Highway on the access are unclear.



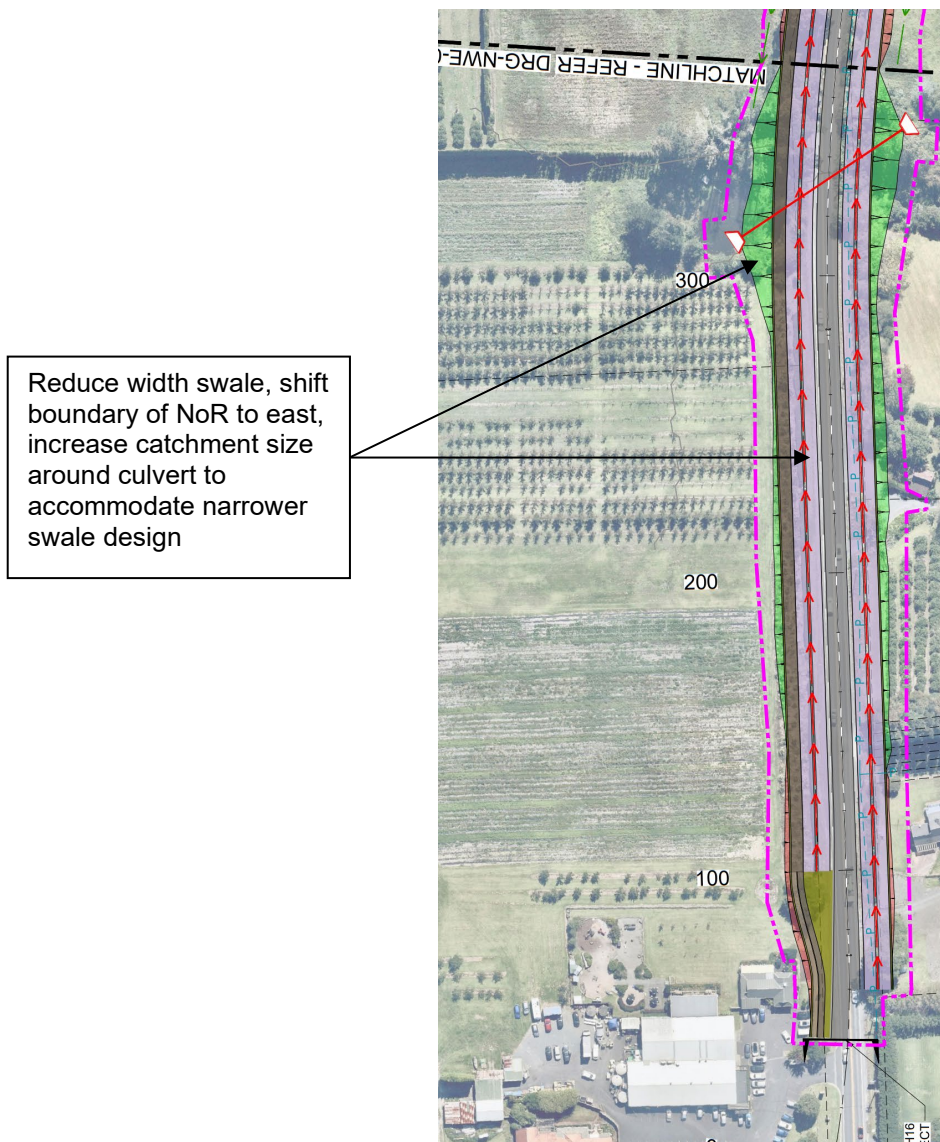
6. At its southern end, the proposed boundary of the NoR (pink dashed line) appears excessively wide relative to the proposed extent of works within the corridor, resulting in the loss of at-grade parking at the eastern boundary of the Boric Food Market and require the site’s western boundary to be relocated immediately adjacent to an existing building on the site – further separation is required in order to maintain the existing building.

Implications of NoR on the horticultural activity

7. The width of the NoR boundary appears overly wide relative to the extent of proposed works along the full length of the corridor between SH16 and Short Road. The swale shown in purple appears overly wide, contributing to the width of the



designation overall. It is suggested instead to narrow its width and rather increase the area of land that is proposed to be taken around the existing stormwater pond adjacent the culvert (illustrated below). This approach will coincidentally narrow the extent of highly productive land that is required to be taken for swales, utilising land already used for stormwater purposes.



8. The NoR boundary appears to have been designed to stop short of the eastern end of trees within the orchard. However, this is not the case as in practice, a buffer of approximately 18-20m is required between the eastern boundary and the nearest productive trees, for the reasons set out below.
9. The proposed works will have the following implications on the operation of the orchard activity:

- a) Loss of around six rows of trees (and equivalent productive land) to provide a buffer of 18-20m at the eastern end of the orchard to accommodate the designation, comprising the necessary separation distance between horticultural land use and underground wastewater discharge driplines, perimeter hedging, trees and fencing along the new eastern boundary, resulting in long-term commercial implications on the orchard and loss of income.
- b) Removal and relocation of 10m wide underground wastewater discharge driplines which are currently situated parallel to the eastern boundary, between the orchard and road boundary;
- c) Removal and relocation of approx. 260m of hedging, trees and fencing along the eastern boundary, all requiring relocation / replanting within the new site boundary.

10. The Submitter acknowledges these works are physically possible and is open to working with the Requiring Authority to undertake these works if required, however all associated costs and loss of income from the removal of productive trees within the orchard will require compensation accordingly, over and above the value of the land itself.

Implications of NoR on access to Lot 400

11. A residential dwelling is located at the northern extent of the site's eastern frontage (within Lot 400). The extent to which the existing vehicle crossing serving Lot 400 will be impacted by the corridor widening works is unclear as it is proposed to introduce active modes, a diversion drain and swale, and cut earthworks in the location of the access, shown below. Further detail is required to assess the actual and potential transportation effects accordingly.



12. Finally, the Submitter requests certainty that construction effects on the Submitter's property will be appropriately managed at the time of construction.

### **Relief Sought**

13. The Submitter seeks that NoR Coatesville-Riverhead Highway be accepted provided conditions are inserted to address the following:

- a) That the designation be amended and conditions imposed on the designation to ensure that:

- i. The NoR is removed entirely from the Submitter's property, and if this is not possible, that:

- The width of the swale on the western side of the corridor is reduced in and coincidentally reduce the extent to which the western NoR boundary encroaches the Submitter's property. Assess the option to increase the area of the stormwater pond at the culvert to mitigate this change accordingly and reduce the extent to which highly productive land is affected by the proposed works.
- The Requiring Authority confirms it will compensate the Submitter for the costs associated with the loss of income otherwise generated by the productive trees that are required to be removed, the physical works necessary to accommodate the proposed corridor widening, and for the land itself.
- The Requiring Authority confirms the on-going operation and safety of the existing vehicle access serving Lot 400 will not be adversely affected by the proposed active modes, swale nor cut works at the eastern boundary of the site.

- b) That conditions are imposed on the designation to ensure that:

- i. Prior to the commencement of construction in the vicinity of the Submitters' land, a site-specific construction management plan applying to the area in the immediate vicinity of the Submitters' land is:

- Prepared by the requiring authority in consultation with the Submitter;
- Provided to Council, along with details of the Submitter's observations and comments on the plan, if any; and
- Approved by the Council.

- c) Such other conditions, relief or other consequential amendments as are considered appropriate or necessary to address the matters outlined in this submission.
- 14. If the above relief is not accepted, the Submitter seeks that NoR Coatesville-Riverhead Highway be declined.
- 15. The Submitter wishes to be heard in support of this submission.
- 16. If others make a similar submission, the Submitter would consider presenting a joint case with them at the hearing.

**DATED** at Auckland this                      24th    day of **April 2023**

**Signature:**

**Milenko Boric**  
Director

**Address for Service:**  
Forme Planning Ltd  
Suite 203, Achilles House  
8 Commerce Street  
Auckland 1010  
[Hannah@formeplanning.co.nz](mailto:Hannah@formeplanning.co.nz)