From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz

To: <u>Unitary Plan</u>

**Subject:** Unitary Plan further submission - Plan Change 78 - Brian McLure

**Date:** Friday, 20 January 2023 11:20:10 am

Attachments: PC 78 BA Trustees Ltd Further Submission 1 to Fletchers Sub 1080.pdf

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

#### **Contact details**

Full name of person making a further submission: Brian McLure

Organisation name: BA Trustees Ltd

Full name of your agent: Colin Hardacre-Hardacre Planning Ltd

Email address: colin@hardacreplanning.co.nz

Contact phone number: 0272808409

Postal address:

colin@hardacreplanning.co.nz

auckland auckland 1051

#### Submission details

#### This is a further submission to:

Plan change number: Plan Change 78

Plan change name: PC 78: Intensification

#### Original submission details

Original submitters name and address:

Fletcher Residential Ltd PO Box 99922 Newmarket Akl 1149

Submission number: 1080

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

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

Point number 1080

The reasons for my or our support or opposition are:

See HPL attachment

I or we want Auckland council to make a decision to: Allow part of original submission

Specify the parts of the original submission you want to allow or disallow:

See HPL attachment.

Submission date: 20 January 2023

Supporting documents

PC 78 BA Trustees Ltd Further Submission 1 to Fletchers Sub 1080.pdf

## Attend a hearing

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

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

#### **Declaration**

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

Specify upon which grounds you come within this category: Landowner and ratepayer of sites in the Business Mixed Use and Business Local Centre zones

#### I declare that:

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



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## Further Submission in support of, or opposition to, a notified proposed plan change or variation Clause 8 of Schedule 1, Resource Management Act 1991

FORM 6



Send your submission to $\underline{\text{unitaryplan@aucklandcouncil.govt.nz}}$ or post to :	For office use only Further Submission No:	
Attn: Planning Technician Auckland Council Level 24, 135 Albert Street Private Bag 92300 Auckland 1142	Receipt Date:	
<u>Further Submitter details</u>		
Full Name or Name of Agent (if applicable)		
Mr/Mrs/Miss/Ms(Full Name)		
Organisation Name (if further submission is made on behalf of	of Organisation)	
BA Trustees Ltd		
C/- Hardacre Planning Ltd, Level 1, Accounting Chambers, 6 Attention: Colin Hardacre  Telephone: 272808409 Fax/Email: co		,
	lin@hardacreplanning.c	o.nz
Contact Person: (Name and designation, if applicable)		
Scope of Further Submission		
This is a further submission in support of ( <i>or</i> opposition to) a change / variation:	submission on the follow	ving proposed plan
Plan Change/Variation Number PC 78		. To
Plan Change/Variation Name Intensification	one in the second	
	Please identify the specil ubmission)	fic parts of the original
	Submission Number	Point-Number
Fletcher Residential Living Ltd	1080	1080
<u> </u>		
The reasons for my support / opposition are:		
See Hardacre Planning Ltd info attached		

(continue on a separate sheet if necessary)
I seek that:
the whole:
or part (describe precisely which part) PC 78 Height Strategy
of the original submission be allowed
disallowed
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 Further Submitter (or person authorised to sign on behalf of further submitter)  PLEASE COMPLETE THE FOLLOWING SECTION
Please tick one
I am a person representing a relevant aspect of the public interest. (Specify upon what grounds you come within this category)
I am a person who has an interest in the proposal that is greater than the interest that the general public has. (Specify on what grounds you come within this category)  Landowner and ratepayer of sites in the Business Local Centre and Business Mixed Use zones.
Notes to person making submission:  A copy of your further submission must be served on the original submitter within 5 working days after it is served on the local authority  If you are making a submission to the Environmental Protection Authority, you should use Form 160.



PC 78 FS1 Director - B.R.P, N.Z.P.I Phone 09 529 2417 Mob 027 280 8409 colin@hardacreplanning.co.nz PO Box 87 127 Meadowbank Auckland 1742

## Getting you the planning go ahead to build

18 January 2023

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

By email: unitaryplan@aucklandcouncil.govt.nz

Dear Sir/Madam,

Information in support of a CROSS SUBMISSION to the Auckland Council's **Proposed Plan Change 78 Intensification** 

Clause 8 of First Schedule, Resource Management Act 1991

FURTHER SUBMITTER: B.A. TRUSTEES LTD (Submission Number 1671)

IN SUPPORT OF FLETCHER RESIDENTIAL LIVING LTD'S SUBMISSION -(Submission Number 1080)

- 1. The Further Submission subject is: PC 78 Height Strategy
- The reasons for this Further Submission are: 2.
  - The plan change needs to be amended and modified to ensure that Plan Change 78 will:
    - i. contribute to well-functioning urban environments;
  - ii. be consistent with the sustainable management of physical resources and the purpose and principles of the RMA;
  - iii. meet the criteria under section 32 of the RMA;
  - iv. meet the reasonably foreseeable needs of future generations;

524 Parnell Road, Parnell AC PC 78 Further Submission 1 - Fletcher Living Ltd JN 2053 Hardacre Planning Ltd

- v. be consistent with sound resource management practice and principles;
- vi. be consistent with Part 2 of the RMA; and
- vii. consistent with the proposed Built and Environment Bill and Act.
- 2. the Council has taken the minimum 6 storey height and development potential within walkable catchments under the NPSUD as a maximum:
- Under the section 32 material, the Jasmax Architects Ltd's technical advice in support of the plan change acknowledges that only a 5 storey redevelopment options would result rather than the minimum required by the NPSUD of 6 storeys minimum;
- 4. The plan change will not provide for building height is commensurate with the level commercial activity and community services within and adjacent to neighbourhood centres, local centres and town Centre zones and as such will be contrary to Policy 3d;
- 5. Additional height and density requirements and opportunities are required within the Business Mixed Use, Town Centre, and Local Centre and Neighbourhood Centre Zones to facilitate high density apartment developments given that these zones have high accessible land to public transport, employment opportunities and options, business, commercial and commercial service, food and beverage and rest and recreation activities (Policies 3a, 3d, 4 and 6);
- Plan Change 78 will not achieve the minimum 6 storeys as required by the NPSUD. It will only achieve 5 storey development and redevelopment options; and
- 7. The Council's plan change as advertised, will not give effect to the objectives and policies and purpose of the NPSUD and MDRS Density Standards.

#### 5. Decision / Relief sought:

I seek the following decision from the Auckland Council:

- The relief sought by Fletcher Residential Living Ltd as per their Original Submission Including Appendix 1 under the heading "PC 78 Height Strategy" being Submission Number 1080; or
- Any alternative, consequential and/or other changes that will address the concerns of the Further Submitter.

The Further Submitter wishes to be heard in support of their submission.

3

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

## Contact details / Address for Service

## Hardacre Planning Ltd - Colin Hardacre

Telephone: mobile 027-280-8409.

Email: colin@hardacreplanning.co.nz

Signature of Submitter: 
(Or person authorised to sign on behalf of submitter. A signature is not required if you make your submission by electronic means)

2023.

COLIN HARDACRE Authorised agent

**Director- Hardacre Planning Ltd** 

BRP (Massey University 1980), MNZPI (23 July 1986)

Date:

Copy to: Mr. Brian McClure

**BA Trustees Ltd** 

507/101 Customs Street West

Viaduct Harbour Auckland City 1010.

Fletcher Living Ltd Private Bag 99922

Newmarket Auckland 1149.

Attention: Mr. Aidan Donnelly

By email: kbergin@frl.co.nz

From: <u>UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz</u>

To: Unitary Plan

**Subject:** Unitary Plan further submission - Plan Change 78 - BA Trustees Ltd

**Date:** Friday, 20 January 2023 1:01:03 pm

Attachments: PC 78 BA Trustees Further Submission to Universal Homes Submission 2083.pdf

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

#### **Contact details**

Full name of person making a further submission: BA Trustees Ltd

Organisation name: BA Trustees Ltd

Full name of your agent: Colin Hardacre - Hardacre Planning Ltd

Email address: colin@hardacreplanning.co.nz

Contact phone number: 0272808409

Postal address:

Level 1

Accounting Chambers 642 Great South Road

Ellerslie auckland auckland 1051

#### Submission details

#### This is a further submission to:

Plan change number: Plan Change 78

Plan change name: PC 78: Intensification

#### Original submission details

Original submitters name and address:

Universal Homes Ltd

C/- Campbell Brown Planning Ltd

Po Box 147001

Ponsonby, Auckland 1144

Submission number: 2083

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

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

Point number See HPL attachment

The reasons for my or our support or opposition are:

See HPL attachment

I or we want Auckland council to make a decision to: Allow part of original submission

Specify the parts of the original submission you want to allow or disallow:

See HPL attachment.

Submission date: 20 January 2023

Supporting documents

PC 78 BA Trustees Further Submission to Universal Homes Submission 2083.pdf

#### Attend a hearing

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

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

#### **Declaration**

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

Specify upon which grounds you come within this category: Business Mixed Use and Business Local Centre zone landowner

I declare that:

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



CAUTION: This email message and any attachments contain information that may be confidential and may be LEGALLY PRIVILEGED. If you are not the intended recipient, any use, disclosure or copying of this message or attachments is strictly prohibited. If you have received this email message in error please notify us immediately and

Page 11 of 54

# Further Submission in support of, or opposition to, a notified proposed plan change or variation Clause 8 of Schedule 1, Resource Management Act 1991 FORM 6



Send your submission to unitaryplan@ar	ucklandcouncil.govt.nz or	For office use only Further Submission No:	
Attn: Planning Technician Auckland Council Level 24, 135 Albert Street Private Bag 92300 Auckland 1142		Receipt Date:	
Further Submitter details			
Full Name or Name of Agent (if applica	able)	•	
Mr/Mrs/Miss/Ms(Full Name)			
Organisation Name (if further submis	sion is made on behalf o	of Organisation)	
BA Trustees Ltd			
Address for service of Further Submit C/- Hardacre Planning Ltd, Level 1, A		42 Great South Road, E	Ellerslie, Auckland 1051
Attention: Colin Hardacre			
Telephone: ()272808409	Fax/Email: co	lin@hardacreplanning.o	co.nz
Contact Person: (Name and designation	, if applicable)	v viscent en e sags in sector	
Scope of Further Submission  This is a further submission in supportange / variation:	rt of ( <i>or</i> opposition to) a	submission on the follo	wing proposed plan
Plan Change/Variation Number	PC 78		
Plan Change/Variation Name	Intensification		1.1
I support : ☑ Oppose ☐ (tick one) t  (Original Submitters Name and Address	Si	Please identify the spec ubmission) Submission Number	ific parts of the original  Point-Number
, ,	•	2083	2083
Universal Homes Ltd		2000	
The reasons for my support / opposit	ion are:		
See Hardacre Planning Ltd info atta			
See Hardacie Flamming Lid into alla	ched		

	(continue on a separate sheet if necessary)
l seek	that:
the wh	ole:
or part	(describe precisely which part) See HPL attachment
of the c	original submission be allowed
	disallowed
	o be heard in support of my submission  wish to be heard in support of my submission
	s make a similar submission, I will consider presenting a joint case with them at a
-	oh Hadell 2023  The of Further Submitter  The son authorised to sign on behalf of further submitter)
	PLEASE COMPLETE THE FOLLOWING SECTION
Please	tick one
	I am a person representing a relevant aspect of the public interest. (Specify upon what grounds you come within this category)
×	I am a person who has an interest in the proposal that is greater than the interest that the general public has. (Specify on what grounds you come within this category)
	Landowner and ratepayer of sites in the Business Local Centre and Business Mixed Use zones.
Notes t	o person making submission:
А сору	of your further submission must be served on the original submitter within 5 working days after it is served on all authority
If you a	re making a submission to the Environmental Protection Authority, you should use Form 16C.



PC 78 FS171 Colin Hardacre Director - B.R.P, N.Z.P.I Phone 09 529 2417 Mob 027 280 8409 colin@hardacreplanning.co.nz PO Box 87 127 Meadowbank Auckland 1742

## Getting you the planning go ahead to build

19 January 2023

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

By email: unitaryplan@aucklandcouncil.govt.nz

Dear Sir/Madam,

Information in support of a CROSS SUBMISSION to the Auckland Council's Proposed Plan Change 78 Intensification

Clause 8 of First Schedule, Resource Management Act 1991

FURTHER SUBMITTER: B.A. TRUSTEES LTD (Submission Number 1671)
IN SUPPORT OF UNIVERSAL HOMES LTD – (Submission Number 2083)

<u>1. The Further Submission subject is: H10 Business – Town Centre Zone, H11. Business – Local Centre Zone, H12 Business – Neighbourhood Centre Zone and H13 the Business – Mixed Use Zone.</u>

## 2. The reasons for this Further Submission are:

- 1. the Plan Change needs to be amended to ensure that Plan Change 78 will:
  - (i) contribute to well-functioning urban environments;
  - (ii) be consistent with the sustainable management of physical resources and the purpose and principles of the RMA;
  - (ii) meet the criteria under section 32 of the RMA;
  - (iv) meet the reasonably foreseeable needs of future generations;
  - (v) be consistent with sound resource management practice and principles;

BA Trustees Ltd Further Submission - Universal Homes Ltd JN 2053

Hardacre Planning Ltd

- (vi) be consistent with Part 2 of the RMA; and
- (vii) be consistent with the proposed Built and Environment Bill and Act;
- 2. the reasoning by the is generally correct in planning fact and law;
- 3. the submission stating that the NPSUD and MDRS intention is a simplify the planning process not complicated and enabling development and intensification and the supply of affordable housing throughout the Auckland urban region is supported;
- 4. there are sites within the walkable catchments of Business Zones where more than 6 storey buildings will be appropriate and consistent with the NPSUD and MDRS Density Standards;
- as proposed, the Plan Change will not provide for building heights for the commercial activity and community services within and adjacent to Business Mixed-Use, Town Centre, Neighbourhood Centre and Local Centre zones and as such, will be contrary to Policy 3d;
- 6. additional height and density requirements and opportunities are required within the Business Mixed Use, Town Centre, and Local Centre and Neighbourhood Centre Zones to facilitate high density apartment developments given that these zones have high accessible land to public transport, employment opportunities and options, business, commercial, commercial service, food and beverage and rest and recreation activities (Policies 3a, 3d, 4 and 6);
- 7. by the Council's section 32 material, Plan Change 78 will not achieve the minimum 6 storeys as required by the NPSUD. It will only achieve 5 storey development and redevelopment options;
- 8. in these Business Mixed-Use, Town Centre and Local Centre Zones, greater NPSUD urban environment efficiency and effectiveness is required and a greater redevelopment opportunities and development potential are required than the Council's proposed 6 storeys which is actually only 5 storeys as required to enable and support a feasible higher density developments within the Auckland urban context. This approach is supported by Walter Christaller's "Central Place Theory" and other land economics studies;
- 9. the Submitter's submission point 8, referencing policy 6 (b) of the NPSUD is supported;
- **10.** the Council's plan change as advertised, will not give effect to the NPSUD objectives, policies and purpose; and
- **11.** as advertised, the Plan Change will not promote appropriate NPSUD and MDRS Density Standards and enable Intensification.

## 5. Decision / Relief sought:

I seek the following decision from the Auckland Council:

- The relief sought by the Original Submission; or
- Any alternative, consequential and/or other changes that will address the concerns of the Further Submitter.

The Further Submitter wishes to be heard in support of their submission.

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

#### Contact details / Address for Service

Hardacre Planning Ltd - Colin Hardacre

Telephone: mobile 027-280-8409.

Email: colin@hardacreplanning.co.nz

Signature of Submitter: Hardwall (Or person authorised to sign on behalf of submitter. A signature is not required if you make your submission by electronic means)

COLIN HARDACRE Authorised agent

**Director- Hardacre Planning Ltd** 

Copy to: Mr. Brian McClure

507/101 Customs Street West

Viaduct Harbour Auckland City 1010.

**BA Trustees Ltd** 

Universal Homes Ltd

Hardacre Planning Ltd

4

C/- Campbell Brown Planning Ltd PO Box 147001 Ponsonby Auckland 1114

By email: michael@campbellbrown.co.nz

**From:** UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz

**Sent:** Friday, 20 January 2023 12:31 pm

**To:** Unitary Plan

**Subject:** Unitary Plan further submission - Plan Change 78 - BA Trustees Ltd

Attachments: PC 78 BA Trustees Ltd Further Submission to Propertry Council NZ Submission 871.pdf

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

#### Contact details

Full name of person making a further submission: BA Trustees Ltd

Organisation name: BA Trustees Ltd

Full name of your agent: Hardacre Planning Ltd - Colin Hardacre

Email address: colin@hardacreplanning.co.nz

Contact phone number: 0272808409

Postal address: Level 1 Accounting Chambers 642 Great South Road Ellerslie auckland auckland 1051

### **Submission details**

#### This is a further submission to:

Plan change number: Plan Change 78

Plan change name: PC 78: Intensification

## Original submission details

Original submitters name and address:

Property Council NZ

Submission number: 871

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

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

Point number See HPL attachment

The reasons for my or our support or opposition are:

See HPL attachment

I or we want Auckland council to make a decision to: Allow part of original submission

Specify the parts of the original submission you want to allow or disallow:

See HPL attachment.

Submission date: 20 January 2023

Supporting documents

PC 78 BA Trustees Ltd Further Submission to Propertry Council NZ Submission 871.pdf

#### Attend a hearing

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

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

#### **Declaration**

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

Specify upon which grounds you come within this category: Business Mixed Use and Business Local Centre zone landowner

#### I declare that:

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



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Page 19 of 54

## Further Submission in support of, or opposition to, a notified proposed plan change or variation Clause 8 of Schedule 1, Resource Management Act 1991 FORM 6



Send your submission to <u>unitaryplan@aucklandcouncil.govt.nz</u> or	For office use only	
post to:	Further Submission No:	
Attn: Planning Technician Auckland Council	Receipt Date:	
Level 24, 135 Albert Street	20 20 20	
Private Bag 92300 Auckland 1142		, pro
	<u> </u>	
Further Submitter details		
Full Name or Name of Agent (if applicable)		
Mr/Mrs/Miss/Ms(Full Name)		
Organisation Name (if further submission is made on behalf o	f Organisation)	
BA Trustees Ltd		
	- 12 Te To 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
Address for service of Further Submitter	100 10 11 0 1 5	''' '' A . I I
C/- Hardacre Planning Ltd, Level 1, Accounting Chambers, 64	2 Great South Road, E	llerslie, Auckland 1051
Attention: Colin Hardacre		
Telephone: 272808409 Fax/Email: col	in@hardacreplanning.c	o.nz
Contact Person: (Name and designation, if applicable)		
Scope of Further Submission		
This is a further submission in support of (or opposition to) a change / variation:	submission on the follow	wing proposed plan
Plan Change/Variation Number PC 78		
Tidit Change, validation National 1 0 70		<u> </u>
Plan Change/Variation Name Intensification		
I support : ☑ Oppose ☐ (tick one) the submission of: (P	lease identify the speci	fic parts of the original
su	bmission) Submission Number	Point-Number
Property Council NZ	871	871
	, J* 1	
The reasons for my support / opposition are:		
See Hardacre Planning Ltd info attached		
<b>S</b>		

						(continue on a separate sheet if necessary
I seek that:						
the whole:						
or part	×	(descr	ibe preci	sely whi	ich part	Housing Instensifaction in Mixed USe Areas and Height Controls
of the origina	submi	ssion be	allowe	d	X	
			disalle	owed		
I do not wish  If others make  hearing  Signature of I	e a sim	lar subi Submiti	nission,	I will con	nsider p	resenting a joint case with them at a 🗵  2027  Date 2027
			PLEAS	SE COM	IPLET	E THE FOLLOWING SECTION
☐ Ian	ı a per			ng a rel		E THE FOLLOWING SECTION  Espect of the public interest. (Specify upon what grounds
☐ Ian you ———————————————————————————————————	n a per come	son wh	oresenti this cate o has ar ify on w	ng a rel egory) n interes hat gro	evant a	
you I an puk	n a per come	son wh	oresenti this cate o has ar ify on w	ng a rel egory) n interes hat gro	evant a	e proposal that is greater than the interest that the general ou come within this category)



PC 78 FS171 Colin Hardacre Director - B.R.P, N.Z.P.I Phone 09 529 2417 Mob 027 280 8409 colin@hardacreplanning.co.nz PO Box 87 127 Meadowbank Auckland 1742

## Getting you the planning go ahead to build

19 January 2023

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

By email: unitaryplan@aucklandcouncil.govt.nz

Dear Sir/Madam,

Information in support of a CROSS SUBMISSION to the Auckland Council's Proposed Plan Change 78 Intensification

Clause 8 of First Schedule, Resource Management Act 1991

FURTHER SUBMITTER: B.A. TRUSTEES LTD (Submission Number 1671)

IN SUPPORT OF PROPERTY COUNCIL NEW ZEALAND SUBMISSION – (Submission Number 871)

- <u>1.</u> <u>The Further Submission subject is:</u> Heights controls Submission points 871.1, 871.2, 871.3, 871.4, 871.5, 871.10, 871.11 and 871.12.
- 2. The reasons for this Further Submission are:
  - the Plan Change needs to be amended and modified to ensure that Plan Change 78 will:
    - (i) contribute to well-functioning urban environments;
    - (ii) be consistent with the sustainable management of physical resources and the purpose and principles of the RMA;
    - (ii) meet the criteria under section 32 of the RMA;
    - (iv) meet the reasonably foreseeable needs of future generations;
    - (v) be consistent with sound resource management practice and principles;

BA Trustees Ltd AC PC 78 Further Submission 3 – Property Council New Zealand JN 2053 Hardacre Planning Ltd

- (vi) be consistent with Part 2 of the RMA; and
- (vii) will be consistent with the proposed Built and Environment Bill and Act;
- 2. the Council has taken the minimum 6 storey height and development potential within walkable catchments under the NPSUD as a maximum;
- the Council's section 32 material including Jasmax Architects Ltd technical advice in support of the plan change acknowledges that only a 5 storey redevelopment options would result rather than the minimum required by the NPSUD of 6 storeys minimum;
- the Council has taken the minimum 6 storey development opportunities to be a maximum;
- there are sites within the walkable catchments of Business Zones where more than 6 storey buildings will be appropriate and consistent with the NPSUD and MDRS Density Standards;
- as proposed, the Plan Change will not provide for building heights to be enabling with the level commercial activity and community services within and adjacent to Business Mixed-Use, Town Centre and Local Centre zones and as such will be contrary to Policy 3d;
- 7. additional height and density requirements and opportunities are required within the Business Mixed Use, Town Centre, and Local Centre and Neighbourhood Centre Zones to facilitate high density apartment developments given that these zones have high accessible land to public transport, employment opportunities and options, business, commercial, commercial service, food and beverage and rest and recreation activities (Policies 3a, 3d, 4 and 6);
- by the Council's section 32 material, Plan Change 78 will not achieve the minimum 6 storeys as required by the NPSUD. It will only achieve 5 storey development and redevelopment options;
- 9. in these Business Mixed-Use, Town Centre and Local Centre Zones, greater NPSUD urban environment efficiency and effectiveness is required and a greater redevelopment opportunities and development potential are required than the Council's proposed 6 storeys which is actually only 5 storeys as required to enable and support a feasible higher density developments within the Auckland urban context. This approach is supported by Walter Christaller's "Central Place Theory" and other land economic studies;
- the Council's plan change as advertised, will not give effect to the NPSUD objectives, policies and purpose;
- **11.** as advertised, the Plan Change will not promote appropriate NPSUD and MDRS Density Standards and enable Intensification;

## 5. Decision / Relief sought:

I seek the following decision from the Auckland Council:

- The relief sought by the Property Council New Zealand as per their Original Submission under the heading "Heights controls" being Submission Number 871; or
- Any alternative, consequential and/or other changes that will address the concerns of the Further Submitter.

The Further Submitter wishes to be heard in support of their submission.

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

## Contact details / Address for Service

## Hardacre Planning Ltd - Colin Hardacre

Telephone: mobile 027-280-8409.

Email: colin@hardacreplanning.co.nz

COLIN HARDACRE
Authorised agent
Director- Hardacre Planning Ltd

Date: \_

Copy to:

Mr. Brian McClure

BA Trustees Ltd

507/101 Customs Street West

Viaduct Harbour Auckland City 1010.

1

Property Council New Zealand PO Box 1033 Auckland 1140

Attention: Ms Leonie Freeman.

**From:** UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz

**Sent:** Friday, 20 January 2023 12:01 pm

**To:** Unitary Plan

**Subject:** Unitary Plan further submission - Plan Change 78 - BA Trustees Ltd

Attachments: PC78 BA Trustees Ltd Further Submission 2 to Fletchers Submission 1080.pdf

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

#### Contact details

Full name of person making a further submission: BA Trustees Ltd

Organisation name: BA Trustees Ltd

Full name of your agent: Colin Hardacre - Hardacre Planning Ltd

Email address: colin@hardacreplanning.co.nz

Contact phone number: 0272808409

Postal address: Level 1 Accounting Chambers 642 Great South Road Ellerslie Auckland auckland 1051

### **Submission details**

#### This is a further submission to:

Plan change number: Plan Change 78

Plan change name: PC 78: Intensification

## Original submission details

Original submitters name and address: Fletcher Residential Living Ltd Private Bag 99922 Newmarket Auckland 1149

Submission number: 1080

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

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

Point number 1080

The reasons for my or our support or opposition are:

See HPL attachment

I or we want Auckland council to make a decision to: Allow part of original submission

Specify the parts of the original submission you want to allow or disallow: See HPL attachment.

Submission date: 20 January 2023

Supporting documents

PC78 BA Trustees Ltd Further Submission 2 to Fletchers Submission 1080.pdf

## Attend a hearing

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

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

#### **Declaration**

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

Specify upon which grounds you come within this category: Business Mixed Use and Business Local Centre landowner

#### I declare that:

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



CAUTION: This email message and any attachments contain information that may be confidential and may be LEGALLY PRIVILEGED. If you are not the intended recipient, any use, disclosure or copying of this message or attachments is strictly prohibited. If you have received this email message in error please notify us immediately and erase all copies of the message and attachments. We do not accept responsibility for any viruses or similar carried with 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.

## Further Submission in support of, or opposition to, a notified proposed plan change or variation Clause 8 of Schedule 1, Resource Management Act 1991 FORM 6



Page 27 of 54

		· ·	
Send your submission to <u>unitaryplan@a</u> post to:	ucklandcouncil.govt.nz	or For office use only Further Submission No	
		Receipt Date:	•
Attn: Planning Technician Auckland Council		receipt bate.	
Level 24, 135 Albert Street Private Bag 92300		10 43 x	
Auckland 1142			
Further Submitter details			
Full Name or Name of Agent (if application)	able)		
Mr/Mrs/Miss/Ms(Full Name)			
Organisation Name (if further submis	sion is made on beha	lf of Organisation)	
BA Trustees Ltd			
Address for service of Further Submit		642 Great South Boad	Ellorelia Augkland 1051
C/- Hardacre Planning Ltd, Level 1, A Attention: Colin Hardacre	ccounting Chambers	, 042 Great South Road, i	Ellersile, Auckland 1051
Audition. Com Hardage			
Telephone: 272808409	Fax/Email:	colin@hardacreplanning.	co.nz
		gg	
Contact Person: (Name and designation,			
Contact Person: (Name and designation,  Scope of Further Submission  This is a further submission in suppor change / variation:	if applicable)	enn en versk gelækkeren glokk vidskaling	(Caasaan) []
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Scope of Further Submission  This is a further submission in suppor change / variation:  Plan Change/Variation Number  Plan Change/Variation Name	if applicable)  It of (or opposition to perform the submission of:	a submission on the follo	wing proposed plan
Scope of Further Submission  This is a further submission in support change / variation:  Plan Change/Variation Number  Plan Change/Variation Name  I support:  Oppose (tick one)	if applicable)  It of (or opposition to perform the submission of:	a submission on the following (Please identify the special submission)	wing proposed plan
Scope of Further Submission  This is a further submission in support change / variation:  Plan Change/Variation Number  Plan Change/Variation Name  I support: Oppose (tick one) till  (Original Submitters Name and Address)	if applicable)  It of (or opposition to perform the submission of:	(Please identify the spec submission) Submission Number	wing proposed plan  ific parts of the original  Point-Number
Scope of Further Submission  This is a further submission in support change / variation:  Plan Change/Variation Number  Plan Change/Variation Name  I support: Oppose (tick one) till  (Original Submitters Name and Address)	if applicable)  It of (or opposition to perform the submission of:	(Please identify the spec submission) Submission Number	wing proposed plan  ific parts of the original  Point-Number
Scope of Further Submission  This is a further submission in support change / variation:  Plan Change/Variation Number  Plan Change/Variation Name  I support: Oppose (tick one) till  (Original Submitters Name and Address)	if applicable)  It of (or opposition to perform the submission of:	(Please identify the spec submission) Submission Number	wing proposed plan  ific parts of the original  Point-Number
Scope of Further Submission  This is a further submission in support change / variation:  Plan Change/Variation Number  Plan Change/Variation Name  I support: Oppose (tick one) till  (Original Submitters Name and Address)	if applicable)  It of (or opposition to perform the submission of:	(Please identify the spec submission) Submission Number	wing proposed plan  ific parts of the original  Point-Number
Scope of Further Submission  This is a further submission in support change / variation:  Plan Change/Variation Number  Plan Change/Variation Name  I support: Oppose (tick one) till  (Original Submitters Name and Address)	if applicable)  It of (or opposition to perform to perf	(Please identify the spec submission) Submission Number	wing proposed plan  ific parts of the original  Point-Number

	(continue on a separate sheet if necessary)
I seek th	
the whol	e: 🔲
or part	(describe precisely which part) PC 78 Heights in Commercail Zones
of the ori	ginal submission be allowed
	disallowed
l wish to	be heard in support of my submission
l do not v	vish to be heard in support of my submission
If others thearing	make a similar submission, I will consider presenting a joint case with them at a 🛛 🗵
	e of Further Submitter n authorised to sign on behalf of further submitter)  Date  Date
	PLEASE COMPLETE THE FOLLOWING SECTION
Please ti	ck one
	I am a person representing a relevant aspect of the public interest. (Specify upon what grounds you come within this category)
	I am a person who has an interest in the proposal that is greater than the interest that the general
X	public has. (Specify on what grounds you come within this category)
	Landowner and ratepayer of sites in the Business Local Centre and Business Mixed Use zones.
Notes to	person making submission:
А сору с	of your further submission must be served on the original submitter within 5 working days after it is served on authority
If you ar	e making a submission to the Environmental Protection Authority, you should use Form 16C.



PC 78 FS171 Colin Hardacre Director - B.R.P, N.Z.P.I Phone 09 529 2417 Mob 027 280 8409 colin@hardacreplanning.co.nz P0 Box 87 127 Meadowbank Auckland 1742

## Getting you the planning go ahead to build

18 January 2023

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

By email: unitaryplan@aucklandcouncil.govt.nz

Dear Sir/Madam,

Information in support of a CROSS SUBMISSION to the Auckland Council's Proposed Plan Change 78 Intensification

Clause 8 of First Schedule, Resource Management Act 1991

FURTHER SUBMITTER: B.A. TRUSTEES LTD (Submission Number 1671)

IN SUPPORT OF FLETCHER RESIDENTIAL LIVING LTD'S SUBMISSION – (Submission Number 1080)

- 1. The Further Submission subject is: Heights within Commercial Zones
- 2. The reasons for this Further Submission are:
  - the Plan Change needs to be amended and/or modified to ensure that Plan Change 78 will:
    - (i) contribute to well-functioning urban environments;
    - (ii) will be consistent with the sustainable management of physical resources and the purpose and principles of the RMA;
    - (ii) will meet the criteria under section 32 of the RMA;
    - (iv) will meet the reasonably foreseeable needs of future generations;
    - (v) will be consistent with sound resource management practice and principles;

524 Parnell Road, Parnell AC PC 78 Further Submission 2 - Fletcher Living Ltd JN 2053 Hardacre Planning Ltd

- (vi) will be consistent with Part 2 of the RMA; and
- (vii) will be consistent with the proposed Built and Environment Bill and Act;
- 2. the Council has taken the minimum 6 storey height and development potential within walkable catchments under the NPSUD as a maximum;
- the Council by its own admission and the Jasmax Architects Ltd technical advice in support of the plan change acknowledges that only a 5 storey redevelopment options would result rather than the minimum required by the NPSUD of 6 storeys minimum;
- 4. the plan change will not provide for building heights to be enabling with the level commercial activity and community services within and adjacent to Business Mixed-Use, Town Centre and Local Centre zones and as such will be contrary to Policy 3d;
- 5. additional height and density requirements and opportunities are required within the Business Mixed Use, Town Centre, and Local Centre and Neighbourhood Centre Zones to facilitate high density apartment developments given that these zones have high accessible land to public transport, employment opportunities and options, business, commercial and commercial service, food and beverage and rest and recreation activities (Policies 3a, 3d, 4 and 6);
- 6. by the Council's section 32 material, Plan Change 78 will not achieve the minimum 6 storeys as required by the NPSUD. It will only achieve 5 storey development and redevelopment options:
- 7. in these Business Mixed-Use, Town Centre and Local Centre Zones, greater NPSUD urban environment efficiency and effectiveness is required and a minimum of 8 storey redevelopment opportunities and development potential to enable and support a feasible higher density developments within the Auckland urban context. This approach is supported by Walter Christaller's "Central Place Theory" and other land economic studies:
- the Council's plan change as advertised, will not give effect to the NPSUD objectives, policies and purpose; and
- as advertised, the Plan Change will not promote appropriate NPSUD and MDRS Density Standards and enable Intensification.

#### 5. <u>Decision / Relief sought:</u>

I seek the following decision from the Auckland Council:

• The relief sought by Fletcher Residential Living Ltd as per their Original Submission Including Appendix 1 under the heading "Heights within Commercial Zones" being Submission Number 1080; or

3

• Any alternative, consequential and/or other changes that will address the concerns of the Further Submitter.

The Further Submitter wishes to be heard in support of their submission.

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

## Contact details / Address for Service

## Hardacre Planning Ltd - Colin Hardacre

Telephone: mobile 027-280-8409.

Email: colin@hardacreplanning.co.nz

Signature of Submitter:

(Or person authorised to sign on behalf of submitter. A signature is not required if you make your submission by electronic means)

2023.

make your submission by electronic means)

COLIN HARDACRE Authorised agent

**Director- Hardacre Planning Ltd** 

Date: \_\_\_ Copy to:

Mr. Brian McClure

BA Trustees Ltd

507/101 Customs Street West

Viaduct Harbour Auckland City 1010.

Fletcher Living Ltd Private Bag 99922 Newmarket Auckland 1149

Attention: Mr. Aidan Donnelly

By email: kbergin@frl.co.nz

## Further Submission in support of, or opposition to, a notified proposed plan change or variation Clause 8 of Schedule 1, Resource Management Act 1991 FORM 6



Send your submission to unitaryplan@apost to:	ucklandcouncil.govt.nz or	For office use only Further Submission N	lo:
Attn: Planning Technician Auckland Council Level 24, 135 Albert Street Private Bag 92300 Auckland 1142		Receipt Date:	
Further Submitter details			
Full Name or Name of Agent (if applic	able)		
Mr/Mrs/Miss/Ms(Full Name)			
Organisation Name (if further submis	ssion is made on behalf o	f Organisation)	
BA Trustees Ltd			
Address for service of Further Submi C/- Hardacre Planning Ltd, Level 1, A Attention: Colin Hardacre		12 Great South Road	, Ellerslie, Auckland 1051
Telephone: 272808409	Fax/Email: col	in@hardacreplanning	J.CO.NZ
Contact Person: (Name and designation			,
Scope of Further Submission  This is a further submission in supportange / variation:		submission on the fol	lowing proposed plan
Plan Change/Variation Number	PC 78	armana (= cos	of course of the
Plan Change/Variation Name	Intensification		
I support : ☑ Oppose ☐ (tick one) t		lease identify the spentrum	ecific parts of the original
(Original Submitters Name and Address)		Submission Number	Point-Number
NZ Housing Foundation		938	938
. , , , , , , , , , , , , , , , , , , ,			
The reasons for my support / opposit	ion are:		
See Hardacre Planning Ltd info attack	ched		

PC 78 FS171

(c	continue on a separate sheet if necessary)
I seek that:	
the whole:	
or part (describe precisely which part) See HPL attach	ment
of the original submission be allowed	
disallowed	
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 the hearing	⊠ ⊡ em at a ⊠
Signature of Further Submitter (or person authorised to sign on behalf of further submitter)  Date	January 2023
PLEASE COMPLETE THE FOLLOWING SECT	<u>TION</u>
Please tick one	
I am a person representing a relevant aspect of the public interest you come within this category)	t. (Specify upon what grounds
I am a person who has an interest in the proposal that is greater the public has. (Specify on what grounds you come within this category Landowner and ratepayer of sites in the Business Local Centre and	ry)
Notes to person making submission:  A copy of your further submission must be served on the original submitter within the local authority	n 5 working days after it is served on
If you are making a submission to the Environmental Protection Authority, you sh	ould use Form 16C.



PC 78 FS 17 Hardacre
Director - B.R.P, N.Z.P.I
Phone 09 529 2417
Mob 027 280 8409
colin@hardacreplanning.co.nz
P0 Box 87 127
Meadowbank
Auckland 1742

## Getting you the planning go ahead to build

19 January 2023

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

By email: unitaryplan@aucklandcouncil.govt.nz

Dear Sir/Madam,

Information in support of a CROSS SUBMISSION to the Auckland Council's Proposed Plan Change 78 Intensification

Clause 8 of First Schedule, Resource Management Act 1991

FURTHER SUBMITTER: B.A. TRUSTEES LTD (Submission Number 1671)

IN SUPPORT OF NEW ZEALAND HOUSING FOUNDATION – (Submission Number 938)

- 1. <u>The Further Submission subject is: H10 Business Town Centre Zone, H11. Business Local Centre Zone, H12 Business Neighbourhood Centre Zone and H13 the Business Mixed Use Zone.</u>
- <u>2.</u> The reasons for this Further Submission are:
  - 1. the Plan Change needs to be amended or modified to ensure that Plan Change 78 will
    - (i) contribute to well-functioning urban environments;
    - (ii) will be consistent with the sustainable management of physical resources and the purpose and principles of the RMA;
    - (ii) will meet the criteria under section 32 of the RMA;
    - (iv) will meet the reasonably foreseeable needs of future generations;

BA Trustees Ltd Further Submission – NZ Housing Foundation JN 2053

Hardacre Planning Ltd

- (v) will be consistent with sound resource management practice and principles;
- (vi) will be consistent with Part 2 of the RMA; and
- (vii) will be consistent with the proposed Built and Environment Bill and Act;
- The submission stating that the NPSUD and MDRS intention is a simplify the planning process – not complicated and enabling development and intensification and the supply of affordable housing throughout the Auckland urban region is supported;
- There are sites within the walkable catchments of Business Zones where more than 6 storey buildings will be appropriate and consistent with the NPSUD and MDRS Density Standards;
- **4.** As proposed, the Plan Change will not provide for building heights for the commercial activity and community services within and adjacent to Business Mixed-Use, Town Centre, Neighbourhood Centre and Local Centre zones and as such, will be contrary to Policy 3d;
- 5. additional height and density requirements and opportunities are required within the Business Mixed Use, Town Centre, and Local Centre and Neighbourhood Centre Zones to facilitate high density apartment developments given that these zones have high accessible land to public transport, employment opportunities and options, business, commercial, commercial service, food and beverage and rest and recreation activities (Policies 3a, 3d, 4 and 6);
- 6. by the Council's section 32 material, Plan Change 78 will not achieve the minimum 6 storeys as required by the NPSUD. It will only achieve 5 storey development and redevelopment options;
- 7. in these Business Mixed-Use, Town Centre and Local Centre Zones, greater NPSUD urban environment efficiency and effectiveness is required and a greater redevelopment opportunities and development potential are required than the Council's proposed 6 storeys which is actually only 5 storeys as required to enable and support a feasible higher density developments within the Auckland urban context. This approach is supported by Walter Christaller's "Central Place Theory" and other land economics studies;
- **8.** The Submitter's submission point 8, referencing policy 6 (b) of the NPSUD is supported;
- **9.** the Council's plan change as advertised, will not give effect to the NPSUD objectives, policies and purpose; and
- **10.** as advertised, the Plan Change will not promote appropriate NPSUD and MDRS Density Standards and enable Intensification.

## 5. Decision / Relief sought:

I seek the following decision from the Auckland Council:

- The relief sought by the Original Submission; or
- Any alternative, consequential and/or other changes that will address the concerns of the Further Submitter.

The Further Submitter wishes to be heard in support of their submission.

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

## Contact details / Address for Service

## Hardacre Planning Ltd - Colin Hardacre

Telephone: mobile 027-280-8409.

Email: colin@hardacreplanning.co.nz

Signature of Submitter: Ohi Pardoe O

2023.

COLIN HARDACRE Authorised agent

**Director- Hardacre Planning Ltd** 

Copy to: Mr. Brian McClure

BA Trustees Ltd 507/101 Customs Street West

Viaduct Harbour Auckland City 1010.

NZ Housing Foundation

C/- Campbell Brown Planning Ltd

PO Box 147001

Ponsonby Auckland 1114

BA Trustees Ltd Further Submission – NZ Housing Foundation JN 2053

Hardacre Planning Ltd

By email: <u>michael@campbellbrown.co.nz</u>

# Further Submission in support of, or opposition to, a notified proposed plan change or variation Clause 8 of Schedule 1, Resource Management Act 1991 FORM 6



Send your submission to unitaryplan@au post to:	ucklandcouncil.govt.nz or	For office use only Further Submission No	r			
Attn: Planning Technician Auckland Council Level 24, 135 Albert Street Private Bag 92300 Auckland 1142		Receipt Date:				
Further Submitter details  Full Name or Name of Agent (if application Mr/Mrs/Miss/Ms(Full Name)  Organisation Name (if further submission submi		of Organisation)				
BA Trustees Ltd						
Address for service of Further Submitted C/- Hardacre Planning Ltd, Level 1, Address for service of Further Submitted Planning Ltd, Level 1, Address for service of Further Submitted Planning Ltd, Level 1, Address for service of Further Submitted Planning Ltd, Level 1, Address for service of Further Submitted Planning Ltd, Level 1, Address for service of Further Submitted Planning Ltd, Level 1, Address for service of Further Submitted Planning Ltd, Level 1, Address for service of Further Submitted Planning Ltd, Level 1, Address for service of Further Submitted Planning Ltd, Level 1, Address for service of Further Submitted Planning Ltd, Level 1, Address for service of Further Submitted Planning Ltd, Level 1, Address for service of Further Submitted Planning Ltd, Level 1, Address for service of Further Submitted Planning Ltd, Level 1, Address for service of Further Submitted Planning Ltd, Level 1, Address for service of Further Submitted Planning Ltd, Level 1, Address for service of Further Submitted Planning Planni		42 Great South Road, l	Ellerslie, Auckland 1051			
Attention: Colin Hardacre						
Telephone: 0272808409	Fax/Email: co	lin@hardacreplanning.	co.nz			
Contact Person: (Name and designation,	if applicable)					
Scope of Further Submission						
This is a further submission in suppor change / variation:	t of ( <i>or</i> opposition to) a	submission on the follo	owing proposed plan			
Plan Change/Variation Number	PC 78	-0 17 55 4 5 57°	11.0.300			
Plan Change/Variation Name	Intensification		1 1999			
I support : ☑ Oppose ☐ (tick one) the (Original Submitters Name and Address)	SL	(Please identify the specific parts of the original submission)  Submission Number Point-Number				
Kianga Ora Homes and Communiti	ies	873	873			
The reasons for my support / opposition			,			
See Hardacre Planning Ltd info attac	ched					

(continue on a separate sheet if necessary)
I seek that:
the whole:
or part (describe precisely which part) See HPL attachment
of the original submission be allowed
disallowed
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 Further Submitter (or person authorised to sign on behalf of further submitter)  23 January 2023  Date
PLEASE COMPLETE THE FOLLOWING SECTION
Please tick one
I am a person representing a relevant aspect of the public interest. (Specify upon what grounds you come within this category)
I am a person who has an interest in the proposal that is greater than the interest that the general public has. (Specify on what grounds you come within this category)  Landowner and ratepayer of sites in the Business Local Centre and Business Mixed Use zones.
Notes to person making submission:  A copy of your further submission must be served on the original submitter within 5 working days after it is served on the local authority
If you are making a submission to the Environmental Protection Authority, you should use Form 16C.



PC 78 FS171 Hardacre
Director - B.R.P, N.Z.P.I
Phone 09 529 2417
Mob 027 280 8409
colin@hardacreplanning.co.nz
P0 Box 87 127
Meadowbank
Auckland 1742

## Getting you the planning go ahead to build

19 January 2023

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

By email: unitaryplan@aucklandcouncil.govt.nz

Dear Sir/Madam,

Information in support of a CROSS SUBMISSION to the Auckland Council's Proposed Plan Change 78 Intensification

Clause 8 of First Schedule, Resource Management Act 1991

FURTHER SUBMITTER: B.A. TRUSTEES LTD (Submission Number 1671)

IN SUPPORT OF KAIANGA ORA – (Submission Number 873)

1. The Further Submission subject is: their Submission in relation to the Business Zones, Walkable Catchments and the Height Variation Control and Appendix 3. Walkable Catchment and Height Variation Control Methodology.

## <u>2.</u> The reasons for this Further Submission are:

- 1. the Plan Change needs to be amended or modified to ensure that it will:
  - (i) contribute to well-functioning urban environments;
  - (ii) be consistent with the sustainable management of physical resources and the purpose and principles of the RMA;
  - (ii) meet the criteria under section 32 of the RMA;
  - (iv) meet the reasonably foreseeable needs of future generations;
  - (v) be consistent with sound resource management practice and principles;

BA Trustees Ltd Further Submission - Universal Homes Ltd JN 2053

Hardacre Planning Ltd

- (vi) be consistent with Part 2 of the RMA; and
- (vii) be consistent with the proposed Built and Environment Bill and Act;
- 2. The submission stating that the NPSUD and MDRS intention is a simplify the planning process not complicated and enabling development and intensification and the supply of affordable housing throughout the Auckland urban region is supported;
- There are sites within the walkable catchments of Business Zones where more than 6 storey buildings will be appropriate and consistent with the NPSUD and MDRS Density Standards;
- 4. As proposed, the Plan Change will not provide for building heights for the commercial activity and community services within and adjacent to Business Mixed-Use, Town Centre, Neighbourhood Centre and Local Centre zones and as such, will be contrary to Policy 3d;
- 5. additional height and density requirements and opportunities are required within the Business Mixed Use, Town Centre, and Local Centre and Neighbourhood Centre Zones to facilitate high density apartment developments given that these zones have high accessible land to public transport, employment opportunities and options, business, commercial, commercial service, food and beverage and rest and recreation activities (Policies 3a, 3d, 4 and 6);
- 6. by the Council's section 32 material, Plan Change 78 will not achieve the minimum 6 storeys as required by the NPSUD. It will only achieve 5 storey development and redevelopment options;
- 7. in these Business Mixed-Use, Town Centre and Local Centre Zones, greater NPSUD urban environment efficiency and effectiveness is required and a greater redevelopment opportunities and development potential are required than the Council's proposed 6 storeys which is actually only 5 storeys as required to enable and support a feasible higher density developments within the Auckland urban context. This approach is supported by Walter Christaller's "Central Place Theory" and other land economics studies;
- 8. the Submitter's submission point 8, referencing policy 6 (b) of the NPSUD is supported;
- 9. the Council's plan change as advertised, will not give effect to the NPSUD objectives, policies and purpose; and
- **10.** as advertised, the Plan Change will not promote appropriate NPSUD and MDRS Density Standards and enable Intensification;

## 5. Decision / Relief sought:

I seek the following decision from the Auckland Council:

- The relief sought by the Original Submission; or
- Any alternative, consequential and/or other changes that will address the concerns of the Further Submitter.

The Further Submitter wishes to be heard in support of their submission.

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

## Contact details / Address for Service

## Hardacre Planning Ltd - Colin Hardacre

Telephone: mobile 027-280-8409.

Email: colin@hardacreplanning.co.nz

Signature of Submitter: Havaller .
(Or person authorised to sign on behalf of submitter.

COLIN HARDACRE Authorised agent Director- Hardacre Planning Ltd

Date: 23 January 2023.

Copy to: Mr. Brian McClure BA Trustees Ltd

507/101 Customs Street West

Viaduct Harbour Auckland City 1010.

Kaianga Ora - Homes and Communities

PO Box 74598 Green Lane

BA Trustees Ltd Further Submission - Universal Homes Ltd JN 2053

Hardacre Planning Ltd

Auckland 1051

Attention: Mr Brendan Liggett

By email: developmentplanning@kianagora.govt.nz

From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz

To: <u>Unitary Plan</u>

**Subject:** Unitary Plan further submission - Plan Change 78 - BA Trustees Ltd

**Date:** Friday, 20 January 2023 3:01:08 pm

Attachments: BA Trustees Ltd Further Submission to Kaianga Ora Submission 873.pdf

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

### **Contact details**

Full name of person making a further submission: BA Trustees Ltd

Organisation name: BA Trustees Ltd

Full name of your agent: Hardacre Planning Ltd

Email address: colin@hardacreplanning.co.nz

Contact phone number: 0272808409

Postal address:

Level 1

Accounting Chambers 642 Great South Road

Ellerslie auckland auckland 1051

### Submission details

### This is a further submission to:

Plan change number: Plan Change 78

Plan change name: PC 78: Intensification

### Original submission details

Original submitters name and address:

Kaianga Ora PO Box 74598 Greenlane Auckland 1051

Submission number: 873

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

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

Point number See HPL attachment

The reasons for my or our support or opposition are:

See HPL attachment

I or we want Auckland council to make a decision to: Allow part of original submission

Specify the parts of the original submission you want to allow or disallow:

See HPL attachment.

Submission date: 20 January 2023

Supporting documents

BA Trustees Ltd Further Submission to Kaianga Ora Submission 873.pdf

### Attend a hearing

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

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

### **Declaration**

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

Specify upon which grounds you come within this category: Business Mixed Use and Business Local Centre zoned landowner

### I declare that:

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



CAUTION: This email message and any attachments contain information that may be confidential and may be LEGALLY PRIVILEGED. If you are not the intended recipient, any use, disclosure or copying of this message or attachments is strictly prohibited. If you have received this email message in error please notify us immediately and

erase all copies of the message and attachments. We do not accept responsibility for any viruses or similar carried with 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.

# Further Submission in support of, or opposition to, a notified proposed plan change or variation Clause 8 of Schedule 1, Resource Management Act 1991 FORM 6



Send your submission to unitaryplan@a post to:	ucklandcouncil.govt.nz or	For office use only Further Submission No:	
		Receipt Date:	
Attn: Planning Technician Auckland Council		1 1000ipt Bato.	
Level 24, 135 Albert Street			
Private Bag 92300 Auckland 1142			
		7	
Further Submitter details			
Full Name or Name of Agent (if application	able)		
Mr/Mrs/Miss/Ms(Full Name)	·		
Organisation Name (if further submis	sion is made on behalf o	f Organisation)	
BA Trustees Ltd			
Address for service of Further Submit			
C/- Hardacre Planning Ltd, Level 1, A	ccounting Chambers, 64	12 Great South Road, E	Ellerslie, Auckland 1051
Attention: Colin Hardacre			
Telephone: 272808409	Fax/Email: co	lin@hardacreplanning.c	co.nz
Contact Person: (Name and designation			
Contact County (County and County)	,		
Scope of Further Submission			
This is a further submission in suppo change / variation:	rt of ( <i>or</i> opposition to) a	submission on the follo	wing proposed plan
Plan Change/Variation Number	PC 78		271-272-271-28
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Plan Change/Variation Name	Intensification		
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	SI	<i>ıbmission)</i> Submission Number	Point-Number
(Original Submitters Name and Address	)		
Civitas Planning Consultants Ltd		812	812
The reasons for my support / opposit	ion are:		
See Hardacre Planning Ltd info atta	CHEC		

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PC 78 FS Colin Hardacre Director - B.R.P, N.Z.P.I Phone 09 529 2417 Mgb 027 280 8409 colin@hardacreplanning.co.nz PO Box 87 127 Meadowbank Auckland 1742

## Getting you the planning go ahead to build

19 January 2023

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

By email: unitaryplan@aucklandcouncil.govt.nz

Dear Sir/Madam,

Information in support of a CROSS SUBMISSION to the Auckland Council's **Proposed Plan Change 78 Intensification** 

Clause 8 of First Schedule, Resource Management Act 1991

FURTHER SUBMITTER: B.A. TRUSTEES LTD (Submission Number 1671)

IN SUPPORT OF CIVITAS PLANNING CONSULTANTS LTD SUBMISSION -(Submission Number 812)

- The Further Submission subject is: Business zones and attached Table -Submission points 812.1, 812.2, 812.3 and 812.4.
- <u>2.</u> The reasons for this Further Submission are:
  - 1. the Plan Change needs to be amended to ensure that Plan Change 78 will
    - (i) contribute to well-functioning urban environments;
    - will be consistent with the sustainable management of physical resources and the purpose and principles of the RMA;
    - (ii) will meet the criteria under section 32 of the RMA;
    - (iv) will meet the reasonably foreseeable needs of future generations;
    - (v) will be consistent with sound resource management practice and principles;

524 Parnell Road, Parnell AC PC 78 Further Submission 3 – Civitas JN 2053

Hardacre Planning Ltd

- (vi) will be consistent with the Part 2 of the RMA; and
- (vii) will be consistent with the proposed Built and Environment Bill and Act;
- 2. the Council has taken the minimum 6 storey height and development potential within walkable catchments under the NPSUD as a maximum;
- 3. the Council's section 32 material including Jasmax Architects Ltd technical advice in support of the plan change acknowledges that only a 5 storey redevelopment options would result rather than the minimum required by the NPSUD of 6 storeys minimum. The plan changes advertised imposes a 21.0 m high height limit whereas this Council section 32 report advises that a 22.5 m height limit will enable greater flexibility, amenity and cost efficiency;
- **4.** the Council has taken the minimum 6 storey development opportunities to be a maximum:
- there are sites within the walkable catchments of Business Zones where more than 6 storey buildings will be appropriate and consistent with the NPSUD and MDRS Density Standards;
- 6. as proposed, the Plan Change will not provide for building heights to be enabling with the level commercial activity and community services within and adjacent to Business Mixed-Use, Town Centre, Neighbourhood Centre and Local Centre zones and as such will be contrary to Policy 3d;
- 7. additional height and density requirements and opportunities are required within the Business Mixed Use, Town Centre, and Local Centre and Neighbourhood Centre Zones to facilitate high density apartment developments given that these zones have high accessible land to public transport, employment opportunities and options, business, commercial, commercial service, food and beverage and rest and recreation activities (Policies 3a, 3d, 4 and 6);
- 8. by the Council's section 32 material, Plan Change 78 will not achieve the minimum 6 storeys as required by the NPSUD. It will only achieve 5 storey development and redevelopment options;
- 9. in these Business Mixed-Use, Town Centre and Local Centre Zones, greater NPSUD urban environment efficiency and effectiveness is required and a greater redevelopment opportunities and development potential are required than the Council's proposed 6 storeys which is actually only 5 storeys as required to enable and support a feasible higher density developments within the Auckland urban context. This approach is supported by Walter Christaller's "Central Place Theory" and other land economics studies;
- **10.** the Council's plan change as advertised, will not give effect to the NPSUD objectives, policies and purpose; and
- 11. as advertised, the Plan Change will not promote appropriate NPSUD and MDRS

Density Standards and enable Intensification.

## 5. Decision / Relief sought:

I seek the following decision from the Auckland Council:

- The relief sought by the Civitas Planning Consultants Ltd as per their Original Submission under the heading "Business zones of the AUP" being Submission Number 812; or
- Any alternative, consequential and/or other changes that will address the concerns of the Further Submitter.

The Further Submitter wishes to be heard in support of their submission.

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

## Contact details / Address for Service

<u>Hardacre Planning Ltd – Colin Hardacre</u>

Telephone: mobile 027-280-8409.

Email: colin@hardacreplanning.co.nz

Signature of Submitter: \_

COLIN HARDACRE Authorised agent

**Director- Hardacre Planning Ltd** 

Date:

Copy to: Mr. Brian McClure

BA Trustees Ltd

507/101 Customs Street West

Viaduct Harbour Auckland City 1010.

Civitas Property Consultants Ltd PO Box 47020, Ponsonby, Auckland 1144

Attention: Iain McManus

By email: iain@civitas.co.nz

From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz

To: <u>Unitary Plan</u>

**Subject:** Unitary Plan further submission - Plan Change 78 - BA Trustees Ltd

**Date:** Friday, 20 January 2023 3:17:24 pm

Attachments: BA Trustees PC 78 Further Submission to Civitas Submission 812.pdf

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

### **Contact details**

Full name of person making a further submission: BA Trustees Ltd

Organisation name: BA Trustees Ltd

Full name of your agent: Hardacre Planning Ltd - Colin Hardacre

Email address: colin@hardacreplanning.co.nz

Contact phone number: 0272808409

Postal address:

colin@hardacreplanning.co.nz

auckland auckland 1051

### Submission details

### This is a further submission to:

Plan change number: Plan Change 78

Plan change name: PC 78: Intensification

## Original submission details

Original submitters name and address: Civitas Planning Consultants Ltd PO Box 47020 Ponsonby Auckland 1144

Submission number: 812

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

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

Point number See HPL attachment

The reasons for my or our support or opposition are:

See HPL attachment.

I or we want Auckland council to make a decision to: Allow part of original submission

Specify the parts of the original submission you want to allow or disallow:

See HPL attachment.

Submission date: 20 January 2023

Supporting documents

BA Trustees PC 78 Further Submission to Civitas Submission 812.pdf

## Attend a hearing

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

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

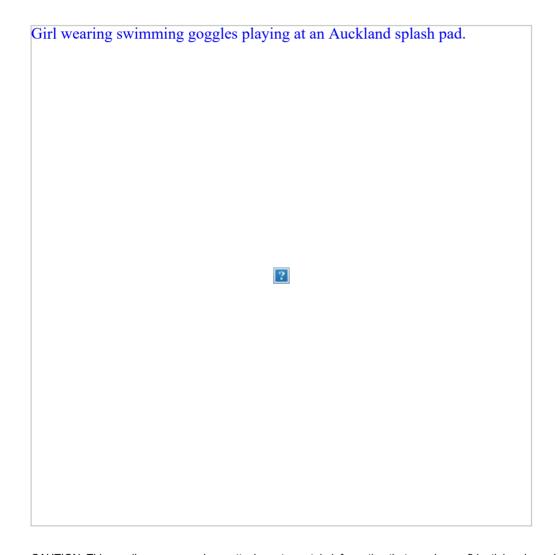
### **Declaration**

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

Specify upon which grounds you come within this category: Business Mixed Use and Business Local Centre zone landowner

### I declare that:

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



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